

STRUCTURE PLAN PANEL

ITEM 4a

28 January 2003

Members of Panel: M Bayes, A Dodd, D Drake, M Saunders (Chairman), R Sanderson, I Simpson, W Storey, B A York

STRUCTURE PLAN ALTERATIONS, 2001- 2016

DRAFT DEPOSIT PLAN: DEVELOPMENT STRATEGY AND HOUSING

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Purpose of Report

1. To put forward a draft of the part of the deposit version covering the main development strategy and housing policies. The points in this covering report all relate equally to a separate draft of that part of the deposit version dealing with the economy and employment needs.

Introduction to Draft Text

2. The Panel considered the way forward at its meeting on 9 January and asked officers to prepare a draft deposit version. This report deals with the part of the plan covering the main development strategy and housing policies. The approach has been to take forward 'Option C' in the July 2002 consultation document, expressed in a way that reflects the decision-making process now envisaged in line with the new planning legislation that is before Parliament. Opportunity has also been taken to reflect a number of suggestions put forward in responses to the public consultation.
3. A draft of the deposit version text of the part of the Alterations covering the development strategy and housing is attached. This is preceded by a draft of the introductory part of the deposit version, in which there is new text on the changing planning system – notably at regional level. The section on the development strategy and housing policies (and, separately for item 4b, the economy & employment needs) comprises the policies in bold type and the 'explanatory memorandum' that introduces them. In statutory terms it is only the policies that carry weight. The explanatory text does not carry weight in the way that what is termed the 'reasoned justification' in local plans does.
4. Temporary paragraph numbers have been inserted to assist the Panel's consideration and discussion at this stage. The whole text will be renumbered when the full deposit text is put together in one document.
5. The Panel is asked to consider the draft text, focusing particularly on the proposed policies, and to advise on any changes it considers would be appropriate.
6. The explanatory text will need further editing to improve clarity and cover additional issues that may be raised, for example at the recommendation of district officers with whom there is a meeting on 27 January and by the Panel.

INTRODUCTION

Purpose of the Structure Plan

1. The County Council is responsible for preparing and keeping up to date the Hertfordshire Structure Plan. This sets out the broad directions in which Hertfordshire should change and develop in the future. The Plan must have regard to national and regional policies and the specific needs and problems of the County.
2. The current Structure Plan is based on the concept of sustainable development. Basically this means seeking to meet the development needs of the present as far as possible without prejudicing the choices open to future generations. The Plan includes 57 policies on a wide range of subjects. These cover the design of development, housing needs, transport, economic development, protecting the environment, town centres, shopping and leisure.
3. The Structure Plan provides a consistent framework for the ten district councils in Hertfordshire to provide more detailed local development plans for their areas, as well as countywide local plans prepared by the County Council for mineral working (mostly sand and gravel) and waste management. The local Plans have to be in 'general conformity' with the Structure Plan. Together, the Structure Plan and twelve local plans make up Hertfordshire's 'Development Plan'.

The Need to Update the Plan and the Consultation Process

4. Development plans need to be reviewed regularly. This is both to respond to new influences and to roll forward the time period covered by the plan. All planning decisions are required to accord with the provisions of the Development Plan unless relevant ('material') considerations indicated otherwise. This emphasises the need to maintain up to date adopted plans.
5. The current Structure Plan was adopted in 1998 and runs to 2011. It now needs to be updated and rolled forward another five years to take account of important changes in Government policies and to provide for additional housing needs up to 2016. This means that it will be necessary to make significant changes to the policies that deal with the overall development strategy, particularly the scale and distribution of housing development and related matters including the Green Belt (pages X to Y). Other key issues are action to make development more sustainable in practice (pages X to Y) and development needs for the economy and employment (pages X to Y). Changes are also needed to bring many policies on other subjects up to date and a few new policies are now considered necessary.
6. Work on updating and rolling forward the Plan began in 1999. Initial public consultations took the form of a Hertfordshire 'Town Renaissance Campaign', while technical work has focused on housing and employment development issues. The technical work has involved close liaison with district councils and other key partners.
7. The County Council held an initial public consultation between July and September 2002. After considering all the responses, the County Council resolved on 13 February to place this document on 'deposit' for a six week period from 28 February to 11 April 2003. The deposit stage is therefore the second stage of public

consultation. It is an opportunity for formal objections to the draft revised (i.e. altered) policies and representations in support of them.

8. A 'Statement of Publicity and Consultation' has also been placed on deposit. This explains the public consultation process to date.

9. There are several other stages to the statutory process before the Plan can be finally adopted by the County Council, which is likely to be in mid 2004. The next stages and provisional timetable for updating the Plan are set out below. The programme follows a statutory procedure which involves more consultations before the County Council makes any final decisions. For further information about the process and timing of the Plan stages, or any other aspect of this document, please contact the Forward Planning Unit (contact details on the front inside page).

Stages in updating and rolling forward the Structure Plan to 2016

2000 – to mid 2002	Initial consultations and preparatory technical work
July to September 2002	First public consultation
28 February to 11 April 2003	'Deposit Stage' consultation – this stage
September 2003	Public inquiry into draft policy alterations. This is termed the 'examination in public' or EIP, which is held by an independent panel appointed by the Government.
Early 2004	County Council considers recommendations in EIP Panel's report and holds another public consultation, if necessary, on any further proposed policy changes (termed the 'modifications' stage).
Mid 2004	County Council formally approves an updated Structure Plan incorporating the alterations (termed 'adoption' of the Plan).

Form and Status of the Plan

10. The Structure Plan comprises a 'Written Statement' and a 'Key Diagram'. The Written Statement is the text of all the adopted policies and proposals. The Key Diagram illustrates the main policies and proposals in a schematic form on a non-Ordnance Survey map base.

11. The Plan also includes an 'explanatory memorandum'. This comprises all the non-policy text that introduces and provides the reasoning behind each of the policies. In legal terms it does not form part of the Plan.

12. This document comprises a draft of the revised (i.e. altered) policies and a correspondingly revised draft Key Diagram (inside the back cover), together with an updated draft explanatory memorandum. Policy numbers are unchanged from the current adopted Plan in order to avoid confusion in examining what alterations have been made¹. Proposed new policies are not numbered at this stage.

13. The County Council's sustainability aims are an important part of the explanatory memorandum, on pages X to Y. The County Council has used external consultants to undertake an independent 'sustainability appraisal' of the draft policy alterations. This work seeks to ensure that the alterations will be in line with the aims and objectives.

14. Separate technical reports have been produced on the first stage of the sustainability appraisal process and other detailed technical matters, notably housing and employment development needs.

15. Pages 3 to 13 of the current adopted Structure Plan contains a section entitled 'Overview of Hertfordshire'. This provides some basic background geographical and demographic information about Hertfordshire. Some of that information is still correct but much of it is no longer up to date.

16. A number of respondents to the pre-deposit stage consultations recommended that the Structure Plan Alterations should be a slimmer document than the existing Plan. One way to help achieve this is to omit background information which is readily available elsewhere. Consequently no background information is provided in this document. Instead consultees may request the most up to date information that is available on the following range of subjects by contacting, in the first instance, the Forward Planning Unit (contact details on inside front cover).

- Population, migration and other demographic information, including available results of the 2001 Census. (Most Census results will not be available until later in 2004.)
- Area and local authority boundaries
- Natural features and land uses
- Development trends since 1991 and currently planned future development (housing and employment including retail)
- Extent of planning policy designations such as Green Belt
- Environmental assets and designations

¹ A background report entitled XXX sets out exactly what alterations have been made to each of the 57 policies in the adopted Plan by using 'bold text', **thus**, to show proposed new wording and 'strikethrough' text, ~~thus~~ to show wording that it is proposed to delete. Some whole policies are proposed to be deleted and some entirely new policies are proposed.

- The economy and employment
- Transportation
- Mineral working
- Waste management and disposal
- The wider region – Hertfordshire is part of the East of England Region.

