



TOWN AND COUNTRY PLANNING ACT 1990 (as amended)
APPEAL BY: Countryside Partnership Ltd and Wattstown Developments Ltd

STATEMENT OF COMMON GROUND

An Appeal against the refusal of planning permission by East Hertfordshire District Council under Section 78 of the Town and Country Planning Act 1990

To be agreed between the Appellant, Countryside Partnership Ltd and Wattstown Developments Ltd and the Defendant, East Hertfordshire District Council

Land East of the A10, Buntingford, Hertfordshire

LPA Reference: 3/23/1447/OUT

PINS REFERENCE: APP/J1915/W/24/3340497

**Prepared by
DLP Planning Ltd
Bedford
And
East Herts District Council**

June 2024

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1.0 INTRODUCTION

1.1 This Statement of Common Ground (SoCG) has been prepared by DLP Planning Ltd on behalf of Countryside Partnership Ltd and Wattsdown Developments Ltd ('the Appellant'), and its contents have been agreed with East Herts District Council ('EHC').

1.2 It relates to an appeal against the refusal by EHC of an application for planning permission with respect to a development on land west of Buntingford ('the Appeal Site') also known as Buntingford West.

1.3 **Paragraph 13.2.2** of the Planning Inspectorate's Procedural Guidance for Planning Appeals in England (January 2024) ('the Procedural Guide') acknowledges that:

"A statement of common ground is essential to ensure that the evidence considered at a hearing, or an inquiry focuses on the areas of disagreement between the appellant and the LPA. This should help to focus the parties' statements of case and, if the appeal is following the inquiry procedure, proofs of evidence, on areas of disagreement."

1.4 This SoCG has been prepared with reference to the above guidance issued by the Planning Inspectorate and sets out matters which are agreed and matters which remain in dispute, to assist the forthcoming appeal.

2.0 DESCRIPTION OF THE APPEAL SITE AND SURROUNDING AREA

2.1 The following factual material is agreed between the parties.

2.2 The Appeal Site measures approximately 28.95 hectares in total:

- 21.1 hectares, located to the southwest of Buntingford, east of the A10 and west of existing residential development served by Luynes Rise, is proposed for development;
- 1.22 hectares, located to the west of the A10, is proposed as an Ecological Enhancement Area. This forms part of a wider parcel of land (7.85 hectares) of which the balance (6.63 hectares) located to the west of the A10, is proposed to be retained in agricultural use (no built form is proposed).

2.3 The part of the Appeal Site proposed for development is primarily in agricultural use and comprises three large arable fields (the northern, middle, and southern fields) which all lie to the east of the A10. Part of the site adjacent to the sewage works, has a temporary change of use of agricultural hardstanding for a period of 5 years for the open storage of building material aggregates (sui generis use).

2.4 The Site Location is contained at **Appendix 1**.

2.5 The land is classified as a mixture of agricultural grade 2 and 3a.

2.6 The part of the Appeal Site proposed for development is bound by the A10 to the west and southwest, Buntingford Waste Water Treatment Works (WWTW) to the south and the existing urban edge of Buntingford to the north, east and south east.

2.7 There is existing planting along the Appeal Site's western/southwestern boundary with the A10. There are also hedgerows along the northern, eastern, and southern site boundaries and hedgerows dividing the fields.

2.8 The Appeal Site is located immediately adjacent to Buntingford, with linkages through to the existing settlement by way of existing Public Rights of Way (PRoW). Two PRoW's cross the Appeal Site: one from Luynes Rise running in a northeast to southwest direction, crossing the A10 to Aspenden (Footpath 26); the other from Monks Walk also in a northeast to southwest direction across the Appeal Site, with a pedestrian bridge over the A10, towards Aspenden Church (Footpath 29).

- 2.9** The Appeal Site slopes down from northwest to southeast, towards the valley of the River Rib, with the northern field being in a more elevated position and the southern field being lower. The central area of the northern field of the Appeal Site also rises from the existing built edge of the settlement towards the A10 road.
- 2.10** There are no designated heritage assets or other nationally significant remains within the Appeal Site. Aspenden Bridge is approximately 205 metres southeast of the Appeal Site and is screened by the WWTW; How Green Farm is located 180m north of the Appeal Site beyond the A10 / Baldock Road roundabout; and Watermill House is located approximately 60m northeast of the southern field on the opposite side of the A10.
- 2.11** Buntingford is located at the centre of a large rural area in the northern half of the District. Buntingford itself is located 17 km north of Hertford, 11 km south of Royston and 15 km west of Bishop's Stortford. To the west lie the towns of Stevenage, Letchworth and Baldock at an approximate 15 km radius. Buntingford is served by the A10, which runs north-south between Cambridge and London and the A507, which heads west towards Baldock and the A1(M).
- 2.12** Buntingford, as described in the Local Plan, is one of the five market towns in EHC's district. With the exception of Buntingford, the main settlements are all located in the south of the district and are surrounded by Green Belt. Buntingford and land surrounding Buntingford, including the Appeal Site, do not lie within the Green Belt but is designated as "Rural Area Beyond the Green Belt" in the East Herts District Proposals Map.
- 2.13** The Buntingford Ward has 8,296 residents, as identified in the 2021 census. It offers a range of shops, employment opportunities and social and community facilities, including first, middle and upper schools, supermarkets, employment areas (including the Park Farm Industrial Estate to the north, the Watermill Industrial Estate to the south-east, and the Buntingford Business Park site to the west), as well as town centre shops and services and health facilities.
- 2.14** The nearest part of the Appeal Site is approximately 480m (Distance 1) or 750m (Distance 2) from Buntingford's main town centre facilities by the shortest walking route. As described in the Local Plan, Buntingford together with Ware and Sawbridgeworth is regarded as a Minor Town Centre.

2.15 Pedestrian facilities within Buntingford are generally good with wide footways, particularly along the High Street and through the centre. Hertfordshire County Council (HCC) has also undertaken further infrastructure improvements along London Road as part of the Active Travel Fund initiatives. These works are along the full length of both London Road and, Station Road, from the new First School extending to the High Street. These works provide access to the Appeal Site via both Luynes Rise and Aspenden Road together with the other existing footpath and road connections from the Appeal Site (including Monks Walk and Chapel End).

2.16 The Institution of Highways and Transportation (IHT) ‘Guidelines for Providing Journeys on Foot’ (2000) suggests ‘acceptable’ and ‘desirable’ walking distances. **Table 1** contains the suggested acceptable walking distances for pedestrians without mobility impairment for some common trip purposes.

Table 1: Suggested Acceptable Walking Distances (metres)

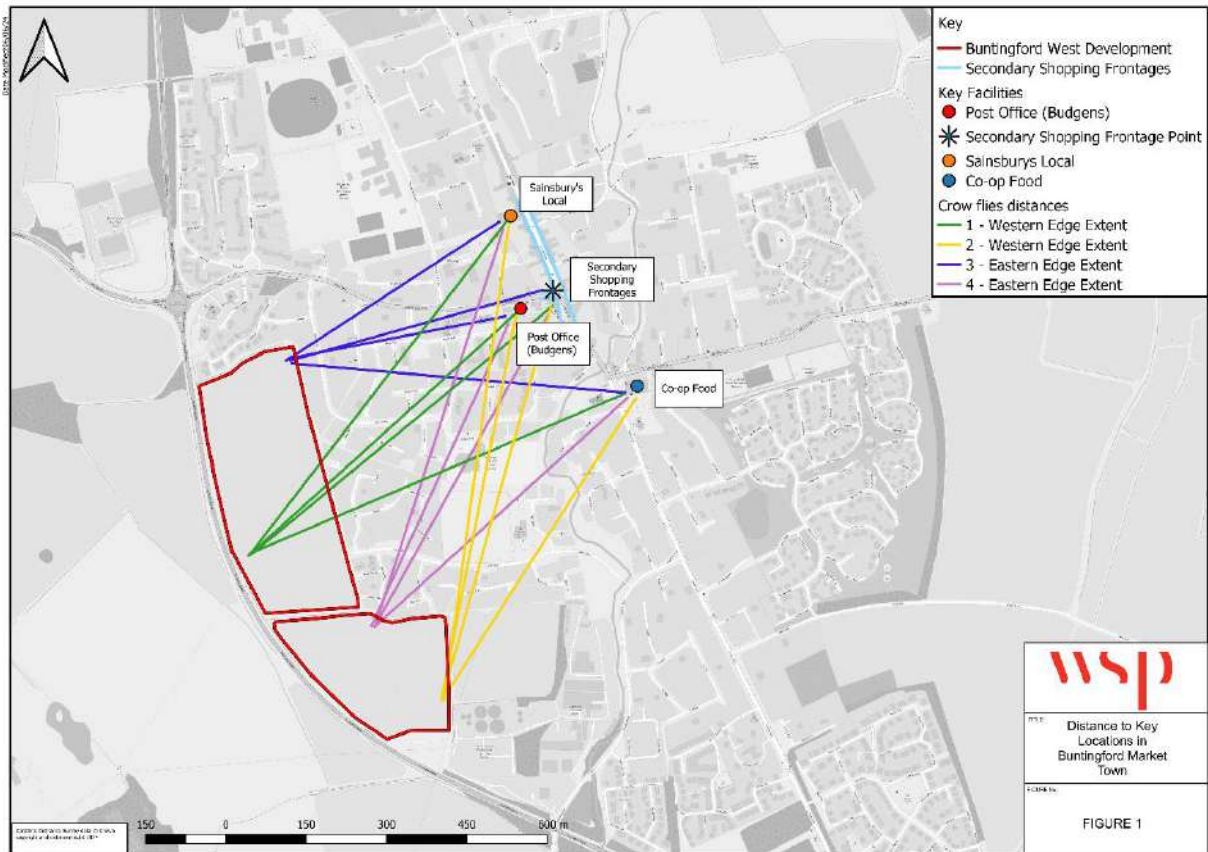
	Town Centres	Commuting/ Schools	Elsewhere
Desirable	200	500	400
Acceptable	400	1,000	800
Preferred Maximum	800	2,000	1,200

2.17 Four points of measurements from the Appeal Site have been taken (as the crow flies), from the northeastern extent (distance 1), the mid extent of the eastern edge (distance 2), the western mid-extent (distance 3) and the southeast western extent (distance 4). These are shown in **Figure 1** and a summary of distances to key frontages in the Buntingford secondary shopping frontage are provided in **Table 2** below. This shows that the majority of the Appeal Site (as shown in **Figure 2**) is within the suggested preferred maximum walking distances to key facilities.

Table 2: Measurements taken from the Appeal Site (metres)

Key Frontage	Distance 1 (m) Northeast Extent	Distance 2 (m) Eastern Mid-Extent	Distance 3 (m) Western Mid-Extent	Distance 4 (m) Southeast Western Extent
Co-op Supermarket	600m	650m	740m	641m
Post Office (Budgens)	410m	630m	656m	730m
Secondary Shopping Frontage	490m	690m	749m	762m
Sainsbury's Local	500m	800m	774m	874m

Figure 1: Distances to key locations in Buntingford's Secondary Shopping Frontage

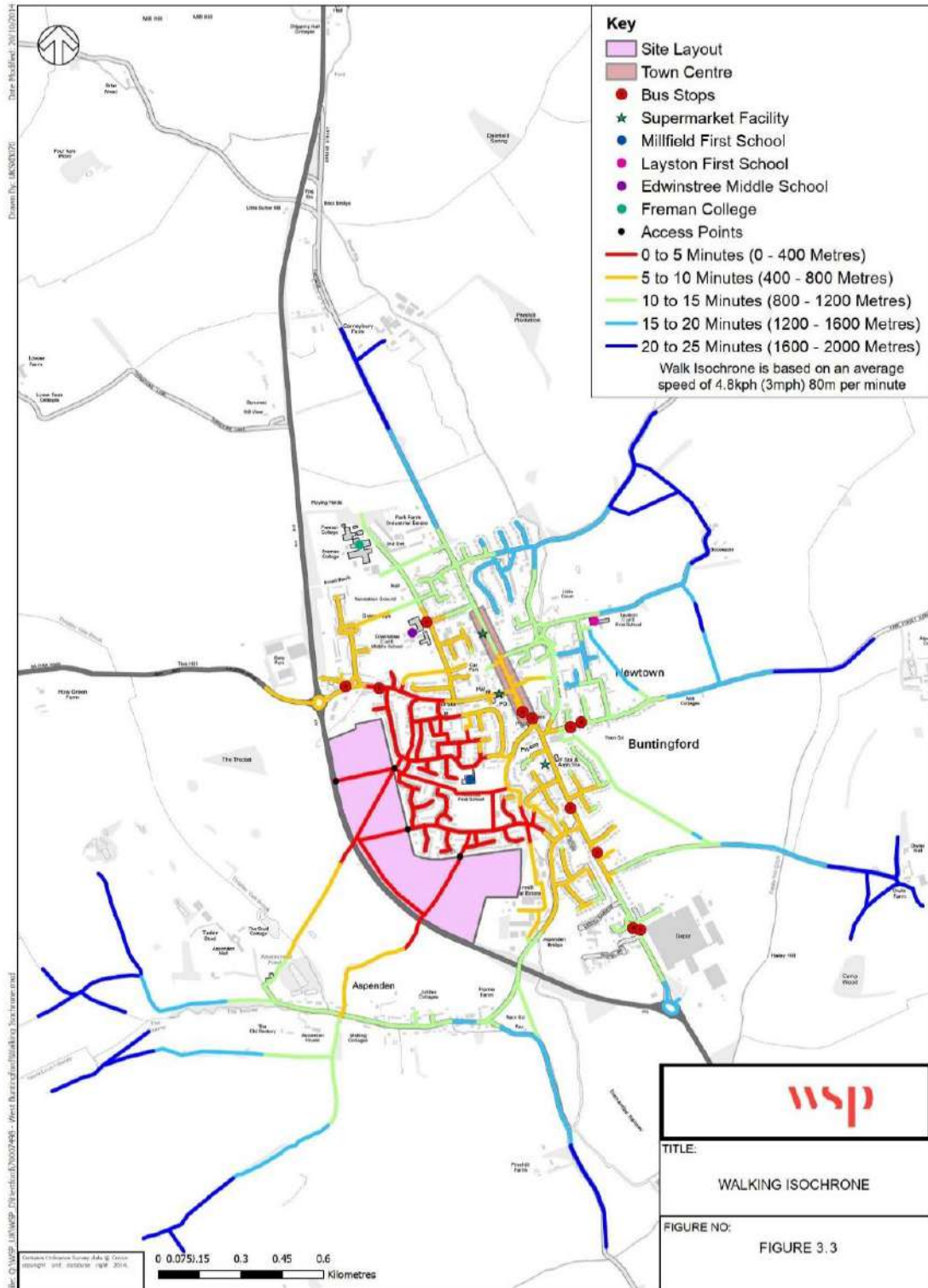


2.18 Further to the above, additional analysis indicates that there are a number of key facilities and services that are within acceptable or preferred maximum walking distance of the Appeal Site including access to bus stops and the local schools. Mapping has been used to establish walk distances and the approximate time it will take a pedestrian to travel this distance to a local facility or service. This is outlined in **Table 3** below with **Figure 2** showing the information graphically.

Table 3: Distances from local facilities

Facility	Approx. Distance (m)	Approx. Walking Time (mins)
Existing Bus Stop (Baldock Road)	270	0-5
Existing Bus Stop (Station Road)	600	5-10
Millfield First & Nursery School	250	5-10
Layston First School	1200	15-20
Edwinstree Church of England Middle School	800	10-15
Upper School (Freman College)	1200	15-20
Buntingford First School	1600	15-20
Park Farm Industrial Estate	1500	15-20
Buntingford Business Park	750	5-10
Watermill Industrial Estate	700	5-10
Seth Ward Community Centre	400	0-5
Medical Centre	800	5-10
Dentist	1000	10-15
Opticians	800	5-10
Pharmacy	800	5-10

Figure 2: Walking Isochrone



- 2.19** The current nearest bus stops are located on Baldock Road to the north of the Appeal Site (270m), and Station Road to the east of the application site (600m). Bus services run between Buntingford and Baldock-Letchworth-Hitchin-Stevenage (386) serving Baldock High Street (a 20-minute bus journey from Buntingford High Street), Ware-Hertford (331), Bishop's Stortford (386), Royston (18), and Standon (831). Two further bus stops are located on Hare Street Road, northeast of the Appeal Site, with route 386 running approximately every 3 hours and route 331 running approximately hourly and route 18 running every 1.5 hours in peak to 2 hours in between and route 831 running a school service in the morning and afternoon.
- 2.20** The HertsLynx on-demand bus service is in addition to the existing bus services which was launched in September 2021. HertsLynx enables users to travel anywhere in its Free-Floating Operating Zone. There are no fixed routes on the service, instead passengers are able to be picked up and dropped off at a vast number of stops within the zone. Those passengers are also able to travel from the Free-Floating Operator Zone to designated locations in the Key Hub Towns which include Stevenage, Bishop's Stortford, Royston, Baldock, Hitchin, Letchworth and Buntingford which is the central hub.
- 2.21** The closest railway stations to the Appeal Site are located in Royston (7.9 miles), Baldock (8.4 miles) (which can be accessed in 20 minutes by using the 386 bus service from Buntingford High Street), Stevenage (10.2 miles), Ware (10.4 miles), Bishop's Stortford (12.5 miles), and Hertford (12.8 miles) either measured from the Greenways or Station Road bus stops in Buntingford via Google maps.

3.0 THE APPEAL PROPOSAL

Planning application submission

3.1 An outline planning application (with all matters reserved except for points of access) was submitted to EHC on the 27 July 2023 and was made valid by EHC on 1 August 2023 (Application reference 3/23/1447/OUT).

3.2 The description of development is as follows:

“Outline planning application (with all matters reserved except for access) for up to 350 dwellings, up to 4,400 sqm of commercial and services floorspace (Use Class E and B8), and up to 500 sqm of retail floorspace (Use Classes E) and other associated works including drainage, access into the site from the A10 and Luynes Rise (but not access within the site), allotments, public open space and landscaping.”

3.3 An EIA screening opinion was issued by EHC on 21 May 2021 (reference: 3/22/0644/SCREEN) confirming in the Council’s view that a previous proposal on the site did not require an EIA. That was for a larger scale of development than the currently proposed Appeal scheme. Whilst no EIA screening opinion has been sought in respect of the Appeal development, the LPA maintains the opinion that an EIA is not required.

3.4 Whilst the application was submitted in outline (with all matters reserved except points of access), a Development Framework Plan and four parameter plans were submitted for consideration.

3.5 Vehicular access to the Appeal Site is proposed to be provided via a new roundabout junction from the A10, and a secondary (bus, pedestrian, cycle and emergency only) access is also proposed from Luynes Rise. The site is also served by two PROWs. A series of infrastructure improvements are proposed through a Section 278 Agreement with HCC. Financial contributions towards an improvement to a local bus service are also proposed as part of a Section 106 Agreement. HCC have agreed to enter into an agreement under section 278 of the Highways Act 1980 to deliver the Luynes Rise/Aspenden Road Sustainable Transport Corridor as a condition of development and that this should be secured by Grampian condition, if the Inspector is minded to grant planning permission as per paragraph 2.14 of the HCC SoCG.

- 3.6** The Proposed Development intends to provide for pedestrian and cycle access connections to public rights of way and provide linkages to routes leading into the town centre, schools and local facilities. A proposed mobility hub within the site will include bus stops, wayfinding points, electric vehicle charging points and a community lockable storage facility (for example, for parcel deliveries and returns). HCC have agreed a series of enhancement to footpaths and PRow's within and external to the Appeal Site. Access to nearby rail stations is also possible by existing bus services or by the HertsLynx DRT system, which will integrate into the proposed mobility hub.
- 3.7** The Development Framework Plan has been submitted in order to seek to demonstrate how the Appeal Site is capable of accommodating up to 350 homes, a local centre, employment area and public open spaces and routes.
- 3.8** As indicated on the submitted Parameter Plan 4: Density & Building Heights, it is proposed that the development will have heights generally to 10.5m with some limited 13.5m high development at focal points within the lower southeast of the Appeal Site.
- 3.9** Two upper limits of housing densities within the parameter plan are proposed across the Appeal Site. The northern section of the Appeal Site is proposed at a lower density limit of approximately 30 dwellings per hectare, whilst the areas surrounding the employment and local centre at the southern section are proposed at a higher density limit of up to 40 dwellings per hectare. The (maximum) average density applied for is 33.8dph (350 homes/10.35 hectares – Parameter Plan 1).
- 3.10** It is proposed that building heights will accommodate a mixture of house typologies and mix with a range of heights from 10.5m – 13.5m in the residential blocks and up to 15m in the employment zone and up to 13.5m in the Local Centre.
- 3.11** The Proposed Development will also provide for up to 4,400m² of business uses (Use Class E and B8) in the south-eastern part of the Appeal Site. It is envisaged that the employment area could provide the opportunity for a variety of uses (subject to a Reserved Matters application), but could include a home working hub, a childcare facility, doctor's surgery, a gym, and small business units. No minimum level of employment floorspace is proposed within the submission. The phasing for the delivery of the employment floorspace provision is not proposed at this stage.

- 3.12** An area of up to 500m² floorspace is proposed on the Appeal Site for use as a mixed-use Local Centre which could offer day-to-day facilities for the new community in a location that is also accessible to existing residents in the southwest of the town. No minimum level of floorspace for the Local Centre is proposed within the submission. The phasing for the delivery of the Local Centre provision is not proposed at this stage.
- 3.13** The land use parameter plan identifies areas of 0.66 hectares and 0.55 hectares for the respective 'up to' floorspaces to be delivered within.
- 3.14** The proposal also makes provision for a total of 15.40 hectares of public open space (POS), including 0.22 hectares allocated to children's play and provision for young people, and 0.28 hectares of allotment space, which are proposed to be located along the north-eastern boundary.
- 3.15** The application as submitted comprised the following plans and documents:

Plans

- Site Location Plan (FPCR, Ref: 10537-FCPR-XX-XX-DR-A-1001-P02)
- Public Open Space (FPCR, Ref: 10537-FCPR-XX-XX-DR-A-1007-P03)
- Building Heights and Density Parameter Plan (FPCR, Ref: 10537-FCPR-XX-XX-DR-A-1006-P05)
- Land Use Parameter Plan (FPCR, Ref: 10537-FCPR-XX-XX-DR-A-1003-P05)
- Development Framework Plan (FPCR, Ref: 10537-FCPR-XX-XX-DR-A-1002-P05)
- Access Parameter Plan (FPCR, Ref: 10537-FCPR-XX-XX-DR-A-1004-P07)
- Green Infrastructure Parameter Plan (FPCR, Ref: FPCR-XX-XX-DR-A-1005-P05)
- Proposed Access to A10 and Luyne Rise Plan (WSP, Ref: 7498-GA-02 Rev H)

Documents

- Agricultural Land Classification (Soil Environment Services Ltd, June 2022)
- Application Form, including Ownership Certificate
- Arboricultural Assessment (FPCR, June 2023)
- Air Quality Assessment (WSP, July 2023)
- Covering Letter (DLP Planning Ltd, July 2023)
- Design and Access Statement (FPCR, July 2023)
- Preliminary Ecological Appraisal (JBA, June 2022)
- Reptile Survey Report (JBA, Jan 2022)
- Breeding Bird Survey Report (JBA, June 2023)
- Badger Survey Report (JBA, June 2022)
- Bat Activity Survey Report (JBA, June 2022)
- Biodiversity Net Gain Report (JBA, June 2023)
- Biodiversity Net Gain Assessment (JBA, June 2023)
- Biodiversity Questionnaire (July 2023)

- Draft Head(s) of Terms (July 2023)
- Energy and Sustainability Statement (AES, April 2023)
- Flood Risk Assessment and Outline Drainage Strategy (WSP, July 2023)
- Geo-Environmental and Geotechnical Preliminary Risk Assessment (WSP, May 2023)
- Heritage Impact Assessment (Icknield Archaeology, July 2023)
- Landscape and Visual Impact Assessment (J E Consulting, June 2023)
- Noise Impact Assessment (RPS, July 2023)
- Planning Statement (DLP Planning Ltd, July 2023)
- Statement of Community Involvement (Curtis Comms, July 2023)
- Sustainability Checklist (AES, June 2023)
- Travel Plan - Commercial (WSP, June 2023)
- Travel Plan – Residential (WSP, June 2023)
- Travel Plan – Retail (WSP, June 2023)
- Transport Assessment incorporating RSA and Designers Response (WSP, July 2023)
- Utilities Assessment (WSP, July 2023. Agricultural Land Quality (SES, June 2022)
- Economic Impact Assessment (SPRU, July 2023)
- Employment Land Needs Assessment (SPRU, July 2023)

3.16 Post submission of the Planning Application, the following amended plans / supporting documents were submitted to EHC, in response to consultee comments and discussions between the LPA, HCC and the applicant:

- Response to Active Travel Comments (15 September 2023)
- Visibility Analysis ref. 7498-GA-02 Revision H
- Flood Risk Assessment and Drainage Strategy Addendum Report (15 November 2023)
- Response to Hertfordshire County Council (14 December 2023)
- Response to Active Travel England Comments (14 December 2023)
- Response to EHDC (Acoustic) (18 December 2023)
- Development Framework Plan (Drawing Reference Number: 10537-FP-XX-XX-DR-A-1002 P07) (5 January 2024).

3.17 As part of discussions during the Appeal process, a further Outline Drainage Strategy Addendum (May 2024) has been submitted to the Council and LLFA and can be seen at **Appendix 2**. This does not fundamentally alter the principles of development, nor does it alter the proposed drainage strategy which would warrant further consultation.

3.18 The original target date for determination was 26 October 2023 and an extension of time was agreed between the Appellant and EHC until 19 January 2024.

3.19 A meeting was held at the council offices on 7 November 2023 to review the outstanding planning, landscape impact and urban design issues which had emerged following the

consultation carried out by the LPA. It was discussed at the meeting that the parties would work together towards agreement on a package of planning obligations, seek a resolution on the outstanding drainage issues and review the potential for amended plans to address the issues discussed at the meeting.

3.20 On the 6 February 2024, the Appellant formally served notification of their intention to submit an appeal under the provisions of Recommendation 3 of the Rosewell Review into inquiry appeals. This notification gave the Local Planning Authority and Planning Inspectorate not less than 10 working days' notice of an intention to submit a planning appeal where the appellant requested the public inquiry (Appeal) procedure.

