

FIVE YEAR HOUSING LAND SUPPLY

PLANNING APPLICATION REF: 07/18/0514/F

SITE ADDRESS: Cheshunt Football Club, Theobald's Lane, Cheshunt, Herts, EN8 8RU


**STATEMENT OF COMMON GROUND
AND REVISED POSITION STATEMENTS**


Martin Paine, Broxbourne Borough Council

Roland Bolton, SPRU, for the Appellant

Introduction

1. This Statement of Common Ground has been agreed between Roland Bolton of DLP Planning Limited on behalf of the Appellant, LW Developments Ltd, and Broxbourne Borough Council (the Council) in respect of an appeal relating to Cheshunt Football Club, Theobald's Lane, Cheshunt, Herts, EN8 8RU.
2. The document has been prepared in light of discussions between both parties and the respective Proofs of Evidence and rebuttals.
3. The purpose of this Statement of Common Ground is twofold:
Part A informs the Inspector and other parties about the areas of agreement between the Council and LW Developments Ltd in the appeal against the refusal.
Part B sets out the respective positions of both parties in tabular format to indicate where those positions differ.
4. This statement does not address windfall, which is addressed separately in our respective Proofs of Evidence and Rebuttals.

Signed on behalf of the Appellant	
Name	Roland Bolton MRTPI
Position	Senior Director, DLP Planning Ltd
Date	28.07.2021

Signed on behalf of Broxbourne Borough Council	
Name	Martin Paine MRTPI
Position	Planning Policy Manager
Date	28.07.2021

A. STATEMENT OF COMMON GROUND

5. The annual requirement is 454 dpa, as set out in the Broxbourne Local Plan 2018-2033 (adopted June 2020, with a base date of 2016) (Annual Monitoring Report 2018 – 2020 table 2 line A and B).
6. As of 1st April 2020, there is a shortfall of 715 dwellings representing under-delivery since the 2016 Local Plan base year and that this shortfall should be made up within the next five years (Annual Monitoring Report 2018 – 2020 table 2 line C and D).
7. A 20% buffer is then added to this. The overall 5 year requirement is therefore 3,582 dwellings. (Annual Monitoring Report 2018 – 2020 table 2 line E and F).
8. For the purposes of calculating the five-year period is from the 1 April 2020 as follows:
Year 1 – 1 April 2020 to 31 March 2021
Year 2 – 1 April 2021 to 31 March 2022
Year 3 – 1 April 2022 to 31 March 2023
Year 4 – 1 April 2023 to 31 March 2024
Year 5 – 1 April 2023 to 31 March 2025

Housing Delivery Test

9. The results of the 2020 Housing Delivery Test (published January 2021) identifies that Broxbourne Borough Council delivered 74% of its housing requirement over the past 3 years.
10. In accordance with paragraph 11(d) of the NPPF, this means that the policies which are most important for determining the application are to be considered to be out-of-date as Footnote 7 clarifies that:
“This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.”
11. For this appeal paragraph 11(d) of the Framework is engaged which means permission should be granted unless:
“i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”
12. Matters of housing land supply are not agreed and these are set out in the Position Statements in Part B below.

Agreed contribution from Local Plan sites

13. The contribution towards the five year housing land supply shown in Table 1 is not disputed.

Table 1: Agreed contribution from Local Plan sites

Site	Total
Broxbourne School	153
South of Goffs Lane	51
Cheshunt Lakeside Phase 1A	195
High Leigh Garden Village	100
North of Cuffley Hill	23
Scania House 17 & 19	24
TOTAL	546

B. POSITION STATEMENTS

Table 1: Summary of the Council's and the Appellant's 5 year land supply position at 1st April 2020

Housing Land Supply Components	Housing Land Supply 2020-2025	BBC (AMR 2018-2020 Appendix H)	BBC PoE Table 2	SPRU (Rebuttal PoE Inquiry doc)
		Commitments (excluding Local Plan sites)	615	615
	Local Plan allocations	2,874	2,522	546
	Windfall Allowance (70dpa)	350	350	140
	Self-build allowance (5dpa over 4 years)	20	20	20
	Total	3,859	3,507	1,321
Requirement calculations	Requirement Scenario			
	Base OAN requirement	454	454	454
	Requirement over 5 years	2,270	2,270	2,270
	Shortfall	715	715	715
	With buffer @ 20%	3,582	3,582	3,582
	Dwellings per annum	716	716	716
5 Year Supply	Council Supply			
	Council deliverable supply	3,859	3,507	1,321
	Year @ 20% Buffer	5.39	4.90	1.84
	Oversupply/undersupply	277	-75	-2261

