

Hertsmere LDF Core Strategy Preferred Options

CPRE - The Hertfordshire Society response

Policy SP1 Creating sustainable development

SUPPORT

We strongly support this policy.

Paragraph 3.5

The “Council for the Protection of Rural England” referred to in the sixth line is no longer the correct title for CPRE. We changed our name to Campaign to Protect Rural England two or three years ago.

Proposed change: Amend “Council for the Protection of Rural England” to “Campaign to Protect Rural England”.

Paragraph 3.11. Criteria for identifying potential housing sites in the Green Belt

We support the criteria listed as PPG2, amenity, access, open space and area-size criteria. However, it appears that the proposed broad area of search to the north west of Potters Bar, indicated on the Key Diagram, would threaten a designated Wildlife Site unless measures are taken to protect it. The proposed area of search to the north of Potters Bar is close to the border with Welwyn Hatfield District, and the area on both sides of the boundary is designated Green Belt, so care must be taken not to cause coalescence with the small settlement of Swanley Bar and the Royal Veterinary College.

[Note: footnote 13 ascribed to *Relevant PPG2 criteria* does not actually appear to relate to PPG2.]

Policy CS1 The location and supply of new homes

SUPPORT

In accepting that the Council will have a statutory obligation to provide for new housing in accordance with the final RSS14, we support the criteria listed in Policy CS1, in particular *vi) the need to focus development within the boundaries of existing built-up areas.*

Policy CS2 Housing need beyond existing built-up areas

OBJECT

Without necessarily accepting that up to 460 of the provisional RSS14 target of 5,000 new dwellings will have to be accommodated by changing the boundaries of existing built-up areas, we support the criteria listed for identifying individual sites, but

consider that *Green Belt designation* should be added to the list (preferably at the top).

Paragraph 3.19

SUPPORT

We particularly welcome the acknowledgement of the need to provide additional infrastructure capacity in some locations before sites can be released for development.

Policy CS3 Phasing of development

SUPPORT

We strongly support this policy to control the rate at which new housebuilding takes place and to ensure that available brownfield sites are developed before greenfield land. This is a good example of the ‘plan, monitor and manage’ approach.

Policy CS4 Affordable housing

OBJECT

We welcome the emphasis on the provision of affordable housing given in this draft Core Strategy, but consider that the targets proposed should be more ambitious if the desired end-result is to be achieved.

While PPS3 paragraph 29 indicates a national indicative minimum site size threshold of 15 dwellings, which the Council proposes to adopt in Policy CS4, it also states that LPAs can set lower minimum thresholds. Some authorities in Hertfordshire are proposing thresholds of 5 or 10 dwellings. We urge the Council to adopt a threshold of 10 residential units or sites of more than 0.3 hectares for the provision of affordable housing.

Policy CS4 proposes provision of at least 25% affordable housing on qualifying sites. In our view, this is much too low to ensure that affordable housing needs are met. Policy H3 Affordable Housing in the Secretary of State’s Proposed Changes to draft RSS14 states that delivery of affordable housing should be monitored against an overall expectation that some 35% of new housing is affordable. We consider that the Council should adopt a target of at least 35%, and preferably 40%.

Proposed changes:

Amend Policy CS4 to state developments involving more than 10 residential units (gross), or residential sites of more than 0.3 hectares and The Council will seek the provision of at least 35% affordable housing on qualifying sites.

Policy CS12 and associated paragraphs 5.5 – 5.8

OBJECT

Policy CS12 and the supporting text in paragraphs 5.5 – 5.8 include Green Belt policy among the issues considered under the heading *Protection and enhancement of the natural and historic environment*. We consider this to be inappropriate: Green belt is a distinct policy, established for the purposes set out in paragraph 1.5 of PPG2, and should not be rowed in with a raft of other designations such as SSSIs, TPOs, Conservation Areas, etc which are directly concerned with the natural and historic environment. Instead, the Green Belt should, in our view, be taken out of this section and presented as a separate policy in its own right. We would like to see a policy similar to Policy C1 in the current Hertsmere Local Plan included in this Core Strategy, so that there is no doubt as to what the Council’s strategic policy is towards the Green Belt. While we appreciate that PPS12 paragraphs 2.28 – 2.30 advises local planning authorities that generic policies should not merely repeat national policy statements, the extent and significance of the Green Belt in Hertsmere is such that it should be accorded a core strategy of its own.

Proposed changes:

Amend Policy CS12 by deleting the sentences “*There will be a presumption against ...as defined in PPG2 (Green Belts)*” and “*A strategic gap in the Green Belt ...separation between the two towns*”.

Create a new policy on Green Belt, incorporating those sentences and any other issues relating directly to the Green Belt.

Amend the supporting text in paragraphs 5.5 – 5.8 to exclude the references to the Green Belt, and re-provide that text in support of the new policy.

Policy CS14 Promoting recreational access to open spaces and the countryside

SUPPORT

We support the approach outlined in this policy and the emphasis placed on the protection of the character of the countryside and the openness of the Green Belt.

Submitted online 21 December 07