3.21 The EHC decision notice was issued on 15 February 2024, containing five reasons for refusal as follows:

1. The proposal comprises a substantial urban extension of Buntingford which would encroach into the rural area beyond the Green Belt, beyond the settlement boundary, to the detriment of the landscape character, rural appearance, and distinctiveness of the area contrary to Policies DES2, DES3, DES4, GBR2 of the East Herts District Plan (2018), Policies ES1, HD1, HD2, HD4 and BE2 of the Buntingford Community Area Neighbourhood Plan and the National Planning Policy Framework.
2. The proposals represent an unsustainable form of development and residents and visitors would be heavily reliant on the private car to access employment, main food and comparison shopping elsewhere. The proposals do not amount to sustainable development (in accordance with the NPPF) and would result in a form of development outside of the settlement boundary that conflicts with the Development Strategy within the District Plan and objectives of the Buntingford Community Area Neighbourhood Plan. The proposal would be wholly contrary to Policies DPS2, INT1, BUNT1, BUNT3 and TRA1 of the East Herts District Plan (2018), policy HD1 of the Buntingford Community Area Neighbourhood Plan and the National Planning Policy Framework.
3. It has not been demonstrated that the application site can accommodate the maximum quantum of development outlined within the submitted parameter plans. The proposal at the maximum level outlined within these plans would create a dense and urban appearance which does not respect the site's rural character or its landscape character and fails to transition between the urban settlement boundary and the countryside beyond. The proposal would fall contrary to policies DES2, DES3, DES4, GBR2 or HOU2 of the East Herts District Plan (2018), policies ES1, HD1, HD2 and HD4 of the Buntingford Community Area Neighbourhood Plan, and guidance in the National Planning Policy Framework.
4. In the absence of a completed legal agreement the application fails to secure appropriate financial contributions to infrastructure to off-set the impact of the development on local infrastructure or to provide any affordable housing, or a required bus route. As such the proposal is contrary to policies DPS4, DEL1, DEL2, HOU3, CFLR1, CFLR7, CFLR9 and CFLR10 of the East Herts District Plan 2018, policies of the Buntingford Community Area Neighbourhood Plan and the National Planning Policy Framework.
5. Insufficient information has been submitted to demonstrate that the proposal would not

have an unacceptable impact on flood risk. This is due to it not being evidenced that there is a viable location to discharge the surface water runoff from the proposal, the greenfield runoff rates and volumes are not agreed and Thames Water have advised that there is no capacity to discharge surface water sewer at the proposed manhole. The development may increase the risk of flooding elsewhere. The proposal falls contrary to policies WAT1, WAT3, WAT4, WAT5 and WAT6 of the East Herts District Plan (2018) and the National Planning Policy Framework.

Appeal Submission

- 3.22** Notification of intention to submit an appeal (**Appendix 3**) was sent to EHC on the 6 February 2024. This was prior to the decision notice issued by EHC on the 15 February 2024.
- 3.23** The appeal was submitted to the Planning Inspectorate on 12 March 2024.

4.0 PLANNING HISTORY

The Appeal Site

- 4.1 The planning history of the Appeal Site is as set out in the table contained at **Pages 11-13** of the submitted Planning Statement (July 2023).
- 4.2 A previous hybrid planning application at the Appeal Site (application reference 3/22/1551/FUL) was submitted to EHC in July 2022 for a similar form of development to the current Appeal proposal. The description of development was as follows:

“Hybrid planning application comprising: (i) Full planning for the development of 350 residential dwellings (Use Class C3), a new highway junction from the A10 with associated works including drainage, access roads, allotments, public open space and landscaping; and (ii) Outline planning (with all matters reserved except for access) for up to 4,400 sqm of commercial and services floorspace (Use Class E and B8), and up to 500 sqm of retail floorspace (Use Classes E).”

- 4.3 Application reference 3/22/1551/FUL was refused by EHC on the 9 November 2022 for eight reasons.

Public Consultation

- 4.4 Prior to the submission of the application subject to this appeal, public consultation was undertaken. A public consultation website was created (www.countrysidebuntingford.co.uk) which explained Countryside’s strategy for the Appeal Site, including the rationale for the outline planning application.
- 4.5 The website was advertised to residents by leaflet drop to Buntingford residents. Details of the feedback received is provided within the Statement of Community Involvement submitted in support of the planning application.

5.0 RELEVANT PLANNING POLICY AND GUIDANCE

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of the Appeal is made in accordance with the development plan unless material considerations indicate otherwise.

5.2 For the purposes of this appeal, the Development Plan comprises:

- **The East Herts District Plan (October 2018);**
- **Policies Map (2018); and,**
- **The Buntingford Community Area Neighbourhood Plan (2017).**

5.3 The following documents are material planning considerations:

- **National Planning Policy Framework (December 2023)**
- **National Planning Practice Guidance (PPG)**
- **Five-Year Housing Land Supply Position Statement (March 2024) & Addendum (April 2024)**
- **Strategic Land Availability Assessment, March 2017**

The Development Plan

5.4 The following Local Plan policies are considered relevant to this appeal:

The East Herts District Plan (2018)

- Policies INT1, DPS2, DPS4, DEL1, DEL2, GBR2, BUNT1, BUNT3, DES2, DES3, DES4, HOU2, HOU3, CFLR1, CFLR7, CFLR9, CFLR10, TRA1, WAT1, WAT3, WAT4, WAT5 and WAT6.

5.5 The East Herts District Plan was adopted in October 2018 (District Plan) and covers the plan period for the District between 2011 and 2033. The Council have assessed the District Plan and it has been agreed at the EHC Council meeting 18 October 2023 that the *“current District Plan was adopted in October 2018 and it was a requirement that it should be reviewed within five years of adoption. The planning department had carried out an assessment and concluded that it did need updating”*. Work on updating the technical studies is yet to take place and there is no clear timescale, but work has commenced to update the plan.

The Buntingford Community Area Neighbourhood Plan (2017)

5.6 The following Neighbourhood Plan policies are of relevance to this appeal:

- Policies ES1, HD1, HD2, HD4, BE2, INFRA1

Supplementary Planning Documents (SPDs)

5.7 The following SPDs are of relevance to this appeal:

- Sustainability SPD (March 2021);
- Landscape Character Assessment (September 2007)
- Affordable Housing SPD (May 2020)
- Open Space and Recreation SPD (May 2020)
- Planning Obligations SPD (October 2008)

5.8 Whilst not SPDs the following are also considered relevant:

- East Herts Contribution Calculator Open Space
- East Herts Contribution Calculator Built Facilities
- Authority Monitoring Reports

Legislation

5.9 The following National Legislation is of relevance to this appeal:

- Town and Country Planning Act 1990 (as amended)
- Planning and Compulsory Purchase Act 2004 (as amended)
- Community Infrastructure Regulations 2010 (as amended)

National Planning Policy Framework (NPPF) (December 2023)

5.10 The Framework should be considered in its entirety with regards to the assessment of the appeal proposal.

National Planning Practice Guidance

5.11 The Planning Practice Guidance provides an additional detailed layer of policy guidance for decision-makers and is a further material consideration of significant importance.

5.12 Regarding design, the PPG states that:

“well-designed places can be achieved by taking a proactive and collaborative approach at all stages of the planning process”.

5.13 The following sections contained within the National Planning Practice Guidance document are of relevance to the appeal:

- Climate change (15 March 2019)
- Consultation and pre-decision matters (1 April 2022)
- Design: process and tools (1 October 2019)
- Effective use of land (22 July 2019)

- Flood risk and coastal change (25 August 2022)
- Healthy and safe communities (7 August 2022)
- Housing supply and delivery (5 February 2024)
- Natural Environment (21 July 2019)
- Open space, sports and recreation facilities, public rights of way and local green space (6 March 2014)
- Planning obligations (1 September 2019)
- Transport evidence bases in plan making and decision taking (13 March 2015)
- Travel Plans, Transport Assessments and Statements (6 March 2014)

Strategic Land Availability Assessment, March 2017

5.14 The Strategic Land Availability Assessment (SLAA) March 2017 was prepared as an evidence base document to support the East Herts District Plan (2018). The SLAA considered a number of sites around Buntingford, including the Appeal Site.

5.15 In relation to the Appeal Site, which was assessed by the SLAA as Site 02/005, Land West of Buntingford, the SLAA states:

“This large greenfield site is located within the Rural Area Beyond the Green Belt, between the existing urban area and the A10. The site is well related to the existing settlement and any incursion into the countryside would be limited by the presence of the A10 which would form the western boundary of the site. While the site could be considered developable subject to a review of the settlement boundary, the impact of a development of this size on existing infrastructure, and the ability to provide new services and facilities as part of the development, would need to be carefully considered. A planning application for 400 homes has been submitted.”

Core Documents

5.16 The parties will seek to agree a Core Documents schedule.

6.0 UNDISPUTED ISSUES – TOPIC AREAS

6.1 This section of the Statement of Common Ground is divided into separate topic areas and the statements included in this section are agreed between the parties.

East Herts District Local Plan (2018)

6.2 The East Herts District Plan was adopted in October 2018 (District Plan) and is therefore now over five years old. The Council has assessed the District Plan and it has been agreed at the EHC Council meeting 18 October 2023 that the District Plan needs updating. Work on updating the technical studies is yet to take place and there is no clear timescale for the review.

6.3 For the purposes of the NPPF, as amended December 2023, **paragraph 77** applies. EHC are therefore required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing.

6.4 The provisions of NPPF paragraph 226 do not apply to EHC.

6.5 In accordance with NPPF paragraph 77 and footnote 42, the five-year supply should be demonstrated against the local housing need (as opposed to the strategic policies in the East Herts District Plan).

6.6 The report (**Appendix 4**), specifically Appendix 2, provides a comprehensive assessment of the policies in the District Plan 2018 against national policy (the then NPPF 2021) and the NPPG, along with changes in local circumstances. This assessment indicates that, while the policies are broadly consistent with the NPPF, many require some form of updating.

6.7 Appendix 3 of the report is the completed PAS Local Plan Route Mapper Toolkit which draws on the information in **Appendix 1** and **Appendix 2**. It indicates that an update to the District Plan 2018 is required for a number of reasons, including:

- The significant change in local housing need arising from the standard method;
- The potential requirement to identify new sites for development to ensure that the Council can demonstrate a five-year housing land supply;
- The ongoing requirement to address affordable housing targets which have increased since the District Plan was adopted in 2018.

The Buntingford Community Area Neighbourhood Plan (2017)

- 6.8** The Buntingford Community Area Neighbourhood Plan was made in 2017 and is therefore now over five years old.
- 6.9** As acknowledged by the national Planning Practice Guidance (PPG), the requirement to review local plans at least every 5 years does not apply to neighbourhood plans. However, individual policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a plan that is adopted after the neighbourhood plan becomes part of the development plan. In these cases, the more recent policy takes precedence. In addition, where a policy has been in force for a period of time, other material considerations may be given greater weight in planning decisions as the evidence base for the plan policy becomes less robust (Paragraph: 072 Reference ID: 61-072-20190315).
- 6.10** No review of the Buntingford Community Area Neighbourhood Plan has been undertaken to date.

Housing Matters

- 6.11** Housing matters, including past delivery, five-year land supply, affordable housing, and self-build housing are all subject to a separate Statement of Common Ground.

Highways

- 6.12** The Highway Authority has offered no objection to the proposals on highway grounds subject to a suitable diverted bus service, agreement of S106 contributions and conditions.
- 6.13** Active Travel England recommend approval subject to conditions.

Contamination

- 6.14** Environmental Health and Housing (Contamination) offer no objection subject to conditions.
- 6.15** The Environment Agency also offer no objection subject to conditions.

Ecology

- 6.16** The proposed development of the Appeal Site does not directly affect any statutorily protected European (SPA/SAC) or national (SSSI) habitat designations.
- 6.17** HCC Ecology offer no objection to the proposals, subject to conditions.

6.18 The development proposals can deliver a biodiversity net gain in excess of 10% subject to condition.

6.19 Subject to the implementation of appropriate avoidance, mitigation, and compensation measures, which can be secured by planning conditions and through the S106, the proposals would comply with Local Plan Policies **NE2**, **NE3**, and **DES4**.

Noise

6.20 The Council's Environmental Health Officer (Noise and Nuisance) has no objection to the proposal, subject to several conditions being attached to any approval.

Air Quality and Odour

6.21 The Council's Environmental Health Officer (Air Quality and Odour) has no objection subject to conditions.

Flood Risk and Drainage

6.22 The Appeal Site is within Environment Agency Flood Zone 1, which based on the NPPF, is classified as having a 'low' probability of tidal and fluvial flooding.

6.23 The Environment Agency, Thames Water and Affinity Water raised no objection to the proposals subject to conditions.

6.24 A Flood Risk Assessment and Drainage Strategy Addendum report dated 15 November 2023 and a further Outline Drainage Strategy Addendum (May 2024) (**Appendix 2**) was submitted by the Appellant to address the objection raised by the LLFA. It is now agreed, as per the LLFA's letter of the 10 May 2024, that there is no objection to the proposed development subject to conditions being secured.

Landscape

6.25 In terms of landscape character, the Appeal Site lies within NCA 86, the 'South Suffolk and North Essex Clayland'. This is a large area, extending from Stevenage in the west to Ipswich in the east, and Bury St Edmunds in the north to Chelmsford in the south. EHDC landscape character areas are set out in the Supplementary Planning Document (SPD) 'Landscape Character Assessment', 2007. This shows the northern part of the site as being within landscape character area 141, the 'Cherry Green Arable Plateau', with the southern part (to the south of the A10 footbridge) within character area 142, the 'High Rib Valley'. This

character area is divided by the urban area of Buntingford, with part of it to the north and the part which includes the southern part of the site to the south and west of the town.

6.26 The site is not covered by any national or local designations for landscape quality or value and does not lie within the Green Belt. The area of and around the site is not a valued landscape in terms of Paragraph 180a) of the NPPF.

Benefits of the Proposal

6.27 The parties agree that following benefits would be delivered by the development:

- Creation of new FTE jobs during the preparation and construction stage of the development, a proportion of which would be expected to be drawn from the local workforce.
- Creation of new jobs through the supply chain.
- Generation of additional spending in the local economy from new households and construction workforce that would support local business and shops.
- Provision of employment floorspace, which could support local people and small/starter businesses.
- Generation of New Homes Bonus Payments.
- The provision of up to 350 new homes on the edge of one of the five main settlements in EHDC, providing an increased range and choice in the housing stock, including affordable housing, which contributes to the supply of housing land in the District.
- Delivery of up to 40% affordable homes in the context of a high level of need for affordable housing in the district.
- Publicly accessible formal/ informal open space and play space for use by new and existing residents which exceeds the minimum policy requirement.
- Provision of mobility hub within the site promoting inclusive travel options.
- Enhancements to the Public Rights of Way Network within and external to the Site.
- Enhancements to the Luynes Rise Sustainable Transport Corridor.
- Introduction of extensive new planting and landscaping.
- Enhanced opportunities for nature conservation, ecology, biodiversity, access and recreation.
- Enhancement of existing habitats both on and off-site via new planting, bird and bat boxes, hedgerow and hedgehog provisions, insect rich habitats suitable for nesting and foraging birds, and high nectar producing shrubs and wildflower.
- The delivery of a net gain in biodiversity in excess of 10%.

7.0 PLANNING CONDITIONS AND OBLIGATIONS

- 7.1** The parties will seek to agree the terms of a planning obligation under Section 106 of the Town and Country Planning Act 1990 to support the appeal.

- 7.2** The parties will seek to agree a list of conditions and indicate where there are any disputes with explanatory text.

8.0 AREAS OF DISAGREEMENT

8.1 The Decision Notice refusing permission advances five Reasons for Refusal, one of which relates to the absence of a planning obligation. The remaining four concern the principle of development and impact of the development on landscape character, rural appearance, and distinctiveness of the area; the sustainability of the proposals and whether the proposals will rely on the private car to access employment, main food and comparison shopping elsewhere; the quantum of development and concerns surrounding density and the transition into the countryside and insufficient information being available to demonstrate that the proposal would not have an unacceptable impact on flood risk. The parties do not agree on whether the proposals accord with the development plan when read as a whole or in respect of specific matters in dispute.

8.2 The full list of planning obligations intended to mitigate the development are not agreed at this stage, but negotiations are still ongoing to resolve this.

8.3 The issue relating to flooding is now agreed subject to the implementation of appropriate conditions.

8.4 This means that the outstanding issues (notwithstanding paragraph 8.2) now relate to Reasons for Refusal 1-3 in respect of the principle of development and impact of the development on landscape character, rural appearance, and distinctiveness of the area; the sustainability of the proposals and whether the proposals will rely on the private car to access employment, main food and comparison shopping elsewhere and the quantum of development and concerns surrounding density and the transition into the countryside.

Housing Matters

8.5 A separate Statement of Common Ground will be prepared to address matters relating to past delivery, five-year land supply, affordable housing, and self-build housing.

Agreed on behalf of the Council by



Signature:

Name: Neil Button

Position: Interim Team Leader

Date: 07/06/2024

Agreed on behalf of the Appellant by



Signature:

Name: Hannah Albans MRTPI

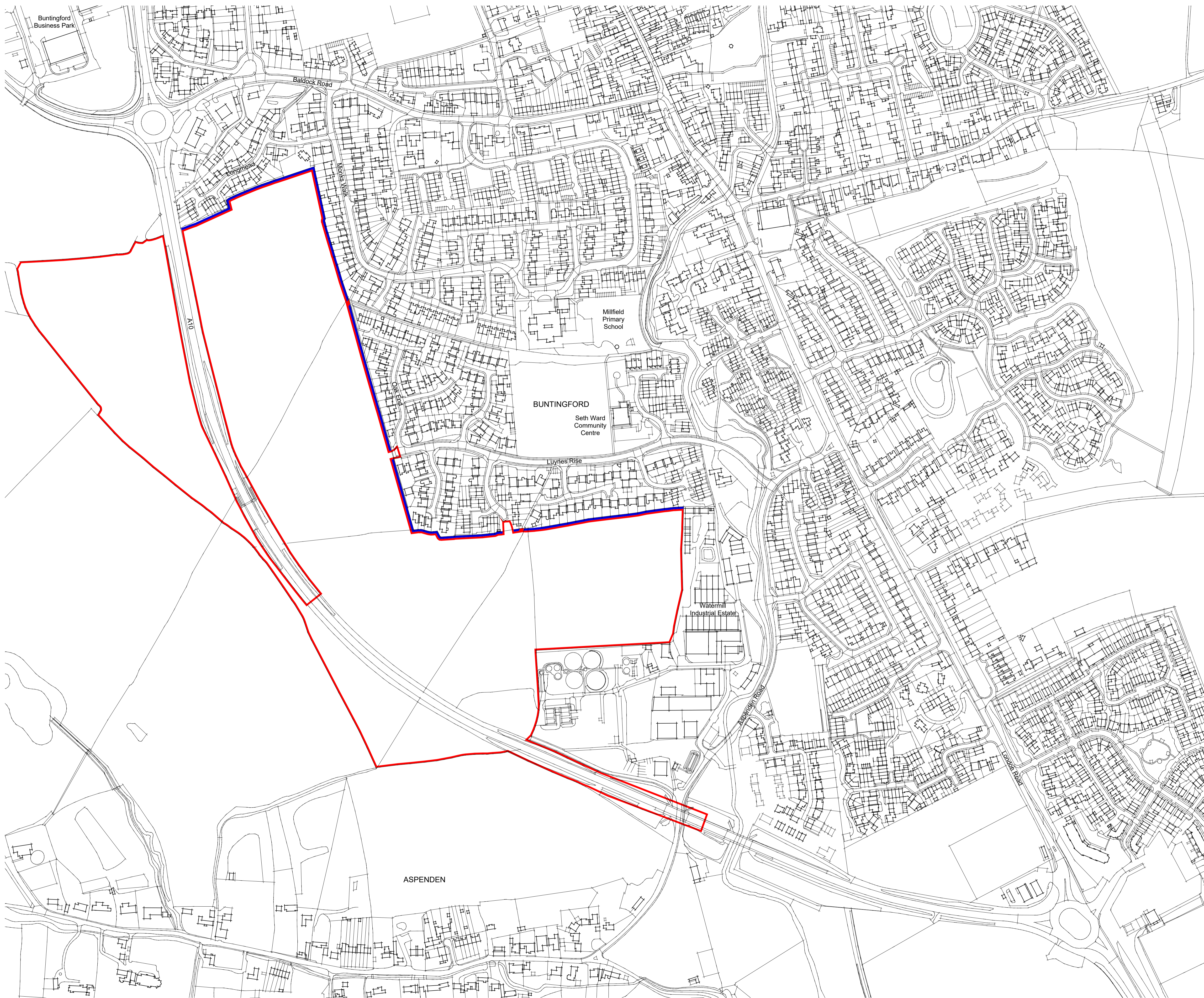
Position: Director (DLP Planning Ltd)

Date: 07/06/2024



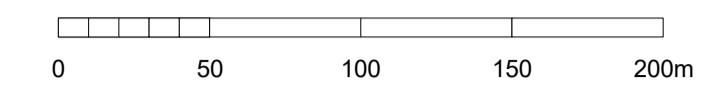
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Appendix 1 Site Location Plan



NOTES

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KEY

— Application boundary

— Land under the control of the applicant

P02	26/05/2023	Title block amended.	JMG	KMN
P01	21/04/2023	First issue.	JMG	KMN
rev	date	description	dm	chk

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- masterplanning
- environmental assessment
- landscape design
- urban design
- ecology
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FPCR Environment and Design Ltd
Lockington Hall
Lockington
Derby
DE74 2RH

t: 01509 672772
e: mail@fpcr.co.uk
w: www.fpcr.co.uk

client
Countryside Partnerships and Vistry Homes

project
Buntingford West,
Buntingford, Hertfordshire

drawing title
SITE LOCATION

scale
1:2500 @ A1

dm chk
JMG KMN

date created
April 2023

project number
10537

status
S3

issue
P02

document number
10537-FPCR-XX-XX-DR-A-1001



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Appendix 2 Outline Drainage Strategy Addendum (May 2024)



Countryside Partnerships and Vistry Homes

LAND AT BUNTINGFORD WEST

Outline Drainage Strategy Addendum





Countryside Partnerships and Vistry Homes

LAND AT BUNTINGFORD WEST

Outline Drainage Strategy Addendum

Type of document (version) Public

Project no. 70084844

Our Ref. No. 10537-WSP-SW-XX-RP-C-0005

Date: May 2024

WSP

WSP House
70 Chancery Lane
London
WC2A 1AF

Phone: +44 20 7314 5000

Fax: +44 20 7314 5111

WSP.com



Quality control

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Date	May 2024			
Prepared by	Chloe Haffenden			
Signature				
Checked by	Andy Twyford			
Signature	<i>A.P. Twyford.</i>			
Authorised by	Andy Twyford			
Signature	<i>A.P. Twyford.</i>			
Project number	70084844			
File reference				



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Appendices

Appendix A

Drawings

1 Introduction

1.1 Commission

- 1.1.1 This Outline Drainage Strategy Addendum (ODSA) has been prepared by WSP in to support the outline planning application for a proposed mixed-use development at the land west of Luynes Rise, Buntingford, Hertfordshire, hereafter referred to as the 'Proposed Development'
- 1.1.2 This ODSA should be read in conjunction with the previously submitted Flood Risk Assessment and Outline Drainage Strategy and other supporting documents submitted with the planning application [3/23/1447/OUT].
- 1.1.3 This ODSA has been prepared to respond to queries raised by LLFA and provide additional information to support an updated Surface Water Drainage Strategy which follows the drainage hierarchy, makes use of the existing ordinary watercourse that traverses the Site and minimises pumping.

1.2 Report Structure

- 1.2.1 This ODSA, in effect, looks to update the following chapters from the previously submitted Flood Risk Assessment and Outline Drainage Strategy Ref 10537-WSP-SW-XX-RP-C-0002;
 - Chapter 7: Outline Surface Water Drainage Strategy;
 - Chapter 10: Offsite Effects;
 - Chapter 11: Residual Flood Risk
 - Chapter 12: Conclusions
- 1.2.2 Therefore, following this introductory section, the remainder of this report is set out as follows:
 - Chapter 2: Outline Surface Water Drainage Strategy;
 - Chapter 3: Offsite Effects;
 - Chapter 4: Residual Flood Risk
 - Chapter 5: Conclusions
- 1.2.3 Relevant Drawings and Calculations are found within Appendices.

2 Outline Surface Water Drainage Strategy

2.1 Overview

- 2.1.1 This section discusses the principles of the proposed Outline Surface Water Drainage Strategy and defines parameters supported by appropriate design calculations and drainage maintenance requirements provided thereafter.
- 2.1.2 As a principle, all proposed drainage will be designed in accordance with local policy, local SuDS guidance, national standards and best practice where applicable during detailed design stages. This Strategy identifies the principles of drainage management for the development and all agreements, permits and applications for connections to the public sewer network will be made post discharge of the Planning Conditions through engagement with the LLFA, Thames Water and other relevant stakeholders.

2.2 General Comments

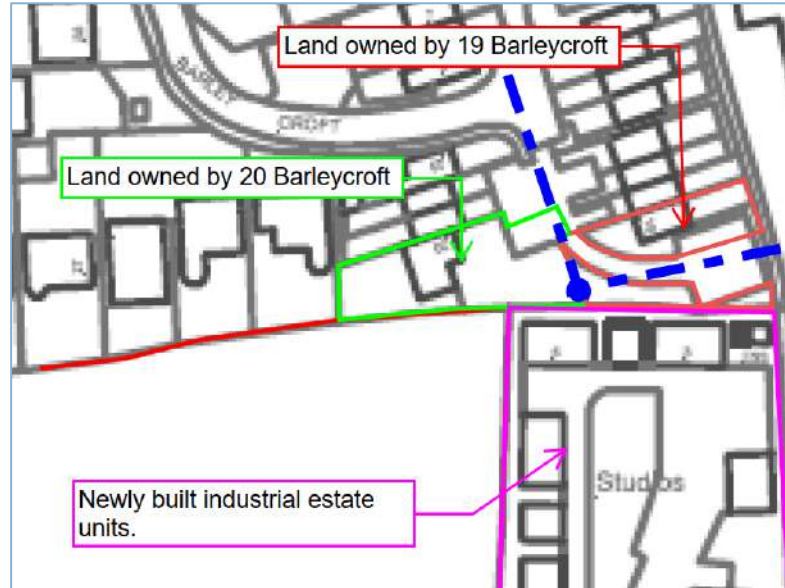
- 2.2.1 The risk to the Site from all sources of flooding has been demonstrated to be negligible to low, therefore, there are no Site-specific flood mitigation measures required on-Site apart from adhering to best practice measures such as:
- Ground levels should fall away from building entrances/thresholds in order to mitigate against surface water runoff entering the ground floor during extreme storm events; and
 - Raised thresholds should be implemented where possible.

2.3 Proposed Surface Water Discharge Method and SuDS

- 2.3.1 Best practice for the management of surface water, based on best practice, National Planning Policy Framework and Building Regulations 2010 Part H (2015 Version) states that surface water runoff from a Site shall discharge to one of the following in order of priority:
- An adequate soakaway or some other adequate infiltration system;
 - A watercourse; and
 - Sewer.
- 2.3.2 The use of infiltration techniques at the Site is limited as Site investigation identified little or no infiltration rates. Furthermore the development is located within a groundwater source protection zone and therefore discharge to the groundwater is not considered to be an appropriate method of discharge for the Site.
- 2.3.3 There are a number of ditches which traverse the site, only one of which has a proven outfall and hence classified as an Ordinary Watercourse (OWC). It is proposed to employ this OWC as discharge for surface water from the Proposed Development as far as reasonably possible. Assessing the existing topography of the Site has allowed the existing catchment to be appraised from which greenfield run-off rates shall be mimicked to ensure flood risk is not increased elsewhere.
- 2.3.4 The eastern end of the site, which due to existing topography is the natural low point of the Site, is surrounded entirely by third-party owned land. This includes the property at 19 and 20 Barleycroft (where TWU sewerage traverses in close proximity), the newly constructed industrial estate and

Thames Water’s waste-water treatment works (WWTW). An indicative land ownership arrangement at the eastern boundary is shown in Figure 1 below.

