

South West Herts Joint Strategic Plan 2050 'Realising Our Potential' Consultation CPRE Hertfordshire Comments

By Chris Berry, Planning Manager

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About CPRE Hertfordshire

CPRE Hertfordshire is a local countryside charity, part of the national CPRE network. We work to promote, enhance and protect a beautiful, thriving countryside for everyone to value and enjoy.

Founded in 1928 we are a grassroots organisation, with about 1000 members and a small team of staff supported by volunteers. CPRE Hertfordshire has a long history of campaigning against inappropriate development on Hertfordshire's green spaces. We also work with local groups around the county, providing advice on how they can best protect the countryside near them.

Why the Joint Strategic Plan matters

1. The Leaders of the six local authorities comprising the South West Herts Joint Strategic Plan area note that this document is the first step in a joint endeavour by Hertfordshire County Council and the five South West Herts Local Planning Authorities to prepare a statutory strategic plan which will, in effect, guide the Districts' own Local Plans preparation and reviews. This Plan matters – a lot – as it will aim to fix certain policies and indeed major projects until 2050.
2. We are all aware of the difficult progress of several emerging Local Plans in South West Herts. Three of the five authorities involved in this Joint Strategic Plan (JSP) have 'paused' their emerging Local Plans due in large part to the nature of the public response to their own consultations, and St Albans is starting again.
3. This JSP aims to provide over-arching policy for all five district local authorities for a longer period than their Local Plans. It has the potential to constrain local planning for a long time in a period of major economic, social and environmental change. The objectives and outcomes are therefore vitally important for our area.

The Foreword

4. The Foreword, co-signed by the six Council Leaders states that this consultation document is “designed to stimulate debate”. It refers to sustainability, climate change, infrastructure, quality of life and similar concerns, but the most commonly used word throughout the document is “growth”.
5. The term “growth” remains undefined but appears to refer to the standard economic development model which concentrates on the provision of houses and jobs, mainly in urban or edge of urban area settings. This constrains the formulation of sustainable development outcomes which would provide a more balanced approach in the future.
6. The JSP document effectively ignores the massive contribution made by the countryside and rural activities to economic and social conditions and the quality of life experienced by residents and businesses. Most countryside in South West Herts is protected, and the lack of recognition of this designation and the potential future role of rural economic activity are major short-comings.

Section 1 - Introduction

7. No opportunity is provided in the consultation document to respond directly to the initial statement of five major ‘policy areas’ to be considered in the JSP:
 - reducing the negative effects of climate change
 - identifying needs for infrastructure
 - reflecting important designations such as Green Belt and AONB
 - establishing opportunities for new homes and jobs
 - identifying growth locations
8. These policy areas are not addressed again; rather “6 pillars” are formulated (see Section 6 below) later in the document for the assessment of seven “growth strategies” (Section 7). The “6 pillars” do not relate directly to the initial policy areas and general comments are made on the above bulleted topics as follows.

Climate change

9. This is appropriately identified at the outset as a prime concern for strategic planning. Climate change will clearly be affected by the amount, location and type of development envisaged by the JSP.

Infrastructure needs

10. Similarly, the level of development anticipated by the JSP will place significant further pressures on already over-stretched existing infrastructure, including social and community facilities, utilities and the highway network. These concerns are neither recognised nor addressed directly.

Important designations

11. This is one of only two mentions of Green Belt in the whole document and the omission of its role is a crucial weakness of the JSP. It is a key planning policy constraint and characteristic of the whole South West Herts area, comprising effectively the whole of the non-built up areas of Hertsmere, Watford, Three Rivers and St Albans, and a large proportion of the non-urban areas of Dacorum.
12. The JSP document makes very limited reference to the majority of the land in South West Herts being designated protected land, including the Chilterns AONB, the Green Belt, and the Chilterns

Beechwoods Special Area of Conservation. The Plan needs actively to prioritise ongoing protection from development of these designated areas, consistent with recently re-emphasised Government Ministerial statements and technical guidance.

New homes and jobs

13. Housing site allocations are appropriately a topic for Local Plans, and housing need should be calculated according to the most up-to-date information available. South West Herts has one of the lowest unemployment rates in the country and new large-scale employment taking up areas of protected countryside is neither necessary nor appropriate.

Growth locations

14. By contrast with Green Belt, 'growth' is mentioned 58 times in the document. The document appears founded on a presumption of growth without appropriate definition, nor evidence to support it.

15. The conceptual nature of this growth is acknowledged in the Introduction: "It is important to recognise that in preparing this initial consultation document on the Joint Strategic Plan we don't yet know the amount of growth needed, or where that growth might be best located." This consultation starts from the position that growth as conceived in this document is inevitable and desirable, and we believe this is a fundamentally mistaken position.

16. Much more appropriate would be a commitment to "sustainable development" in terms of the widely used definition of "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". The type of "growth" envisaged by the JSP does not meet either element of the above definition.

17. The scenarios promoted initially and later in the document imply significant housing development without infrastructure, leading to congestion, over-heating, inadequate services and facilities, and huge damage to highly valued countryside. The countryside and rural areas making up most of the area of the County are largely ignored in economic, social and environmental terms and this is unacceptable in a strategic plan for the future.

How does the JSP fit with Local Plans?

18. The JSP matters because it will aim to fix certain policies, and indeed major projects, until at least 2050. We are all aware of the difficult passages of several Local Plans in South West Herts, including for four of the five district authorities affected (Watford Local Plan is now adopted) due in large part to the negative nature of the public response to the allocation of designated protected countryside for development.