Table 2: Local Plan sites Position Statements

(full list of local plan sites taken from rows 151 – 184 of the AMR Housing Trajectory - Inquiry Document CD5.4)

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
1	Brookfield Riverside (BR1)	0	0	0	Y	-	-
2	Brookfield Garden Village (BR2)	100	0	0	Y	-	-
3	Gas Distribution Station (BX3)	0	0	0	Y	-	-
4	Broxbourne School (BX4)	153	153	153	Y	-	-
5	Cheshunt Lakeside (CH1) - net after Phase 1A	555	601	0	N	Mr Neo Rakodi (the Land Development Director for Cheshunt Lakeside) of Inland Homes (Cheshunt Lakeside Ltd) provided the following phasing schedule: Parcel 14, 22 dwellings starting July 2021 completion Sept 2022. Parcel 2, 205 dwellings, start August 2021 completion October 2023 Parcel 13, 95 dwellings, starts April 2022, completion April 2024. Parcel 12, 279 dwellings, start June 2023, completion December 2025 (note: prorata 198 by end March 2025) Reserve matters application for Parcel 2 (205 dwellings) was approved and	Not a Category B site at the baseline date of the assessment this was a draft allocation with no extant permissions. Detailed applications for Parcel 2 (Phase 1B, 205 units) and Parcel 14 (22 units) submitted December 2020 which is significantly after the base line date. Parcel 14 - ref. 07/20/1186/RM approved 3 March 2021. Parcel 2 - ref. 07/20/1187/RM submitted December 2020 - decision pending, no extant reserved matters permission. No clear evidence that other units (apart from the 22 units in Parcel 14 with reserved matters approval) will be delivered. No evidence that any of the site passed the test of being deliverable at the base date. At best the 22 with RM approval would pass the test of deliverable if the site was a cat B site at the baseline which it was not. The council's recent evidence is based upon an email received from Redrow on the 8th

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
						issued in June 2021. A Reserved Matters application for Parcel 12 is expected in late 2021 and parcel 13 in early 2022. Developer evidence of deliverability is clear within the scope of Part B of the Framework definition. Add 46 (555 > 601).	June 2021 (Email bundle page 33). The email clearly identifies that these are "indicative" and provides no information with regard to the timing of securing of the necessary consents. The email fails short of clear evidence of the delivery of this site which at present only has RM consent for 22 dwellings. The councils claimed level of completions of some 601 in the next 3 years 9 months is unrealistic even with delivery starting in September 2021 this represents a build out rate of 171 dpa this is significantly higher than the average build out rate so sites of this size of 68 dpa so even if the inspector was to accept that the site is deliverable then the contribution has been seriously over estimated on the basis of the assertion of the developer. It is further noted that the responded in their telephone conversation with Camile Rantz Mc Donald a number of sizes were highlighted regarding delays experienced in the borough but that there is no suggests that these issues have actually been addressed (email bundle page 33). This email exchange falls short of clear evidence that completions will be delivered from this site.
6	Cheshunt Lakeside - Phase 1 A reserved matters	195	195	195	A	-	-
7	Rosedale Park - North/South of	240	181	0	N	Mr James Demello, Land Manager at developer Crest	Not a Cat B site at the baseline date of the assessment this was a draft allocation with no