Figure 1 – Land ownership at Eastern Boundary



2.3.5 The remainder of the Proposed Development is therefore proposed to discharge surface water to the existing Thames Water surface water sewer network located within Peasmead. It is noted that this local surface water sewer network discharges to the River Rib via an existing outfall approximately 490m downstream of the Proposed Development connection.

2.3.6 We would confirm that the existing land ownership arrangement as pertains to the site boundary. The applicant retains title deeds for the land between 7 and 8 Peasmead required to make connection to the TW MH0804 as per the proposed outline drainage strategy. This connection would therefore not require any agreement from, or works within, third-party owned land excluding the public highway. An extract from title plans showing this ownership to application boundary is shown below in figure 2.

Figure 2 – Land ownership of Applicant bounded red



- 2.3.7 Discharge via gravity to this surface water sewer is again maximised from the Proposed Development, however some of the Site will need to be pumped to this sewer. The Site has a significant topographical level change of around 20m falling from northwest to east, and consequently the eastern end of the Site is too low to discharge to the Peasmead sewer under gravity. Both pumped discharge and gravity discharge will be maintained at greenfield run-off rates, with flows limited by pump specification or a vortex flow control such as a HydroBrake.
- 2.3.8 The proposed surface water drainage concept is illustrated by WSP Drainage Strategy drawing 10537-WSP-XX-XX-DR-C-0001 Rev P04, included within Appendix A. In general, Source Control methodologies such as rainwater harvesting (in the form of water butts) and permeable paving will be employed whilst SuDS techniques such as swales, filter drains, pipes, tanks and detention basins/ponds will combine to form residual attenuation requirements. Surface water discharge will be restricted to the Qbar Greenfield rate as per the requirements of 'SuDS Design in Hertfordshire (2021)' guidance.
- 2.3.9 Permeable paving is proposed for incorporation across any non-adoptable roads and parking areas with a suggested 300mm sub-base. Permeable paving provides a volume of storage that will be considered at detailed design stage and is not considered within the total attenuation volume requirements at this stage. Permeable paving supports evaporation potential and forms part of the suds treatment train prior to discharge to the storage basins. Permeable paving improves the filtration of silts, biodegradation of pollutants and retention of solids.
- 2.3.10 Roadside swales are proposed to create a green corridor through the centre of the development to collect surface water run-off from the carriageway and provide a level of surface water treatment. As infiltration is not suitable for the development, any swales would require underdraining with a perforated pipe connecting to main spine sewers throughout the development, conveying surface water to the detention basins. Surface water will be conveyed towards the swale via levels design as per the concept provided in the CIRIA SuDS Manual 2015. Due to the fall in levels across the development, check dams should be provided where the gradient is greater than 3%.
- 2.3.11 2 no. indicative surface water detention basin attenuation features are shown on WSP Drainage Strategy drawing 10537-WSP-XX-XX-DR-C-0001 Rev P04. The basins will serve to provide attractive water features with the additional benefit of the eastern benefit provided public open amenity space. The basins will have an over-deepened area with a permanent pool that will enhance biodiversity and also provide additional treatment for the capture of sediment.
- 2.3.12 For any detention basin, a sediment forebay is proposed to be installed at the basin inlets based on CIRIA suds manual C365 guidance. The sediment forebay allows sediment build-up to be easily monitored and concentrates any required sediment removal activities within a small area, thereby minimising potential damage to the rest of the pond or wetland. The plan area of the sedimentation bay should be at least 10% of the total basin area and could consist of a separate basin or be formed by building an earth berm, stone-or rock-filled gabion or rip-rap across the upstream portion of the basin.
- 2.3.13 A summary of the proposed discharge methods in relation to the drainage hierarchy is provided in Table 1 overleaf.

Table 1 - Drainage Hierarchy - Discharge Method Summary

Surface Water Discharge Method	Feasible (Y/N)	Proposed (Y/N)	Proposed Drainage Strategy and Reasons:
Store rainwater for later use	Y	Y	Source Control Measures such as rainwater harvesting eg water butts will be assessed at the detailed design stage.
Use infiltration techniques, such as porous surface in non-clay areas	N	N	Inadequate geological conditions
Attenuate rainwater in ponds or open water features for gradual release	Y	Y	Detention basins and ponds are proposed to assist in attenuating surface water to Qbar rate.
Rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)	Y	Y	Green/blue roofs are not suitable for the proposed pitched roof houses. The incorporation of rain gardens will be assessed at the detailed design stage.
Attenuate rainwater by storing in tanks or sealed water features for gradual release	Y	Y	N/A
Discharge rainwater direct to a watercourse	Y	Y	Strategy maximises catchment to the existing OWC and mimics greenfield run-off.
Discharge rainwater to a surface water sewer/drain	Y	Y	Where unfeasible to discharge to watercourse, it is proposed to discharge to the existing surface water sewer within Peasmead. This sewer discharges to the River Rib after 490m.
Discharge rainwater to the combined sewer	N	N	N/A

2.4 Proposed Surface Water Discharge Rates

Existing Greenfield run-off rate

- 2.4.1 Existing runoff rates have been calculated using the FEH Statistical Method provided on www.UKSUDS.com, this method being deemed suitable as per table 24.1 of the CIRIA C753 SuDS Manual. The base flow index (BFI) based on the Hydrology of Soil Types (HOST) has been determined from the FEH22 dataset for the site, the latest BFIHOST19 has been used within the calculation as recommended by UK Centre for Ecology and Hydrology. As this is an outline strategy and the extent of development area could change throughout the design process the greenfield rate has been expressed in l/s/ha, refer to Table 2. Full calculations for the greenfield runoff rate can be found in Appendix B):

Table 2 – Estimation of Greenfield run-off rate

Return Period	Flow (l/s/ha)
Qbar	1.52
1 in 1 Year	1.29
1 in 30 Year	3.50
1 in 100 Year	4.85

2.4.2 The existing Qbar **greenfield discharge rate** has been calculated as **1.52l/s/ha**. It is therefore proposed the Site will discharge at this rate in line with ‘SuDS Design in Hertfordshire (2015) best practice guidance provided which negates the need to provide additional long-term storage and helps reduce the overall impact off Site to the downstream sewer network.

Thames Water Consultation

2.4.3 A pre-development enquiry to identify if capacity is available within the existing public sewer network for the discharge of surface water flows from the Site was submitted to Thames Water (TW) in May 2022.

2.4.4 TW confirmed that there are capacity concerns in the local surface water network to accommodate surface water flows from the Site. Thames Water will undertake hydraulic network capacity modelling post planning to determine whether any upgrade works will be required to the local sewer network as a result of the development.

2.4.5 TW are obligated to provide capacity and necessary upgrades works within 24 months of a Planning Application being approved to ensure the development can drain surface water. Thames Water indicated in their pre-development response that a typical timescale for a development of the magnitude of the proposed is 20 months.

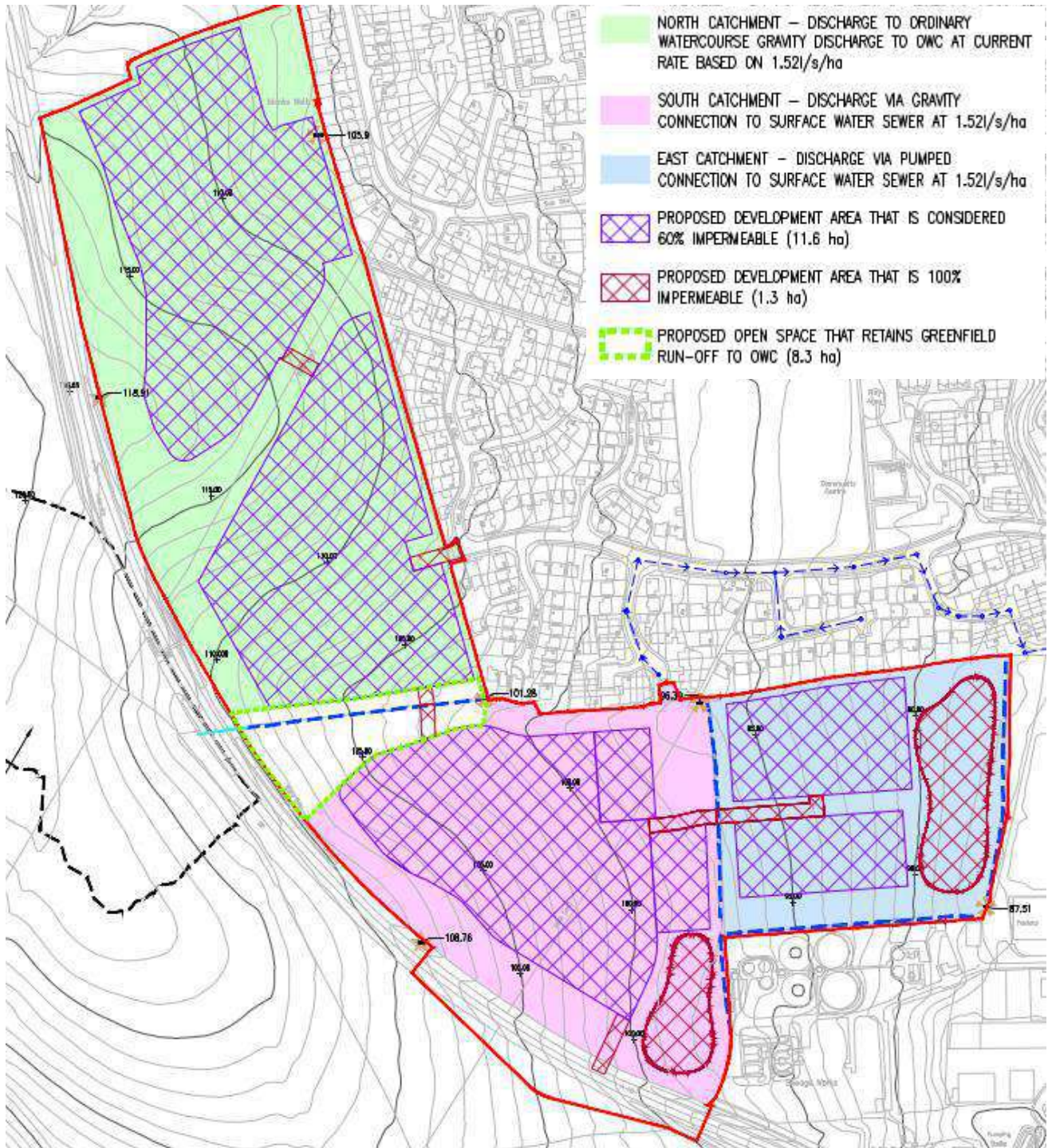
2.4.6 It should however be noted that from TW records the diameter of the proposed connection to existing sewer is 600mm. This is at the current head of the run and such a diameter would seemingly not be warranted from existing flows discharging to this point. It is therefore reasonable to assume that this sewer was designed oversized to potentially receive discharge from future development such as this current application. In any case, discharge flows from the proposed development mimic greenfield run off and, as noted previously, TW will undertake capacity assessment upon developer receipt of an Outline Planning Approval.

2.5 Surface Water Modelling Results

2.5.1 As discussed previously, the development has been split into 3 no. catchments each with their natural discharge point and method to mimic greenfield run-off rates. These catchments have been modelled using Info-Drainage to determine the required amount of attenuation to accommodate the 1:100 year + 40% climate change storm event. The results of this modelling are provided within Appendix B.

2.5.2 A representation of these Catchments is provided overleaf in Figure 3 overleaf whilst a description of their respective surface water strategies follows.

Figure 3 – Proposed Development Catchments (extract from 1057-WSP-XX-XX-SK-C-0003)



North Catchment

- North Catchment will discharge to the existing Ordinary Watercourse that runs through the site at a discharge rate no higher than the existing run-off.
- An appraisal of the existing topography to understand the current drainage regime at the Site has been undertaken. The existing catchment draining to the existing ordinary watercourse has been measured at 6.2ha as shown on 10537-WSP-XX-XX-SK-C-0001. Using the

greenfield runoff rate of 1.52l/s/ha a total of 9.43l/s discharges to the existing ditch. So as to increase any flood risk this discharge rate from the development site east of the A10 is maintained in the proposed Drainage Strategy.

- For robustness an area of this existing catchment, green open space adjacent to OWC in proposals, is retained at greenfield run-off rate discharge to the OWC. This area is 0.84 ha, hence 1.3 l/s (0.84 x 1.52) resulting in an available 8.1 l/s available for the North Catchment development.
- The proposed catchment will need to discharge to the OWC is approximately 10ha, shown on drawing 10537-WSP-XX-XX-SK-C-0003.
- Based on the current development proposals at 60% impermeable area +8% urban creep with a CV value of 1.0 a discharge rate of 8.1l/s is proposed resulting in 4,625m³ of attenuation.

South Catchment

- The South Catchment will discharge at greenfield rate of 1.52l/s/ha
- Surface water will discharge to the existing TW manhole 0804 via a gravity connection at a rate of 3.6l/s (2.42ha impermeable area x 1.52l/s/ha) resulting in 3,120m³ of attenuation.

East Catchment

- The East Catchment will discharge at greenfield rate of 1.52l/s/ha
- Surface Water will discharge to the existing TW manhole 0804 via a pumped connection at a rate of 2.6l/s (1.74ha impermeable area x 1.52l/s/ha) resulting in 2,165m³ of attenuation.
- 24hr storage for the surface water is to be provided in case of pump or power fail ie no discharge, and this can be provided within the indicative basin. The basin will have enough storage for the longest storm we can model within the software (10080min storm) this would result in 3,325m³ water within the basin and hence a 525mm freeboard.

Water Quality Control

2.5.3 The committed permeable paving and wetland attenuation basins are to provide levels of surface water pre-treatment prior to discharge. These devices will provide sufficient stages of pre-treatment to satisfy Section 26 of the CIRIA C753 SuDS Manual. This is proven in the calculations below.

2.5.4 It has been assumed that the adoptable spine road (known as the Boulevard) running through the development will experience more than 300 traffic movements per day and that these roads will drain to the on-Site basins via swales. Table 26.2 of the CIRIA C753 SuDS notes that pollution hazard levels for all roads except low traffic roads and trunk roads/motorways are as follows:

- TSS is 0.7;
- Metals is 0.6;
- Hydrocarbons is 0.7.

2.5.5 It is anticipated that the Site will have three levels of treatment which consists of a sediment forebay, the wetland attenuation basin itself, and where feasible permeable paving. It cannot however be guaranteed that some areas of the roads will pass through permeable paving. Table 26.3 – “*Indicative*



SuDS mitigation indices for discharges to surface waters” shows that a sediment forebay (detention basin) and wetland are able to provide treatment to the following levels:

- Detention Basin TSS at $0.5 + 0.5(\text{Wetland at } 0.8) = 0.9$
- Detention Basin Metals at $0.5 + 0.5(\text{Wetland at } 0.8) = 0.9$
- Detention Basin Hydrocarbons at $0.6 + 0.5(\text{Wetland at } 0.8) = 1.0$

2.5.6 Each of the above is beyond the level of pollutants expected from the proposed usage. Therefore, the use of just an attenuation basin and sediment forebay is an adequate level of pre-treatment for the Site. This assessment is subject to further detailed design.

3 Offsite Effects

- 3.1.1 The proposed development will significantly reduce the rate of surface water discharge leaving the Site for representative rainfall events up to 1% annual probability including a climate change allowance, in accordance with the NPPF.
- 3.1.2 The Outline Drainage Strategy demonstrates that the drainage network of the Site will be designed to accommodate runoff during all events up to and including the 100-year return period plus 40% climate change allowance rainfall event and reduce the discharge rate from the Site when compared to the existing Site. As such, the Proposed Development will not have a negative impact on surface water flooding offsite.
- 3.1.3 Due to the Topography of the site and land ownership, particularly along the eastern boundary of the Site, as discussed it is necessary for some of surface water from the Proposed Development to be pumped. In this regard the surface water drainage system has to mitigate the residual risk of failure of the pump (either through mechanical, power or blockage) whilst still ensuring flood risk elsewhere is not increased for the critical design storm (the 1 in 100 (1%) AEP plus climate change).
- 3.1.4 In essence if such a failure occurs it must be ensured that the water does not flow uncontrolled off site as this would increase flood risk to others. The time period for this failure is set at 24 hours. Therefore to ensure the residual risk is appropriately managed in accordance with NPPF, and that flood risk is not increased to the surrounding area, it has to be demonstrated that a failure of 24 hours does not increase flood risk to the site or surrounding area with the preference of passive measures over active measures as per NPPF. The water must not leave the site uncontrolled and unrestricted during the design storm when considering the residual risk of failure and must still be safe and suitably mitigated.
- 3.1.5 To satisfy this requirement the basin located to the east, within east Catchment, has been oversized to cater for such an event.:
- Volume provided = 4,957m³
 - Volume required = 2,165m³ (for critical storm event 1 in 100yr +40% cc)
 - Volume required = 3,325m³ (for 10080min storm with 0l/s if pump failure) hence 525mm freeboard provided.
- 3.1.6 This requirement is therefore satisfied, and although the basin is currently shown indicatively, the commitment to provide such an oversized detention basin is provided with parameters subject to future parameters, detailed design and LLFA agreement.

4 Residual Flood Risk

- 4.1.1 The ODS demonstrates that the drainage network at the Site is designed to accommodate runoff during all events up to and including the 100-year return period plus a climate change allowance preventing potential exceedance flows off-Site, including additional freeboard allowances within the storage basins.

5 Conclusions

- 5.1.1 This Outline Drainage Strategy Addendum (ODSA) has been prepared by WSP in to support the outline planning application for a proposed mixed-use development at the land west of Luynes Rise, Buntingford, Hertfordshire, hereafter referred to as the 'Proposed Development'. This ODSA should be read in conjunction with the previously submitted Flood Risk Assessment and Outline Drainage Strategy and other supporting documents submitted with the planning application [3/23/1447/OUT].
- 5.1.2 The Site is shown in the EA Flood Maps as being located predominantly within Flood Zone 1, which based on the NPPF, is classified as having a 'low' probability of tidal and fluvial flooding. Other potential sources of flooding have been investigated and the probability of flooding has also been assessed as low to negligible
- 5.1.3 This ODSA has been prepared to respond to queries raised by the LLFA and provide additional information to support the updated Surface Water Drainage Strategy as presented which follows the drainage hierarchy, makes use of the existing ordinary watercourse that traverses the Site and minimises pumping. The Surface Water Drainage Strategy therefore;
- Adheres to the drainage hierarchy as far as possible;
 - Mimics existing greenfield run-off rate of 1.52l/s/ha;
 - Maximises use of the existing Ordinary Watercourse (OWC) that traverses the site for surface water discharge;
 - Manages surface water runoff within the proposed development, taking into account potential climate change impact with the overall aim to reduce the rate of surface water run-off from the proposed building and limit the impact on the public sewer network in line with policy and best practice.
 - Commits to appropriate attenuation storage via source controls such as permeable paving, swales and detention basins to form part of the SuDS management train.
 - Demonstrates that the Proposed Development is safe for its lifetime without increasing flood risk elsewhere, this in particular regard to the area requiring a pumped solution where on-site detention basin is proven to adequately store critical design storm for 24 hr period without discharge.
- 5.1.4 The Proposed Development drainage strategy has therefore been designed in accordance with the relevant Local and National Planning Policy.



Appendix A

Drawings



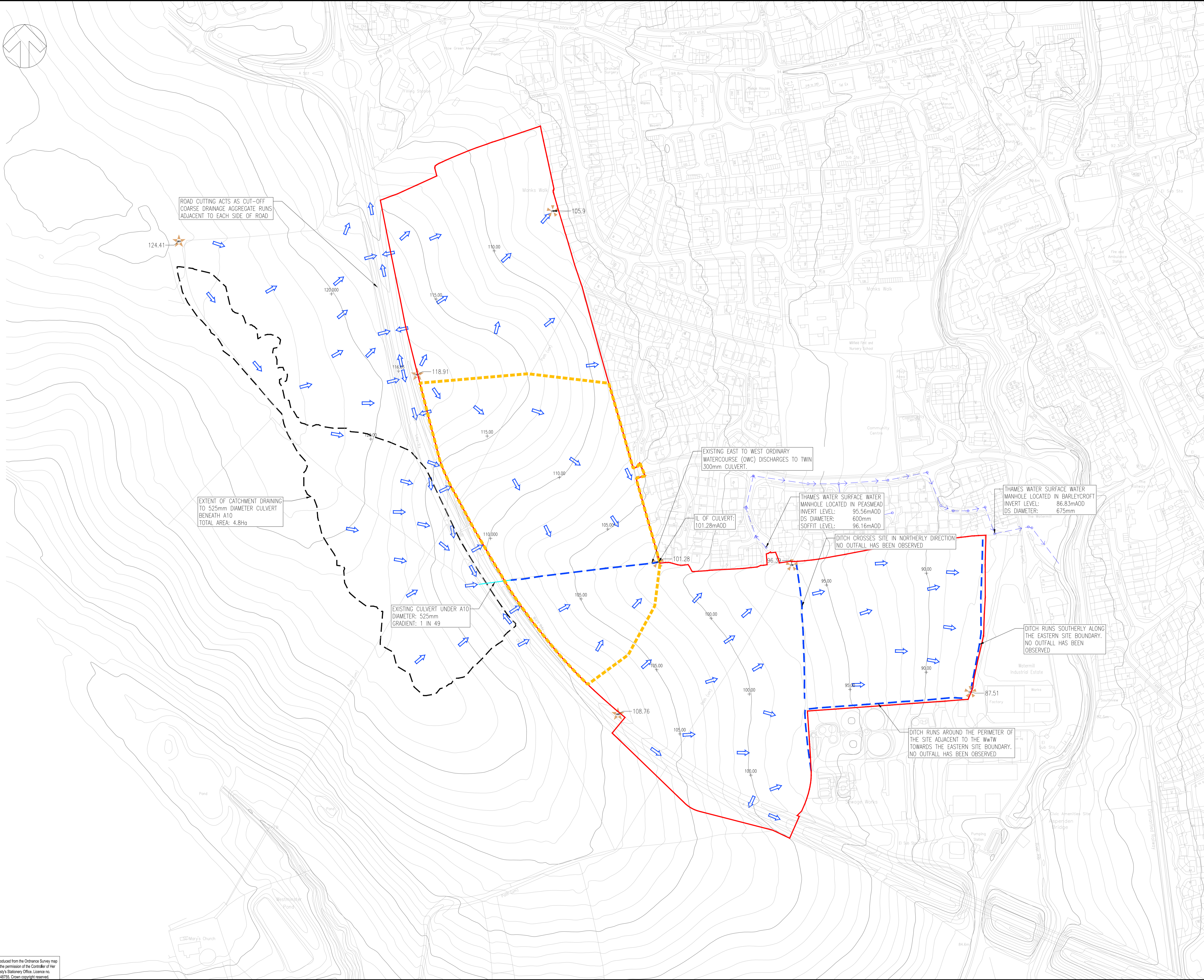
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NOTES

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5. CULVERT CATCHMENT DELINEATED USING GIS AND ENVIRONMENT AGENCY 1m LIDAR

KEY

- SITE RED LINE BOUNDARY
- CULVERT CATCHMENT CONTRIBUTING TO FLOW THROUGH CULVERT
- 525mm DIAMETER A10 CULVERT
- EXISTING LAND DRAINAGE DITCHES
- EXISTING OVERLAND FLOW ROUTE
- - - EXISTING THAMES WATER SURFACE WATER SEWERS (NOT ALL SEWERS SHOWN)
- ★ HIGH (OR LOW) POINT MARKER
- AREA OF PROPOSED DEVELOPMENT THAT CURRENTLY DISCHARGES TO OWC (AREA 6.2 HA)



P01	03/05/2024	CC	FIRST ISSUE	CH	AT
REV	DATE	BY	DESCRIPTION	CHK	APP

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One Queens Drive, Birmingham, B5 4PJ, UK
T+ 44 (0) 121 352 4700, F+ 44 (0) 121 352 4701
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CLIENT: **COUNTRYSIDE PARTNERSHIPS AND VISTRY HOMES**

ARCHITECT: **FPCR**

SITE/PROJECT: **BUNTINGFORD WEST**

TITLE: **EXISTING DRAINAGE FEATURES**

SCALE @ A1: 1:2000m	CHECKED: CH	APPROVED: AT
PROJECT NO: 70007498	DESIGNED: CC	DATE: May 24

DRAWING NO: **10537-WSP-XX-XX-SK-C-0001** REV: **P01**

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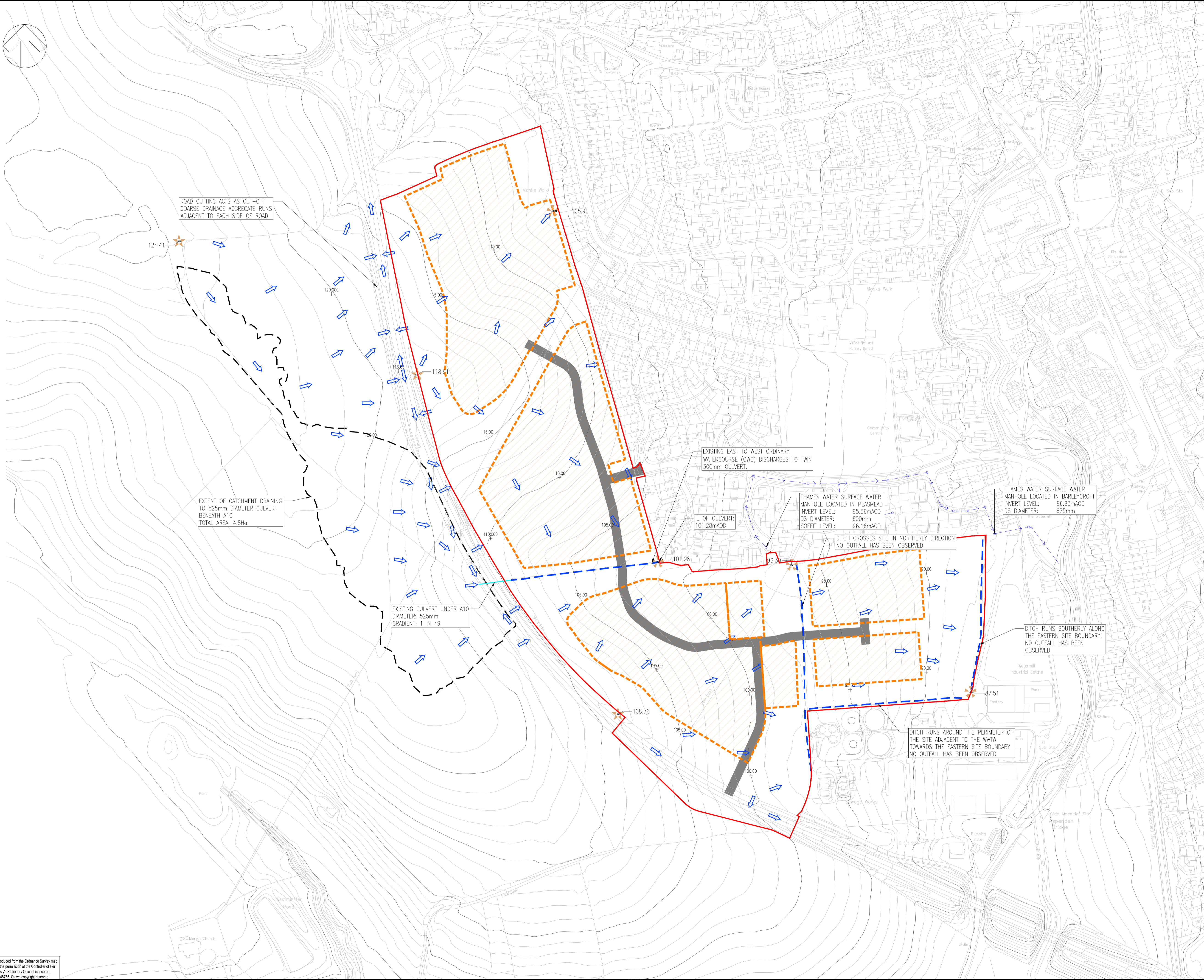
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5. CULVERT CATCHMENT DELINEATED USING GIS AND ENVIRONMENT AGENCY 1m LIDAR

