## Update on housing sites – review of criteria and rescore of sites

The Neighbourhood Plan Housing Subgroup have now extensively reviewed the site selection

#### **Review of Selection Criteria**

We had already made some changes to our selection criteria in line with AECOM's recommendations last year, adding further criteria to our first round assessment to make this a more robust RAG rating using national planning policy. In the second round assessment (the scored assessment), we clarified certain criteria as suggested and removed others such as that relating to community views. These changes were recommended to SAPC in December last year but not accepted.

Earlier this year we revisited the AECOM report and assessed our criteria against its recommendations again. It was acknowledged that AECOM had recommended a considerable number of other assessment criteria that had not made it into our scheme. In view of this, we examined in detail all those criteria which we had not adopted and set out our reasoning (document to be included as part of our evidence base). Some of the criteria were then included following further consideration; in other cases we saw no reason to do so as we felt the criteria were already adequately covered in our assessment. Others would involve amounts of work that we considered as a group of volunteers to be simply unfeasible, and which could be covered adequately at planning stage. A number of AECOM's recommendations were very generic and not particularly applicable to the sites we have identified in our village; we therefore did not feel they were useful to us in choosing between sites.

### **Green Belt Sites**

We also looked again specifically at our assessment criteria around development in the Green Belt. We had based these criteria on East Herts DC's 2015 review of the Green Belt in 2015; this review had assessed parcels of land in the district for possible future development against criteria based on those for including land within the Green Belt. As follows:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and spatial character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land

The parcels of land assessed are characterized as **Very Low/ Low/ Moderate/High** suitability for development. However, all of the Green Belt land around Stanstead Abbotts is characterized as Low or Very Low suitability for development under this assessment; this means that it is not very useful as a tool for selecting between sites as all fall within the same category. For this reason, after consideration we moved this criteria from the RAG rated first round (as it excluded every single site in the Green Belt from further consideration) and put it back into the second round matrix scoring.

This did present some difficulties in scoring the Netherfield Lane site (K&L) in particular: this is because it is a hybrid site, with a significant portion being brownfield within the Green Belt (and therefore of high



suitability for development – this piece of the site would not need to be formally released from the Green Belt before being developed). The rest of the site is Green Belt with Very Low suitability for development. Our original assessment (of the joint site) had reflected the hybrid nature of the site, assessing it as of Moderate suitability for development and scoring accordingly. On revisiting this criterion, we agreed that the site as a whole should be scored as Low suitability, in common with all our Green Belt sites.

The site known as C2 (the Catesby site) was rescored as a revised and much smaller site had been presented to us by the landowners for possible development. The changed site made it through the first round of RAG rating, albeit with three criteria assessed as Amber.

### Rescore of Sites - outcome

Following this review, we made further changes to our second round assessment criteria and carried out a full rescore against the revised criteria of all the sites which made it through our RAG rating. The results are attached.

We have ranked the sites in order according to scoring; however to reflect the high priority that should be accorded to sites within the settlement area, we have separated the village sites from the Green Belt sites. Regardless of detailed scoring, these sites must take precedence over Green Belt sites – our scoring system was developed to enable us to assess sites and make choices between them on an objective basis, not to form a straitjacket forcing us to select particular sites.

Our first priority was to fulfill our quota via sites within the settlement area. Only if sites identified did not provide enough dwellings would we look at sites within the Green Belt. The East Herts District Plan allows us to review and redraw our boundaries to accommodate additional housing development as part of the neighbourhood plan and the National Planning Policy Framework allows neighbourhood plans to make changes to the Green Belt boundary if these are established in our strategic policies, where needed.

The village sites should provide approximately 48 dwellings; therefore we needed to find sites for a further 46 or so. Once we realized that we were not in a position to fill our quota from sites within the settlement boundary, it was always our intention to find just one site in the Green Belt which supply the rest of the allocation of 94 homes; if we have to make changes to the Green Belt boundary we want to do so only in one place and where we can create a strong and defensible new boundary.