17. In some cases the County Council itself holds relevant data. In other cases it will need to advise consultees to contact other organisations, such as district councils, the Environment Agency or Regional Development Agency.

European, National and Regional Planning Context

18. The future development of the County will be shaped by the context provided by European, National and Regional policies.

European Level

19. The influence of the European Union on the UK and its regions will be a factor of increasing importance through the Plan period. The European Spatial Development Perspective (ESDP) sets out a framework for spatial planning - the aims of which are:

- economic and social cohesion;
- conservation and management of natural resources and cultural heritage;
- more balanced competitiveness of the European territory, strengthening economic cohesion and offsetting regional imbalances.

20. Another key document is the European Union's new Strategic Environmental Appraisal (SEA) Directive. The aims of the Directive 'on the assessment of the effects of certain plans and programmes on the environment' are to provide for a high level of protection of the environment and contribute to the integration of environmental considerations in to the preparation and adoption of plans, with a view to promoting sustainable development. The Directive and accompanying national guidance on its implementation emphasise some key new areas of focus which appraisals will need to meet. These are:

- Identifying strategic options that make the plan more sustainable;
- Collecting baseline environmental information, particularly for areas likely to be significantly affected by the plan;
- More rigorous prediction of environmental effects;
- Greater consultation of the public and environmental authorities;
- Mitigating and monitoring significant environmental effects of the plan.

National Level

21. National policy is set out in Planning Policy Guidance (PPGs), Circulars and Ministerial Statements. Sustainable development remains the key priority. This means ensuring a better quality of life now and for future generations. Sustainability objectives in the Government's Strategy entitled 'A better quality of life' (May 1999) include:

- social progress which recognises the needs of everyone

- effective protection of the environment
- prudent use of natural resources
- maintenance of high and stable levels of economic growth and employment

22. Of particular significance for future development in Hertfordshire are the recent PPG3 on Housing and PPG13 on Transport. Key components are:

- A new the “Plan Monitor and Manage” (PMM) approach to housing provision – this involves keeping the need for and location of housing under regular review and updating housing targets and policy as necessary – this will require urgent and regular updating of development plans;
- A target of 60% of housing development, including conversions, should be built on previously developed land rather than new “green field” sites by 2008;
- Sequential approach to choosing development locations, using suitable previously developed sites in existing urban areas first, before green field land;
- Using ‘Urban Capacity Studies’ to help maximise opportunities for locating new development on previously developed land;
- Managing development to make full use of public transport by focusing major travel generating development in town and district centres and near to public transport interchanges and plan for increased intensity of development at locations which are highly accessible by public transport, walking and cycling.

23. The Government has also promoted an ‘urban renaissance’ and set up the Urban Task Force in 1998 to make recommendations on how to deliver a better quality of urban development and living. It also is committed to restoring the vitality and viability of rural areas. The Rural and Urban White Papers published in 2000 took this work forward and set out the Government’s proposals and strategy.

24. The Government is also seeking to develop a national aviation policy and to publish a White Paper on this. A recent consultation (‘The Future of Aviation’, 2001) raises key sustainable development and economic issues to do with aviation such as whether demand for travel should be met or managed and how to secure the economic benefits while the environmental costs of aviation are reduced. In addition the Department of Transport published the South East Regional Airports study (SERAS) in July 2002. This Study proposes options for civil airports in the South East and a further round of consultation on revised options is taking place in 2003. The Government is not expected to publish its Aviation White Paper until early 2004 at the earliest. Therefore it has not been possible in this document to take account of the land use and transport planning implications for Hertfordshire of any further airport development at Stansted, Luton or Heathrow Airports.

Regional Level

25. Paragraphs 26 to 28 summarise the existing regional planning framework for Hertfordshire. However the Government is about to make radical changes to the planning system. A new Planning Bill is likely to become law later in 2003 and come into force in 2004. Paragraphs 29 to 35 of this document outline the main changes and, assuming they are enacted, how they will affect strategic level planning for Hertfordshire.

Existing regional planning arrangements

26. Draft 'Regional Planning Guidance' is prepared by Regional Planning Bodies (local authorities and some other stakeholders working in partnership). This is submitted to the Government which holds a public inquiry and then issues the final version. RPG sets the framework for Development Plans. New guidance for the South East of England (RPG9) was adopted in March 2001. RPG9 covers all the counties in the South East of England, including Hertfordshire, and so provides the currently approved regional framework for updating the adopted Hertfordshire Structure Plan.

27. However boundaries for RPG were adjusted in 2000. New RPG is currently being prepared for the East of England Region which includes Hertfordshire, Bedfordshire, Essex, Cambridgeshire, Norfolk and Suffolk. RPG14 for the East of England will cover the period to at least 2021 and it is anticipated that this will be issued by the Government in late 2004 or 2005.

28. The Regional Strategy in RPG9 seeks to achieve an appropriate balance between economic performance, sustainable development, environmental improvements, opportunity and choice. The key issues for Hertfordshire in RPG9 are:

- a requirement for an annual average of 3,280 new homes to be provided in the County each year;
- urban areas should be the main focus for new development, with a regional target that 60% of all new housing development should be on previously developed land;
- encouraging development to make a more efficient use of land; in particular housing developments should be between 30 to 50 dwellings per ha;
- no regional case for reviewing Green Belt boundaries, but recognition that there may be local exceptional circumstances;
- The Lee Valley including parts of Broxbourne Borough in Hertfordshire is identified as a Priority Area for Economic Regeneration (PAER). Expectation that development plans will tackle economic weaknesses in PAERs;
- London's World City role needs to be developed – Hertfordshire has a key role in providing skilled labour to the Capital and many key transportation corridors run through the County;
- encouragement for business clusters, of which there are several in Hertfordshire including bio-sciences and the film industry;
- a provisional aim that over 40% of regional housing provision should be for 'affordable' housing;
- policies should minimise the need to travel whilst enhancing choice and ease of access to activities;
- adoption of 'maximum' parking standards for all new development (resulting in less parking provision than in the recent past);
- interregional studies to consider further development potential in three 'potential growth areas', of which two affect Hertfordshire. The London-Stansted-Cambridge study area includes East Herts Broxbourne and part of North Herts Districts. The Milton Keynes / South Midlands sub-region borders Hertfordshire at Luton;
- the need for a number of transportation studies and strategies that are now being prepared. The main studies that will affect Hertfordshire are the London-South Midlands and London orbital Multi Modal Studies (MMS) and the Regional Transport Strategy for the East of England. The result of these studies is hoped to be a comprehensive strategy indicating regional priorities for investment in transport infrastructure.

- RPG9 identifies the Government's intention to commission the South East Regional Airports Study (SERAS - see paragraph XX).

New regional planning arrangements

29. A new Planning Bill was introduced into Parliament on 4th December 2002 and legislation is likely to be enacted later in 2003. The Bill takes forward proposals to abolish structure and local plans. In their place, the development plan will comprise new statutory regional spatial strategies (RSS) instead of RPG and, at district level, 'local development documents (LDDs) that must conform generally with the RSS.

30. The Government has stated that it wishes those counties that are in the process of reviewing or altering their structure plans continue to with this process. It proposes transitional arrangements to ensure this work will not be wasted. A key date for the proposed transitional arrangements is the 'commencement' of the provisions of the new Planning and Compensation Act, which the Government expects to be Spring 2004.

31. The Government proposes that preparation of structure plan proposals that have not reached the statutory deposit stage by 'commencement' should cease, but that preparation of those which do reach deposit stage by then (i.e. probably Spring 2004) should continue under current procedures. Such plans will be 'saved' for a period of three years from adoption. Policies in saved structure plans will then be progressively replaced by revisions to the new RSS.

32. The County Council is proceeding on the basis that if the Structure Plan Alterations are adopted in mid 2004, then they will be 'saved' until mid 2007. The Alterations will provide an interim strategic planning framework to guide the preparation of the first round of LDDs covering the period to 2016.