KEY

- SITE RED LINE BOUNDARY
- CULVERT CATCHMENT CONTRIBUTING TO FLOW THROUGH CULVERT
- 525mm DIAMETER A10 CULVERT
- EXISTING LAND DRAINAGE DITCHES
- EXISTING OVERLAND FLOW ROUTE
- EXISTING THAMES WATER SURFACE WATER SEWERS (NOT ALL SEWERS SHOWN)
- ★ HIGH (OR LOW) POINT MARKER
- PROPOSED DEVELOPMENT AREAS CONSIDERED 60% IMPERMEABLE (11.6 ha)



REV	DATE	BY	DESCRIPTION	CHK	APP
P01	03/05/2024	CC	FIRST ISSUE	CH	AT

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ARCHITECT: **FPCR**

SITE PROJECT: **BUNTINGFORD WEST**

TITLE: **EXISTING DRAINAGE FEATURES WITH PROPOSED IMPERMEABLE DEVELOPMENT AREAS**

SCALE @ A1:	CHECKED:	APPROVED:
1:2000m	CC	AT
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70007498	CC	May 24
DRAWING NO:	REV:	
10537-WSP-XX-XX-SK-C-0002	P01	

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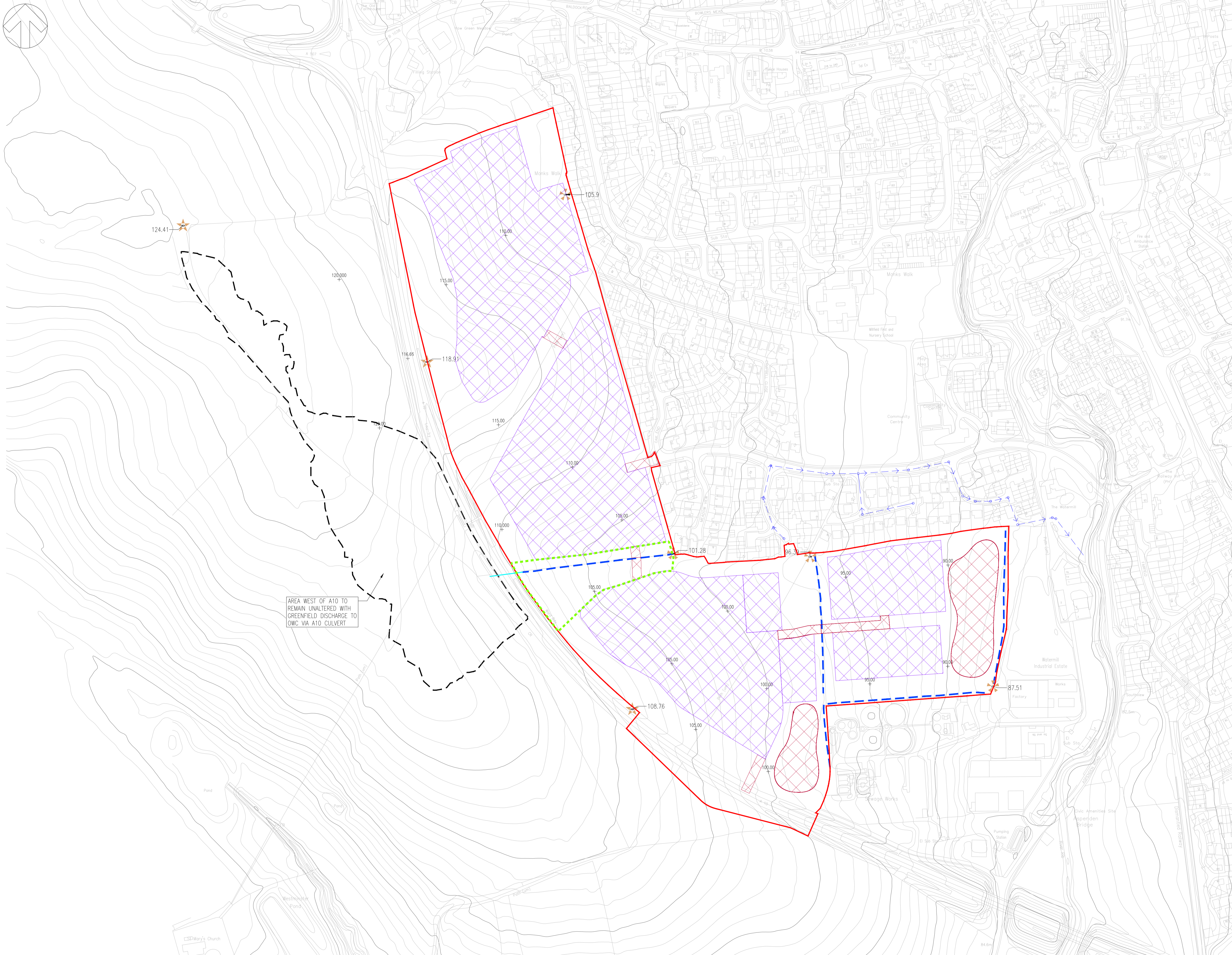
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5. CULVERT CATCHMENT DELINEATED USING GIS AND ENVIRONMENT AGENCY 1m LIDAR

KEY

- SITE RED LINE BOUNDARY
- CULVERT CATCHMENT CONTRIBUTING TO FLOW THROUGH CULVERT
- 525mm DIAMETER A10 CULVERT
- EXISTING LAND DRAINAGE DITCHES
- EXISTING THAMES WATER SURFACE WATER SEWERS (NOT ALL SEWERS SHOWN)
- ★ HIGH (OR LOW) POINT MARKER
- NORTH CATCHMENT - DISCHARGE TO ORDINARY WATERCOURSE GRAVITY DISCHARGE TO OWC AT CURRENT RATE BASED ON 1.52l/s/ha
- SOUTH CATCHMENT - DISCHARGE VIA GRAVITY CONNECTION TO SURFACE WATER SEWER AT 1.52l/s/ha
- EAST CATCHMENT - DISCHARGE VIA PUMPED CONNECTION TO SURFACE WATER SEWER AT 1.52l/s/ha
- PROPOSED DEVELOPMENT AREA THAT IS CONSIDERED 60% IMPERMEABLE (11.6 ha)
- PROPOSED DEVELOPMENT AREA THAT IS 100% IMPERMEABLE (1.3 ha)
- PROPOSED OPEN SPACE THAT RETAINS GREENFIELD RUN-OFF TO OWC (8.3 ha)



P01	03/05/2024	CC	FIRST ISSUE	CH	AT
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T+ 44 (0) 121 352 4700, F+ 44 (0) 121 352 4701
wsp.com

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ARCHITECT: **FPCR**

SITE/PROJECT: **BUNTINGFORD WEST**

TITLE: **PROPOSED CATCHMENT PLAN**

SCALE @ A1:	1:2000 m	CHECKED:	CH	APPROVED:	AT
PROJECT NO:	70007498	DESIGNED:	CC	DATE:	May 24

DRAWING NO: **10537-WSP-XX-XX-SK-C-0003** REV: **P01**

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- NOTES:
- LEVELS ARE IN METERS ABOVE ORDNANCE DATUM UNLESS OTHERWISE STATED.
 - DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.
 - EXISTING THAMES WATER ASSETS BASED ON THAMES WATER ASSET RECORDS 'ALS/ALS STANDARD/2013_2474942'.
 - INFILTRATION TESTING CONFIRMED THAT THE SITE INFILTRATION RATES ARE INSUFFICIENT TO ACHIEVE DISCHARGE VIA INFILTRATION (REFER TO WSP INFILTRATION TESTING REPORT)
 - MODELLING UNDERTAKEN USING FEH22 RAINFALL DATA.
 - PROPOSED MASTERPLAN BASED ON 10537-FPCR-XX-XX-DR-A-1002_P05 PREPARED BY FPCR ENVIRONMENT AND DESIGN LTD.
 - SURFACE WATER FROM THE SITE WILL BE RESTRICTED TO THE OADR GREENFIELD RATE FOR ALL STORMS UP TO & INCLUDING THE DESIGN 1 IN 100 YEAR + ADR CLIMATE CHANGE EVENT. A TOTAL OF 7971m³ OF ATTENUATION STORAGE IS CALCULATED TO BE REQUIRED, AND THE BASINS HAVE BEEN SIZED TO ATTENUATE THEIR CONTRIBUTING CATCHMENTS. THE ATTENUATION BASIN EXTENTS ARE SUBJECT TO DETAILED DESIGN.
 - CALCULATED EXISTING GREENFIELD RUN-OFF RATE OF 1.52L/S/HA APPLIED FOR DRAINAGE STRATEGY.
 - LAND OUTSIDE THE CATCHMENTS IDENTIFIED, INCLUDING THE A10 AND LAND WEST OF THE A10 ARE NOT INCLUDED WITHIN THE DRAINAGE STRATEGY AND ARE ASSUMED TO DRAIN AS PER THE EXISTING ARRANGEMENT. THE CATCHMENT PARAMETERS OF THIS LAND IS NOT CHANGING AS A RESULT OF THE DEVELOPMENT.
 - A SEDIMENT FOREBAY IS PROPOSED TO BE INSTALLED AT THE BASIN INLETS, BASED ON CIRA SUDS MANUAL C.265 GUIDANCE. THE SEDIMENT FOREBAY ALLOWS SEDIMENT BUILD-UP TO BE EASILY MONITORED, AND CONCENTRATES ANY REQUIRED SEDIMENT REMOVAL ACTIVITIES WITHIN A SMALL AREA, THEREBY MINIMISING POTENTIAL DAMAGE TO THE REST OF THE POND OR WETLAND. THE PLAN AREA OF THE SEDIMENTATION BAY SHOULD BE AT LEAST 10% OF THE TOTAL BASIN AREA AND SHOULD CONSIST OF A SEPARATE BASIN, OR BE FORMED BY BUILDING AN EARTH BERM, STONE-OR ROCK-FILLED GABION OR RIP-RAP ACROSS THE UPSTREAM PORTION OF THE BASIN.
 - PERMEABLE PAVING IS PROPOSED FOR INCORPORATION ACROSS ALL NON-ADAPTABLE ROADS AND PARKING AREAS WITH 300mm SUB-BASE. PERMEABLE PAVING PROVIDES A VOLUME OF STORAGE THAT WILL BE CONSIDERED AT DETAILED DESIGN STAGE AND IS NOT CONSIDERED WITHIN THE TOTAL ATTENUATION VOLUME REQUIREMENTS AT THIS STAGE. PERMEABLE PAVING SUPPORTS EVAPORATION POTENTIAL AND FORM PART OF THE SUDS TREATMENT TRAIN PRIOR TO DISCHARGE TO THE STORAGE BASINS. PERMEABLE PAVING IMPROVES FILTRATION OF SILTS, BIODEGRADATION OF POLLUTANTS AND RETENTION OF SOLIDS.
 - COVER LEVELS SHOWN ARE INDICATIVE AND SUBJECT TO DETAILED DESIGN.
 - CHECK DAMS TO BE INCORPORATED WHERE SWALE SLOPE IS GREATER THAN 3%.
 - DRAWING IS TO BE READ IN CONJUNCTION WITH WSP OUTLINE DRAINAGE STRATEGY AND FLOOD RISK ASSESSMENT AND O&S APPENDIX.
 - WATER BUTTS TO BE PROVIDED TO ENCOURAGE RAINWATER RE-USE.

- KEY:
- SITE BOUNDARY
 - EXISTING THAMES WATER FOUL SEWER AND MANHOLE
 - EXISTING THAMES WATER SURFACE WATER SEWER AND MANHOLE
 - EXISTING THAMES WATER STORM RELIEF
 - EXISTING THAMES WATER MANHOLE REFERENCE AND PIPE DIAMETER
 - PROPOSED FOUL SEWER AND MANHOLE
 - PROPOSED SURFACE WATER SEWER AND MANHOLE
 - PROPOSED SURFACE WATER RISING MAIN
 - PROPOSED SWALE
 - PROPOSED ATTENUATION BASIN
 - PROPOSED CONTOUR AND LEVEL
 - +115.04 EXISTING SPOT LEVEL
 - CATCHMENT A FOUL WATER - GRAVITY DISCHARGE TO TWMH806 SURFACE WATER - GRAVITY DISCHARGE TO OWC AT CURRENT RATE BASED ON 1.52L/S/HA
 - CATCHMENT B FOUL WATER - GRAVITY DISCHARGE TO TWMH802 SURFACE WATER - GRAVITY DISCHARGE TO TWMH804 AT 1.52L/S/HA
 - CATCHMENT C FOUL WATER - PUMPED DISCHARGE TO TWMH802 SURFACE WATER - PUMPED DISCHARGE TO TWMH804 AT 1.52L/S/HA
 - PROPOSED OPEN SPACE THAT RETAINS GREENFIELD RUN-OFF TO OWC (8.3 ha)
 - EXISTING DRAINAGE DITCH TO BE RETAINED WHERE NECESSARY, TO BE AGREED IN FUTURE DISCUSSION WITH LFLA

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REV	DATE	BY	DESCRIPTION	CHK	APP
P04	03/05/2023	CC	UPDATED TO ADDRESS LFLA COMMENTS	SH	AT
P03	15/11/2023	BB	UPDATED TO LFLA COMMENTS	SH	AT
P02	16/06/2023	BB	REVISED BACKGROUND	SH	AT
P01	30/06/2022	BB	FIRST ISSUE	SH	AT

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T: +44 (0) 207 314 5000 F: +44 (0) 207 314 5111
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CUSTOMER:	VISTRY
PROJECT:	fpcr
PROJECT:	BUNTINGFORD WEST, BUNTINGFORD, HERTFORDSHIRE
TITLE:	FOUL AND SURFACE WATER DRAINAGE STRATEGY

SCALE:	1:500	D-DRAWN:	CH	APPROVED:	AT
PROJECT NO.:	70084544	DESIGNED:	CC	DATE:	May 24
DRAWING NO.:	10537-WSP-XX-XX-DR-C-0001	REV:			P04

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Appendix B

Calculations



Calculated by:	Chloe Lauren Cogger
Site name:	Buntingford West
Site location:	Land East of the A10, Peasmead, Buntingford, SG9 9SF

Site Details

Latitude:	51.94072° N
Longitude:	0.02429° W

This is an estimation of the greenfield runoff rates that are used to meet normal best practice criteria in line with Environment Agency guidance "Rainfall runoff management for developments", SC030219 (2013), the SuDS Manual C753 (Ciria, 2015) and the non-statutory standards for SuDS (Defra, 2015). This information on greenfield runoff rates may be the basis for setting consents for the drainage of surface water runoff from sites.

Reference:	1110964139
Date:	Apr 30 2024 16:32

Runoff estimation approach

FEH Statistical

Site characteristics

Total site area (ha):	20.09
-----------------------	-------

Methodology

Q _{MED} estimation method:	Calculate from BFI and SAAR
BFI and SPR method:	Specify BFI manually
HOST class:	7
BFI / BFIHOST:	0.639
Q _{MED} (l/s):	22.58
Q _{BAR} / Q _{MED} factor:	1.14

Notes

(1) Is $Q_{BAR} < 2.0$ l/s/ha?

When Q_{BAR} is < 2.0 l/s/ha then limiting discharge rates are set at 2.0 l/s/ha.

(2) Are flow rates < 5.0 l/s?

Where flow rates are less than 5.0 l/s consent for discharge is usually set at 5.0 l/s if blockage from vegetation and other materials is possible.

Hydrological characteristics

SAAR (mm):

Default	Edited
	630

Hydrological region:

	6
--	---

Growth curve factor 1 year:

	0.85
--	------

Growth curve factor 30 years:

	2.3
--	-----

Growth curve factor 100 years:

	3.19
--	------

Growth curve factor 200 years:

	3.74
--	------

Lower consent flow rates may be set where the blockage risk is addressed by using appropriate drainage elements.

(3) Is $SPR/SPRHOST \leq 0.3$?

Where groundwater levels are low enough the use of soakaways to avoid discharge offsite would normally be preferred for disposal of surface water runoff.

Greenfield runoff rates

Q_{BAR} (l/s):

Default	Edited
	30.56

1 in 1 year (l/s):

	25.98
--	-------

1 in 30 years (l/s):

	70.29
--	-------

1 in 100 year (l/s):

	97.49
--	-------

1 in 200 years (l/s):

	114.29
--	--------

This report was produced using the greenfield runoff tool developed by HR Wallingford and available at www.uksuds.com. The use of this tool is subject to the UK SuDS terms and conditions and licence agreement, which can both be found at www.uksuds.com/terms-and-conditions.htm. The outputs from this tool are estimates of greenfield runoff rates. The use of these results is the responsibility of the users of this tool. No liability will be accepted by HR Wallingford, the Environment Agency, CEH, Hydrosolutions or any other organisation for the use of this data in the design or operational characteristics of any drainage scheme.

Buntingford West: Catchment A Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by: CH	Approved By: AT
Report Details: Type: Junctions Storm Phase: Phase	Company Address:		



Outlets

Junction	Outlet Name	Outgoing Connection	Outlet Type
Outfall	Outlet	(None)	Hydro-Brake®
	Invert Level (m)	102.500	
	Design Depth (m)	1.200	
	Design Flow (L/s)	8.1	
	Objective	Minimise Upstream Storage Requirements	
	Application	Surface Water Only	
	Sump Available	<input type="checkbox"/>	
	Unit Reference	CHE-0122-8100-1200-8100	

Buntingford West: Catchment A Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by: CH	Approved By: AT
Report Details: Type: Stormwater Controls Storm Phase: Phase	Company Address:		



Pond

Type : Pond

Dimensions

Exceedance Level (m)	104.000
Depth (m)	1.500
Base Level (m)	102.500
Freeboard (mm)	300
Initial Depth (m)	0.000
Porosity (%)	100
Average Slope (1:X)	3.007
Total Volume (m³)	4670.479

Depth (m)	Area (m²)	Volume (m³)
0.000	3500.00	0.000
1.500	4510.00	5991.517

Advanced

Perimeter	Circular
Length (m)	105.946
Friction Scheme	Manning's n
n	0.02

Buntingford West: Catchment A Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by: CH	Approved By: AT
Report Title: Rainfall Analysis Criteria	Company Address:		



Runoff Type	Dynamic
Output Interval (mins)	5
Time Step	Default
Urban Creep	Apply Global Value
Urban Creep Global Value (%)	8
Junction Flood Risk Margin (mm)	300
Perform No Discharge Analysis	<input type="checkbox"/>

Rainfall

FEH	Type: FEH
Site Location	GB 535761 228934 TL 35761 28934
Rainfall Version	2022
Data Type	Point
Summer	<input checked="" type="checkbox"/>
Winter	<input checked="" type="checkbox"/>

Return Period

Return Period (years)	Increase Rainfall (%)
100.0	40.000

Storm Durations

Duration (mins)	Run Time (mins)
15	30
30	60
60	120
120	240
180	360
240	480
360	720
480	960
600	1200
720	1440
960	1920
1440	2880
2160	4320
2880	5760
4320	8640
5760	11520
7200	14400
8640	17280
10080	20160

Buntingford West: Catchment A Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by: CH	Approved By: AT
Report Details: Type: Inflows Summary Storm Phase: Phase	Company Address:		



Critical Storm Per Item: Rank By: Max. Inflow

Inflow	Storm Event	Inflow Area (ha)	Max. Inflow (L/s)	Total Inflow Volume (m³)
Catchment A	FEH: 100 years: +40 %: 15 mins: Summer	4.09	3265.3	1450.914

Buntingford West: Catchment A Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by: CH	Approved By: AT
Report Details: Type: Junctions Summary Storm Phase: Phase	Company Address:		



Critical Storm Per Item: Rank By: Max. Depth

Junction	Storm Event	Cover Level (m)	Invert Level (m)	Max. Level (m)	Max. Depth (m)	Max. Inflow (L/s)	Max. Resident Volume (m³)	Max. Flooded Volume (m³)	Max. Outflow (L/s)	Total Discharge Volume (m³)	Status
Outfall	FEH: 100 years: +40 %: 10080 mins: Summer	104.000	102.500	103.687	1.187	8.1	1.342	0.000	8.1	7342.931	OK

Buntingford West: Catchment A Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by: CH	Approved By: AT
Report Details: Type: Stormwater Controls Summary Storm Phase: Phase	Company Address:		



Critical Storm Per Item: Rank By: Max. Avg. Depth

Stormwater Control	Storm Event	Max. US Level (m)	Max. DS Level (m)	Max. US Depth (m)	Max. DS Depth (m)	Max. Inflow (L/s)	Max. Residant Volume (m³)	Max. Flooded Volume (m³)	Total Lost Volume (m³)	Max. Outflow (L/s)	Total Discharge Volume (m³)	Percentage Available (%)	Status
Pond	FEH: 100 years: +40 %: 10080 mins: Summer	103.689	103.689	1.189	1.189	50.4	4622.199	0.000	0.000	8.1	7343.091	1.034	OK

Buntingford West: Catchment B Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Junctions Storm Phase: Phase	Company Address:		



Outlets

Junction	Outlet Name	Outgoing Connection	Outlet Type	
Outfall	Outlet	(None)	Hydro-Brake®	
	Invert Level (m)		97.400	
	Design Depth (m)		1.200	
	Design Flow (L/s)		3.68	
	Objective	Minimise Upstream Storage Requirements		
	Application	Surface Water Only		
	Sump Available	<input type="checkbox"/>		
	Unit Reference	CHE-0084-3680-1200-3680		

Buntingford West: Catchment B Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Stormwater Controls Storm Phase: Phase	Company Address:		



Pond

Type : Pond

Dimensions

Exceedance Level (m)	98.900
Depth (m)	1.500
Base Level (m)	97.400
Freeboard (mm)	300
Initial Depth (m)	0.000
Porosity (%)	100
Average Slope (1:X)	3.073
Total Volume (m³)	3537.046

Depth (m)	Area (m²)	Volume (m³)
0.000	2600.00	0.000
1.500	3500.00	4558.310

Advanced

Perimeter	Circular
Length (m)	153.730
Friction Scheme	Manning's n
n	0.02

Buntingford West: Catchment B Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Title: Rainfall Analysis Criteria	Company Address:		



Runoff Type	Dynamic
Output Interval (mins)	5
Time Step	Default
Urban Creep	Apply Global Value
Urban Creep Global Value (%)	8
Junction Flood Risk Margin (mm)	300
Perform No Discharge Analysis	<input type="checkbox"/>

Rainfall

FEH	Type: FEH	
Site Location	GB 535761 228934 TL 35761 28934	
Rainfall Version	2022	
Data Type	Point	
Summer	<input checked="" type="checkbox"/>	
Winter	<input checked="" type="checkbox"/>	

Return Period

Return Period (years)	Increase Rainfall (%)
100.0	40.000

Storm Durations

Duration (mins)	Run Time (mins)
15	30
30	60
60	120
120	240
180	360
240	480
360	720
480	960
600	1200
720	1440
960	1920
1440	2880
2160	4320
2880	5760
4320	8640
5760	11520
7200	14400
8640	17280
10080	20160

Buntingford West: Catchment B Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Inflows Summary Storm Phase: Phase	Company Address:		



Critical Storm Per Item: Rank By: Max. Inflow

Inflow	Storm Event	Inflow Area (ha)	Max. Inflow (L/s)	Total Inflow Volume (m³)
Catchment B	FEH: 100 years: +40 %: 15 mins: Summer	2.42	1911.2	861.008

Buntingford West: Catchment B Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Junctions Summary Storm Phase: Phase	Company Address:		



Critical Storm Per Item: Rank By: Max. Depth

Junction	Storm Event	Cover Level (m)	Invert Level (m)	Max. Level (m)	Max. Depth (m)	Max. Inflow (L/s)	Max. Resident Volume (m³)	Max. Flooded Volume (m³)	Max. Outflow (L/s)	Total Discharge Volume (m³)	Status
Outfall	FEH: 100 years: +40 %: 10080 mins: Winter	98.90 0	97.40 0	98.472	1.072	3.5	1.212	0.000	3.5	3308.247	OK

Buntingford West: Catchment B Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Stormwater Controls Summary Storm Phase: Phase	Company Address:		



Critical Storm Per Item: Rank By: Max. Avg. Depth

Stormwater Control	Storm Event	Max. US Level (m)	Max. DS Level (m)	Max. US Depth (m)	Max. DS Depth (m)	Max. Inflow (L/s)	Max. Residant Volume (m³)	Max. Flooded Volume (m³)	Total Lost Volume (m³)	Max. Outflow (L/s)	Total Discharge Volume (m³)	Percentage Available (%)	Status
Pond	FEH: 100 years: +40 %: 10080 mins: Winter	98.472	98.472	1.072	1.072	19.2	3119.243	0.000	0.000	3.5	3310.447	11.812	OK

Buntingford Wesr: Catchment C Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Junctions Storm Phase: Phase	Company Address:		