The Green Belt site we have chosen therefore is the Netherfield Lane site, K&L. This site scores best against our criteria, but has a number of additional advantages in terms of creating a defensible boundary. The site currently consists of a greenfield and a brownfield site, the brownfield section being a redundant factory. The greenfield is therefore surrounded on three sites by development – the Almshouses and cottages at one end, the Netherfield lane houses along one side and the factory at the other end. There is a road and cottages further off to the other side. An application to redevelop the factory site for 20 dwellings has already been submitted and is expected to succeed; this part of the site is brownfield within the Green Belt and does not need to be released from the Green Belt in order to be developed. Essentially, there is already a very strong natural boundary around three sides of the site which makes it much easier to delineate and defend. Conversely, should the greenfield not be selected for the

Neighbourhood Plan, it becomes uniquely vulnerable to development as it will be essentially infill. We are aware that there have already been proposals made to build on this site in the past.

The (revised) Catesby site scores quite well following the review but still scores lower than Netherfield Lane. It should be noted that even if Catesby's offer to gift 60% of the original large site to the parish is accepted, the site they propose is still large enough to take well over 100 homes (their response to our Call for Sites was somewhat coy about how many homes they were actually proposing to build there). As there would be a need for no more than 30 homes to be built on this site – assuming Websters get planning permission for 20 on the brownfield site - the amount of unused land is a matter of concern; there have been cases where developers have come back after planning permission has been granted to ask to build more homes (this is what happened in the Ware Road development, which was allocated for 200 homes but the developer decided that they wanted to build double that number and succeeded on appeal). Furthermore, if the site approved is large enough to take more homes, it would be very hard for EHDC to resist the opportunity to use this as a "windfall" site if, as seems likely, the review of the District Plan leads to a requirement for us to take more development. Once we remove it from the Green Belt, we would not be able to oppose the further development of the site.

The Marsh Lane site was also rescored; we had taken this out of consideration after the Lea Valley Park expressed strong opposition. However, it has proved impossible to get them to put this in writing at this stage so we decided we could not reasonably refuse to consider it under the circumstances. It scored quite well but still came below Netherfield Lane and Catesbys so will not be included in the plan.

## Numbers of Dwellings Included in the Plan

There has been considerable confusion about the numbers of dwellings included in the plan, with the figure of 118 being mentioned at the mediation session.

It is difficult to be exact, but our final figure looks more like 108. With the exception of two sites – SASM H7 and SASM H3 – where the landowner has supplied definite numbers of homes to be built, we are relying in most cases on our own calculations of what is possible. This is based on a figure of 30 dwellings per hectare (30 dph).

Calculations are further complicated by the fact that some sites have undergone revision since original assessment and approval as to size of developable area and type of development deemed appropriate. Furthermore, the crucial question of availability has affected our ability to predict numbers exactly, with some sites proving unavailable whilst the availability of others becoming much more likely.

This has led to our creating a "buffer" of 14 dwellings on top of our allocation of 94, giving the figure of 108 in total.

The table below gives more detail about what each site can deliver and which are our most uncertain.

# <u>Site Ranking List Revised – Scores after RAG rating</u>

# **VILLAGE SITES**

Site Ref/SASM policy no.	Site Address	Score	Estimated no. dwellings as at July 2021
32&33 (SASM H7)	Chapelfields garages	68	7
28	North of Hoddesdon road (the Wilderness) PP	66	8
36	Hillside C	65	1
37	French's Close C	65	1
38	French's Close C	65	1
30a	West of Hoddesdon Road (The Spinney) C	64	6
30b	West of Hoddesdon Road (under construction)	64	2
5&6 (SASM H5)	South Street/Millers Lane	60	6 U
29	East of Hoddesdon Road ("hobbit houses") C	57	4
23 (SASM H8)	Amwell Lane (garages)	54	2 U
35 (SASM H6)	Amwell Lane (Thames Water)	53	10 U (could be as low as 6)
Total dwellings			48 estimated (inc 13 already built)

## **GREEN BELT SITES OUTSIDE SETTLEMENT AREA**

Site Ref	Site Address	Score	Estimated no. dwellings on site
K&L (SASM H3)	Netherfield Lane combined site	64	60

TOTAL ESTIMATED = 108. Includes "buffer" of 14 dwellings excess to requirement.

Of these 108 dwellings, delivery of 18 are uncertain (U) in that we have only the bare agreement of the landowner to the notion of development and there are additional topographical and policy constraints. There is further uncertainty about the numbers of homes that can be accommodated on some sites such as 23 and 35.

C = completed

**PP** = planning permission