33. The East of England Local Government Conference (EELGC) is the Regional Planning Body responsible for drafting a new RPG/RSS14 for the East of England. The EELGC held an initial public consultation during Autumn 2002. Technical work on drafting RPG/RSS14 is proceeding. This includes studies in the potential growth areas (Thames Gateway/South Essex, Milton Keynes/South Midlands and London – Stansted – Cambridge) identified in RPG9, where the Deputy Prime Minister has indicated in recent statements that he wishes to see a step increase in dwelling provision.

34. On the current timetable draft RPG/RSS14 will be submitted to the Government in mid 2003 and, following a public inquiry, the final version issued by the Government during the second half of 2004. However the timetable for the remaining stages of the RPG/RSS14 process is uncertain and this timetable may slip. It will take significantly longer if a full district level dwelling distribution is to be agreed and included. (There are 46 district and unitary council areas in the region.) Alternatively, if a district level distribution is not included then an early review will be needed to achieve this.

35. Paragraphs 87 to 90 of this document address key long term development issues for the region and the transitional process that the County Council envisages will be needed to take account of these issues before this Plan can be replaced.

Implementation and Monitoring

36. Implementation of Hertfordshire's Structure Plan through the detailed local plans is a shared responsibility involving many stakeholders. These include all the local authorities, many community organisations, developers and utility providers, together with central government departments and statutory bodies such as the Environment, Countryside and Regional Development Agencies and the Housing Corporation.

37. An important element in assessing whether or not Hertfordshire is becoming more sustainable is how the stakeholders work in partnership to monitor change. A significant amount of monitoring is already undertaken. The Hertfordshire Environment Forum, for example, produces a State of the Environment Report each year, currently taking the form of monitoring a set of key indicators of Hertfordshire's environment. Other organisations undertake monitoring on a whole range of issues, including the economy and employment, health, population, housing, habitats, species, air and water quality. For many years the County Council has produced an Annual Monitoring Report (AMR) on the implementation and effectiveness of key policies in the Structure Plan, notably in relation to housing development.

38. The County Council will continue to monitor emerging issues and trends. However the changes to the planning system and the forthcoming abolition of structure plans (paragraph 29) mean that the County Council may no longer publish its own Structure Plan AMR. Instead it will increasingly focus its resources for monitoring on work to inform the regional planning process in the East of England. The County Council is already contributing to new partnership arrangements in the East of England that have been set up to produce regional rather than county-level AMRs. Regional AMRs for 2001 and 2002 have been published and these provide a wealth of information about Hertfordshire as well as other parts of the region.

39. An approach to monitoring which has recently become prevalent is the use of 'targets' to clarify what it is that policies are seeking to achieve and measurable 'indicators' of whether targets are being met. The Government published a guide in 2002 entitled '*Monitoring Regional Planning Guidance: Good Practice Guidance on Targets and Indicators*'. That guide will provide the framework for expanding and improving on the range and quality of data in forthcoming regional AMRs.

Note to Panel

Section on 'Framework Policies for Sustainable Development' (Policies 1 to 4) is not included here

DEVELOPMENT STRATEGY AND HOUSING

DEVELOPMENT STRATEGY

The Green Belt

40. A Metropolitan Green Belt around London was first proposed in 1935 and the 1947 Town and Country Planning Act enabled Green Belt proposals to be incorporated in the first development plans. The Government's current policy stance on Green Belts is set out in Planning Policy Guidance Note 2 (PPG2), which was last revised in 1995.

41. There are five purposes of including land in Green Belts:

- i) to check the unrestricted sprawl of large built-up areas;
- ii) to prevent neighbouring towns from merging into one another;
- iii) to assist in safeguarding the countryside from encroachment;
- iv) to preserve the setting and special character of historic towns; and
- v) to assist in urban regeneration, by encouraging the recycling of derelict and other land.

42. The original Green Belt in Hertfordshire was based on proposals in Abercrombie's Greater London Plan of 1944, and covered a ring around the Capital south of a line roughly from Hemel Hempstead to St Albans and Hertford. Successive Structure Plan Reviews have extended the Green Belt in the County outwards along the main communication corridors radiating out of London. All but one (Royston) of the 29 main settlements listed in Policy 6 are now tightly constrained by the Green Belt.

43. The first part of Policy 5 deals with the extent of the Green Belt. Hertfordshire has complete local plan coverage and detailed Green Belt boundaries are defined in all the local plans. It is therefore not necessary to describe the boundary in Structure Plan policy as it has in the past, though the general extent of the Green Belt is shown on the Key Diagram.

44. An essential characteristic of the Green Belt is its permanence and its protection in Hertfordshire must be maintained as far as can be seen ahead, with the Structure Plan providing the strategic policy framework for planning at the local level. No Countywide review of either inner or outer Green Belt boundaries is proposed in these Alterations.

45. Policy 5 allows for minor adjustments to the Green Belt boundary to secure a more sustainable pattern of development and activities within settlements. Any adjustments of this kind would have to be justified by exceptional circumstances and the number of sites released is expected to be low. Further context is provided in the text introducing Policy 7 on the main development strategy.

46. Paragraph 2.12 of PPG2 on Green Belts provides advice on 'safeguarded land', which in Hertfordshire have sometimes been referred to as 'areas of special restraint'. These are areas that are released from the Green Belt to be available for possible development needs after the local plan period ends. The intention in safeguarding such land is to try to ensure that Green Belt boundaries will endure, therefore avoiding the need to review them again at the end of the plan period. However current PPG2 was issued before the new 'plan, monitor and manage' approach was heralded in revised PPG3: Housing (see paragraph 22). The County Council considers that in Hertfordshire the aim to minimise the scale of green field development will be best served if no more safeguarded land is identified in Hertfordshire in the next review of local plans to 2016. This is now stated in Policy 5. Only if and when strategic scale development locations are identified through the regional planning process (see paragraph 89) would it be appropriate for district councils to consider the need to identify safeguarded land at such locations.

47. The current Structure Plan adopted in 1998 included text in Policy 5 to make provision for an extension of the Green Belt to contain strategic scale development that was proposed in the Plan on Green Belt west of the A1(M) at Stevenage. This had the effect of designating as Green Belt the whole of the area south of the A505 between Stevenage and Luton. The proposal for development west of the A1(M) is now deleted from the Structure Plan for reasons explained in paragraphs 74 to 79. The County Council has therefore considered whether it will still be appropriate for the review of Local Plans and Local Development Documents to extend the Green Belt to cover the whole of the area south of the A505 between Stevenage and Luton. It has concluded that this will still be appropriate due to emerging proposals for major urban regeneration and green field expansion at Luton, just inside Bedfordshire. Extension of the Green Belt around Luton in Hertfordshire is considered appropriate to assist the regeneration of Luton and to counter pressures for green field development at unsustainable village locations close to it, including Great Offley, Preston, Whitwell and Kimpton.

48. Elsewhere, provision is being made in the current review of the Dacorum Local Plan to 2011 for a more limited extension of the Green Belt in the Markyate area, up to the Chilterns Area of Outstanding Natural Beauty (CAONB). This is in line with the current adopted Structure Plan and need no longer be referred to in Policy 5. The extension will contain any development at Markyate, minimise coalescence between Luton and settlements in west Hertfordshire and aid the regeneration of Luton and Dunstable. The CAONB provides protection for the area further west.

49. The combined area of the Green Belt extensions west of the A1(M) at Stevenage and at Markyate is about 5,600 hectares, subject to detailed definition in local plan reviews. The general extent of these extensions is indicated on the Key Diagram. The net effect of the extensions will be to increase Green Belt cover from 60% to about 63% of the County, excluding urban areas.