Outlets

Junction	Outlet Name	Outgoing Connection	Outlet Type
	Outlet	(None)	Pump
	Invert Level (m)	88.400	
	Depth (m)	Outflow (L/s)	
	0.100	2.65	
	0.200	2.65	
	0.300	2.65	
	0.400	2.65	
	0.500	2.65	
	0.600	2.65	
	0.700	2.65	
	0.800	2.65	
	0.900	2.65	
	1.000	2.65	
	1.100	2.65	
	1.200	2.65	
	1.300	2.65	
	1.400	2.65	
	1.500	2.65	
	1.600	2.65	
	1.700	2.65	
	1.800	2.65	
	1.900	2.65	
	2.000	2.65	
	2.100	2.65	
	2.200	2.65	
	2.300	2.65	
	2.400	2.65	
	2.500	2.65	
	2.600	2.65	
	2.700	2.65	
	2.800	2.65	
	2.900	2.65	
	3.000	2.65	
	3.100	2.65	
	3.200	2.65	
	3.300	2.65	
	3.400	2.65	
	3.500	2.65	
	3.600	2.65	
	3.700	2.65	
	3.800	2.65	
	3.900	2.65	
	4.000	2.65	
	4.100	2.65	
	4.200	2.65	
	4.300	2.65	
	4.400	2.65	
	4.500	2.65	
	4.600	2.65	
	4.700	2.65	
	4.800	2.65	
	4.900	2.65	
	5.000	2.65	
	5.100	2.65	
	5.200	2.65	
	5.300	2.65	
	5.400	2.65	
	5.500	2.65	
	5.600	2.65	
	5.700	2.65	
	5.800	2.65	
	5.900	2.65	
	6.000	2.65	
	6.100	2.65	

Outfall

Buntingford Wes: Catchment C Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Junctions Storm Phase: Phase	Company Address:		



Junction	Outlet Name	Outgoing Connection	Outlet Type
	6.200	2.65	
	6.300	2.65	
	6.400	2.65	
	6.500	2.65	
	6.600	2.65	
	6.700	2.65	
	6.800	2.65	
	6.900	2.65	
	7.000	2.65	
	7.100	2.65	
	7.200	2.65	
	7.300	2.65	
	7.400	2.65	
	7.500	2.65	
	7.600	2.65	
	7.700	2.65	
	7.800	2.65	
	7.900	2.65	
	8.000	2.65	
	8.100	2.65	
	8.200	2.65	
	8.300	2.65	
	8.400	2.65	
	8.500	2.65	
	8.600	2.65	
	8.700	2.65	
	8.800	2.65	
	8.900	2.65	
	9.000	2.65	
	9.100	2.65	
	9.200	2.65	
	9.300	2.65	
	9.400	2.65	
	9.500	2.65	
	9.600	2.65	
	9.700	2.65	
	9.800	2.65	
	9.900	2.65	
	10.000	2.65	

Buntingford Wesr: Catchment C Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Stormwater Controls Storm Phase: Phase	Company Address:		



Pond

Type : Pond

Dimensions

Exceedance Level (m)	89.700
Depth (m)	1.300
Base Level (m)	88.400
Freeboard (mm)	300
Initial Depth (m)	0.000
Porosity (%)	100
Average Slope (1:X)	10.034
Total Volume (m³)	4657.540

Depth (m)	Area (m²)	Volume (m³)
0.000	3500.00	0.000
1.300	6770.00	6559.692

Advanced

Perimeter	Circular
Length (m)	145.382
Friction Scheme	Manning's n
n	0.02

Buntingford Wesr: Catchment C Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Title: Rainfall Analysis Criteria	Company Address:		



Runoff Type	Dynamic
Output Interval (mins)	5
Time Step	Default
Urban Creep	Apply Global Value
Urban Creep Global Value (%)	8
Junction Flood Risk Margin (mm)	300
Perform No Discharge Analysis	<input type="checkbox"/>

Rainfall

FEH	Type: FEH
Site Location	GB 535761 228934 TL 35761 28934
Rainfall Version	2022
Data Type	Point
Summer	<input checked="" type="checkbox"/>
Winter	<input checked="" type="checkbox"/>

Return Period

Return Period (years)	Increase Rainfall (%)
100.0	40.000

Storm Durations

Duration (mins)	Run Time (mins)
15	30
30	60
60	120
120	240
180	360
240	480
360	720
480	960
600	1200
720	1440
960	1920
1440	2880
2160	4320
2880	5760
4320	8640
5760	11520
7200	14400
8640	17280
10080	20160

Buntingford Wesr: Catchment C Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Inflows Summary Storm Phase: Phase	Company Address:		



Critical Storm Per Item: Rank By: Max. Inflow

Inflow	Storm Event	Inflow Area (ha)	Max. Inflow (L/s)	Total Inflow Volume (m³)
Catchment C	FEH: 100 years: +40 %: 15 mins: Summer	1.75	1382.1	622.898

Buntingford Wes: Catchment C Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Junctions Summary Storm Phase: Phase	Company Address:		



Critical Storm Per Item: Rank By: Max. Depth


Junction	Storm Event	Cover Level (m)	Invert Level (m)	Max. Level (m)	Max. Depth (m)	Max. Inflow (L/s)	Max. Resident Volume (m³)	Max. Flooded Volume (m³)	Max. Outflow (L/s)	Total Discharge Volume (m³)	Status
Outfall	FEH: 100 years: +40 %: 10080 mins: Summer	89.70 0	88.40 0	88.929	0.529	2.7	0.598	0.000	2.6	2833.522	OK

Buntingford Wes: Catchment C Surface Water Calculations	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Stormwater Controls Summary Storm Phase: Phase	Company Address:		



Critical Storm Per Item: Rank By: Max. Avg. Depth

Stormwater Control	Storm Event	Max. US Level (m)	Max. DS Level (m)	Max. US Depth (m)	Max. DS Depth (m)	Max. Inflow (L/s)	Max. Residant Volume (m³)	Max. Flooded Volume (m³)	Total Lost Volume (m³)	Max. Outflow (L/s)	Total Discharge Volume (m³)	Percentage Available (%)	Status
Pond	FEH: 100 years: +40 %: 10080 mins: Summer	88.929	88.929	0.529	0.529	21.6	2163.273	0.000	0.000	2.7	2834.900	53.553	OK

Buntingford West: Catchment C Surface Water Calculations Pump Failure	Date: 30/04/2024			
	Designed by:	Checked by:	Approved By:	
Report Details: Type: Junctions Storm Phase: Phase	Company Address: CC			

Outlets

Junction	Outlet Name	Outgoing Connection	Outlet Type
	Outlet	(None)	Pump
	Invert Level (m)	88.400	
	Depth (m)	Outflow (L/s)	
	0.100	0.0	
	0.200	0.0	
	0.300	0.0	
	0.400	0.0	
	0.500	0.0	
	0.600	0.0	
	0.700	0.0	
	0.800	0.0	
	0.900	0.0	
	1.000	0.0	
	1.100	0.0	
	1.200	0.0	
	1.300	0.0	
	1.400	0.0	
	1.500	0.0	
	1.600	0.0	
	1.700	0.0	
	1.800	0.0	
	1.900	0.0	
	2.000	0.0	
	2.100	0.0	
	2.200	0.0	
	2.300	0.0	
	2.400	0.0	
	2.500	0.0	
	2.600	0.0	
	2.700	0.0	
	2.800	0.0	
	2.900	0.0	
	3.000	0.0	
	3.100	0.0	
	3.200	0.0	
	3.300	0.0	
	3.400	0.0	
	3.500	0.0	
	3.600	0.0	
	3.700	0.0	
	3.800	0.0	
	3.900	0.0	
	4.000	0.0	
	4.100	0.0	
	4.200	0.0	
	4.300	0.0	
	4.400	0.0	
	4.500	0.0	
	4.600	0.0	
	4.700	0.0	
	4.800	0.0	
	4.900	0.0	
	5.000	0.0	
	5.100	0.0	
	5.200	0.0	
	5.300	0.0	
	5.400	0.0	
	5.500	0.0	
	5.600	0.0	
	5.700	0.0	
	5.800	0.0	
	5.900	0.0	
	6.000	0.0	
	6.100	0.0	

Outfall

Buntingford West: Catchment C Surface Water Calculations Pump Failure	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Junctions Storm Phase: Phase	Company Address:		



Junction	Outlet Name	Outgoing Connection	Outlet Type
	6.200	0.0	
	6.300	0.0	
	6.400	0.0	
	6.500	0.0	
	6.600	0.0	
	6.700	0.0	
	6.800	0.0	
	6.900	0.0	
	7.000	0.0	
	7.100	0.0	
	7.200	0.0	
	7.300	0.0	
	7.400	0.0	
	7.500	0.0	
	7.600	0.0	
	7.700	0.0	
	7.800	0.0	
	7.900	0.0	
	8.000	0.0	
	8.100	0.0	
	8.200	0.0	
	8.300	0.0	
	8.400	0.0	
	8.500	0.0	
	8.600	0.0	
	8.700	0.0	
	8.800	0.0	
	8.900	0.0	
	9.000	0.0	
	9.100	0.0	
	9.200	0.0	
	9.300	0.0	
	9.400	0.0	
	9.500	0.0	
	9.600	0.0	
	9.700	0.0	
	9.800	0.0	
	9.900	0.0	
	10.000	0.0	

Buntingford West: Catchment C Surface Water Calculations Pump Failure	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Stormwater Controls Storm Phase: Phase	Company Address:		



Pond

Type : Pond


Dimensions

Exceedance Level (m)	89.700
Depth (m)	1.300
Base Level (m)	88.400
Freeboard (mm)	300
Initial Depth (m)	0.000
Porosity (%)	100
Average Slope (1:X)	10.034
Total Volume (m³)	4657.540

Depth (m)	Area (m²)	Volume (m³)
0.000	3500.00	0.000
1.300	6770.00	6559.692

Advanced

Perimeter	Circular
Length (m)	145.382
Friction Scheme	Manning's n
n	0.02

Buntingford West: Catchment C Surface Water Calculations Pump Failure	Date: 30/04/2024			
Report Title: Rainfall Analysis Criteria	Designed by: CC		Checked by:	Approved By:
Company Address:				

Runoff Type	Dynamic
Output Interval (mins)	5
Time Step	Default
Urban Creep	Apply Global Value
Urban Creep Global Value (%)	8
Junction Flood Risk Margin (mm)	300
Perform No Discharge Analysis	<input checked="" type="checkbox"/>
Rainfall Depth (mm)	1.0
Run Time (mins)	10080

Rainfall

FEH	Type: FEH	
Site Location	GB 535761 228934 TL 35761 28934	
Rainfall Version	2022	
Data Type	Point	
Summer	<input checked="" type="checkbox"/>	
Winter	<input checked="" type="checkbox"/>	

Return Period

Return Period (years)	Increase Rainfall (%)
100.0	40.000

Storm Durations

Duration (mins)	Run Time (mins)
15	30
30	60
60	120
120	240
180	360
240	480
360	720
480	960
600	1200
720	1440
960	1920
1440	2880
2160	4320
2880	5760
4320	8640
5760	11520
7200	14400
8640	17280
10080	20160

Buntingford West: Catchment C Surface Water Calculations Pump Failure	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Inflows Summary Storm Phase: Phase	Company Address:		



FEH: 100 years: Increase Rainfall (%): +40: 1440 mins: Summer

Inflow	Inflow Area (ha)	Max. Inflow (L/s)	Total Inflow Volume (m ³)
Catchment Area C	1.75	97.9	2156.930

Buntingford West: Catchment C Surface Water Calculations Pump Failure	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Inflows Summary Storm Phase: Phase	Company Address:		



FEH: 100 years: Increase Rainfall (%): +40: 10080 mins: Summer

Inflow	Inflow Area (ha)	Max. Inflow (L/s)	Total Inflow Volume (m ³)
Catchment Area C	1.75	21.6	3327.320

Buntingford West: Catchment C Surface Water Calculations Pump Failure	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Junctions Summary Storm Phase: Phase	Company Address:		



FEH: 100 years: Increase Rainfall (%): +40: 1440 mins: Summer

Junction	Cover Level (m)	Invert Level (m)	Max. Level (m)	Max. Depth (m)	Max. Inflow (L/s)	Max. Resident Volume (m³)	Max. Flooded Volume (m³)	Max. Outflow (L/s)	Total Discharge Volume (m³)	Status
Outfall	89.70 0	88.40 0	88.928	0.528	0.2	0.597	0.000	0.0	0.318	OK

Buntingford West: Catchment C Surface Water Calculations Pump Failure	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Junctions Summary Storm Phase: Phase	Company Address:		



FEH: 100 years: Increase Rainfall (%): +40: 10080 mins: Summer

Junction	Cover Level (m)	Invert Level (m)	Max. Level (m)	Max. Depth (m)	Max. Inflow (L/s)	Max. Resident Volume (m³)	Max. Flooded Volume (m³)	Max. Outflow (L/s)	Total Discharge Volume (m³)	Status
Outfall	89.70 0	88.40 0	89.162	0.762	0.0	0.862	0.000	0.0	2.910	OK

Buntingford West: Catchment C Surface Water Calculations Pump Failure	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Stormwater Controls Summary Storm Phase: Phase	Company Address:		



FEH: 100 years: Increase Rainfall (%): +40: 1440 mins: Summer

Stormwater Control	Max. US Level (m)	Max. DS Level (m)	Max. US Depth (m)	Max. DS Depth (m)	Max. Inflow (L/s)	Max. Residual Volume (m³)	Max. Flooded Volume (m³)	Total Lost Volume (m³)	Max. Outflow (L/s)	Total Discharge Volume (m³)	Percentage Available (%)	Status
Pond	88.927	88.927	0.527	0.527	97.9	2153.276	0.000	0.000	0.2	3.948	53.768	OK

Buntingford West: Catchment C Surface Water Calculations Pump Failure	Date: 30/04/2024		
	Designed by: CC	Checked by:	Approved By:
Report Details: Type: Stormwater Controls Summary Storm Phase: Phase	Company Address:		



FEH: 100 years: Increase Rainfall (%): +40: 10080 mins: Summer

Stormwater Control	Max. US Level (m)	Max. DS Level (m)	Max. US Depth (m)	Max. DS Depth (m)	Max. Inflow (L/s)	Max. Residual Volume (m³)	Max. Flooded Volume (m³)	Total Lost Volume (m³)	Max. Outflow (L/s)	Total Discharge Volume (m³)	Percentage Available (%)	Status
Pond	89.162	89.162	0.762	0.762	21.6	3323.131	0.000	0.000	0.0	7.130	28.651	OK



WSP House
70 Chancery Lane
London
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Appendix 3 Appeal Notification

Hannah Weston
East Herts Council
Wallfields,
Pegs Lane,
Hertford,
SG13 8EQ

By email to: Hannah.Weston@eastherts.gov.uk

Dear Ms Weston,

Re: TOWN AND COUNTRY PLANNING ACT 1990. APPEAL UNDER SECTION 78

Notification of intention to submit an appeal

Under the provisions of Recommendation 3 of the Rosewell Review into inquiry appeals, this notification is to give the Local Planning Authority and Planning Inspectorate not less than 10 working days' notice of an intention to submit a planning appeal where the appellant will request the inquiry procedure.

The appeal will be against East Herts Council (the Council) for the failure of the Council to determine planning application 3/23/1447/OUT.

Appellant(s) name: Countryside Partnerships Ltd and Wattsdown Developments Ltd

Site address: Land East Of The A10, Buntingford, Hertfordshire

Description of development: Outline planning application (with all matters reserved except for access) for up to 350 dwellings, up to 4,400 sqm of commercial and services floorspace (Use Class E and B8), and up to 500 sqm of retail floorspace (Use Classes E) and other associated works including drainage, access into the site from the A10 and Luynes Rise (but not access within the site), allotments, public open space and landscaping

Planning application number: 3/23/1447/OUT

Likely submission date of appeal: 29 February 2024

Proposed duration of inquiry: 8 days

Yours sincerely



Hannah Albans MRTPI
Director

CC The Planning Inspectorate

18 Regent Place, Rugby, Warwickshire, CV21 2PN

† 01788 562 233 • e rugby@dipconsultants.co.uk • www.dipconsultants.co.uk

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Appendix 4 East Herts Council Report – Review of the East Herts District Plan 2018 and Appendices

East Herts Council Report

Meeting of the Executive

Date of meeting: Tuesday 3 October 2023

Report by: Councillor Vicky Glover-Ward – Executive Member for Planning and Growth

Report title: Review of the East Herts District Plan 2018

Ward(s) affected: All Wards

Summary – The East Herts District Plan was adopted in October 2018. There is a statutory requirement to consider whether a review of the District Plan is required within five years from its adoption (i.e., by the end of October 2023). This report assesses this requirement and concludes that the District Plan needs updating.

RECOMMENDATIONS FOR EXECUTIVE that the following be recommended to Council for approval:

- a) Having assessed the East Herts District Plan 2018 in accordance with regulation 10A of The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017, it is agreed that, in order that the Council can continue to fulfil its statutory duties, the District Plan needs updating;**
- b) Work commences during 2023/24 on updating the technical studies needed to provide a robust evidence base to inform an update of the District Plan;**
- c) A 'Call for Sites' is undertaken during 2023/24;**

- d) The District Planning Executive Panel is re-convened with membership drawn from the Executive in accordance with paragraph 8.5.2 of the Constitution;**
- e) An engagement strategy is prepared which sets out the Council's approach to consulting and engaging the community and stakeholders;**
- f) A further report on the detailed scope of the update and the timetable for its preparation is prepared at the earliest opportunity once the implications of the new National Planning Policy Framework (NPPF) are better understood, the Levelling-up and Regeneration Bill has received Royal Assent, and the statutory framework required to implement the reforms has been approved.**

1.0 Proposal(s)

- 1.1 There is a statutory requirement that policies in Local Plans should be assessed to see whether they need updating at least once every five years. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area (local changes), or any relevant changes in national policy.
- 1.2 This report assesses whether the East Herts District Plan 2018 needs updating and any necessary actions arising from that assessment.

2.0 Background

- 2.1 The National Planning Policy Framework (NPPF)¹ sets out that the planning system should be genuinely plan-led. Up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social, and environmental priorities; and a platform for local people to shape their surroundings.
- 2.2 The current East Herts District Plan was adopted in October 2018 following a successful examination in public. This has meant that planning in East Herts has over the last five-years been 'plan led' with a clear framework for addressing the district's housing needs and other economic, social, and environmental priorities. Having a spatial strategy in place has meant that the Council has been able to manage growth, ensuring that it is delivered in a sustainable and balanced manner meeting objectively assessed needs for new homes, jobs and infrastructure, whilst making sure that the natural and built environment is protected and enhanced.
- 2.3 Since the adoption of the District Plan, 3,567 dwellings have been delivered; of these 997 were affordable homes (April 2019 – April 2023). The Council has also continued its trend of annual improvements on the Housing Delivery Test. Last year (2022) the Council was able to demonstrate a 130% delivery rate meaning that the Council is not only meeting its housing need but also addressing the undersupply of previous years.
- 2.4 Overall, the District Plan housing trajectory has been, and continues to be, delivered broadly in line with what was anticipated in 2018 and the communities of East Herts are

¹ [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/publishing.service.gov.uk)

benefitting from much needed housing and associated infrastructure. In 2022/23 alone nearly £3-million of S.106 money was allocated to individual projects or uses across the district.

2.5 The benefits of having an up-to-date and clear framework in place cannot be underestimated. Given that the District Plan is now nearly five years old, and to ensure that it continues to be effective for our communities, it is vital that, in line with national guidance, the Council considers whether an update of the Plan is required to take account of changing circumstances.

2.6 Updating the District Plan would ensure that:

- The district benefits from having an up-to-date development plan against which all planning decisions are made.
- The policies in the District Plan are updated to capture the best current practice available, the latest evidence base and also would also offer the opportunity to support key corporate objectives.
- Stakeholder engagement is at the heart of Plan-making and any update would involve and integrate feedback from key stakeholders across the district, alongside statutory public consultation involving our communities.
- An updated evidence base provides better decision-making and ensures planning is directly supporting the need of the community. Opportunities to update evidence will also assist other departments' responsibilities and work-streams where there is shared-evidence in particular Economic Development and Housing.
- The Council can defend its planning decisions robustly, reducing the likelihood of costly planning inquires and appeals.

- A fit for purpose spatial strategy in the District Plan will limit the amount of speculative planning applications received and ensure that any development is Plan-led. Plan-led growth allows infrastructure to be planned for proactively via direct liaison with infrastructure providers throughout the process and can reduce piecemeal development in unsustainable locations.
- The joint-administration has the opportunity to work collaboratively to establish joint goals and objectives that could then be reflected within the strategy of an updated Plan and policies.

3.0 Reason(s)

- 3.1 Paragraph 33 of the National Planning Policy Framework (NPPF)² states that: *“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.”*
- 3.2 The National Planning Practice Guidance (NPPG)³ provides further guidance: *“Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)*

² [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/publishing/service/gov/uk)

³ [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

local planning authorities must review local plans, and Statements of Community Involvement at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. Most plans are likely to require updating in whole or in part at least every 5 years. Reviews should be proportionate to the issues in hand..." (paragraph 62).

"The NPPF is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period. Policies age at different rates according to local circumstances and a plan does not become out-of-date automatically after 5 years. The review process is a method to ensure that a plan and the policies within remains effective. Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Due weight should be given to relevant policies in existing plans according to their consistency with the National Planning Policy Framework. It will be up to the decision-maker to decide the weight to give to the policies." (paragraph 64).

"A local planning authority can review specific policies on an individual basis. Updates to the plan or certain policies within it must follow the plan-making procedure; including preparation, publication, and examination by the Planning Inspectorate on behalf of the Secretary of State." (paragraph 69).

- 3.3 Furthermore the NPPG states that: *"If a local planning authority decides that they do not need to update their policies, they must publish the reasons for this decision within 5 years of the adoption date of the plan. A local planning authority will not necessarily need to revise their entire plan in whole and may publish a list of*

which policies they will update and which policies they consider do not need updating.” (paragraph 70).

- 3.4 Therefore the Council is required to assess whether the District Plan needs updating by the end of October 2023. It is important to be clear at this stage that the review of the District Plan is only to consider whether the plan needs updating because the circumstances in which the plan was prepared are no longer relevant or have changed. This includes consideration of national policy and the supporting evidence that justified its policies and allocations. Importantly, it does not decide what planning policy approaches any update to the District Plan should take. This will be for the Council’s future consideration if it is decided that an update is needed.
- 3.5 Whilst reviewing a plan would normally be a relatively straight forward process, this is not currently the case due to significant uncertainty around the Government’s proposed reforms to the planning system. These changes are summarised below.

Summary of proposed reforms to the planning system

Planning White Paper:

- 3.6 Published in August 2020, a series of proposals in the White Paper were set out that would seek to ‘radically’ reform the planning system; ensuring that it is ‘fit for purpose’. The focus was on a system that is streamlined and modernised (fit for the 21st Century), with a new focus on design and sustainability, but which also ensured that more land is made available for development.

3.7 The White Paper set out that the Duty to Cooperate, the requirement for a five-year land supply, the tests of soundness and sustainability appraisals would all be abolished. Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable of no more than 30 months in total for key stages of the process, and there will be sanctions for those who fail to do so.

Levelling Up White Paper:

3.8 Published in February 2022, the Levelling Up White Paper provides minimal detail on planning reform, but states that local plans will be made simpler and shorter, and that the Government is developing models for a new infrastructure levy which will enable local authorities to capture value from development more efficiently.

3.9 Wider changes to the planning system will secure enhanced social and economic outcomes by fostering beautiful places; improving democracy and engagement in planning decisions; supporting environmental protection, including support for the transition to Net Zero; and securing clear benefits for neighbourhoods and local people through a stronger say over where homes are built and what they look like.

Levelling-Up and Regeneration Bill:

3.10 Published in May 2022, this replaces the standalone Planning Bill, which was previously promised. The Bill seeks to improve the planning system by giving communities a louder voice and ensuring that developments are *'beautiful, green and accompanied by new infrastructure and affordable housing'* to support the regeneration of towns and cities where it is needed

most. The Bill will give effect to a number of measures first proposed in the Levelling Up White Paper.

Reforms to National Planning Policy Consultation:

- 3.11 Published in December 2022, this consultation sought views on the government's approach to updating the National Planning Policy Framework (NPPF)⁴.
- 3.12 As set out above, the February 2022 Levelling Up White Paper reiterated the government's commitment to making improvements to the planning system, by giving communities a stronger say over where homes are built and what they look like. The Levelling-up and Regeneration Bill (the Bill) which is currently before Parliament will put the foundations in place for delivering this by creating a plan-led system with a stronger voice for communities.
- 3.13 Whilst the Bill begins to put communities at the heart of the planning system, further changes are also needed to national policy and guidance. The Reforms to National Planning Policy consultation set out the government's proposed changes which will help deliver this wider change.
- 3.14 The changes are wide ranging and include, inter alia, specific proposals which make clear how housing figures should be derived and applied so that communities can respond to local circumstances.
- 3.15 Alongside specific changes, the consultation also seeks views on a wider range of proposals, particularly focused on making sure the planning system capitalises on opportunities to

⁴ The Council submitted a response to the consultation in February 2023. The Council's response can be found here: [Decision - Levelling-up and Regeneration Bill Reforms to National Planning Policy \(NKD23/04\) - East Herts District Council](#)

support the natural environment, responds to climate change, and delivers on levelling up of economic opportunity.

- 3.16 The consultation also set out the envisaged role for National Development Management Policies. These are intended to save plan-makers from having to repeat nationally important policies in their own plans so that, in theory, plans can be quicker to produce and focus on locally relevant policies.
- 3.17 Finally, the consultation set out proposed changes to the plan-making system. Subject to parliamentary approval, it is anticipated that these plan-making reforms will be implemented from late 2024.

Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms:

- 3.18 Published on the 25 July 2023, the consultation seeks views on the government's proposals to implement the parts of the Levelling-up and Regeneration Bill which relate to plan-making.
- 3.19 The consultation runs from the 25 July to 18 October 2023, and confirms, subject to Royal Assent of the Levelling-up and Regeneration Bill, certain key plan-making transitional milestone dates, which were consulted on in December 2022. The main proposals will:
- Make the role and content of plans clearer – plans will be simpler, shorter and more visual. The repetition of policies across plans will be eliminated and a new suite of national development management policies⁵ will cover common planning considerations.

⁵ A suite of NDMPs will be consulted on separately.

- Speed up the process for preparing a plan – plans will be prepared and adopted over 30 months.
- Ensure local communities are engaged – planning authorities will be required to undertake two periods of public consultation. There will also be a requirement to ‘notify’ and ‘invite’ early participation on matters that might shape the direction of the plan. There will be a strengthened role for a strategic vision, which will be developed collaboratively with communities and stakeholders.
- Make the most of digital technology.