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
	Andrews Lane, and South of Peakes Way (CH2)					Nicholson Eastern, has provided the following phasing plan: 2020/1 – 0 2021/2 – 50 (Phase 1A) 2022/3 – 35 (Phase 1B) 2023/4 – 48 (Phase 2) (pro-rata) 2024/5 – 48 (Phase 2) (pro-rata) Reserved Matters application 21/0596/RM for 50 dwellings in phase 1A has been received and is under consideration. Clear evidence is provided within the scope of Part B of the Framework definition. Deduct 59 (240 > 181).	extant permissions. No reserved matters application submitted at base date. Application for discharge of condition 29 of outline application submitted January 2021 (ref. 07/21/0033/DRC) - decision pending. No clear evidence that site will be delivered. Email from RPS dated 22/06/2021, states that the pre-reserved matters determination conditions will be submitted within the next two weeks. Email from 2/6/2021 suggests that a RM was submitted for 50 dwellings on 6/5/2021 and that the site has been transferred to Crest Eastern for implementation The email from James Demello (email bundle page 42) states that the information provided is based upon their "Current anticipated timings" with year 1 commencing in early 2022. The council have has interpreted this as meaning that 50 dwellings will be delivered in 2021/22 i.e. 50 dwellings delivered in the period. Besides confirming that an application has been made for the first phase 1 a (for 50 dwellings) the email provides no further evidence of how this site will be delivered in terms of securing future applications etc. These emails do not amount to clear evidence that the site was deliverable at the base date or is presently deliverable.
8	Rosedale Park (CH2) - North of Andrews Lane 64 bed care home	64	0	0	A	-	-

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
9	Rosedale Park - Tudor Nurseries (CH2)	280	242	0	N	Ms Cristina Naulls, Senior Planning Manager at Redrow Homes, has provided a housing delivery schedule for this site as follows: Oct 2021 – June 2022: 50 units July 2022 – June 2023: 70 units July 2023 – June 2024: 70 units July 2024 – June 2025: 70 units (52 pro-rata over 9 months to 31 March). Construction has started on site and the shell of a significant number of homes have already been completed. Ms Naulls has indicated that the S278 Site accesses will be completed in August 2021, with first occupation in Q4 2021. Site falls within the scope of Part A of the Framework definition and there is clear developer evidence of the lead in times. Deduct 38 (280 > 242).	Not a Cat B site at the baseline date of the assessment this was a draft allocation with no extant permissions. Outline application 07/17/0864/O approved 22 January 2020 with no clear evidence provided to support deliverability assessment. 07/20/0157/RM not approved until after base date. Approved 23 December 2020. Also challenged on delivery rates - NLP rates suggest would only deliver 140 in next 5 years. The Council's recent evidence is based upon an email received from Redrow on the 14th June 2021 (Email bundle page 9). This was in a response to a request from Mr Paine requesting the approximate dates for the phasing numbers being supplied. This email does not represent clear evidence of delivery it provides an estimate of delivery without addressing issues such as the securing of the necessary consents. The majority of the site is still not covered by implementable permissions. This email exchange does not constitute clear evidence of delivery.
10	Rosedale Park - South of Andrews Lane (CH2)	60	76	0	N	Full permission for 66 dwellings 07/21/0005/F (Bellway Homes) currently under consideration. Briffa Phillips architects have in an application for a further 10 dwellings on part of the site in a separate landownership (07/20/1068/F). Site falls within the scope of Part B of the	Not a Cat B site at start of assessment period it was a draft allocation. No reserved matters application submitted at base date. No clear evidence that site will be delivered. Besides reporting the existence of the two applications there is no further evidence as to the delivery of these sites. These recent submissions fall short of clear evidence of delivery.

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
						Framework definition of deliverable and there is clear evidence that delivery will take place within five years. Add 16 (60 > 76).	
11	Cheshunt Football Club (CH7)	100	0	0	Y	-	-
12	Theobalds Brook Field (CH9)	90	90	0	N	Ms Justine Fancy, Programme Director for Hertfordshire at Chalkdene Developments states that, subject to resolution of two outstanding issues with Broxbourne Council's property team, the site should be delivered by 2024/25. The site benefits from an outline permission reference 07/18/0021/O. Site falls within Part B of the Framework definition and there is clear evidence of delivery within five years. No change (90).	Not a Cat B site at start of assessment period Outline application (07/18/0021/O) received on 03/01/2018 and is still under consideration. No extant permission and no clear evidence that site will be delivered. Email from Chalkdene Developments dated 16/6/2021 (email bundle page 37) stating that the site was approved to be sold in Q4 of 2020 however now needs to go back for reapproval due to cabinet changes. Therefore the site needs approval to be sold and approval of valuation method. There is no evidence that this process has been completed. It is pertinent to note that the Ms Fancy's email identifies not only the need for the release of the site to be approved by the council but also for a method of valuation to be agreed and is seeking assistance on this later matter. The email from Mr Paine on this matter requested that the respondent confirm that subject to planning it is realistic that the site would be completed by March 2026. This correspondence simply highlights the present barriers that are required to be overcome and provide no evidence