50. The last part of Policy 5 deals with development control and priorities for the use and management of land in the Green Belt. The priorities are mostly as set out in PPG2, in addition reference has been made to support the objectives of the Watling Chase Community Forest (Policy 51). Policy 5 has been worded so as to be entirely

consistent with national policy guidance as contained in PPG2. For this reason there is no reference in Policy 5 to the various kinds of circumstances which, exceptionally, may justify development that would not normally be permitted within the Green Belt.

51. Local Plans have already addressed the scope for redevelopment of some existing major developed sites within the Hertfordshire Green Belt, including most of the former psychiatric hospitals. However other major existing developed sites remain where existing uses are likely to come to an end. Policy 5 gives support to the preparation of suitable redevelopment proposals on such sites, subject to compliance with the criteria in Annex C of PPG2.

POLICY 5 GREEN BELT

A Green Belt will be maintained in the south of the County as part of a Green Belt about 12-15 miles deep around London with limited extensions along the main radial corridors and around the settlements, as indicated on the Key Diagram. The Green Belt will also be maintained in the County to the east of Luton, as part of the South Bedfordshire Green Belt. The precise boundaries of the Green Belt, as modified in accordance with the following provisions of this policy, shall be as defined in district local plans.

Boundary Reviews linked to Policies 6 and 7

Boundaries of the Green Belt around towns may be reviewed in local plans to identify land at settlements listed in Policy 6 for the purposes of limited peripheral development under Policy 7. In addition, minor adjustments may be considered in reviews to secure a more sustainable pattern of development and activities within these settlements.

Individual adjustments linked to Policies 6 and 7 will need to be fully justified by reference to the criterion of exceptional circumstances indicated in Planning Policy Guidance Note 2 'Green Belts' (PPG2). Proposals should demonstrate that they contribute to sustainability objectives, and must be part of a comprehensive planning approach to deliver these objectives. In particular, housing, employment, retailing and transport related development will only be appropriate as part of this comprehensive approach, and where it can be clearly demonstrated that the relevant needs can best be accommodated by development as proposed.

Any land released from the Green Belt in accordance with Policies 6 and 7 and this policy should be on a scale sufficient only to ensure that development needs during the period of the local plan review can be provided in line with the requirements of Policy 9. No more land will be excluded from the Green Belt to meet possible development needs after that period (generally termed 'safeguarded land' or an 'area of special restraint').

Green Belt Extension

The Green Belt will be extended between Luton and Stevenage so as to extend it to cover the whole of the area south of the A505.

Development Control and Priorities

In the Green Belt there is a presumption against inappropriate development and permission will not be given, except in very special circumstances, for purposes other than those detailed in PPG2. Local Plans may list settlements within the Green Belt where infilling will be permitted under the guidelines contained in PPG2 and in accordance with Policy 6 of this Plan.

Subject to compliance with the criteria in paragraph 3.8 of PPG2, re-use of major developed sites and other existing buildings within the Green Belt is not an inappropriate form of development, though the acceptability of re-use in any particular case will also need to be considered in the light of other relevant policies and considerations, in particular traffic impact.

Throughout the Green Belt priorities for the use of land are to:

- i) provide opportunities for access to the open countryside for the urban population;**
- ii) provide opportunities for outdoor sport, and outdoor recreation near urban areas;**
- iii) retain attractive landscapes, and enhance landscapes near to where people live;**
- iv) improve damaged and derelict land;**
- v) secure the nature conservation interest;**
- vi) retain land in agricultural, forestry and related uses; and**
- vii) support the objectives of Watling Chase Community Forest.**

Development which is permitted within the Green Belt, and management of land and activities within it, should aim to contribute to these priorities.

Settlement Pattern and Urban Concentration

52. The settlement pattern of Hertfordshire is characterised by a number of small to medium sized settlements, each with a range of facilities and surrounded by accessible open countryside. In parts of the County, notably the south and west, the bands of countryside between settlements are narrow and are only maintained by strict implementation of Green Belt policies. None of the County's settlements are completely self-sufficient in terms of providing a full range of employment, social, leisure and shopping facilities for its residents and there are high levels of interaction, and therefore movement, between the settlements. Nevertheless, most of Hertfordshire's settlements have managed to retain some individual character. It is this pattern of distinct and diverse communities, each capable of supporting an appropriate range of housing, employment, leisure and shopping facilities, on which the development strategy in this Plan seeks to build.

53. The main development strategy remains substantively unchanged from the current adopted Plan. It aims at broadly maintaining the general settlement pattern in Hertfordshire, while making the best use of the resource which our towns represent. This approach will take account of the major changes which could arise in activities and land use over the next twenty years and seeks to bring forward development within the context of an integrated, planned and long-term approach, with development being used as a positive agent of change. The principal element of the strategy is to continue to concentrate development within the main urban areas through a process of 'planned regeneration'. The main urban areas are listed in

Policy 6. All of these have good access onto the primary road and rail systems and have a population greater than 7,000.

54. Policy 6 sets a holistic approach to planning development in villages. This is based on the concept of a settlement hierarchy and would seek to identify, on the basis of sustainability criteria, those (generally larger) villages where some development may be appropriate to support the service functions of the village as a whole. Lower down the hierarchy would come other villages where development should be more limited and, finally, smaller villages where development may only be acceptable in exceptional circumstances. Such an approach would shift the focus towards identifying, and where appropriate supporting village services that meet a range of local needs.

POLICY 6 SETTLEMENT PATTERN AND URBAN CONCENTRATION

Development will generally be concentrated in the following settlements and in accordance with local plans:

Abbots Langley	Letchworth
Baldock	Potters Bar (including Little Heath)
Berkhamsted	Radlett
Bishop's Stortford	Rickmansworth
Borehamwood	Royston
Bushey	Sawbridgeworth
Cheshunt	South Oxhey, Carpenders Park and
Chorleywood	Eastbury
Croxley Green	St Albans
Harpenden	Stevenage
Hatfield	Tring
Hemel Hempstead	Waltham Cross
Hertford	Ware
Hitchin	Watford
Hoddesdon	Welwyn Garden City

All other settlements within and beyond the Green Belt should be categorised in local plans on the basis of what types and scale of development may be appropriate in terms of relevant sustainability criteria, including consideration of community services.

Within the Green Belt development in any larger settlements that are 'inset' (that is excluded from the Green Belt) will be limited to that which is compatible with the maintenance and enhancement of their Green Belt boundary.

The Main Development Strategy

54. The main development strategy is fundamentally unchanged from the current adopted Plan. It is to continue to meet development needs as far as possible on suitable sites within existing urban areas. This approach is in line with national policy including the 2000 Urban White Paper and revised PPG3 – also issued in 2000, and regional planning guidance. The main development strategy is set out in Policy 7, which has been updated to more clearly express the need to give priority to the re-use of previously developed land in preference to the development of green field sites. Changes also reflect the Government's drive to promote an urban renaissance and improve quality of life. Physical regeneration of existing urban areas will be gradual and renewal needs to respect the existing built heritage and other valued environmental assets in existing urban areas.

55. The main development need is for more housing, which is covered in paragraphs 61 to 98. However the overall development strategy involves far more than just dealing with the needs for additional housing development. Whilst adequate housing is vitally important, this is only one among many types of development for which provision needs to be made within existing urban areas. Regeneration and redevelopment must also take into account the development needs of business, education, health services, various forms of institutional care, leisure, shopping and community uses, as well as transportation, other infrastructure needs and improvements to townscape and public open space.

56. The County Council is confident that the Structure Plan Alterations will not require districts to identify green field sites to meet the revised overall Structure Plan housing requirement. (See paragraphs 70 – 71, 74 and 84.) However, as part of the overall development package for a settlements, Policy 7 allows for the review of local plans to include proposals for limited peripheral development (whether for housing or other needs) providing that three important criteria in this policy are satisfied. These criteria are to ensure that any peripheral development is absolutely necessary, is planned within the context of the town as a whole and will provide demonstrable sustainability benefits.