3.20 It is anticipated that new-style plans will be prepared over a 30-month period, as set out in the below flow diagram:

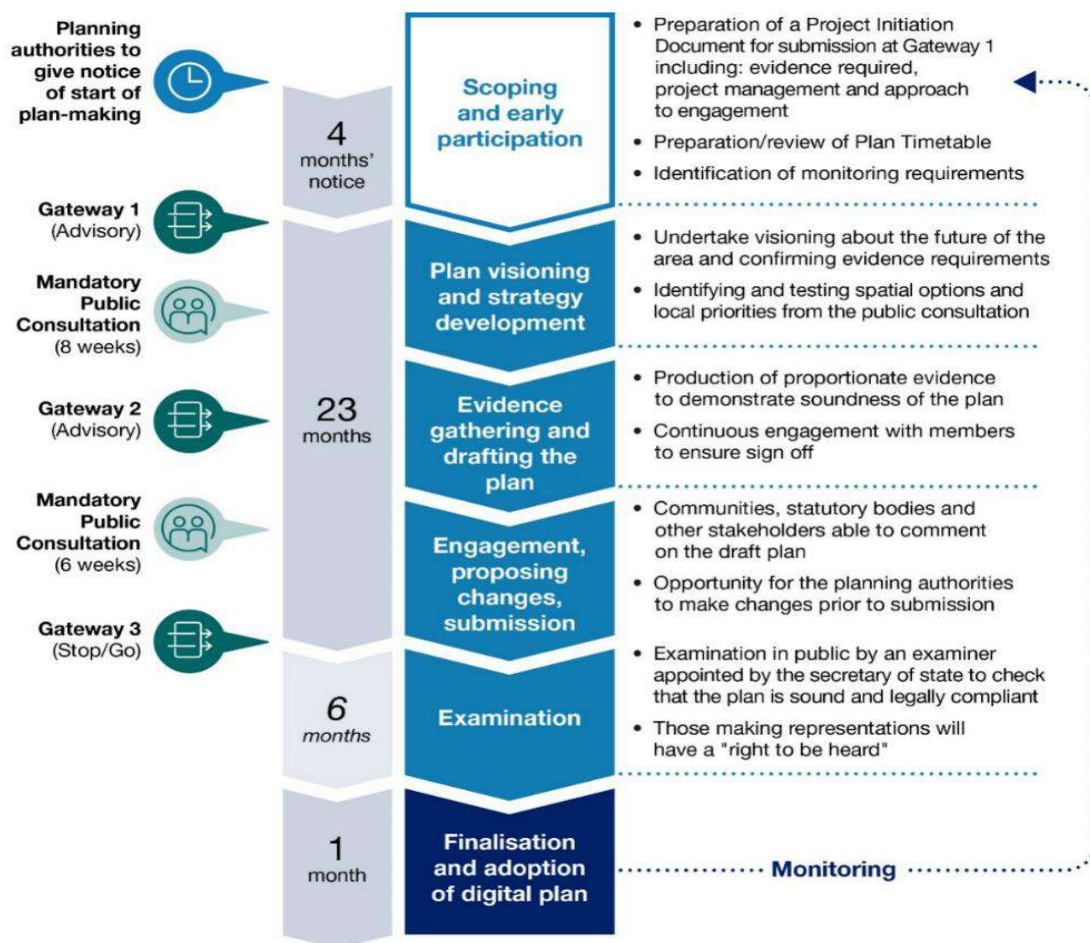


Figure 1 - Process to Make a Local Plan

3.21 The consultation also sets out proposed arrangements for moving from the current plans system to the new one. The government intends to have in place the required regulations, policy and guidance by Autumn 2024 to enable the preparation of the first new-style local plans.

Conclusion:

3.22 As set out above, the proposed reforms to the planning system are wide ranging. There is still a lot of detail that remains to be seen while political opposition and parliamentary timetables mean that we are still some way from any proposed changes becoming a formal part of the planning system, with no guarantee that they will all become law. There will then need to be a comprehensive suite of secondary legislation to implement the reforms, as well as changes to national policy and guidance. These changes are therefore likely to have a significant bearing on the process, scope, and approach of any update to the East Herts District Plan.

Review of the East Herts District Plan 2018

3.23 The review of the District Plan 2018 set out in this report and appendices is based on the current NPPF (2021) and NPPG. It can be updated as the planning reforms referred to above reach a stage where they can be given significant weight. Paragraph 65 of the NPPG indicates that, in reviewing a plan, an authority can consider information such as (but not exclusively):

- *conformity with national planning policy;*
- *changes to local circumstances; such as a change in Local Housing Need;*
- *their Housing Delivery Test performance;*

- *whether the authority can demonstrate a 5 year supply of deliverable sites for housing;*
- *whether issues have arisen that may impact on the deliverability of key site allocations;*
- *their appeals performance;*
- *success of policies against indicators in the Development Plan as set out in their Authority Monitoring Report;*
- *the impact of changes to higher tier plans;*
- *plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need;*
- *significant economic changes that may impact on viability.;*
and
- *whether any new social, environmental or economic priorities may have arisen.*

3.24 Paragraph 68 of the NPPG states that a local planning authority may need to gather new evidence to inform their review. Proportionate, relevant, and up-to-date evidence should be used to justify a decision not to update policies and to have due regard to the Duty to Cooperate.

3.25 The East Herts District Plan 2018 was based on evidence gathered mainly in the period from 2013 to 2017. Some elements relating to the physical environment may remain fit for purpose (e.g., landscape character appraisals), but other evidence such as on social and economic matters will need to be updated (see below).

3.26 Officers have undertaken a review of the District Plan 2018 using:

- Consultation with Duty to Co-operate bodies including Hertfordshire County Council, Essex County Council, neighbouring local planning authorities and statutory/public bodies;
- An assessment of the consistency of the policies in the District Plan 2018 with the current NPPF (2021) and NPPG;
- Information available regarding changes in local circumstances; and
- The Local Plan Route Mapper Toolkit produced by PAS in October 2021.

3.27 **Appendix 1** sets out a summary of responses received to date from the Duty to Co-operate bodies. The discussions have generally focussed on the importance of updating the Council's evidence base to take account of local changes and updates to national policy. Duty to Co-operate discussions will continue throughout the process of updating the District Plan.

3.28 **Appendix 2** provides a comprehensive assessment of the policies in the District Plan 2018 against current national policy set out in the NPPF (2021) and the NPPG, along with changes in local circumstances. This indicates that, while the policies are broadly consistent with the NPPF, many will require some form of updating. It should be noted that this assessment reflects a point in time and the process will need to be repeated once the content of the new NPPF and proposed National Development Management Policies become clearer, as this may remove the need to include certain policies unless there are specific local matters that should be addressed. The update of the District Plan will also need to take account of changes to relevant legislation, such as the Environment Act 2021 and the Building

Regulations. Updated evidence may also result in further changes being required.

3.29 It should be noted that Appendix 2 does not identify where the supporting text to each policy will need updating and, due to the time elapsed since drafting of the District Plan 2018, it is likely that the majority of supporting text will need re-drafting.

3.30 Likewise, Appendix 2 does not include the following:

- Any new policy areas that may need to be included or developed in an update of the District Plan.
- Policies that should be updated to incorporate the latest evidence, best practice, updated strategies, and new requirements of statutory consultees.
- Policies that will be reviewed or added due to the priorities identified by the Council or corporate objectives.

3.31 **Appendix 3** is the completed PAS Local Plan Route Mapper Toolkit, which draws on the information in Appendix 1 and Appendix 2. It indicates that an update to the District Plan 2018 is required for a number of reasons, including the following:

- The significant change in local housing need arising from the standard method (see Appendix 4 for more information).
- The potential requirement to identify new sites for development to ensure that the Council can demonstrate a five year housing land supply.
- The ongoing requirement to address affordable housing targets which have increased since the District Plan was adopted in 2018.
- The need to maximise opportunities for jobs growth and to take account of changing economic circumstances.

- Changes in the environmental context including the Council's declaration of climate emergency and the requirement for biodiversity net gain.
- A number of the development management policies will also need clarification and updating to reflect changes in national policy/local changes, including the requirement to draw up design codes and guidance.

3.32 Having assessed in detail the policies in the District Plan 2018 it is concluded that an update is required. In terms of the scope of that update, the PAS toolkit suggests that if any of the following statements apply a full, rather than partial, update will be needed:

1. The policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.
2. The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and a policies update is likely to involve a change to this.
3. The policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.

3.33 It is difficult to answer these questions until the implications of the planning reforms outlined above become clearer. Potential changes to strategic housing requirements are clearly a key factor in considering the scope of the District Plan review. The NPPF (paragraph 61) requires that the local housing need figure calculated using the standard method should be the starting point for considering housing requirements (unless an alternative approach is justified in exceptional circumstances).

3.34 **Appendix 4** explains the background to the current District Plan 2018 housing requirement of 839 dwellings/year, and the updated housing need figure of 1,112 dwellings/year which would arise from the standard method. Paragraph 62 of the NPPG states that local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method.

3.35 The District Plan 2018 was adopted prior to the standard method being implemented, and the local housing need requirement is significantly lower than the standard method requirement. This supports the conclusion that the plan needs updating and that this is likely to be a full update. However, the implications of this will require careful consideration in the context of the emerging planning reforms and a detailed assessment of constraints and capacity, in due course.

Evidence Base

3.36 As details of the new plan-making system continue to emerge, it is recommended that the Council proactively commences work on updating the District Plan evidence base so that the Council is in a strong position to commence formal stages at the earliest opportunity from Autumn 2024 (when the new plan-making is anticipated to commence).

3.37 Updating the existing evidence base, will also provide the Council with an opportunity to address issues that have risen to greater prominence since the District Plan 2018 was prepared. These include:

Climate Change – The importance of tackling climate change has risen in the national agenda since the adoption of the District Plan in 2018. In 2019 the Government amended the Climate Change Act to commit the UK to net zero greenhouse gas emissions by 2050. Subsequently, changes to the building regulations came into force in June 2022, which require new homes to reduce carbon emissions by 30% and non-domestic buildings to reduce emissions by 27%.

The Council has recently made a declaration of climate emergency (Council, 26th July 2023⁶) and it has become clear that action to mitigate against climate change and adapt to its impacts must be embedded and integrated into all aspects of policy preparation, including through a review of the District Plan.

Design - Revised national policies state that local authorities must draw up design codes and guidance as part of their local plans or as a standalone policy document. Paragraph 129 of the NPPF states that, to "carry weight in decision-making", design guides and codes "should be produced either as part of a [development] plan or as supplementary planning documents".

Improvements to the Environment - The update to the NPPF in 2021 emphasised the importance of trees for enhancing the quality and character of the urban area and addressing climate change. Paragraph 131 states that planning policies and decisions should ensure that streets are tree lined and that opportunities are taken to ensure trees are incorporated elsewhere in developments.

⁶<http://democracy.eastherts.gov.uk/documents/s63110/Declaration%20of%20a%20Climate%20Emergency%20and%20the%20councils%20response.pdf?J=4>

Biodiversity - The Environment Act in 2021 introduced a mandatory requirement for biodiversity net gain and local nature recovery strategies. Development proposals will need to deliver a minimum 10% net gain using a biodiversity metric and approval of a biodiversity net gain plan. This will start to come into force for some planning applications from November 2023.

Affordable Housing - The current District Plan sets out the affordable housing need over the period 2011-2033, of 217 dwellings per annum. Work commissioned in 2021 and completed in 2022 concluded that the annual need for affordable housing in East Herts had risen since the District Plan was adopted. The work concluded that there was a total need of 3,784 affordable dwellings over the period 2021-2033, or 315 per annum. It should be noted that this increase in growth is largely due to the shorter period to address the backlog of need alongside the introduction of those aspiring to own being considered as potentially being in affordable housing need.

Use Classes - The current District Plan uses outdated Use Classes, which were subsequently updated on 1 September 2020. Inter alia, the changes provide for three new use classes - Class E, Class F.1 and F.2.

These amendments allow far greater flexibility to change uses within town centres without the need to obtain planning permission. The new approach aims to promote the vitality and viability of town centres by allowing more diversification in a way that can respond to rapid changes in the retail and leisure sectors. This does mean however that local planning

authorities will need to re-think their policy/strategies for town centres with less emphasis on retail as a key attraction.

- 3.38 An audit of existing evidence is currently being undertaken to identify gaps and to consider where these can be filled using in-house capacity and skills, and where external consultants will need to be commissioned.
- 3.39 The proposed planning reforms suggest a more streamlined plan-making process with less stringent tests of soundness, which may reduce the scope and cost of the necessary evidence base. Consideration will also be given to opportunities to commission work jointly with other neighbouring authorities.

Call for Sites

- 3.40 Councils must be able to demonstrate that they have an adequate supply of housing to meet their needs in both the short term (i.e., being able to identify a rolling 5-year supply) and in the longer term, with a strategy to meet needs across the whole of the plan period. Whilst the Council's local housing need figure going forward has not yet been determined, it is anticipated that there could be a requirement to accommodate some additional growth. It is therefore recommended that a 'Call for Sites' is undertaken so that the Council can demonstrate that it is able to meet its identified needs.
- 3.41 A 'Call for Sites' is an opportunity for landowners, developers, agents and site promoters to submit sites which may be considered to have the potential for future development. The call for sites exercise will not determine the strategy or whether

a site *should* be allocated for development. However, it is important that a 'Call for Sites' takes place as it will help identify a potential pool of sites for further consideration through a range of technical work to assess their sustainability, suitability and deliverability.

- 3.42 A 'Call for Sites' does not relate solely to housing development, but could, for example, include other proposals for Gypsies and Travellers, employment, open space, and land for biodiversity offsetting.

District Planning Executive Panel

- 3.43 As work commences on a review of the District Plan it is recommended that the District Planning Executive Panel is reconvened.
- 3.44 The constitution sets out at paragraph 8.5.2 that *'The District Planning Executive Panel (herein referred to as 'the Panel' in this section) will be appointed annually by the Executive and membership will be drawn from the Executive only.'*
- 3.45 The remit of the Panel is to make recommendations to Council, via the Executive, on issues associated with the East Herts District Plan. The Panel was previously made up of the Leader and two other Executive Members. However, all Councillors were invited to attend and participate, and the related discussions enabled all members to gain a far greater understanding of the processes and challenges faced in developing a robust strategy and policies.

Conclusion

- 3.46 The review of the policies in the current District Plan using the combined mechanisms of the PAS Toolkit, assessment of consistency with the NPPF, and engagement with Duty to Cooperate bodies, concludes that the Plan requires updating.
- 3.47 Furthermore, it is likely that this will need to be a full, rather than partial, review of the Plan. This is largely because of the need to consider potential changes to housing requirements and the implications for other aspects of the Plan, along with the need to ensure that all policies are consistent with the latest NPPF and legislation. It will also allow the Council to give greater emphasis to climate change mitigation and adaptation and to design quality.
- 3.48 It is recommended that decisions on the final scope of the update and its associated timetable should be made when the implications of the proposed changes to the NPPF are better understood, the Levelling-up and Regeneration Bill has received Royal Assent, and the statutory framework required to implement the reforms has been approved.
- 3.49 However, while the scope of the District Plan update has yet to be determined, what is clear at this stage is that under the new system a strong evidence base will still be expected to inform and support local plans, and that evidence will remain an important part of plan-making and monitoring, allowing planning authorities to develop robust and effective plans and allowing communities and other stakeholders to understand the decisions that have been made.
- 3.50 It is therefore considered that the focus in 2023/24 should be on starting to update the evidence base and other preparatory

work needed to support an update to the District Plan, including a Call for Sites. This will enable work on updating the District Plan to progress quickly when the new plan-making system formally commences from Autumn 2024. Given the Government is currently proposing a 30 month plan-making timetable, it is particularly important that preparatory work is started soon, to help the Council meet these ambitious timescales.

4.0 Options

- 4.1 The Council is legally required to assess whether a review of its District Plan is required no later than five years from the date of adoption under the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017.

5.0 Risks

- 5.1 There are a number of risks associated with not undertaking an update of the District Plan.
- 5.2 Without an up-to-date District Plan it will be difficult for the Council to challenge planning applications from developers and proposals may result in unsustainable, unplanned, piecemeal development across the district without the required supporting infrastructure such as roads, schools, healthcare facilities etc.
- 5.3 The costs of fighting appeals resulting from refused applications in unsuitable speculative locations should not be underestimated, both in monetary and staff resource terms, as

previous experience in the district prior to adoption of the District Plan has shown. Such costs are also not currently budgeted for but would need to be met by the Council.

- 5.4 To continue to demonstrate a five-year land supply, the Council must ensure that its housing needs are being met. Key to meeting its needs is understanding the current supply of housing and whether the supply will meet those future needs. Failure to demonstrate a five-year land supply could result in the Council losing control of certain decisions and increases the likelihood of speculative planning applications and subsequent appeals and the associated costly hearings and inquiries, as outlined above. The likely success rate at such appeals could also be negatively impacted by a lack of five-year supply or ability to demonstrate a sufficient supply of future housing sites.

6.0 Implications/Consultations

- 6.1 An engagement strategy will be prepared for the review of the District Plan⁷. As well as traditional consultation and engagement methods this will also consider opportunities for greater use of digital technologies as advocated in the proposed planning reforms and will also seek to reach all communities.

Community Safety

No

⁷ The Levelling-up and Regeneration Bill removes the requirement to prepare a Statement of Community Involvement (SCI). Instead, the Council's approach to engagement and consultation should set out in the Project Initiation Document.

Data Protection

No

Equalities

There are no direct equality, diversity, or inclusion implications in this report. An Equalities Impact Assessment (EqIA) will be carried out of the District Plan update in accordance with The Equality Act 2010.

Environmental Sustainability

A review of the District Plan will allow the Council to put climate change mitigation and adaptation at the heart of the development plan to contribute to meeting the Council's environmental and sustainability objectives.

Financial

Reviewing the District Plan will require a fully staffed Planning Policy Team to enable the Council to comply with the Government's proposed reduced 30 month timetable towards adoption.

Other costs are associated with the technical work required in the production of a robust evidence base to underpin the plan, and other process costs, including stakeholder and community engagement, as well as the cost of the examination.

Costs will be controlled by undertaking as much of the technical and engagement work as possible in house and by ensuring that evidence prepared for the examination enables it to be carried out in the most efficient manner.

The Council holds a reserve to cover costs related to the District Plan. The existing reserve is around £460K (which includes £400K of New Homes Bonus which the Council agreed could be set aside to meet costs in November 2022). Other costs will be met from the existing budget arrangement of £100K per year.

Costs will be refined and where possible reduced, including by taking a proportionate approach to commissioning evidence while meeting Government requirements, and exploring opportunities for joint commissioning of technical work with other neighbouring authorities, as appropriate.

Health and Safety

No

Human Resources

No

Human Rights

No

Legal

Policies in local plans should be reviewed to assess whether they need updating at least once every five years and should be updated as necessary⁸. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area (local changes), or any relevant changes in national policy.

Specific Wards

All

7.0 Background papers, appendices and other relevant material

7.1 Appendix 1 – Summary of responses from Duty to Cooperate bodies.

⁸ Reviews at least every five years are a legal requirement for all local plans – see Regulation 10A of [The Town and Country Planning \(Local Planning\) \(England\) \(Amendment\) Regulations 2017 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2017/1000/regs/10a)

- 7.2 Appendix 2 – Compliance of District Plan 2018 policies with the NPPF (2021) and NPPG.
- 7.3 Appendix 3 – Completed PAS Local Plan Route Mapper Toolkit.
- 7.4 Appendix 4 – Changes to local housing need.

Contact Member

Executive Member for Planning and Growth -

Cllr Vicky Glover-Ward

vicky.glover-ward@eastherts.gov.uk

Contact Officer

Head of Planning and Building Control – Sara Saunders

Contact Tel. No. 01992 531656

sara.saunders@eastherts.gov.uk

Report Authors

Claire Sime – Service Manager (Planning Policy, Design and Conservation)

claire.sime@eastherts.gov.uk

George Pavey – Team Leader (Planning Policy)

george.pavey@eastherts.gov.uk

Appendix 1 - Summary of responses from the Duty to Co-operate Bodies

Statutory/Public Bodies:

Environment Agency (EA):

The discussion focussed on water resources. It was recognised that East Herts is in an area of water stress. The EA are working with the water companies on updated evidence to inform their position on the efficient use of water resources. They should be able to share further information in the next six-months. The EA welcomes the current District Plan requirement to meet a target of 110 litres or less per head per day.

An updated Water Cycle Study will be required. East Herts should liaise with Hertfordshire County Council on this.

The Council's existing policies on water quality and the water environment are generally fit for purpose. The EA require an undeveloped strip at least 8m wide alongside all main rivers.

The importance of Hertfordshire's chalk rivers were discussed. The Council has requested a further meeting with the EA's Chalk Catchment Co-Ordinator.

New development should be located in areas with the lowest probability of flooding – the sequential test should be used. An updated Strategic Flood Risk Assessment (SFRA) will be required.

Other areas to consider are Source Protection Zones, Waste and Contaminated Land.

Historic England:

Historic England welcomes the proactive approach that the Council is taking.

The discussion focused on ensuring that the historic environment plays a positive role in allocating sites for development. Heritage considerations need to be fully integrated in any site selection methodology. Historic England can offer advice on evidence gathering; site selection; and site allocation policies.

Historic England has been raising awareness of the impact of climate change on heritage and the historic environment. An advice note on climate change is currently being prepared.

Design codes were discussed, including the role of the historic environment and historic expertise within design coding.

Historic England will review the policies in the current District Plan and will provide comments.

Natural England:

Meeting due to take place on 26 September 2023.

Local Enterprise Partnership:

The focus of the LEP over the last two years has been on business growth and opportunities. Hertfordshire overall has seen a net loss of employment land over the last five years. There was a recognition that the nature of employment is changing with an increase in the number of people working from home, although post-covid work patterns are still evolving.

Bishop's Stortford continues to offer an excellent location for commercial activity due to its transport links and location in relation to Stansted Airport.

The proposed Hertfordshire Essex Rapid Transit (HERT) proposals for a new sustainable transport network could offer significant economic opportunities which should be considered the Council.

Entrepreneurial businesses related to the environmental sector should be supported.

The Council's economic evidence will need updating and the LEP would welcome ongoing involvement in this work.

NHS – Hertfordshire and West Essex Integrated Care Board:

Meeting date to be confirmed.

Sport England:

The discussion focused on updating the evidence base for community sport and the increasing policy focus on creating 'active environments' through development. Sport England would like to see 'active design' embedded into strategic policies.

Energy Undertakers:

Meeting date to be confirmed.

Thames Water:

The discussion focussed on Thames Water's Drainage and Wastewater Management Plan, draft Water Resource Management Plan and their current business plan. Generally, the policies in the District Plan remain fit for purpose.

Water efficiency was discussed, and Thames Water considers that there are benefits to requiring the calculations to be based on the 'fittings approach'.

It was noted that Rye Meads Sewerage Treatment works was upgraded in 2020 and currently has capacity until 2036, with space for future upgrades.

Affinity Water:

Meeting date to be confirmed.

Hertfordshire County Council:

Growth and Infrastructure Unit:

The discussion focussed on HCC's 'Local & Joint Strategic Plans Engagement Document'. The document stresses the importance of sharing potential sites and growth scenario(s) with the county council at the earliest opportunity.

The main focus of the discussion was on education provision (including early years, mainstream schools and special schools) with specific attention drawn to the county council's new tiered approach to new development sites (1:400, 1:500, 1:1000). The planning ratio expresses the number of new dwellings in each category for which the county council would plan to be able to provide an additional form of entry. Depending on the growth strategy proposed there may be a requirement to identify reserve school sites.

The Growth and Infrastructure Unit will also coordinate responses from Adult Care Services, Community Protection, Library Services, Public Health, and Services for Young People.

Minerals and Waste:

Meeting date to be confirmed.

Highway Authority:

HCC's Local Transport Plan (LTP4 2018-2031) was adopted in 2018 and is currently being reviewed. The District Plan will need to need to take account of any update to the Local Transport Plan (LTP5), in particular how emerging technology might affect the way that transport needs to be provided in the longer term.

The proposed Hertfordshire Essex Rapid Transit (HERT) proposals for a new sustainable transport network should be considered.

Updated parking standards should be considered taking account of LTP5.

The provision of a Hertford bypass to address identified constraints on the A414 needs reviewing.

It will be important to take account of development in Uttlesford and any impacts on Bishop's Stortford and Sawbridgeworth

A new transport model (which will replace COMET) will be available in due course.

Landscape Ecology Archaeology Design (LEADs) Team:

Meeting date to be confirmed.

Lead Local Flood Authority:

Meeting date to be confirmed.

Essex County Council:

Highway Authority:

The discussion focussed on the A120 and A414 corridors. The timing of the second Stort crossing was raised. Updates were provided on key schemes, including the HGGT/Gilston Area sustainable transport corridor (due to be completed by March 2026), M11 Junction 7a (now open and fully operational), and M11 Junction 8 (under construction and due to be completed in Autumn 2023).

A multi-modal transport model is now available, which covers the district across to the A10.

Neighbouring Local Planning Authorities (Hertfordshire):

Broxbourne Borough Council:

Meeting date to be confirmed.

North Herts District Council:

Meeting date to be confirmed.

Stevenage Borough Council:

SBC confirmed that they will likely be undertaking a partial review of their local plan, with a full review to follow in 2025. Unlike East Herts the standard method does not result in a significant change in their housing need figure, and they are currently able to demonstrate a 5-year housing land supply.

Opportunities to work collaboratively on evidence base updates were discussed.

Welwyn Hatfield Borough Council:

Meeting date to be confirmed.

Neighbouring Local Planning Authorities (Essex):

Epping Forest District Council:

The Epping Forest Local Plan 2011-2033 was adopted on 6 March 2023. It is anticipated that a review will be undertaken by March 2025. The discussion focussed on implementation of the Epping Forest Local Plan, including masterplanning work. The Plan identifies a number of strategic sites which will continue to deliver after 2033.

The potential strategic implications of Biodiversity Net Gain (BNG) were discussed.

No other Duty to Co-operate matters were raised.

Harlow Council:

Meeting date to be confirmed.

Uttlesford District Council:

Meeting date to be confirmed.