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
							as to the resolution of these matters or of securing the necessary consents to bring the site forward. This email exchange falls short of providing clear evidence of delivery.
13	East of Dark Lane (CH10)	50	50	0	N	Ms Justine Fancy, Programme Director for Hertfordshire at developer Chalkdene Developments has stated that this development is expected to be on site at Q4 2021/Q1 2022 and complete Q3 2023. The site benefits from an outline permission 07/18/0022/O. Site falls within the scope of Part B of the Framework definition of deliverable and there is clear developer evidence of delivery within five years. No change (50).	Not a Cat B site at start of assessment period Outline application (07/18/0022/O) received on 08/01/2018. Outline permission granted 15/12/2020 but no reserved matters application submitted. No discharge of condition applications submitted. No clear evidence that site will be delivered. Email from Chalkdene Developments dated 16/6/2021 stating that there is ongoing s106 discussions have delayed the site by 6 months, hoping to have the s106 signed this month. If planning is obtained in October as hoped completion is anticipated in q3 of 2023. All of this is contingent in securing a s106, and RM consents and the timings provided are simply aspirations of the promoter. This email exchange does not represent clear evidence of delivery
14	Former eastern Playing Fields (CH11)	75	75	0	N	Mr John Evans, Senior Planning Officer at Hertfordshire County Council – property, has stated that it is anticipated that this 75-bed extra care facility will be completed by autumn/winter 2024. Site falls within Part B of the Framework definition of deliverable. No change (90).	Not a Cat B site at start of assessment period No applications submitted. No extant permission and no clear evidence that site will be delivered. The email from Hertfordshire County Council dated 18/6/2021 (email bundle page 15) that states HCC are undertaking a procurement exercise to identify a RP to secure planning permission, design, build, and manage the scheme as extra care. They indicate that the RP will be selected in summer 2021 and completion will be in 2024. There is also a copy of the pre app response which states the

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
							principle of development is acceptable. It is noted that this is in response to Mr Paine's email of 11 June 2021 (email Bundle page 17) which requests "I just need an optimistic statement that the site should be completed before 31st March and a sentence on how it will be delivered". The email exchange demonstrates that this project is at a very early stage with no developer selected, no scheme, and no planning or other approvals. This email exchange does not provide clear evidence of delivery.
15	Land North of Bonney Grove (CH12)	40	0	0	Y	-	-
16	Borough Council Offices, Churchgate (CH13)	30	49	0	N	Application for full permission comprising a residential proposal of 49 dwellings is currently under consideration 07/21/0668/F. The applicant is Broxbourne Borough Council Property Services for development on land owned by Broxbourne Borough Council. Site falls within the scope of Part B of the Framework definition of deliverable. Add 19 (30 > 49).	Not a Cat B site at start of assessment period it was simply a draft allocation. No applications submitted at base line. No extant permission and no clear evidence that site will be delivered. There is no further information regarding this application. Application 07/21/0668/F submitted this year by the council. There appears to be no developer appointed to deliver the scheme. The presence of an undetermined application falls short of clear evidence of delivery.
17	Land south of Hammond-street Road (CH14)	45	0	0	Y	-	-