57. It will be for the district councils to decide what scale of development is 'limited', having regard to local circumstances and the scale of any development needs which are in accordance with this Plan but which cannot be provided satisfactorily within existing urban areas.

58. In reviewing local plans, the choice of sites for any limited peripheral development should be informed by a comparative appraisal of the respective sustainability advantages and disadvantages of different options.

59. The review of local plans may also consider whether minor adjustments to the boundary of existing urban areas could help secure a more sustainable pattern of development and activities within them. For example, in exceptional circumstances this might involve the relocation of an existing urban land use to a more appropriate peripheral site. This would enable the vacated site to be re-used in a way which makes a substantial contribution to fulfilling the sustainability aims of this Plan.

60. All but one (Royston) of the 29 main settlements listed in Policy 6 are tightly constrained by Green Belt. Therefore, providing exceptional circumstances can be demonstrated, limited reviews of the inner Green Belt boundary around some towns

will form part of the overall approach set by Policy 7, in accordance with the corresponding provision for this in Policy 5 on the Green Belt.

POLICY 7 MAIN DEVELOPMENT STRATEGY

Priority will be given to meeting development needs within existing urban areas, as listed in Policy 6, while protecting or enhancing their distinctive character and environmental quality.

Ways to increase the potential for high quality development within existing urban areas will be advanced and kept under continuous review in local plans.

Land within existing urban areas will be used in the most efficient way to accommodate new development by:

- a) recycling of previously developed land, especially vacant, derelict and under-used land;**
- b) re-use of existing buildings by refurbishment, conversions, changes of use, and extensions;**
- c) restructuring of land uses, including redevelopment of land occupied by single storey buildings and surface car parks;**
- d) mixed use development where appropriate;**
- e) use of high density development where compatible with the character of the area in question and local plan design policies;**
- f) greater sharing of facilities by different users at different times where appropriate, as this can reduce the need for new development and/or enable redevelopment of surplus premises for other development needs.**

Limited peripheral development will only be acceptable where:

- i) the review of local plans has fully explored opportunities to accommodate further development within existing urban areas, in the case of housing informed by up to date urban capacity studies; and**
- ii) development is planned within the context of the settlement as a whole; and**
- iii) it will provide demonstrable sustainability benefits.**

All proposals will be brought forward through the local plan process. Proposals will be demonstrably deliverable, based on the sustainability aims and land use objectives of this Plan and include wide community involvement in the planning process.

HOUSING

The Current Structure Plan

61. The current adopted Structure Plan makes provision for 65,000 dwellings in the period 1991 to 2011. This equates to an average annual rate of 3,250 during this 20 year period. The housing strategy and distribution in the current Plan assumed that in order to meet the entire dwelling requirement to 2011 it would be necessary to allocate more green field land for development. Policy 9 in the current Plan distributes the 65,000 between the ten Hertfordshire districts on the following basis:

- a) Dwelling already completed since 1991 in each district when the Plan was prepared;
- b) An estimate of capacity on land with planning permission and other sites already allocated in local plans when the Plan was prepared (This included some large green field sites that remain undeveloped and without planning permission in 2003, notably at Bishops Stortford and Welwyn Garden City.);
- c) An estimate of additional dwelling capacity on previously developed land, being the estimate endorsed by an independent Panel following an Examination in Public (EIP) held in 1997;
- d) Allocations of more green field land, for about 7,000 dwellings, to make up the 'shortfall' between the 65,000 total and the sum of (a), (b) and (c). The locations comprised:
 - 4,600 at two strategic locations identified in Policy 8, being 1,000 at Hemel Hempstead and 3,600 west of the A1(M) at Stevenage (with at least a further 1,400 to follow here after 2011);
 - An estimate that about 2,400² would need to be provided at relatively small green field sites on the edge of towns in line with the main development strategy (Policy 7)

62. Alterations to roll forward existing housing policies 8 and 9 need to:

- Accord with numeric requirements in the Government's current regional planning guidance (RPG9, see paragraphs XX to YY);
- Accord with the Government's updated planning policy guidance on housing (PPG3, see paragraph 22), which sets out a new 'plan, monitor and manage' approach;
- Take account, as far as is possible, of Government statements on planning since issue of RPG9, notably in relation to the London - Stansted - Cambridge potential growth area;

² The 1997 EIP recommended specific sites at Royston, Napsbury and North East Stevenage for a total of about 1,400 and assumed that 1,000 more would be dispersed throughout the County.

- Have regard, as far as is possible, to the new strategic planning arrangements that are being introduced to strengthen regional planning and replace structure plans (paragraphs 29 to 35).

Regional Planning Guidance

63. The Government published revised Regional Planning Guidance for the South East (RPG9) in March 2001 (paragraph 26). RPG9 requires 3,280 dwellings to be built in Hertfordshire annually from 2001 to at least 2006.

64. RPG9 states that where development plans are reviewed and the new plan extends beyond 2006, they should continue to provide for additional dwellings at the same annual rate until such time as any different rate is adopted following review of RPG. The policy alterations are intended to roll forward the Plan to 2016 in line with RPG9. Therefore the altered policies need to make provision for 15 years X 3,280 = 49,200 dwellings in the 15 year period 2001 to 2016. This represents an increase of about 300 units per annum on the overall rate of about 2,970 that is being planned in the current round of local plan reviews to 2011.

65. New Regional Planning Guidance for the East of England including Hertfordshire is now being prepared (RPG14, see paragraphs 27 and 33-35). However this is at an early draft stage.

66. The Government will not be publishing updated population and household projections based on 2001 Census data until 2004. We do not know whether or not the updated household projections will be higher than the most recent (1996-based) projections. Much will depend on the Census data and what assumptions the Government makes on patterns of migration and future social trends in household formation. Consequently there is uncertainty what overall level of housing provision in the Region will be required in RPG14.

67. The distribution of housing within the region in RPG14 is equally uncertain. Hertfordshire's percentage share may or may not change significantly, depending on what overall spatial development strategy is chosen. Recent statements by the Deputy Prime Minister have signalled his concern about the shortage of housing in the South East and his wish to see an acceleration of the existing proposals in RPG9 for significant growth in the four potential growth areas that are identified in the RPG. One of these areas is the London - Stansted - Cambridge study area, which includes part of Hertfordshire.

Urban Housing Capacity Study

68. Revised PPG3 on Housing sets out a 'sequential' approach to identification of land for housing. This starts with housing 'capacity studies' to identify potential on previously developed land. The results inform the second stage, which is to decide on the scale and location of green field development that is likely to be needed to meet overall housing requirements. In determining the order in which identified sites should be developed, the general presumption is that previously developed sites suitable for housing should be developed before green field sites.

69. The sequential approach will require detailed monitoring of changes in the supply of suitable previously developed sites, coupled with policies to control timing of the

release of identified development sites by granting planning permission. Monitoring will also shed light on the reliability of housing capacity studies and inform the next review of plans, when the same sequential approach must be repeated.

70. The County Council has carried out a comprehensive and detailed countywide study of housing capacity during 2001 to 2016, liaising closely with district councils and other key stakeholders as the technical work proceeded. The study sought to assess all sources of housing capacity on previously developed land, together with capacity on green field sites that already have planning permission for development. A full technical report³ on the study is available, and this contains an update to take account of the most recent available monitoring data.

71. The capacity study indicates that it will be possible to provide about 49,700 dwellings in Hertfordshire during the period 2001 to 2016. Table 1 summarises the district breakdown. The total excludes all green field sites identified in the recent round of local plan reviews, other than those with planning permission in 2002 (when the figures were updated to include recent permissions). However the assessment of each source of capacity has inevitably involved having to make many technical assumptions and policy judgements. Consequently there is and will remain considerable uncertainty about overall housing capacity. It clearly will not turn out to be *exactly* 49,700.

