

**Hertsmere Development Plan Document
Revised Core Strategy
Publication Stage Representation Form
Representation from CPRE Hertfordshire - 6th January 2012**

PART B

Q3 - Paragraph 4.21

Q4 (2) - No

Q5 - In part

Q6 (1) - Not justified

Q6 (3) - Not consistent with national policy

Q7 - (See also our representation on Policy CS8). Policy CS8 proposes the allocation and safeguarding of an undefined area of Green Belt land for employment development between Borehamwood and the A1, and this is shown diagrammatically on the Key Diagram. No recognition of the Green Belt status of this land is included in the Policy, or in the relevant text in paragraph

4.21, no indication is given of the size of the area proposed for development, and no explanation is given of the Council's justification for developing this Green Belt land contrary to national, and the Council's own, Green Belt policy. The statement that the Council considers that this is 'the most appropriate location for the provision of additional employment land' does not meet the national policy requirement for justification of the release of Green Belt for development. The inclusion of this specific proposal is therefore considered to be unsound by virtue of being unjustified and inconsistent with national planning policy.

Q8 - Without a reasoned justification for allocation of land in the Green Belt for development in a development plan document, as required by national guidance, the only recourse to achieve soundness of the Core Strategy would be to delete the proposed allocation and safeguarding of land for the extension of the Elstree Way Employment Area from the document, including from Policy CS8, the Key Diagram, and from paragraph 4.21.

Q9 - Yes

Q10 - To ensure that CPRE Hertfordshire's concerns about the issues relating to the principle of the allocation of Green Belt land for development through the Hertsmere development plan process are fully considered in the Examination of the Core Strategy.

Q3 - Paragraph 5.22

Q4 (2) - Not sound

Q5 - In part

Q6 (2) - Not effective

Q6 (3) - Not consistent with national policy

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Q7 - The final sentence of paragraph 5.22 notes that there is a 'wish to avoid a concentration of uses on the site (a farm) which might not be considered as conventional or appropriate activity in such a location' in part reflecting its Green Belt location. This wording fails to reflect that the starting point for consideration of proposals in Green Belt locations, should be whether both the 'uses' that might be considered acceptable, and the specific development proposals, are appropriate in Green Belt terms as defined in national planning policy. The current wording is not therefore likely to be effective, and is not consistent with national planning policy.

Q8 - In order to be made sound in terms of effectiveness and consistency with national policy, the words 'inappropriate development or' should be included after 'wish to avoid' in the second line of the final sentence of paragraph 5.22.

Q9 - No

Q10 - Not applicable

Q3 - Policy CS1

Q4 (2) - No

Q5 - In Part

Q6 (2) - Not Effective

Q6 (3) - Not consistent with national policy

Q7 - As currently worded, clause (vii) of Policy CS1 misleadingly implies that only 'inappropriate development' that is harmful to the openness and appearance of the Green Belt should be avoided, whereas all development that is inappropriate in the Green Belt should be avoided, because it is contrary to national policy, as currently set out in PPG2. The misleading implication is a result of a comma being omitted after 'inappropriate development'. The policy is therefore inconsistent with the text of the Revised Core Strategy and with Policy CS12, as well as national policy.

Q8 - The unsoundness of the wording of Policy CS1 (vii) could be conveniently corrected by the inclusion of a comma after the words 'inappropriate development', but for greater clarity the following text could be inserted at this point:-

'in the Green Belt, particularly such development'

Q9 - No

Q10 - Not applicable

Q3 - Policy CS8

Q4 (2) - No

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Q5 - In part

Q6 (1) - Not Justified

Q6 (3) - Not consistent with national policy

Q7 - Policy CS8 proposes the allocation and safeguarding of an undefined area of Green Belt land for employment development between Borehamwood and the A1, and this is shown diagrammatically on the Key Diagram. No recognition of the Green Belt status of this land is included in the Policy, or in the relevant text in paragraph 4.21, no indication is given of the size of the area proposed for development, and no explanation is given of the Council's justification for developing this Green Belt land contrary to national, and the Council's own, Green Belt policy. The inclusion of this specific proposal is therefore considered to be unsound by virtue of being unjustified and inconsistent with national planning policy.

Q8 - Without a reasoned justification for allocation of land in the Green Belt for development in a development plan document, as required by national guidance, the only recourse to achieve soundness of the Core Strategy would be to delete the proposed allocation and safeguarding of land for the extension of the Elstree Way Employment Area from the document, including from the Key Diagram and paragraph 4.21.

Q9 - Yes

Q10 - To ensure that CPRE Hertfordshire's concerns about the issues relating to the principle of the allocation of Green Belt land for development through the Hertsmere development plan process are fully considered in the Examination of the Core Strategy.

Q3 - Policy CS12

Q4 (2) - No

Q5 - In part

Q6 (2) - Not Effective

Q6 (3) - Not consistent with national policy

Q7 - In our representations on the Pre-submission Core Strategy we suggested that the reference to PPG2 be amended to refer to 'national planning policy' in view of the government intention to supersede existing individual guidance documents apart from PPS10. This is necessary to avoid a cross reference to an out of date document.

To be effective, the second paragraph of the Policy should also appear first, to provide the proper strategic context for decision making on development in the Green Belt, that is, the presumption against inappropriate development, and as indicated in the Policy title. This change would in part overcome our concern expressed on the Pre-submission Core Strategy in 2011, about the need for a specific Green Belt policy.

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Q8 - The second paragraph of Policy CS12 should be moved to become this first paragraph, and slightly amended to read as follows in order to be both effective, and consistent with national policy:-

‘There will [‘also’ deleted] be a presumption against inappropriate development as defined in national policy [moved from end of sentence with ‘national policy’ replacing ‘PPG2 (Green Belts)’], which causes harm to the openness and appearance of the Green Belt.’

Q9 - No

Q10 - Not applicable

Q3 - Policy CS14

Q4 (2) - No

Q5 - In part

Q6 (2) - Not effective

Q6 (3) - Not consistent with national policy

Q7 - Clause ‘v)’ of Policy CS14 rightly refers to promotion of recreational uses which are appropriate in the Green Belt, but should also ensure that the development itself is appropriate, as defined in national policy, otherwise the policy implies that any development will be encouraged, whether ‘appropriate’ or ‘inappropriate’ in Green Belt terms. This would be contrary to national planning policy and the stated intentions of the Core Strategy.

Q8 - Clause ‘v)’ of Policy CS14 should be amended to read as follows in order to be both effective and consistent with national planning policy:-

‘promotes development, including land uses, which can be considered as appropriate in The Green Belt; and’

Q9 - No

Q10 - Not applicable