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
18	North of Goffs Lane (GO2) - (Tina Nurseries site)	81	81	0	N	Mr Ben Grinnall, Director at Land Chain, has stated that Matthew Homes will be the developers for this site, the sale of which has now been completed. Pre-application advice has been sought and is currently being prepared by the Council. The site benefits from an outline planning permission (07/18/1097/O). Site falls within the scope of Part B of the Framework definition of deliverable. No change (81).	Outline permission granted 23 October 2019. No conditions discharged or reserved matters applications submitted. No clear evidence that site will be delivered. Emails from Land Chain (the Planning Consultants) 22/06/2021 (Email Bundle page 2) suggests that the site has now been purchased by Matthew Homes. The email however states that there is a pre app submitted, it also suggests that cooperation may assist the pre app process. Also, they note that information on the timescales of construction and completions is not available yet. It is noted that the Council officer comments that the response "doesn't say much!". We would agree. This email exchange falls short of clear evidence of delivery.
19	North of Goffs Lane (GO2) - (Inex site)	0	0	0	Y	-	-
20	South of Goffs Lane (GO3)	51	51	51	Y	-	-
21	Newgatestreet Road (GO4)	25	38	0	N	On 2 March 2021 Planning Committee resolved to approved a Full Plans application for 38 dwellings on this site (07/20/1220/F). It is anticipated that a Section 106 agreement will be signed within the next month. Site falls within the scope of Part A of the Framework definition of deliverable. Add 13 (25 > 38).	Not a Cat B site at start of assessment period as it was just a draft allocation. Application for 42 units (ref. 07/19/0753/F) refused 2nd July 2020. 07/20/1220/F – application for 38 dwellings validated 24/12/2020. Recommended for approval as per an officer report with a committee date of 02/03/2021 but no decision notice or completed S106 agreement published on Council's website. Trajectory indicates 25 units will be delivered in 2023/24. This site does not yet appear to have an

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
							extant permission in place and therefore no clear evidence site will be delivered within 5 years. Email from Stonebond Properties dated 8/6/2021 (email bundle Page 40) states that the section 106 is not signed and there is no decision notice, this is anticipated in June 2021. Still no planning permission. The short email exchange falls short of clear evidence of delivery as it sets out the developers aspirations.
22	North of Cuffley Hill (CG Edwards) (GO5)	23	23	23	Y	-	-
23	North of Cuffley Hill (Rosemead/Fairmead Nursery) (GO5)	26	58	0	N	Mr Ben Hunt, Associate Director (Development) at Countryside Properties states that a scheme for 59 homes is currently in planning (with an aspiration for a decision at Planning Committee in September). He states that the high level programme shows a start on site date for this project late summer 2022 with first private completions coming forward in Autumn 2023. Site falls within the scope of Part B of the Framework definition of deliverable and there is clear developer evidence of delivery	Not a Cat B site at start of assessment period just a draft allocation. Application at Fairmead (07/19/0200/F) received 04/03/2019 and is under consideration. No extant permission and no clear evidence that site will be delivered. Email dated 24/06/2021 from Countryside (Email bundle page 1) who have an option on the land, states they are planning to make further changes to the application in response to officers comments and will submit these to the council in July 2021. The email also indicates the s106 agreement and negotiations has not commenced, and that there is an expected start date in late summer 2022 and completions in Autumn 2023. Therefore, the site still has no extent permission and progress towards delivery is limited. the email exchange highlights the lack of progress on the current application and the need

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
						within five years. Add 33 (26 > 59)	for further changes. There is not clear evidence that this site will deliver.
24	Scania House 17 & 19 - first floor (HOD2)	24	24	24	Y		
25	Scania House and Amwell Street (HOD2)	36	0	0	Y	[Error in proof of evidence Table 2 only – make no difference to total]	-
26	Former Hoddesdon Police station (HOD3)	30	30	0	N	The sale of this land to Capitalise Ltd took place last year and they have now appointed DPA Associates. Council is awaiting a statement from DPA. Site falls within the scope of Part B of the Framework. No change (30).	Not a Cat B site at start of assessment period just a draft allocation. No applications submitted. No extant permission and no clear evidence that site will be delivered The council provide no additional evidence to support the statement the fact that a sale of the land has occurred is not clear evidence that the site will deliver housing in the next five years..
27	Turnford Surfacing Site (HOD4)	40	104	0	N	Resolution to grant 104 dwellings, March 2021 (07/20/0467/F)	Not a Cat B site at start of assessment period. Application submitted 12 June 2020. Committee resolved to grant permission at 15 December 2020 meeting. No permission in place at 1st April 2020 base date or June 2021 There is no clear evidence that this site will deliver completions in the next five years.
28	East of Dinant Link Road (HOD6)	35	35	0	N	Mr Kevin Clark, Head of Property at Broxbourne Borough Council, has stated that there is a commitment to push forward with a residential scheme on this site based on drawings produced previously which indicated a	Not a Cat B site at start of assessment period just a draft allocation. No applications submitted. No extant permission and no clear evidence that site will be delivered. There is an email from the head of property services at the council dated 24/6/2021 (email bundle page 28) and states that the council have yet to take control of the land and that the