72. Most of the district councils currently consider that the County Council's draft assessment, originally of 46,440 and now updated to about 49,700, is an over-estimate of housing capacity. There is considerable disagreement at this stage about some sources of capacity, for example the scope to release employment land, while there is less or no significant disagreement about other sources.

73. In January 2002 all the district councils responded with their own draft housing capacity figures for the period 2001 to 2016. Districts have used widely differing methodologies and assumptions in reaching their draft figures, which they stress are still under review and subject to change. The combined countywide total of the districts' draft assessments is about 37,000 dwellings. This total also excludes all green field sites identified in the recent round of local plan reviews, other than those with planning permission in 2002. It is therefore directly comparable and about 12,700 less than the County Council's assessment.

³ Technical Report 2 entitled *Housing Capacity in Hertfordshire, 2001 to 2016*, together with other supporting documents.

Table 1: Assessment of Housing Capacity in Hertfordshire, 2001 to 2016

Col 1	Col 2	Col 3	Col 4	Col 5	Col 6
District	Dwelling Completions between April 2001 and March 2002	Current estimates of capacity on (a) all sites with planning permission in 2002, plus (b) other sites identified in current reviews of local plans that are on previously developed land	County Council's assessment of additional capacity	County Council's assessment of total capacity = Cols 2 + 3 + 4	Assessment annualised = figures in Col 5 /15 years, unrounded
Broxbourne	170	1,110	2,930	4,210	281
Dacorum	320	1,700	3,050	5,070	338
East Herts	610	2,330	3,930	6,870	458
Hertsmere	290	1,200	2,260	3,750	250
North Herts	720	2,550	3,300	6,570	438
St Albans	360	1,690	5,070	7,120	475
Stevenage	170	490	2,010	2,670	178
Three Rivers	370	1,130	1,690	3,190	213
Watford	60	1,150	3,150	4,360	291
Welwyn Hatfield	80	2,860	3,000	5,940	396
County Total	3,150	16,210	30,390	49,750	3,317

NB Figures in cols 2 to 5 are rounded to nearest 10.
 Figures in Col 3 take account of an assumption that about 5% of sites will not be implemented for various reasons.

Sequential Approach

74. Because of the work undertaken to date, urban housing capacity can now be established to be within the range of 37,000 (the sum of the district councils' estimates) to 49,000 and possibly more (the County Council's estimate). Under these circumstances, there already appears to be sufficient housing capacity to meet development needs until at least 2011 in line with the requirements in RPG9. The County Council has reached this view on the basis of the following steps:

- i) The requirement indicated by RPG9 for the period 2001 to 2011 is 32,800 dwellings (i.e. 10 years at 3,280 per year).
- ii) 3,150 dwellings were built in the first year of the Plan period (2001/02). At the end of this first year, planning permissions and land allocations on previously developed land were already sufficient to provide about 16,200 dwellings (See Table 1.) Assuming that this 'committed' capacity can all be developed by 2011, there remains a 'gap' of another 13,450 to reach 32,800 by 2011.
- iii) The sum of the district councils' current assessments of total capacity in the 15 year period 2001 to 2016 is about 37,000. This comprises the 3,150 dwellings were built in the first year of the Plan period, planning permissions and land allocations on previously developed land at the end of the first year for about 16,200 dwellings and an implied 'residual' estimate of additional capacity in the remaining 14 years of about 17,650. The County Council regards this residual figure as a minimum estimate of additional capacity. On this basis it seems reasonable to assume that at least 9/14 of the 17,650 residual figure can be delivered in the 9 year period 2002 to 2011, i.e. about 11,350. Adding 11,350 to 3,150 and 16,200 gives 30,700, leaving a residual 'gap' of about 2,100 dwellings.
- iv) The residual 'gap' of about 2,100⁴ to reach 32,800 by 2011 is very likely to be bridged for several reasons.
 - (a) Clearly the first reason is that County Council considers, on the basis of its technical work to date, that the District Council's combined current assessments of urban housing capacity will turn out to be too low. The combined total of the districts' assessments when the current Plan was prepared have turned out to have under-estimated capacity by about 14,000 dwellings in the period to 2011.
 - (b) Several small green field housing land allocations⁵ may be permitted during the next few years for a variety of local planning reasons – notably sites where negotiations with developers and/or housing associations are at an advanced stage.
 - (c) There may be instances where, for local planning reasons, district councils grant planning permission on small green field sites within urban areas, for example some surplus allotments where affordable

⁴ This figure represents about eight months housing supply, based on an annual requirement of 3,280.

⁵ These are listed in an Appendix J to the updated Housing Capacity Study (Technical Report 2, as reissued with this document.)

housing is envisaged. Such sites are outside the scope of both the County and District Councils' assessments of housing capacity.

75. On the assumption that there will be sufficient housing capacity in line with RPG9 until at least 2011, then two substantive scenarios need to be considered.

- (a) In the medium term, how to plan for the possibility that the forthcoming RPG14 will set a higher annual dwelling requirement than in the current RPG9 to take effect before 2011 - say from 2006 onwards;
- (b) In the longer term, how to plan for whatever scale of green field development may be needed after 2011 and looking beyond 2016, depending on how accurate the County Council's capacity assessment turns out to be and what sub-regional development strategy and housing requirements are set in RPG14.

76. One possible approach that the County Council has considered would be to identify strategic scale green field locations in the Structure Plan Alterations now, but on a reserve or 'contingent' basis. Such land would only be released for development if and when required in response to either or both of scenarios (a) and (b) above. Locations could vary in scale, with some where development could start soon, say around 2006, if needed and others that would require a longer 'lead in time' between permission and development starting, say around 2011. Such an approach would have the advantage – in theory - of providing certainty about the location of large scale green field development(s) in the event that monitoring indicates this to be necessary, in line with the sequential approach in PPG3.

77. The way forward with a 'reserve sites' approach would begin with a sustainability appraisal. This involves a systematic comparison of different potential locations against an explicit set of assessment criteria to decide where, on balance, would be the most appropriate green field locations. Appraisal can involve 'ranking' locations, starting with what are considered to be the most suitable for development, followed by progressively less suitable locations. A comprehensive sustainability appraisal would need to consider not only the strategic scale locations that are already identified in the Structure and local plans, but also all other possible strategic scale locations on the edge of towns which might be suitable for planned urban extensions.

78. However there would be significant difficulties in undertaking a sustainability appraisal of green field development options prematurely, before the Government resolves a number of key issues in the emerging regional planning framework and related strategic economic and transport strategies. Some of the main difficulties are uncertainty about:

- i) What will be the scale and distribution of future growth in employment in the region and in London⁶, given that the distribution of housing should aim to achieve a good match between the location of jobs and housing so as to reduce commuting.

⁶ In the East of England these matters are being addressed in a review of EEDA's Regional Economic Strategy and consideration of the implications in preparation of a spatial strategy for RPG14. In London these matters are being considered in preparation of the Mayor's draft Spatial Development Framework for London.

- ii) Whether there may be a new runway(s) at Stansted Airport, depending on the Government's response to the South East Regional Airports Study (SERAS), in which case the Government may favour locating a substantial share of green field development in the region close to the expanding Airport.
- iii) Whether and how operations at Luton Airport will expand, given that one of the SERAS options on which the Government has consulted on would result in a significant worsening of aircraft noise over the location west of the A1(M) at Stevenage that was not expected when this location was identified in the current Structure Plan.
- iv) Whether, airport noise apart, the sustainability advantages of the location west of the A1(M) at Stevenage are still robust in comparison with other potential locations in the light of the most recent consideration of environmental constraints on the scale of development that might be accommodated there.

79. The County Council has decided that it would not be appropriate to identify any housing locations in the Structure Plan Alterations, even on a 'reserve' basis, for two reasons. The first is that the urban housing capacity indicates that there is sufficient capacity without having to permit any more green field development. The second reason is the uncertainties outlined above and the wisdom of avoiding premature and potentially ill-judged decisions.