Appendix 2 – compliance of District Plan 2018 policies with the NPPF (2021) and NPPG

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
1. Introduction				
INT1 Presumption in Favour of Sustainable Development	Model policy which supports the delivery of growth.	Accords with national guidance.	No	-
2. Vision and Strategic Objectives				
Vision and Strategic Objectives will need updating.				
3. Development Strategy				
DSP1 Housing, Employment and Retail Growth	Sets out the level of need for housing, employment and retail growth.	Will need updating to reflect the standard method, new use classes and up-to-date evidence.	Yes	National Policy Change
DPS2 The Development Strategy 2011-2033	<p>Sets out where development should be located within the district.</p> <p>Sets out what the 5-year housing land supply will comprise.</p>	<p>The approach is to deliver sustainable development in accordance with a hierarchy. This is broadly in accordance with national policy i.e., brownfield first.</p> <p>Policy will however need updating to reflect updated local housing need.</p> <p>Part I will need to be updated to include a new bullet point that covers development outlined in Policy GBR2.</p>	Yes	National Policy Change / Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
		Part I should say 'Limited development in the villages <i>in accordance with Policies VILL1, VILL2 and VILL3.</i> '		
DPS3 Housing Supply 2011-2033	Sets out minimum housing supply to meet projected need to 2033.	Will need updating to take account of delivery of strategic sites, and updated commitments, completions and windfall.	Yes	Local Change
DPS4 Infrastructure Requirements	Sets out infrastructure required to support development.	Will need updating to take account of delivery and the latest infrastructure requirements.	Yes	Local Change
DPS5 Neighbourhood Planning	Supports in principle development brought forward through Neighbourhood Planning.	Accords with national guidance and the Localism Act 2011.	No	-
4. Green Belt and Rural Area Beyond the Green Belt				
GBR1 Green Belt	(I) Sets out that planning applications in the Green Belt will be considered in line provisions of the NPPF. (II) References villages where changes to Green Belt boundaries may be required to accommodate growth identified in Neighbourhood Plans.	(I) Accords with national guidance. (II) Paragraph 140 of the NPPF now allows Neighbourhood Plans to change to Green Belt boundaries where the need has been established through strategic policies.	Yes	National Policy Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
GBR2 Rural Area Beyond the Green Belt	Sets out the types of development that will be permitted in the Rural Area Beyond the Green Belt.	The policy generally accords with national policy and has been mostly effective but would benefit from an update in order to provide clarity to decision-makers on other forms of development such as residential outbuildings and change of use.	Yes	Local Change
5. Bishop's Stortford				
BISH1 Development in Bishop's Stortford	Sets out the housing, employment and retail growth that Bishop's Stortford will accommodate over the plan-period.	Will need updating to take account of delivery of strategic sites, and updated commitments, completions and windfall. Policy may also require updating to reflect updated local housing need and floorspace requirements.	Yes	National Policy Change / Local Change
BISH2 Bishop's Stortford Town Centre Planning Framework	Sets out that proposals in Bishop's Stortford should take account of the Town Centre Planning Framework.	Whilst the Town Centre Framework was agreed in 2016 and may need reviewing, the policy remains fit for purpose.	No	-
BISH3 Bishop's Stortford North	Strategic site allocation policy.	The site benefits from planning permission and development has commenced. The policy should be retained until the site has been completed. The policy will need to be updated to reflect latest position on the site.	Yes	Local Change
BISH4 Land South of Hadham Road	Strategic site allocation policy.	The site benefits from planning permission and development has commenced. The policy should be retained until the site has been	Yes	Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
		completed. The policy will need to be updated to reflect latest position on the site.		
BISH5 Bishop's Stortford South	Strategic site allocation policy.	The site benefits from planning permission and development has commenced. The policy should be retained until the site has been completed. The policy will need to be updated to reflect latest position on the site.	Yes	Local Change
BISH6 Bishop's Stortford High School Site, London Road	Strategic site allocation policy.	The site has a resolution to grant permission subject to the signing of a Section 106 Agreement. The policy should be retained until the site has been completed. The policy will need to be updated to reflect latest position on the site.	Yes	Local Change
BISH7 The Goods Yard	Strategic site allocation policy.	The site benefits from planning permission and development has commenced. The policy should be retained until the site has been completed. The policy will need to be updated to reflect latest position on the site.	Yes	Local Change
BISH8 Old River Lane	Strategic site allocation policy.	The site does not currently have planning permission. An outline planning application has been submitted for up to 225 dwellings. The policy should be retained until the site has been completed.	No	-
BISH9 East of Manor Links	Strategic Site allocation policy.	The site benefits from planning permission and development is almost completed. The policy should be retained until the site has been completed. The policy will need to be updated to reflect latest position on the site.	Yes	Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
BISH10 The Mill Site	Strategic site allocation policy.	The site does not currently have planning permission. The policy should be retained until the site has been completed.	No	-
BISH11 Employment in Bishop's Stortford	Identifies existing designated Employment Areas, and new proposed Employment Areas and other opportunities.	Policy generally reflects local position but will require updating to reflect the status of the new employment areas at BISH3 and BISH5. Likewise, the policy may need to be updated to reflect the latest position at BISH7, BISH8 and BISH10 along with any relevant employment opportunities coming forward on these sites.	Yes	Local Change
BISH12 Retail, Leisure and Recreation in Bishop's Stortford	Identifies retail, leisure and recreation requirements.	Reference to Rhodes Centre in (II) needs updating to South Mill Arts Centre.	Yes	Local Change
6. Buntingford				
BUNT1 Development in Buntingford	Sets out the housing growth that Buntingford will accommodate over the plan-period.	Will need updating to take account of delivery of strategic sites, and updated commitments, completions and windfall. Policy may also require updating to reflect updated local housing need and floorspace requirements.	Yes	National Policy Change / Local Change
BUNT2 First School Site Allocation	Allocates a site for a 2-form of entry First School.	Development complete.	Delete	Local Change
BUNT3 Employment in Buntingford	Identifies existing designated Employment Areas, and new proposed Employment Areas.	Policy reflects local position.	No	-

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
7. Hertford				
HERT1 Development in Hertford	Sets out the housing, employment and retail growth that Hertford will accommodate over the plan-period.	Will need updating to take account of delivery of strategic sites, and updated commitments, completions and windfall. Policy may also require updating to reflect updated local housing need and floorspace requirements.	Yes	National Policy Change / Local Change
HERT2 Mead Lane Area	Strategic site allocation policy.	The site benefits from planning permission and development has commenced. The policy should be retained until the site has been completed. The policy will need to be updated to reflect latest position on the site.	Yes	Local Change
HERT3 West of Hertford	Strategic site allocation policy.	The Thieves Lane element of the allocation is nearing completion and so part III of the policy can be deleted. The Archers Spring element of the allocation does not have full planning permission and so this part of the policy should be retained.	Yes	Local Change
HERT4 North of Hertford	Strategic site allocation policy.	The former nursery element of the allocation has been completed and so references to that part of the site can be deleted. An application has recently been submitted on the remainder of the site for 118 dwellings (Land West of Wadesmill Road, Bengo). The policy will need to be updated to reflect latest position on the site.	Yes	Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
HERT5 South of Hertford	Strategic site allocation policy	The site benefits from planning permission and development has commenced. The policy should be retained until the site has been completed. The policy will need to be updated to reflect latest position on the site.	Yes	Local Change
HERT6 Employment in Hertford	Identifies existing designated Employment Areas.	Policy reflects local position.	No	-
HERT7 Hertford Town Centre Urban Design Strategy	Sets out that proposals in Hertford should take account of the Town Centre Urban Design Strategy.	The policy remains fit for purpose.	No	-
8. Sawbridgeworth				
SAWB1 Development in Sawbridgeworth	Sets out the housing, employment and retail growth that Sawbridgeworth will accommodate over the plan-period.	Will need updating to take account of delivery of strategic sites, and updated commitments, completions and windfall. Policy may also require updating to reflect updated local housing need and floorspace requirements.	Yes	National Policy Change / Local Change
SAWB2 Land to the North of West Road	Strategic site allocation policy.	The site benefits from planning permission and development has commenced. The policy should be retained until the site has been completed. The policy will need to be updated to reflect latest position on the site.	Yes	Local Change
SAWB3 Land to the South of West Road	Strategic site allocation policy.	The site benefits from planning permission and development has commenced. The policy should be retained until the site has been	Yes	Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
		completed. The policy will need to be updated to reflect latest position on the site.		
SAWB4 Land to the North of Sawbridgeworth	Strategic site allocation policy.	Part of this site has a resolution to grant permission subject to the signing of a Section 106 Agreement. The policy should be retained until the whole site has been completed. The policy will need to be updated to reflect latest position on the site.	Yes	Local Change
9. Ware				
WARE1 Development in Ware	Sets out the housing, employment and retail growth that Ware will accommodate over the plan-period.	Will need updating to take account of delivery of strategic sites, and updated commitments, completions and windfall. Policy may also require updating to reflect updated local housing need and floorspace requirements.	Yes	National Policy Change / Local Change
WARE2 Land North and East of Ware	Strategic site allocation policy.	The site does not currently have planning permission. A hybrid/outline planning application has been submitted for up to 1,800 dwellings. The policy should be retained until the site has been completed. Some minor amendments required to accord with the approved Masterplanning Framework.	Yes	Local Change
WARE3 Employment in Ware	Identifies existing designated Employment Areas, and a new proposed Employment Area to the North and East of Ware.	Policy reflects local position.	No	-

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
10. Villages				
VILL1 Group 1 Villages	Identifies Group 1 Villages and sets out a requirement to accommodate at least 500 new homes between 2017-2033. Encourages the preparation of Neighbourhood Plans to allocate land for development.	<p>Policy may need updating to take account of any changes to the services and facilities in each village, and the level of public transport available etc.</p> <p>The policy should be updated to reflect the quantum of homes delivered across the villages.</p> <p>Paragraph 140 of the NPPF now allows Neighbourhood Plans to change to Green Belt boundaries where the need has been established through to strategic policies.</p> <p>Part V. should be reviewed in discussion with those Parish Councils that have not met the 31st March 2021 deadline.</p> <p>Further clarity required on village development boundaries.</p>	Yes	National Policy Change / Local Change
VILL2 Group 2 Villages	Identifies Group 2 Villages and sets out that limited infill development will be permitted within the village development boundary.	<p>Policy may need updating to take account of any changes to the services and facilities in each village, and the level of public transport available etc.</p> <p>Further clarity required on village development boundaries.</p>	Yes	National Policy Change / Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
VILL3 Group 3 Villages	Sets out that only infill development identified in an adopted Neighbourhood Plan will be permitted.	<p>When Policy VILL3 was written, it took account of the wording in the 2012 NPPF (para. 89) which set out that an exception to inappropriate development in the Green Belt was: "limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan;"</p> <p>The NPPF 2021, no longer links limited infilling to local plan policies. Instead, it simply states that "limited infilling in villages" is considered an exception to inappropriate development in the Green Belt (paragraph 149 (e)).</p> <p>The policy therefore needs updating to reflect this latest position.</p>	Yes	National Policy Change
VILL4 Village Employment Areas	Identifies existing designated Employment Areas.	Policy reflects local position.	No	-
11. The Gilston Area				
GA1 The Gilston Area	Strategic site allocation policy.	The site has a resolution to grant permission subject to the signing of a Section 106 Agreement. The policy should be retained until the site has been completed. The policy may need to be updated to reflect latest position on the site.	Yes	Local Change
GA2 The River Stort Crossings	Seeks to facilitate the delivery of transport improvements to crossings over the River Stort.	Planning permission has been granted for the Central and Eastern Stort Crossings. Policy	No	-

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
		should be retained until the proposals have been delivered.		
12. East of Stevenage				
EOS1 Land East of Stevenage	Strategic site allocation policy.	The site benefits from planning permission and development has commenced. The policy should be retained until the site has been completed, including the Travelling Showpeople's site. The policy will need to be updated to reflect latest position on the site.	Yes	Local Change
13. East of Welwyn Garden City				
EWEL1 Land East of Welwyn Garden City	Strategic site allocation policy.	The site does not currently have planning permission. An outline planning application has been submitted for up to 2,650 dwellings. The policy should be retained until the site has been completed. The policy will need to be updated to reflect the latest position in Welwyn Hatfield.	Yes	Local Change
14. Housing				
HOU1 Type and Mix of Housing	Sets out the type and mix of housing required appropriate to local character, taking account of the latest evidence.	Policy generally signposts readers to other relevant policies but also provides a link to the Strategic Housing Market Assessment (SHMA) which sets out the appropriate type and mix of housing. Given the NPPF 2021 requirement to establish housing needs through the standard method, there is likely to be a need to update the SHMA to take into account the revised housing requirement. Likewise, the policy refers to a number of strategies, data sources	Yes	National Policy Change / Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
		and design considerations; these will need to be updated to reflect the most-relevant and up-to-date information.		
HOU2 Housing Density	Requires the efficient use of land, informed by the character of the local area.	<p>Paragraph 125 of the NPPF 2021 sets out that plans should set minimum density standards in town centres that are well served by public transport, and that minimum density standards should also be considered for other parts of the plan area. It also states that it might be appropriate to set a range of densities that reflect the different levels of accessibility and potential of different areas.</p> <p>The current policy does not set out a minimum density standard, nor does it refer to a range of densities in different locations and as such the policy will need to be updated to reflect this requirement</p>	Yes	National Policy Change
HOU3 Affordable Housing	Sets out when Affordable Housing required, the amount (%) and tenure.	<p>Policy needs updating to reflect paragraph 64 of the NPPF 2021 which sets out that 'affordable housing should not be sought for residential developments that are not major developments'.</p> <p>Policy will also need to reflect the latest affordable housing definition in the NPPF 2021, including consideration of First Homes.</p>	Yes	National Policy Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
		<p>Paragraph 65 of the NPPF 2021 requires planning policies to expect at least 10% of the total number of homes on major sites to be for affordable home ownership unless specific exceptions apply. Policy HOU3 does not refer to the requirements of paragraph 65 of the NPPF.</p> <p>Policy may need updating to reflect the latest evidence, including consideration of delivery since the start of the plan-period; the PPG requirement to consider aspirational need; and viability.</p>		
HOU4 Rural Exception Affordable Housing Sites	Sets out when rural exception housing schemes will be permitted.	The PPG sets out that local authorities are encouraged to produce policies that specify in further detail the proportions of market housing that would be considered acceptable, and under what circumstances in regard to Rural Exception policies. The PPG also sets out that plan-makers are encouraged to set policies that detail the circumstances in which alternative approaches to viability would be considered. The current policy does not define or detail either of these criteria and as such may require updating.	Yes	National Policy Change
HOU5 Dwellings for Rural Workers	Sets out when dwellings for rural workers will be permitted.	Policy generally accords with national guidance.	No	-

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
HOU6 Specialist Housing for Older and Vulnerable People	Encourages the provision of specialist housing for older and vulnerable people. Sets a target of at least 530 bed-spaces to meet these specialist needs.	<p>Additional guidance in the PPG was published on Housing for Older and Disabled People. This includes setting out categories of the different types of specialist housing for older people and also identifying the need to provide housing for older people as critical.</p> <p>Policy HOU6 should be updated to reflect the additional guidance and also to reflect the latest needs, and the delivery of specialist/older housing provision since the adoption of the plan.</p>	Yes	National Policy Change
HOU7 Accessible and Adaptable Homes	Ensures the delivery of accessible and adaptable homes to meet the changing needs of occupants.	<p>The PPG and NPPF allows plan-making authorities to set out the proportion of new housing that will be delivered to technical housing standards – Policy HOU7 currently does this.</p> <p>However, the proportion will need to be reassessed in light of any up-to-date evidence and viability considerations. As such the Policy will likely need to be updated.</p>	Yes	Local change
HOU8 Self-Build and Custom Build Housing	On sites of more than 200 homes, the policy requires at least 1% of dwellings for sale to self-builders.	Policy should be reviewed to increase effectiveness.	Yes	Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
HOU9 Gypsies and Travellers and Travelling Showpeople	Ensures the delivery of traveller pitches and plots to meet locally identified need and sets out criteria for assessing proposals on allocated or windfall sites	<p>Policy should be reviewed to:</p> <p>Update Part I in light of 2022 GTANA and implications for pitch/plot delivery on allocated sites;</p> <p>Update Part II to add link to locally identified need through GTANA in criteria;</p> <p>Update Part II (a) to make clearer that ‘a sustainable location’ applies not only to services but also to reflect that travel is an important consideration in this respect and should link to meeting the aims of Policy TRA1;</p> <p>Update Part II (g) to change ‘undue’ to ‘adverse’ for clarity and to avoid potential issues around interpretation.</p>	Yes	Local Change
HOU10 New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople	Seeks the delivery of traveller pitches and plots to meet locally identified need for travellers who have permanently ceased to travel and sets out criteria for windfall sites	<p>Policy should be reviewed to:</p> <p>Assess any potential implications of the Lisa Smith judgement in policy revision;</p> <p>Update preamble in light of 2022 GTANA and implications for pitch/plot delivery;</p> <p>Update to add link to locally identified need through GTANA in criteria;</p>	Yes	Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
		<p>Introduce mechanisms for meeting locally identified need through site allocations (which may, or may not, be linked to site allocations to be delivered through Policy HOU9); Update criterion (a) to make clearer that ‘a sustainable location’ applies not only to services but also to reflect that travel is an important consideration in this respect and should link to meeting the aims of Policy TRA1;</p> <p>Update criterion (g) to change ‘undue’ to ‘adverse’ for clarity and to avoid potential issues around interpretation.</p>		
HOU11 Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages	Sets out the criteria against which proposals for extensions and alterations to dwellings, residential outbuildings, and work within residential curtilages, will be considered.	Policy generally accords with national guidance.	No	-
HOU12 Change of Use of Land to Residential Garden and Enclosure of Amenity Land	Sets out when a change of use of land to residential garden will be permitted.	Policy generally accords with national guidance.	No	-
HOU13 Residential Annexes	Sets out when residential annexes will be permitted.	Policy generally accords with national guidance.	No	-

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
15. Economic Development				
ED1 Employment	<p>Refers to designated Employment Areas.</p> <p>Supports in principle the provision of new employment uses in suitable locations. Sets out that development which would cause the loss of an employment site will only be permitted where various criteria are met.</p>	The Use Classes Order was amended in September 2020 and use classes previously under Class B1 are now under Class E – Commercial, business and service.	Yes	National Policy Change
ED2 Rural Economy	Supports sustainable economic growth in the rural areas and seeks to prevent the loss of rural employment. Proposals for diversification will be supported in principle subject to criteria.	Paragraph 84 of the NPPF 2021 strengthens the support planning policies should offer the rural economy. In particular with reference to the expansion and growth of businesses. Policy will also need to be updated to reflect the addition of paragraph 85 of the NPPF.	Yes	National Policy Change
ED3 Communications Infrastructure	Supports the provision and expansion of communications networks where appropriate.	Paragraphs 114 and 115 of the NPPF 2021 have expanded and updated the support for ‘next generation mobile technology (such as 5G) and full fibre broadband connections’ and as such the policy should be updated to reflect this.	Yes	National Policy Change
ED4 Flexible Working Practices	Policy supports proposals for live/work units in sustainable locations.	Policy generally accords with national guidance.	Yes	Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
		Policy refers to the Vehicle Parking Provision at New Development SPD, which under the proposed new plan-making system will potentially cease to have effect.		
ED5 Tourism	Supports tourism facilities in appropriate locations.	Policy generally accords with national guidance.	No	-
ED6 Lifelong Learning	Supports in principle the provision of new educational establishments in line with policy CFLR10 (Education)	Policy generally accords with national guidance.	No	-
16. Retail and Town Centres				
RTC1 Retail Development	Supports town centre uses as defined by the NPPF within town centre boundaries. Requires proposals to be assessed in line with the sequential approach.	Policy generally accords with national guidance. Updated evidence might be required such as a Retail and Town Centres Study to determine whether the thresholds currently applied are still appropriate.	No	-
RTC2 Primary Shopping Area	Identifies Primary Shopping Areas for Bishop's Stortford, Hertford and Ware.	Policy generally accords with national guidance.	No	-
RTC3 Primary Shopping Frontages	Identifies Primary Shopping Frontages in Bishop's Stortford, Hertford and Ware.	The Use Classes Order was amended in September 2020. This abolished the A Class definition for uses of land and buildings across England. Classes A1, A2 and A3 joined business Class B1 along with health and assembly uses D1 and D2 in a newly created Class E – Commercial, Business and Service.	Yes	National Policy Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
RTC4 Secondary Shopping Frontages	Identifies Secondary Shopping Frontages in Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware.	Policy generally accords with national guidance and local issues.	No	-
RTC5 District Centres, Neighbourhood Centres, Local Parades and Individual Shops	Sets out that when proposals will be supported in District Centres, Neighbourhood Centres and Local Parades. Proposals that result in the loss of shops will be resisted.	Reference to A1 Use needs updating following the amendment to the Use Classes Order in September 2020.	Yes	National Policy Change
17. Design and Landscape				
DES1 Masterplanning	Requires all 'significant' development proposals to collaboratively prepare a masterplan.	Policy could be strengthened to reflect the lessons learnt from the masterplanning process.	Yes	Local Change
DES2 Landscape Character	Requires development proposals to demonstrate how they conserve, enhance or strengthen the character and distinctive features of the district's landscape.	Refers to the Landscape Character Assessment SPD, which under the proposed new plan-making system will potentially cease to have effect.	Yes	National Policy Change
DES3 Landscaping	Requires development proposals to demonstrate how they will retain, protect and enhance existing landscape features.	Policy generally accords with national guidance. The NPPF 2021 introduced a requirement for planning policies and decisions to encourage tree-lined streets and incorporate trees in new development.	Yes	National Policy Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
DES4 Design of Development	Requires all development proposals to be of high standard of design and layout to reflect and promote local distinctiveness.	<p>Policy needs to be updated to better incorporate sustainability measures and ensure that it captures all key principles for good urban design.</p> <p>Revised national policies state that local authorities must draw up design codes and guidance as part of their local plans or as a standalone policy document. Paragraph 129 of the NPPF 2021 states that, to "carry weight in decision-making", design guides and codes "should be produced either as part of a [development] plan or as supplementary planning documents".</p>	Yes	National Policy Change / Local Change
DES5 Crime and Security	Requires developments to be designed to reduce the opportunity for crime.	Accords with national guidance. The NPPF 2021 requires developments to be safe and accessible, so that crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.	No	-
DES6 Advertisements and Signs	To ensure that the display of advertisements and signs is appropriate.	Policy should cross reference Policy HA5 (Shopfronts in Conservation Areas) and Policy HA6 (Advertisements in Conservation Areas).	Yes	Local Change
18. Transport				
TRA1 Sustainable Transport	To achieve accessibility improvements and promotion of sustainable transport in the district.	To reflect national and local changes, the policy requires updating to maximise sustainable transport potential through development. In particular HCC is currently in the process of updating both policy and guidance in this	Yes	National Policy Change / Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
		respect. Policy should also be strengthened to reflect the active travel agenda.		
TRA2 Safe and Suitable Highway Access Arrangements and Mitigation	To ensure safe and suitable access can be achieved.	Policy generally accords with national guidance.	No	-
TRA3 Vehicle Parking Provision	To secure appropriate vehicle parking provision through development proposals.	Policy refers to the Vehicle Parking Provision at New Development SPD, which under the proposed new plan-making system will potentially cease to have effect. Parking standards will therefore need to be included within the District Plan.	Yes	National Policy Change / Local Change
19. Community Facilities, Leisure and Recreation				
CFLR1 Open Space, Sport and Recreation	Requires new development to incorporate open space, sport and recreation provision on-site or where appropriate through financial contributions for off-site provision.	Policy generally accords with national guidance.	No	-
CFLR2 Local Green Space	Sets out that development will only be permitted if it is consistent with the function, character and use of the Local Green Space to which it relates.	Could include designated Local Green Spaces identified in the District Plan i.e., the 'green fingers' in Hertford and Bishop's Stortford. Appropriate LGS policy is subject to the guidance of the Court of Appeal in R (Lochailort) v (Mendip DC), which states LGS policy should be consistent with the NPPF unless exceptional circumstances are given. Para 103 of the NPPF	Yes	National Change/ Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
		2021 requires development in LGS should be consistent with those for Green Belt.		
CFLR3 Public Rights of Way	Requires development proposals to take full account of the need to protect and enhance Public Rights of Way.	Policy generally accords with national guidance.	No	-
CFLR4 Water Based Recreation	Supports in principle water based recreation.	Policy generally accords with national guidance.	No	-
CFLR5 The Lee Valley Regional Park	Supports proposals for leisure related development within the Lee Valley Regional Park.	Supporting text may need updating.	No	-
CFLR6 Equine Development	Sets out that proposals for equine development will be permitted subject to criteria.	Clarity around equine needs assessments required to assist with effective decision-making.	Yes	Local Change
CFLR7 Community Facilities	Requires the provision of adequate and appropriately located community facilities in conjunction with new development.	Policy generally accords with national guidance.	No	-
CFLR8 Loss of Community Facilities	To protect existing community facilities.	Clarity required on how to demonstrate that a facility is no longer needed.	Yes	Local Change
CFLR9 Health and Wellbeing	Seeks to promote healthy communities and reduce health inequalities.	Policy generally accords with national guidance. May need to be updated to address local issues such as air quality.	Yes	Local Change
CFLR10 Education	To ensure that appropriate education facilities are	Policy generally accords with national guidance.	No	-

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
	provided in conjunction with new development.			
20. Natural Environment				
NE1 International, National and Locally Designated Nature Conservation Sites	To protect and enhance designated nature conservation sites.	The Environment Act 2021 introduced the requirement for mandatory biodiversity net gain and local nature recovery strategies. Policy will need to be updated to reflect these changes.	Yes	National Policy Change
NE2 Sites or Features of Nature Conservation Interest (Non-Designated)	To ensure new proposals achieve a net gain in biodiversity.	The Environment Act 2021 requires new development to deliver a mandatory 10% biodiversity net gain. Policy will need to be updated to reflect the new requirements.	Yes	National Policy Change
NE3 Species and Habitats	To ensure proposals enhance biodiversity and create opportunities for wildlife.	The Environment Act 2021 requires new development to deliver a mandatory 10% biodiversity net gain. Policy will need to be updated to reflect the new requirements. Criteria VIII could be updated to make reference to specific species, e.g., swifts and hedgehogs.	Yes	National Policy Change / Local Change
NE4 Green Infrastructure	To ensure the delivery, protection and enhancement of multi-functional green infrastructure across the district.	Policy generally accords with national guidance. Policy could be strengthened to reflect the lessons learnt from the delivery of strategic sites, such as stewardship arrangements. Opportunity to update to include reference to most up to date local strategies.	Yes	Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
21. Heritage Assets				
HA1 Designated Heritage Assets	Sets out that development proposals should preserve and where appropriate enhance the historic environment. Proposals that lead to substantial harm to a heritage asset will not be permitted unless it can be demonstrated that public benefits outweigh the harm or loss.	Policy generally accords with national guidance. Could be expanded to make clear that great weight should be given to less than substantial harm.	Yes	Local Change
HA2 Non-Designated Heritage Assets	Sets out that the Council will engage with key stakeholders and local communities to identify non-designated heritage assets.	Policy generally accords with national guidance. Could be expanded to refer to a future local list, which would be appended to the District Plan.	Yes	Local Change
HA3 Archaeology	Sets the requirement to submit a desk-based assessment and a field evaluation where sites have the potential include heritage assets with archaeological interest.	Policy generally accords with national guidance.	No	-
HA4 Conservation Areas	Sets out criteria for dealing with development proposals in/outside Conservation Areas.	Policy requires updating to ensure that sustainability is given sufficient weight.	Yes	National Policy Change / Local Change
HA5 Shopfronts in Conservation Areas	Ensures that a high-quality environment is maintained in	Policy generally accords with national guidance.	No	-

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
	the district's Conservation Areas. Proposals must be sensitive to the character and appearance of the area.			
HA6 Advertisements in Conservation Areas	To ensure signage is sensitive in Conservation Areas and does not increase levels of illumination along the street.	Policy generally accords with national guidance. Could refer to avoiding full window vinyl adverts.	Yes	Local Change
HA7 Listed Buildings	Sets out criteria for dealing with proposals involving the alteration, extension, or change of use of a Listed Building. Proposals that affect the setting of a Listed Building will only be permitted where the setting of the building is preserved.	Policy requires updating to ensure that sustainability is given sufficient weight.	Yes	National Policy Change / Local Change
HA8 Historic Parks and Gardens	Requires development proposals to protect the special historic character, appearance or setting of sites listed on the Historic England 'Register of Historic Parks and Gardens'. The same level of protection will be afforded to other locally important sites.	Section refers to the Historic Parks and Gardens SPD, which under the proposed new plan-making system will potentially cease to have effect. Locally important sites may need to be referred to in policy and appended to the District Plan.	Yes	National Policy Change
HA9 Enabling Development	Requires proposals to be assessed having regard to	Accords with the latest Historic England's guidance.	No	-

