

Standing up for Hertfordshire's countryside

Planning Strategy Team
Hertsmere Borough Council
Civic Offices
Elstree Way
Borehamwood
Herts WD6 1WA

Our Ref:

Your Ref:

30th November 2018 (by email)

Dear Sirs,

**Hertsmere Local Plan
Potential Housing and Employment Sites Consultation: October 2018**

Thank you for consulting CPRE Hertfordshire on the above document.

In considering our comments we draw your attention to our previous representations, dated 29 November 2017 and 2 May 2018, on your Issues and Options and Sustainability Appraisal Consultations respectively, the planning policy aspects of which have clearly not been taken into consideration in preparing the documentation for the current consultation on potential development sites.

We are not able to comment specifically on the Planning merits of the individual potential sites identified by the Council as included in the consultation document, but we do wish to comment on how the context for the consultation is set out in the Foreword and Introduction, as set out below. We also wish to comment on consistency of interpretation of relevant information about the individual sites, including the findings in the new draft Green Belt Assessment Report dated 16 October 2018.

Firstly, the Foreword states that the Council is asking for opinions on the most appropriate locations for development *'with the least impact on the environment'*, but there is no reference at all in the Foreword to opinions on impacts on the Green Belt, which in Hertsmere is of fundamental importance in terms of national planning policy.

Secondly, your email dated 25 October 2018, does not make any reference to the publication in September of vitally important information essential to the Council's consideration of development site proposals in the District, which in our view materially affects the way potential development sites should be considered. That information, in the form of the recently published household projections for the Borough by the Office for National Statistics (ONS) shows that 4,000 fewer households are projected to exist in 2034 than assumed when the Council calculated its housing need figure earlier this year, and that the increase in households between 2018 and 2034 would be 2,000 fewer.

Although the Foreword to the consultation document refers to the latest household projections, it incorrectly states that these indicate a need for at least 500 more homes each year, which is not correct. Applying the Government's standard methodology for calculating housing need to the latest projections shows that the annual need is either 370 or 420 households per year, depending on how the capping element of the calculation is applied. Contrary to what is said in paragraph 1.17 of the consultation, there is no separate requirement for an additional 20% buffer to be added as part of the standard method for calculating housing need.

Thirdly, the Introduction misleadingly implies that full housing need must be planned for, which is untrue by virtue of paragraph 11 of the new NPPF. We therefore consider that the Council has described a misleading context for the consultation, which is dominated by landowner and developer promoted sites in the Green Belt (the most important constraint listed under NPPF paragraph 11 and footnote 6 for Hertsmere). Although paragraph 1.19 rightly states that all opportunities within existing built-up areas must be identified to minimise the loss of Green Belt, there is no reference to the ability of the Council to set a lower housing requirement consistent with paragraph 11 of the NPPF. This omission undermines the credibility of the Council's approach based on meeting all of the assessed housing need in the Borough.

As we pointed out in our letters to you on the Issues and Options and Sustainability Appraisal Consultations, 'Housing Need' and 'Housing Requirement' are not the same thing. The latter is the number of houses planned for after the consequences of providing for the former has been assessed, taking into account such matters as policy constraints in national policy (now specifically listed in footnote 6 of the new NPPF), and other relevant considerations.

In this context we would remind the Council that the Inspector's Report on Hertsmere's Revised Core Strategy at the end of 2012, after the NPPF came into force, stated as follows (paragraph 21): '*Nonetheless, it is reasonable to expect that Green Belt protection would be a significant consideration in selecting the housing target*'. The Inspector also noted in that paragraph that 'the Government attaches great importance to Green Belts', a continuous theme since that time.

The Foreword and Introduction in the current consultation document should not therefore have indicated that the Council will have to meet housing need in full (however that is calculated) as a key assumption for the consultation, and it is flawed as a result of doing so.

In terms of the detailed analysis in the document and the draft Green Belt Assessment we are concerned that there is some inconsistency in the summary analyses and descriptions of sites and areas, and would ask the Council to be aware of this when drawing conclusions from the responses to the consultation. As an example, the description of 'surrounding uses' in the 'site information' for site R1, is clearly inaccurate in ignoring adjacent open land abutting the site to the north west and south west.

Similarly, the description of Site BE1 seems to relate to a much larger area between Elstree and Borehamwood when referring to the cemetery 'in the centre of the site.'

CPRE Hertfordshire disagrees strongly with the draft Green Belt Assessment findings for some of the limited number of sites that we have had the opportunity of considering, and would therefore wish the Council to carry out a more rigorous review of the information available for each site before reaching conclusions on the individual sites that are taken forward for further consideration.

We also suggest that the Council identifies and provides a link or links to map-based information on nationally designated policy areas for consultees to study when commenting on potential sites and groups of sites.

Finally, we urge the Council to pay particular attention to the potential cumulative impacts of development of combinations of sites, including the consequences for Green Belt purposes of such development close to the boundaries with adjacent districts, for example as a result of the potential for major development at Park Street in St Albans District.

Please contact me if you require any clarification of our comments.

Yours sincerely,

Steve Baker,
Planning Manager