80. Instead, the revised housing distribution in Policy 9 is based primarily on the outcome of the County Council's capacity study (paragraphs 68 to 71) and the location west of the A1(M) at Stevenage is proposed to be deleted from the Plan (paragraph 91). In order to conform with the Structure Plan Alterations, therefore, the current reviews of the Stevenage and North Herts Local Plans should not identify land at this location for development⁷.

Decision making process after adoption of Alterations

81. The proposed approach involves rigorous monitoring of new housing development and proposals will be essential during the period up to 2005. By then, the monitoring should provide more clarity about the scale of capacity on previously developed land and new RPG14 will have been issued. That will be the right stage to undertake a full sustainability appraisal of all potential locations to inform decisions about the scale and location of green field development.

82. The County Council recognises that the decision-making process in 2005/06 is likely to be undertaken through the new regional planning arrangements outlined in

⁷ The circumstances in regard to the strategic location identified in Policy 8 in the current Structure Plan at Hemel Hempstead are different. There, Dacorum Borough Council did not identify a single strategic scale housing allocation as envisaged when Policy 8 was drafted, but a number of relatively small sites that accord with the strategic framework for peripheral development which is provided by Structure Plan Policy 7. Moreover, the sites at Hemel Hempstead have already been considered at a local plan inquiry. It will now be for Dacorum Borough Council to consider the recommendations in the forthcoming Inspector's report and to decide whether to embark on further modifications in regard to the status and role of these sites. These are essentially local planning matters outside the scope of the proposed replacement of Structure Plan Policy 8.

paragraphs 29 to 35, not through another review of the Structure Plan. Two key strands to the process are envisaged, which overlap:

- Preparation of the Local Development Documents (LDDs, paragraph 29) covering the period to 2016;
- Sub-regional planning decisions as part of the first review of RPG14, which is expected to include a full district level dwelling distribution.

Preparation of the Local Development Documents

83. Preparation of the first LDDs can and should start before adoption of the Structure Plan alterations. Dwelling figures should be on the assumption that the district level distribution will be as in the deposit Structure Plan or any amended figure recommended in the EIP Panel report.

84. The County Council remains confident about its overall assessment of housing capacity (see paragraphs 56, 70 – 71 and 74) and that the dwelling distribution in the Structure Plan Alterations will not require districts to identify green field sites. However the districts will need to take account of the latest monitoring information as they update their own assessments of housing capacity. The provisions of Policy 7 will allow individual districts to identify small scale green field sites for development on the edges of towns if they consider this may be appropriate in line with the criteria in Policy 7 and PPG3.

85. However, in line with PPG3 a new Structure Plan policy on phasing and control over the release of allocated sites is put forward in these Alterations, immediately following Policy 9. This aims to prevent the release of allocated green field sites for development unless and until monitoring shows this to be absolutely necessary. See paragraphs 96 to 98.

86. It will be for the relevant district councils to decide whether or not 'areas of special restraint' (ASRs⁸) that are identified in current local plan reviews to meet possible development needs after 2011 should be retained as ASRs when these plans are reviewed or replaced to cover the period to 2016.

Sub-regional planning decisions as part of the first review of RPG14

87. The other strand of the implementation process is the work involved when the Spatial Strategy for the East of England Region in RPG/RSS14 is first prepared or reviewed to address emerging issues that have a bearing on what should be the scale and distribution of housing. These issues include:

- i) Any change in overall dwelling requirements in the Region compared with existing RPG9, which will need to be informed by new household projections in 2004 that take account of the 2001 Census data;
- ii) The outcome and implications of studies in the potential growth areas, notably the London – Stansted – Cambridge area (see paragraph 33);

⁸ See paragraph 46. The largest ASRs are at Bishops Stortford and Welwyn Garden City. Much smaller ASRs have been identified at Royston and elsewhere.

- iii) The White Paper on Aviation (not likely to be published before 2004), including the implications of increased aircraft noise due to any new runway development on the location of new housing;
- iv) The spatial implications of the Regional Economic Strategy, which is currently being reviewed by the East of England Development Agency and its partners;
- v) The Government's decision on the planning applications for development west of the A1(M) west of Stevenage⁹ and any other large scale proposals that may be 'called in'.

88. The timetable for addressing the above issues is uncertain, but most of the key uncertainties should be resolved by 2005. At that stage a comprehensive sustainability appraisal of green field development options in the Region could be undertaken. The East of England Local Government Conference (EELGC) is the Regional Planning Body in the region and would need to take the lead on this work. Hertfordshire County Council, as a member of the EELGC, would expect to be part of the partnership that jointly undertakes the appraisal work.

89. The conclusions of the appraisal would inform the identification of strategic scale green field development locations in an updated RSS14 that looks to 2026 and beyond. Some of the identified locations may, or may not, be in Hertfordshire. Some locations may provide for very large scale development with a long lead in time, such that development might not commence until around 2011. Other locations might be smaller and relatively unproblematic in terms of putting the necessary transport and other infrastructure in place, in which case it might be possible to start development at some such locations soon after 2006.

90. Timing issues mean that once any specific development locations are identified in the statutory RSS it may be necessary for master plans to be prepared and then planning applications determined in parallel with reviews of the relevant LDDs, rather afterwards.

91. The results of the County Council's housing capacity study, the uncertainties identified in paragraph 78 and the emerging regional planning issues and processes identified in paragraph 87 mean that it is no longer appropriate to allocate the strategic location West of the A1(M) at Stevenage or any other strategic scale location in the Structure Plan.

92. Consequently the County Council proposes to delete Policy 8 in the current Structure Plan and replace it with a short new policy, overleaf. This maps out the process envisaged to identify the location(s) of any strategic scale green field housing development that may be required.

⁹ The Government has 'called in' applications for development at this location, on the grounds that they may conflict with national planning policies. However the timetable for an inquiry into the applications has not been notified by the Planning Inspectorate. Given the complexity of the issues it seems unlikely that a decision will be made during 2003.

NEW POLICY TO SUPERSEDE AND REPLACE POLICY 8

STRATEGIC SCALE GREEN FIELD HOUSING DEVELOPMENT

The need for any strategic scale green field development in Hertfordshire is expected to be addressed by the Regional Planning Body (RPB) for the East of England after it has considered relevant emerging issues that include:

- i) Interpretation of data in forthcoming Regional Annual Monitoring Reports;
- ii) Any change in overall dwelling requirements in the Region compared with RPG9;
- iii) The outcome of studies and decisions in regard to the potential growth areas identified in RPG9, particularly the London-Stansted-Cambridge area;
- iv) The White Paper on Aviation, including the implications of aircraft noise for the location of new housing;
- v) The spatial implications of reviews to the Regional Economic Strategy;
- vi) The Government's decision on the planning applications for development west of the A1(M) west of Stevenage and any other strategic locations where the Secretary of State so intervenes.

Before the RPB concludes that review:

- No strategic scale housing allocations (where the eventual scale would exceed about 1,000 dwellings) or new strategic scale 'areas of special restraint' will be identified in the review of local plans in Hertfordshire;
- No further strategic scale housing developments will be permitted anywhere in Hertfordshire, save any permitted by the Secretary of State using his reserve powers.

District Dwelling Distribution

93. The distribution of housing development between districts is the subject of Policy 9. The distribution is based on the results of the County Council's assessment of urban housing capacity in the fifteen year period 2001 to 2016, being a total of about 49,700 which is close to the figure required during this period in line with RPG9 (see paragraph 28). The distribution has been calculated by simply dividing the capacity assessment figures for each district during the period 2001 to 2016 by 15 to derive an equivalent average annual rate¹⁰.

94. There are of course a number of factors other than urban housing capacity that need to be taken into account in preparing the dwelling distribution. These factors include district level demographic projections of population and household growth, any major changes to the pattern of employment and commuting, transportation issues such as congestion and infrastructure constraints such as water supply and flood risk. The County Council has considered these matters¹¹ and concluded that there are no paramount considerations based on firm information that would point to a distribution differing from that put forward in Policy 9 (and therefore which would require more green field land to be developed).