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
	Historic England's latest guidance.			
22. Climate Change				
CC1 Climate Change Adaptation	Requires new development to adapt to the impacts of climate change.	Policy needs to be strengthened to reflect latest national and local position on climate change. The NPPF 2021 states that plans should take a proactive approach to mitigating and adapting to climate change.	Yes	National Policy Change / Local Change
CC2 Climate Change Mitigation	To ensure that new development proposals demonstrate how they will mitigate against climate change, such as reducing on-site emissions.	Policy needs to be strengthened to reflect latest national and local position on climate change. In July 2023 the Council declared a climate change emergency in East Herts. The NPPF 2021 states that plans should take a proactive approach to mitigating and adapting to climate change.	Yes	National Policy Change / Local Change
CC3 Renewable and Low Carbon Energy	Identifies criteria to inform the appropriate location of sources of renewable energy generation.	Policy generally accords with national guidance. Part II should explicitly refer to setting of designated heritage assets.	Yes	Local Change
23. Water				
WAT1 Flood Risk Management	To ensure new development does not increase flood risk.	Paragraph 160 of the NPPF 2021 has been amended to clarify the sequential test should take into account "all sources of flood risk", and new Annex 3 now sets out the Flood Risk Vulnerability Classification which was	Yes	National Policy Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
		<p>previously included in national planning guidance.</p> <p>The flood risk and coastal change section of the Planning Practice Guidance was updated in 2022 to strengthen guidance on the how to apply the sequential test, surface water flood risks and sustainable drainage.</p>		
WAT2 Source Protection Zones	To protect Source Protection Zones, by requiring proposals for certain types of development to assess potential impact.	Policy generally accords with national guidance.	No	-
WAT3 Water Quality and the Water Environment	Requires proposals to preserve and enhance water quality.	Policy generally accords with national guidance.	No	-
WAT4 Efficient Use of Water Resources	Requires proposals to minimise the use of mains water by improving water efficiency.	Policy needs to be strengthened to reflect latest national and local position on climate change adaptation.	Yes	National Policy Change / Local Change
WAT5 Sustainable Drainage	To ensure new development utilises effective sustainable drainage.	The flood risk and coastal change section of the Planning Practice Guidance was updated in 2022 to strengthen guidance on surface water flood risk, the role and multi-functional use of sustainable drainage (SuDS) and to encourage the use of local policies to steer the type of SuDs preferred in different locations.	Yes	National Policy Change/ Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
		Since the adoption of the District Plan, Herts County Council as the Lead Local Flood Risk Authority (LLFRA) have published a new strategy and guidance.		
WAT6 Wastewater Infrastructure	To ensure there is an adequate wastewater network to support any new development.	Policy generally accords with national guidance.	No	-
24. Environmental Quality				
EQ1 Contaminated Land and Land Instability	Requires new development to demonstrate that unacceptable risks from contamination and land instability can be addressed.	Policy generally accords with national guidance.	No	-
EQ2 Noise Pollution	Requires development to be designed and operated in a way that minimises the impact of noise on the surrounding environment and to ensure the impact of existing noise generating sources are taken into account when assessing new development.	Policy generally accords with national guidance.	No	-
EQ3 Light Pollution	To reduce light pollution by ensuring external lighting schemes address a number of criteria.	Policy should be strengthened to address impact of light pollution on wildlife.	Yes	Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
EQ4 Air Quality	To ensure new development includes measures to minimise the impact on air quality.	Policy needs to be strengthened to reflect latest national and local position on improving air quality.	Yes	National Policy Change/ Local Change
25. Delivery and Monitoring				
DEL1 Infrastructure and Service Delivery	Requires the timely provision of infrastructure to support sustainable development.	Accords with national guidance.	No	-
DEL2 Planning Obligations	Sets out that planning obligations will be sought under Section 106 of the Town and Country Planning Act.	The Levelling-up and Regeneration Bill seeks to replace the current system of developer contributions with a mandatory, more streamlined, and locally determined Infrastructure Levy.	Yes	National Policy Change
DEL3 Monitoring Framework	Requires monitoring of housing delivery.	Policy superseded by the Housing Delivery Test which is an annual measurement of housing delivery in a local planning authority area.	Yes	National Policy Change
DEL4 Monitoring of the Gilston Area	Requires an action plan setting out key milestones for the delivery of the site, which will be monitored on an annual basis.	Policy should be retained.	No	-
Appendix A				
Key Diagram	Illustrates the main components of the development strategy.	Consequential changes following any update to strategic site allocations.	Yes	Local Change

District Plan Policy	Purpose	Comments (e.g., compliance with NPPF/ NPPG and other legislation, monitoring, delivery etc)	Does the policy need reviewing? (Yes/No)	Reason (National Policy Change / Local Change)
Appendix B				
Strategy Worksheet	Sets out anticipated trajectory for delivery of strategic site allocations.	Consequential changes following any update to strategic site allocations.	Yes	Local Change
Appendix C				
Glossary	Provides definition of key terms used in the District Plan.	Based on the 2012 NPPF and requires updating to reflect the 2021 NPPF (or any further updates).	Yes	National Policy Change

Appendix 3 – PAS Local Plan Route Mapper Toolkit: Local Plan Review Assessment

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	The plan policies still reflect current national planning policy requirements.	Disagree	Appendix 2 demonstrates that whilst a number of the policies in the District Plan 2018 generally accord with national policy and guidance, many do not and will require updating to reflect either a national policy change or a local change in circumstance.
A2.	There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).	Disagree	<p>Appendix 4 considers changes to local housing need.</p> <p>Paragraph 62 of the NPPG states that local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method.</p> <p>The District Plan requirement is for 839 dwellings per annum. The current local housing need set by the standard method is for 1,112 dwellings per annum. This represents a 33% increase and is deemed to be a significant change to local housing need.</p>

<p>A3.</p>	<p>You have a 5-year supply of housing land</p>	<p>Disagree</p>	<p>Following a hearing session in December 2022, an Inspector concluded that the Council is unable to demonstrate a five year housing land supply (5YHLS) of deliverable sites. In particular, the Inspector questioned the deliverability of the Council's anticipated supply of housing, setting out specific concerns about the following four sites:</p> <ul style="list-style-type: none"> - GA1: The Gilston Area - HERT3: West of Hertford (Archers Spring) - EWEL1: East of Welwyn - WARE2: North and East of Ware <p>The Inspector concluded that no development from these sites should be included in the five year supply, thereby reducing the overall supply by 1,800 dwellings, leading to a 760 dwelling shortfall. This results in the Council only having 4.41 years of supply.</p> <p>The Council's Planning Policy Team will be considering the latest housing completions data and will use this, alongside other evidence, to review the land supply position. This offers the best opportunity for the Council to comprehensively address the appeal Inspector's concerns.</p>
<p>A4.</p>	<p>You are meeting housing delivery targets</p>	<p>Agree</p>	<p>The Council has continued its trend of annual improvements on the Housing Delivery Test. The last Housing Delivery Test result showed that the Council was able to demonstrate a 130% delivery rate.</p>

A5.	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period.</p>	<p>Disagree</p>	<p>i) affordable housing targets including requirements for First Homes</p> <p>The East Herts District Plan sets out the affordable housing need and targets in Table 14.1 (page 182) over the period 2011-2033, of 217 dwellings per annum.</p> <p>Work commissioned in 2021 and completed in 2022 concluded that the annual need for affordable housing in East Herts had risen since the District Plan was adopted. The work concluded that there was a total need of 3,784 affordable dwellings over the period 2021-2033, or 315 per annum. It should be noted that this increase in growth is largely due to the shorter period to address the backlog of need alongside the introduction of those aspiring to own being considered as potentially being in affordable housing need.</p> <p>When looking at the annual delivery rates of affordable housing, it is clear that since the adoption of the District Plan in 2018, a significant increase in affordable completions has followed which is demonstrated in the table below. However, the table also demonstrates that the net affordable completions have fallen short of the average affordable dwellings target since the start of the plan period.</p> <table border="1" data-bbox="1182 1134 2063 1374"> <thead> <tr> <th>Year</th> <th>Net Affordable Completions</th> </tr> </thead> <tbody> <tr> <td>11/12</td> <td>124</td> </tr> <tr> <td>12/13</td> <td>196</td> </tr> <tr> <td>13/14</td> <td>68</td> </tr> <tr> <td>14/15</td> <td>125</td> </tr> </tbody> </table>	Year	Net Affordable Completions	11/12	124	12/13	196	13/14	68	14/15	125
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16/17	158
17/18	60
18/19	199
19/20	310
20/21	267
21/22	196
22/23	242

The District Plan 2018 does not include a policy on First Homes.

(ii) commercial floorspace/jobs targets over the remaining plan period.

Whilst further work will need to be undertaken to establish the exact delivery of jobs/employment land targets, it is clear that employment floorspace has continued its trend of a net decrease since the District Plan has been adopted.

			<div data-bbox="1169 124 2065 474" data-label="Table"> <table border="1"> <tr><td>15/16</td><td>121</td></tr> <tr><td>16/17</td><td>158</td></tr> <tr><td>17/18</td><td>60</td></tr> <tr><td>18/19</td><td>199</td></tr> <tr><td>19/20</td><td>310</td></tr> <tr><td>20/21</td><td>267</td></tr> <tr><td>21/22</td><td>196</td></tr> <tr><td>22/23</td><td>242</td></tr> </table> </div> <div data-bbox="1169 513 2069 557" data-label="Text"> <p>The District Plan 2018 does not include a policy on First Homes.</p> </div> <div data-bbox="1169 595 2056 676" data-label="Section-Header"> <p>(ii) commercial floorspace/jobs targets over the remaining plan period.</p> </div> <div data-bbox="1169 715 2098 876" data-label="Text"> <p>Whilst further work will need to be undertaken to establish the exact delivery of jobs/employment land targets, it is clear that employment floorspace has continued its trend of a net decrease since the District Plan has been adopted.</p> </div>	15/16	121	16/17	158	17/18	60	18/19	199	19/20	310	20/21	267	21/22	196	22/23	242
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<p>A6.</p>	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p>	<p>Disagree</p>	<p>There have been some significant changes in economic conditions that will need to be taken into account. These include the impact of the pandemic and changes to the use classes order that allows for commercial premises (business and retail) to change to housing without the need for planning permission.</p> <p>Historic evidence suggests that there has been a steady decline of employment space in East Herts, and existing employment areas continue to come under pressure to redevelop to other uses.</p>																

			Updated economic evidence will be required to assess jobs growth and projections, and other opportunities for business growth across the district.
A7.	There have been no significant changes affecting viability of planned development.	Disagree	<p>It is acknowledged that there are currently macro-events and trends that could affect the viability of delivering developments such as the increasing cost of materials and labour shortages.</p> <p>Whilst the direct impact of the above on the viability of planned development is difficult to determine, there are local examples of site allocations demonstrating viability issues. For example, the Gilston Area allocation for 10,000 homes is unlikely to reach policy-compliant levels of affordable housing due to viability reasons. Likewise, the submitted application at HERT3 has experienced delays in determination directly linked to viability issues.</p> <p>Delays to brownfield developments could be viability linked; HERT2 was granted permission in 2020 but aside from a material start on site there have been no completions and work has largely stalled for over a year.</p>
A8.	Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.	Agree/ Disagree	<p>Twelve of the allocated sites in the District Plan have been granted planning permission and development is in progress. In terms of the remaining sites, an update on each one is provided below:</p> <p>BISH6 - Bishop's Stortford High School, has a resolution to grant permission subject to the signing of a Section 106 Agreement, which is in final draft and will be issued shortly. This is an outline planning application for up to 223 dwellings including the demolition of existing buildings.</p>

BISH8 - Land at Old River Lane, does not currently have planning permission. An outline planning application has been submitted for up to 225 dwellings and will be determined by the Development Management committee in due course (committee date to be agreed).

HERT3 - West of Hertford (Archers Spring), does not currently have planning permission. An outline application has been submitted for 342 dwellings and will be determined by the Development Management Committee in due course (committee date to be agreed).

HERT4 - North of Hertford (West of Wadesmill Road), does not currently have planning permission. A planning application for 118 dwellings has been submitted and will be determined by the Development Management Committee in due course (committee date to be agreed).

SAWB4 - Land North of Sawbridgeworth, has a resolution to grant permission subject to the signing of a Section 106 Agreement. This is hybrid planning application for full permission for 85 dwellings and outline permission for 99 dwellings.

WARE2 - Land North and East of Ware, does not currently have planning permission. A hybrid planning application has been submitted including outline permission for 1,800 dwellings and will be determined by the Development Management Committee in due course (committee date to be agreed).

GA1 - The Gilston Area, has a resolution to grant outline planning permission subject to the signing of Section 106 Agreements. This

			<p>relates to two separate permissions, one for 8,500 dwellings (Villages 1-6), and the second for 1,500 dwellings (Village 7).</p> <p>EWEL1 - East of Welwyn Garden City, does not currently have planning permission. An outline planning application for 1,350 homes in East Herts District and 1,300 homes in Welwyn Hatfield Borough has been submitted and will be determined by each Council's Development Management Committee in due course (committee date/s to be agreed).</p> <p>This means that the District Plan housing trajectory is being delivered broadly in line with what was anticipated in 2018; however, as the Council cannot currently demonstrate a 5-year housing land supply, there may be a need to identify additional sites to ensure an adequate supply of housing (see A3. above).</p>
<p>A9.</p>	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p>	<p>Disagree</p>	<p><u>Climate Change</u> - The importance of tackling climate change has risen in the national agenda since the adoption of the District Plan in 2018. In 2019 the Government amended the Climate Change Act to commit the UK to net zero greenhouse gas emissions by 2050. Subsequently, changes to the building regulations came into force in June 2022, which require new homes to reduce carbon emissions by 30% and non-domestic buildings to reduce emissions by 27%.</p> <p>The Council has recently made a declaration of climate emergency (Council, 26th July 2023) and it has become clear that action to mitigate against climate change and adapt to its impacts must be embedded and integrated into all aspects of policy preparation, including through a review of the District Plan.</p>

			<p><u>Flood Risk</u> - Any change to strategic policies and proposals, including to site allocations, will need a revised Strategic Flood Risk Assessment (SFRA) and application of the sequential approach.</p> <p><u>Improvements to the Environment</u> - The update to the NPPF in 2021 emphasised the importance of trees for enhancing the quality and character of the urban area and addressing climate change. Paragraph 131 states that planning policies and decisions should ensure that streets are tree lined and that opportunities are taken to ensure trees are incorporated elsewhere in developments.</p> <p><u>Biodiversity</u> - The Environment Act in 2021 introduced a mandatory requirement for biodiversity net gain. Development proposals will need to deliver a minimum 10% net gain using a biodiversity metric and approval of a biodiversity net gain plan. This will start to come into force for some planning applications from November 2023.</p> <p><u>Sustainability Appraisal</u> - The SA will need to be reviewed against any new District Plan objectives. The SA will also require updating if housing numbers and distribution needs change. New sites will also need to be assessed.</p>
<p>A10.</p>	<p>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p>	<p>Agree</p>	<p>Delivery of the development strategy set out in the District Plan has ensured that planning in East Herts has been genuinely 'plan led' over the last five years, which will have significantly reduced the number of speculative developments coming forward.</p>

			<p>It will be important that the District Plan continues to provide a clear framework for addressing the district's housing needs and other economic, social, and environmental priorities.</p>														
<p>A11.</p>	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p>	<p>Agree</p>	<p>Policy DPS4 Infrastructure Requirements sets out the key planned infrastructure requirements to support the levels of growth required – the table below assesses their progress and current status:</p> <table border="1" data-bbox="1182 491 2063 1026"> <thead> <tr> <th data-bbox="1182 491 1624 536">Project</th> <th data-bbox="1624 491 2063 536">Progress</th> </tr> </thead> <tbody> <tr> <td data-bbox="1182 536 1624 576">a) New Junction 7a on M11</td> <td data-bbox="1624 536 2063 576">Completed</td> </tr> <tr> <td data-bbox="1182 576 1624 699">b) Upgrades to Junction 7 and 8 of M11</td> <td data-bbox="1624 576 2063 699">Junction 8 under construction due to be complete autumn 2023</td> </tr> <tr> <td data-bbox="1182 699 1624 858">c) Widening of existing River Stort crossing, provision of a second</td> <td data-bbox="1624 699 2063 858">Permission granted for both the widening of the existing crossing, and the provision of the new crossing</td> </tr> <tr> <td data-bbox="1182 858 1624 943">d) Provision of Hertford bypass</td> <td data-bbox="1624 858 2063 943">Solution not identified</td> </tr> <tr> <td data-bbox="1182 943 1624 983">e) Little Hadham bypass</td> <td data-bbox="1624 943 2063 983">Completed</td> </tr> <tr> <td data-bbox="1182 983 1624 1026">f) Upgrades to A602</td> <td data-bbox="1624 983 2063 1026">Completed</td> </tr> </tbody> </table> <p>Other infrastructure required to support development has also been delivered or will be delivered, including:</p> <ul style="list-style-type: none"> - upgrades to rail network - measures to facilitate sustainable transport - new schools and the expansion of existing schools - healthcare facilities - broadband telecoms 	Project	Progress	a) New Junction 7a on M11	Completed	b) Upgrades to Junction 7 and 8 of M11	Junction 8 under construction due to be complete autumn 2023	c) Widening of existing River Stort crossing, provision of a second	Permission granted for both the widening of the existing crossing, and the provision of the new crossing	d) Provision of Hertford bypass	Solution not identified	e) Little Hadham bypass	Completed	f) Upgrades to A602	Completed
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f) Upgrades to A602	Completed																

			<p>- upgrades to wastewater and water supply</p> <p>In 2022/23 alone nearly £3-million of S.106 money was allocated to individual projects or uses across the district.</p> <p>Further information on infrastructure delivery is available in the Council's Annual Infrastructure Delivery Statements - https://www.eastherts.gov.uk/about-east-herts-0/east-herts-annual-infrastructure-funding-statements.</p>
<p>A12.</p>	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p>	<p>Disagree</p>	<p>Appendix 2 considers the individual policies in the Plan and identifies where updates are required based on either local changes and/or national policy changes.</p> <p>In some cases, the need to update is due to the effectiveness of the policy since its adoption. This mainly relates to the Development Management policies, where a number of them would benefit from an update following lessons learnt across a number of years of decision-making.</p> <p>Similarly, where a national policy change has occurred some policies have become outdated or are now in conflict with the NPPF; again, an update would benefit the effectiveness of these policies.</p> <p>Where issues have been identified and Development Management colleagues have reported them, this information has been included in the commentary within Appendix 2 accompanying the relevant policy.</p>

<p>A13.</p>	<p>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p>	<p>Agree</p>	<p>Appendix 1 summarises the Duty to Co-operate discussions that have been held to date with key stakeholders.</p> <p>There are currently no identified matters that would have a material impact on the planning context for the district. This will be kept under review.</p>
<p>A14.</p>	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p>	<p>Disagree</p>	<p>The political make-up of East Herts Council changed substantially in May 2023. The new-Joint Administration may have a different approach or objectives and likewise may wish to incorporate their manifesto commitments into any update.</p> <p>A Corporate Plan was agreed in 2020 and whilst the District Plan doesn't necessarily conflict with the objectives of this Plan, it does not contain reference to it or directly support its objectives. Furthermore, it is anticipated that a new Corporate Plan will be prepared by the Joint Administration.</p> <p>Key partners and departments have also adopted or agreed a number of strategies and plans in the intervening years since the District Plan was adopted. For example, the East Herts Housing Strategy 2022-27 and the Homelessness Review and Strategy 2019-2024 were both agreed following the District Plan adoption.</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	NO	If no go to question A16.
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies	YES	If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.
A17.	<p><u>Decision:</u> Update plan policies</p> <p>Reasons for decision on whether or not to update plan policies:</p> <ul style="list-style-type: none"> • The significant change in local housing need arising from the standard method (see Appendix 4 for more information). • The potential requirement to identify new sites for development to ensure that the Council can demonstrate a five year housing land supply. • The ongoing requirement to address affordable housing targets which have increased since the District Plan was adopted in 2018. • The need to maximise opportunities for jobs growth and to take account of changing economic circumstances. • Changes in the environmental context including the Council's declaration of climate emergency and the requirement for biodiversity net gain. • A number of the development management policies will also need clarification and updating to reflect changes in national policy/local changes, including the requirement to draw up design codes and guidance. 		

	B. POLICY UPDATE FACTORS	YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area
B1.	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.	YES	The housing need for East Herts has changed from the currently adopted District Plan-figure of 839, to the standard method derived figure of 1,112. This represents a 33% increase and is deemed to be significant change to local housing need.
B2.	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.	YES/NO	<p>A change to the housing requirement does not necessarily mean that there is a need for a change to the spatial strategy. However, this cannot be concluded until a full assessment of the implications of the increase on the longevity of the development strategy have been considered, alongside the consequences of an extended plan-period.</p> <p>Likewise, the ability of the Council to be able to demonstrate a five year housing land supply and perform well in the housing delivery test are also key metrics as to the effectiveness of the spatial strategy. The continued delivery of the site allocations and their ability to contribute to the overall spatial strategy is also a further consideration.</p>
B3.	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	YES	The increased local housing need figure, alongside the extended plan-period, will have consequential impacts on other policies in the plan.

	<p>You have answered yes to one or more questions above.</p>	<p>YES</p>	<p>You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.</p>
	<p>You have said no to <u>all</u> questions (B1 to B3) above</p>		<p>If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.</p>
<p>B4.</p>	<p><u>Decision:</u> Full Update of Plan Policies</p> <p>Reasons for scope of review:</p> <p>It is likely that be a full, rather than partial, review of the Plan will be required. This is largely because of the need to consider potential changes to housing requirements and the implications for other aspects of the Plan, along with the need to ensure that all policies are consistent with the latest NPPF and legislation. A full update will also allow the Council to give greater emphasis to climate change mitigation and adaptation and to design quality.</p> <p>It is recommended that decisions on the final scope of the review and its associated timetable should be made when the implications of the proposed changes to the NPPF are better understood, the Levelling-up and Regeneration Bill has received Royal Assent, and the statutory framework required to implement the reforms has been approved.</p>		

Appendix 4 – Changes to Local Housing Need

1. Introduction: Housing Need

- 1.1 The NPPF requires that strategic policy-making authorities should establish a housing requirement figure for their whole area which can be met over the plan period
- 1.2 The NPPF sets out that if the local housing need figure for an authority has changed significantly then strategic policies will need updating.
- 1.3 This appendix sets out the current housing requirement and explores the future approach to housing need, before going on to consider the significance of the resulting variation and the next steps in the context of a District Plan review.

2. Current Housing Need:

- 2.1 Previously, when the East Herts District Plan was progressing through the plan-making process, Strategic Housing Market Assessments (SHMA) were prepared to identify the Objectively Assessed Housing Need (OAHN) for an area.
- 2.2 East Herts worked with its SHMA partners Uttlesford, Harlow and Epping Forest to produce a SHMA that concluded that the total housing need across the four authorities between 2011 – 2033 was 51,878 dwellings. East Herts, along with the other partners, committed to meeting their own needs and entered the District Plan Examination in 2017 with a housing need figure of 18,396 which equates to 836 dwellings per year across the plan period.

2.3 Through the examination process, the Inspector took the view that there should be an amendment to the figure derived by the SHMA and it was concluded that the overall housing figure for East Herts over the plan period was 18,458 dwellings, or **839** dwellings per year. This change from 836 to 839 was the result of a change to the market signals uplift from 13.6% to 14%¹.

3. Future Housing Need:

3.1 The NPPF, through paragraph 61, states that:

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

3.2 The standard method for calculating housing need was introduced by the government in 2018 and is a different method to that used previously to inform the formulation of the East Herts District Plan, which underwent Examination from 2017. The standard method, which is the approach recommended by NPPF, uses a specific formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. It should be noted that the standard method

¹ [Microsoft Word - Inspector's post hearing note East Herts District Plan.docx \(onwebcurl.com\)](#)

only identifies a minimum annual housing need figure, it does not go further to produce a housing requirement figure.

3.3 The standard method formula uses 4 steps to determine the annual figure:

Step 1 - Setting the baseline

Step 2 - An adjustment to take account of affordability

Step 3 - Capping the level of any increase

Step 4 - Cities and urban centres uplift

3.4 For East Herts, Step 4 doesn't affect the standard method figure as this is only applied to the largest 20 cities and urban centres in England. Likewise, currently the East Herts figure does not find itself being capped under Step 3, due to the increase being under a 40% of the current housing requirement figure.

3.5 Utilising the standard method, the annual housing need figure for East Herts is calculated using the following components:

Step 1: is set using the 2014-based household projections (the approach required by Planning Practice Guidance (PPG)), calculating any increase across a 10-year period, 2013-2023. The increase in East Herts over this period is 732.3 and this forms the baseline figure.

Step 2: makes an adjustment for affordability using the median workplace-based affordability ratio. The ratio for East Herts, which is assigned to the council by the government, is 12.29 which, applying the methodology, translates to an adjustment factor of 1.518.

Annual need figure: Multiplying the baseline and the adjustment factor produces the annual housing need figure which for East Herts is **1,112** dwellings per year.

4. Change to Housing Need

4.1 Paragraph 33 of the NPPF states that:

“Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; ...”

4.2 As detailed above, and summarised in the table below, the housing need for East Herts has changed from the adopted District Plan-figure of 839, to the standard method derived figure of 1,112. This represents a 33% increase and is deemed to be a significant change to local housing need.

2018 Adopted Housing Need	Local Housing Need 2023
839	1,112

5. Next Steps and Further Considerations

5.1 The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method for assessing local housing need. Understanding the housing need figure at the start of the plan-making process is essential. This number should also be kept under review and revised where appropriate, and in some cases the housing need figure could change as the inputs are variable. It should also be noted that the standard method figure set out above only identifies the

minimum annual housing need figure, it does not produce a housing requirement figure.

- 5.2 After identifying the increase in housing need from 839 to 1,112, it is important that officers assess the impact of this increase on the ability of the current housing strategy to meet the long-term housing needs of the district.



BEDFORD

Planning / SDD / SPRU

bedford@dlpconsultants.co.uk

BRISTOL

Planning / SDD / SPRU

bristol@dlpconsultants.co.uk

EAST MIDLANDS

Planning/ SDD

nottingham@dlpconsultants.co.uk

LEEDS

Planning

leeds@dlpconsultants.co.uk

LIVERPOOL

Planning

liverpool@dlpconsultants.co.uk

LONDON

Planning

london@dlpconsultants.co.uk

MILTON KEYNES

Planning

miltonkeynes@dlpconsultants.co.uk

RUGBY

Planning

rugby.enquiries@dlpconsultants.co.uk

SHEFFIELD

Planning/ SDD / SPRU

sheffield@dlpconsultants.co.uk



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Chartered Town Planner