



Campaign to Protect  
Rural England

**HERTFORDSHIRE**

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Our Ref: DI/SB

Your Ref:

18<sup>th</sup> February 2011

Dear Sirs,

**Revised Core Strategy Consultation  
December 2010**

CPRE Hertfordshire broadly supports the proposals in Hertsmere Borough Council's Revised Core Strategy.

As the Council notes in the Introduction to the Consultation document, 80% of the Borough is Green Belt and we are pleased to see the Council recognises its importance and the necessity to protect this open land. This recognition is repeated throughout the document and is explicitly stated in the supporting text for both the policies on Settlement Strategy and Protecting the Natural Environment. We welcome the fact that protection of the Green Belt is included as Strategic Objective 2 in Table 4 listing the LDF Core Strategy Objectives.

Consequently, it comes as a surprise that, unlike the former Hertsmere Local Plan, there is no specific policy on Green Belt included in the Revised Core Strategy.

Core Strategy policy reference to Green Belt is only included in Policy CS12 (Protection and Enhancement of the Natural Environment). We consider this to be insufficient. Maintenance of the Green Belt is a distinct national policy, established for the purposes set out in paragraph 1.5 of Planning Policy Guidance Note 2. These purposes are much wider than just environmental conservation and Green Belt should not be included as simply one of a raft of other designations such as SSSIs, TPOs etc. We would like to see a policy similar to Policy C1 of the current Hertsmere Local Plan included in this Core Strategy so that there is no doubt regarding the Council's strong commitment to upholding the provisions of national Green Belt policy, as currently expressed in PPG2.

While commenting on Policy CS12 we note that the Government intends to replace current policy guidance documents with a new National Planning Policy Framework. The Council may wish to consider amending the wording of policies such as CS12 to refer to national planning policy rather than existing PPS/PPG's.

We also note that future site allocations will consider other development opportunities, which could include “any very minor, small-scale changes to Green Belt boundaries where anomalies exist and a more appropriate, defensible boundary can be set” (para. 2.35). This paragraph does not define what constitutes “small-scale” and we would welcome clarification of this, as what may be “small-scale” to a developer may be significant to a rural community.

On individual questions raised in the consultation response form we would like to specifically respond to:

Q1 *Do you agree with the Council's settlement strategy?*

Yes. In particular we welcome the recognition that there is limited scope for significant further growth at Radlett and that Shenley is considered to have reached its natural limits and consequently any further growth in these areas will be restricted to small scale infill opportunities. (paras 2.37 and 2.38)

Q2 *Do you agree with the preferred target of 3,200 homes over 15 years?*

We accept the logic of the Council's use of the Chelmer model in determining the quantum of housing in the Borough up to 2026 and agree that the preferred target should be 3,200. However, we note that in para. 2.26 the Council states that the Strategic Housing Land Availability Assessment identifies capacity of ‘just over’ 3,200 during the plan period. This implies that should sites not come forward during the plan period, there may be a shortfall. It would be beneficial if there was a clear statement that regular reviews of housing land availability will be undertaken in order to give the earliest possible indication of any need to vary the strategy of focussing housing development in the existing settlements.

Q3 *The Council is aiming to provide an appropriate level of housing in the Borough by maximising the potential of sites within existing towns whilst protecting the Green Belt. Do you agree with this approach?*

Yes. However, the comments made above under question 2 also apply here.

Q5 *Do you support the criteria in policy CS1 against which the proposals for new housing in the borough should be delivered?*

We support the criteria in policy CS1, but, as mentioned above, would prefer to see a specific policy relating to Green Belt added to the list of policies in criterion (i).

Q7 *Do you support the planned distribution of housing across the Borough which is largely based on the availability of sites within existing built up areas?*

Yes, though it is unclear how 10% of the provision will be made in Radlett given the earlier comments made by the Council regarding limits of growth there. (para. 2.37).

Q8 *Do you support the provision of 35% affordable housing on sites of 10 units or more?*

We are happy with the 35% percentage. However, the Council's housing strategy is substantially dependent on the redevelopment of infill sites in existing settlements, many of which may be less than 0.3 hectares in area and have capacity below 10 units. None of these would be required to contribute to the affordable housing requirement. Consequently we would like to see the threshold reduced to 6 units.

Q9 *What are your views on the approach to meeting accommodation requirements of the gypsy and traveller community?*

We agree with the approach adopted in Policy CS6, with the caveat that there will need to be a review of the policy in the light of the outcomes of the Government's proposed review of Gypsy and Traveller Requirements, which is expected before the end of the Plan period.

Much of the Core Strategy is premised on the assumption that the Regional Spatial Strategy will be revoked by the Government. However, in the unlikely event that the revocation of the East of England Plan does not proceed, it would be necessary to revert to the regional housing target and the strategy of identifying potential locations in the Green Belt. Similarly if sites in the SHLAA do not come forward at the anticipated rate, there may be a need to review the focus on housing growth within existing built up areas. It would therefore be useful if the Core Strategy was more explicit at the pre-submission stage on the contingencies which the Council will put in place to address such eventualities.

Equally, as referred to above in respect of Policy CS12, the Government has announced its intention to comprehensively overhaul the existing national planning policies and produce a new National Planning Policy Framework. This is referred to in para. 1.15 of the Core Strategy consultation document. It would be useful if the Council were to outline how it would review, consult on, and amend the Core Strategy in the light of those changes.

Yours sincerely,



Steve Baker  
Planning Manager