95. Districts are expected to achieve the rates of development in Policy 9 by following the guidance in PPG3 and the relevant Structure Plan policies, notably Policies 5, 6, 7 and 8.

POLICY 9: DWELLING PROVISION AND DISTRIBUTION

The review of local plans will make provision for development of an annual average rate of 3,280 additional dwellings in Hertfordshire. This rate will apply from April 2001 onwards and be distributed as follows:

Broxbourne	280
Dacorum	330
East Hertfordshire	450
Hertsmere	250
North Hertfordshire	430
St Albans	470
Stevenage	180
Three Rivers	210
Watford	290
Welwyn Hatfield	390
HERTFORDSHIRE	3,280

The scale and distribution of housing development in this policy will be reviewed by the Regional Planning Body as part of the same process identified in [replacement] Policy 8.

¹⁰ A second step involved a small pro-rata reduction so that the total of the district level annual rates is 3,280 dwellings, in line with RPG9.

¹¹ Section 6 of Technical Report 3 entitled 'Sustainability Appraisal Stage 1', dated July 2002

Monitoring of housing land supply and managed release of allocated sites

96. The Government has produced good practice guidance¹² on the managed (or 'phased') release of housing sites in order to deliver the 'plan, monitor and manage' approach. The new policy below is in line with that guidance and provides a strategic framework to deliver the flexible approach that will be needed. Implementation of this policy will depend on timely monitoring data, which will be collected as part of wider regional arrangements being developed to improve the quality of monitoring. See paragraphs 36 to 39.

97. The County Council intends to work jointly with district councils to deal consistently with the detailed issues that will arise in implementing this policy and in producing any supplementary planning guidance that may be helpful. One of the issues will be how to ensure that any revisions to phasing of green field development does not jeopardise funding arrangements for development of affordable housing. It will be necessary for district councils to liaise with the Housing Corporation on this matter.

98. It will be open to district councils to consider whether any variation about the rates in Policy 9 from one phasing period to another (e.g. 2001 to 2006, 2007 to 2011 and 2012 to 2016) can be justified in reviewing their local plans.

NEW POLICY TO BE INSERTED AFTER POLICY 9

MONITORING OF HOUSING LAND SUPPLY AND PHASED RELEASE OF ALLOCATED SITES

As part of wider regional monitoring arrangements, the County and District Councils will jointly monitor the rate of housing development and the supply of land available for house building.

Local plans should include phasing policies to control the timing of planning permission for development on allocated housing sites, with the aim that previously developed sites (or buildings for re-use or conversion) should be developed before green field sites.

Local plan phasing policies should allow all 'windfall'¹³ housing proposals on previously developed land to be permitted without delay, provided they are acceptable in terms of other relevant policies.

District councils should liaise in preparing and reviewing their local plan phasing policies. Adjoining authorities should operate complementary approaches for releasing sites in order to maximise the re-use of suitable previously developed land.

¹² *'Planning to Deliver – The managed release of housing sites: towards better practice*, published by DTLR in July 2001'.

¹³ As defined in paragraph 35 of PPG3. These are housing proposals on previously developed sites that have not been identified through the review of local plans.

Affordable Housing

99. One of the aims of the Structure Plan is to ensure that housing needs are met. The level of provision and its location are not the only factors in determining this. Housing costs in Hertfordshire are amongst the highest in Britain. While this is not an issue for many Hertfordshire households, there is a substantial number for whom an inability to find suitable and affordable accommodation is a problem. As a consequence many households including families with children are forced to occupy too cramped or otherwise inadequate accommodation. This commonly involves involuntary sharing of a dwelling by more than one household and in some instances the difficulties such conditions generate lead to homelessness.

100. Circular 6/98 on 'Planning and Affordable Housing' defines the term 'affordable housing' as encompassing both low-cost market and subsidised housing, irrespective of tenure or ownership, that will be available to people who cannot afford to rent or buy homes generally available locally on the open market. Two other terms are in common use. '*Social rented housing*' is affordable housing which is usually provided by a 'registered social landlord' (RSL), generally with the use of public subsidy in order to ensure that rents are typically no higher than the Housing Corporation targets rents. '*Intermediate market housing*' is housing which is generally, but not exclusively, provided by RSLs at below open market levels but above Housing Corporation target rent levels. It can include shared ownership, mid-market rent and, where appropriate, certain types of 'low cost home ownership' (LCHO).

101. The high cost of housing on the open market is one of the main problems facing Hertfordshire and a major concern of both the County and District Councils. The district councils are the statutory local housing authorities and the County Council has a particular and direct interest in subsidies, such as those available from the Government through the Starter Homes Initiative (SHI), to provide 'key worker' housing to meet the needs of public sector workers such as nurses/health workers, police officers, teachers, social workers and firefighters.

102. A Key Worker Housing Strategy for Hertfordshire has been produced by a representative group of key worker employers, housing authorities, county and district planning authorities and housing associations. This accepts the definition of 'key workers' as prescribed by the SHI but also acknowledges that it should be kept under review as public services are increasingly provided by the private and voluntary sector and to reflect the difficulties faced by employers in the recruitment and retention of staff which are related to high housing costs.

103. Only 16% of housing built since 1991 has been subsidised 'affordable' housing that is managed by a 'registered social landlord' (an RSL - the district council or, increasingly, a housing association) and offered to qualifying households generally for rent or in some instances on a 'shared equity' basis at below market costs.

104. The district councils' studies of housing need show that much more affordable housing is needed than is currently being built, and that most of the need is for social rented housing managed through an RSL, rather than low cost market housing, which the Government includes in its broad definition of 'affordable housing'.

105. In respect to meeting key worker housing requirements, the Hertfordshire Key Worker Housing Strategy recognises that key workers have different housing needs depending on the point they have reached in their career and life cycle. As a result, choice is required both in terms of property types and tenures. The Strategy has

therefore committed to undertaking a housing needs assessment for key workers in Hertfordshire to inform the planning and delivery of appropriate types accommodation that will meet the need.

106. RPG9 currently sets an indicative target that 46-49% of new housing should be 'affordable' in the South East outside London. This includes 'low cost market housing' but this category is difficult to define and monitor.

107. It is Government policy that local plans should include policies on:

- the minimum size of development ('thresholds') above which the district council will aim to negotiate with developers for the inclusion of a proportion of affordable housing;
- targets for what proportion of housing on sites larger than the threshold for negotiation should be affordable and managed through an RSL, where appropriate indicating different targets for particular sites.

108. Policy 10 reflects the above requirements, but does not actually set thresholds and the percentage of affordable housing sought - either separately for each district or at county level. These are matters for the district councils to decide in their capacity as local housing and planning authorities and their decisions need not be repeated in a strategic level planning policy.

109. The County Council will closely monitor trends in the provision of affordable housing and will encourage district councils to update local needs surveys and housing strategies on a consistent basis across Hertfordshire.

POLICY 10 AFFORDABLE HOUSING

The type and level of need for affordable housing will be identified from local authority housing needs surveys and housing strategies that will inform the review of local plans, which should include policies on:

- i) a housing site size¹⁴ threshold over which the developer will be expected to enter into negotiation over the provision of a proportion of affordable housing;**
- ii) targets for the minimum proportion of relevant categories of affordable housing that will be acceptable on sites above the threshold size and, where appropriate, different targets for particular identified sites.**

In rural areas beyond the Green Belt, local plans should include policies to support small scale affordable housing to meet local needs on land within or adjacent to settlements that is not otherwise proposed for residential development ('exception' sites). In rural areas within the Green Belt such development should be within settlements.

¹⁴ Size needs to be defined in local plans in terms of area and number of dwellings, taking account of Government guidance on thresholds.