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
						<p>mixed flatted and terraced housing scheme achieving 35 units. Tendering for the design work is due to commence next month with a target of completion of the development before 31/03/2025. It is highly likely the Council will undertake the development itself or via a Joint Venture rather than disposing of the site on the open market, therefore giving the Council more control on the ultimate delivery of the units. Site falls within the scope of Part B of the Framework definition of deliverable and there is clear developer evidence of delivery within five years. No change (35)</p>	<p>tendering for the design work is due to commence next month and that the council are targeting completion before 31/03/2025 although no further detail is provided as to how this will be achieved in terms of achieving the planning and other consents. This email falls short of clear evidence of delivery.</p>
29	High Leigh (HOD7) - housing only	275	328	100	N	<p>Mr Andrew Holloway, Land and Planning Director at Taylor Wimpey North Thames, has provided a phasing schedule including the following build dates: Phase 1: 100 homes (Sept 21- Nov 22) – 07/20/0046/RM (granted) Phase 2: 141 homes (Dec-22 - June 24) – 07/21/0405/RM (under consideration)</p>	<p>At present only 100 dwellings have RM consent. Reserved matters (07/16/1371/RM) approved 15 March 2017. Number of discharge of conditions submitted since this time. The further RM for an additional 141 dwelling still pending. The email correspondence (page 35 email bundle) highlights a number of factors that might delay the delivery of this site including planning delays. The information provided is described as a "high level build programme". the email highlights that similar delays to the granting of RM for the pending of phase 2 application will result in issues of build</p>

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
						Phase 3: 109 homes (May 24 - Aug 25) (87 pro-rata for 12 months to end March 2025). Site falls in Part within the scope of Part A of the Framework. Remainder of the site falls within the scope of Part B of the Framework and there is clear developer evidence of delivery within five years. Add 53 (275 > 328).	continuity which would result in further delays to delivery. In light of this evidence it is not considered that the whole of the build programme has clear evidence of delivery. At present there is only clear evidence of delivery of 100 dwellings which presently have RM approval.
30	High Leigh (HOD7) - 64 bed care home	64	0	0	Y	-	-
31	Westfield Primary School (HOD8)	37	37	0	N	Ben Bowles, Senior Planning Officer at Hertfordshire County Council, has advised that the new school facilities at High Leigh Garden Village are due to open in time for the 2024 academic year (September 2024). Demolition of the existing school can be expected to take place over the summer of 2024 with housing construction realistically expected to take place immediately after that, with full completion by 31 March 2025. Site falls within the Scope of Part B of the Framework No change (37).	Outline permission granted March 2019. No conditions discharged or reserved matters applications submitted. No clear evidence that site will be delivered. The email exchanges (page 12 of the email bundle) is extremely vague and does not confirm the position as set out in Mr Paine's evidence. The two RM granted 07/20/0046/RM and 07/21/0405/RM do not relate to the redevelopment of the existing school. There is no evidence to support the statement that these 37 dwellings will be delivered within 9 months between the demolition of the school in summer of 2024 and march 2025 as claimed by the council. The email exchange falls short of clear evidence of delivery.

	Local Plan Site & ref	AMR	Revised Council	SPRU	Agreed?	Council position. (Proof of Evidence CD3.23 and CD3.17)	SPRU position. Proof of Evidence – (CD2.18); Rebuttal (CD2.21)
32	Waltham Cross Northern High Street (WC2)	0	0	0	Y		-
33	Theobalds Grove Station (WC3)	50	0	0	Y		-
34	Britannia Nurseries (LV6)	0	0	0	Y		-
	TOTAL	2,874	2,522	546			