19. The JSP aims to provide over-arching policy for all five district authorities for a longer period than their emerging Local Plans which have plan periods from 2031 to 2033. It thus has the potential to constrain local planning for a long time, in a period of unprecedented economic, social and environmental change.

Section 2 - Our world is changing

20. This brief section underlines the dynamic nature of the issues facing the JSP area. The climate change emergency is appropriately mentioned, in three brief sentences without any indication of its significance or implications.

21. The topics outlined in this section are the economy, demographics, mobility, technology and the pandemic. No mention is made of the growing significance of environmental pressures, loss of biodiversity, resource usage or increasing pressures on services and facilities.

CPRE Hertfordshire Feedback response:

Q. 1) Yes. Please see para. 21.

Section 3 - South West Herts today

22. This section refers to previous consultations, principally the early 2020 “SW Herts Your Future” poll. The succeeding report (Realising our Potential: a vision for SW Herts’; SW Herts Initial Engagement Results, July 2020), showed that the poll was highly selective and limited, targeted at specific demographics at the start of the Covid pandemic in Feb 2020, closing in April that year, and exclusively on-line.

23. Even so, all those who participated still valued open space more highly than anything else, with only 165 people under 25 years of age saying that improving housing choice was a higher priority. We believe that the consultation undertaken so far has been almost meaningless and the present consultation should be extended.

a) Our environment in South West Herts

24. Five sub-headings are offered:

- Climate emergency
- Home to important landscapes
- Strong historic heritage
- Access to green space
- Attractive as a home for businesses and people

25. It is noted that climate emergencies have been declared by all five district authorities and the County Council without any further elaboration, but to suggest that “further action is required” is to misrepresent entirely the challenge this constitutes. Specific mention is made of water resources and the relatively high usage in South West Herts without further comment.

26. The Chilterns Area of Outstanding Natural Beauty (AONB) is mentioned, together with the Colne Valley Regional Park, the Grand Union Canal and “a wide range of public open spaces”. The main designated area of countryside, the Green Belt, which is the principal planning constraint (by area affected) on development in the County, is not identified.

27. The Green Belt continues to be the most significant policy affecting the non built-up area of South West Herts. It is highly valued by local communities as a contributor to the local environment, preventing the coalescence of settlements and maintaining the open character of the countryside.

28. Insufficient attention is given to the Watling Chase Community Forest and Heartwood Forest and the need for these to be protected, maintained and enhanced for improved biodiversity, climate change mitigation, and public recreation. The JSP should be more ambitious in its policies to promote additional large-scale community woodland to aid the achievement of these three objectives.

29. The significance of historic heritage is identified, but access to green space is limited to the treatment of spaces rather than promoting the benefits of the countryside in its own terms. It is a key asset affecting peoples' quality of life, and offers opportunities for limited sustainable development.

30. There is a paradox between offering "high quality natural environment" and promoting unspecified growth. We believe that there is no apparent acceptance of the balance that needs to be drawn between the economic, social and environmental implications of development in this document.

CPRE Hertfordshire Feedback response:

Q.2) No. See above paras. 26 and 27.

Q.3) Yes. See above paras. 28 to 30.

b) Living in South West Herts

31. This section talks about housing characteristics and notes the location of South West Herts relative to London, its diversity of character, population changes and pressures. The accompanying charts show that population density in South West Herts districts is generally higher than both the rest of the County and England as a whole (Watford is particularly urban).

32. Pockets of deprivation exist in Watford and elsewhere, but a key statistic is that house prices in the area are 82% above the national average. Recent CPRE Hertfordshire research has shown that the average income household in Hertfordshire cannot afford an average priced house within existing market conditions; new Green Belt located housing is priced overwhelmingly above average.

33. New housing should use previously developed land. Household and population projections should use the latest available data which will demonstrate a reduction in housing need from the data quoted in emerging Local Plans in Dacorum, Three Rivers, Hertsmeire and St Albans.

CPRE Hertfordshire Feedback response:

Q.4) No. See above para. 32.

Q.5) Yes. See above para. 33.

c) Working in South West Herts

34. The strength of the local economy is identified, together with suggested economic pressures, the base in research, innovation and the creative industries. There is low unemployment and a highly skilled workforce and a significant increase in 'agile working' practices.

35. South West Herts has a highly developed and mature economic structure with virtually full employment and significant labour shortages in many of its industries. Large-scale expansion using extensive undeveloped land is neither necessary nor appropriate, both in terms of its local impact and the Government's 'levelling-up' agenda.

36. There is no mention of employment linked to rural areas (eg food, drink, rural tourism, rural diversification), nor of essential services including health, social care, education, retail and hospitality. These are major elements of sustainable development potential which are ignored.

CPRE Hertfordshire Feedback response:

Q.6 Yes

Q.7 Yes. See above paras. 35 and 36.

d) Playing in South West Herts

37. The document notes the strong sporting community and high quality visitor attractions in South West Herts. Town centres are identified as centres for leisure, cultural and recreational facilities together with cycling networks and local public spaces.

38. The list of activities is partial and imbalanced towards predominantly economic and urban activities with a complete lack of identification of the significance of the countryside for recreation, health and well-being as well as limited sustainable development. Recent events have emphasised the importance of the countryside for physical and mental health and this is a serious omission in the JSP document

CPRE Hertfordshire Feedback response:

Q.8) No. See above para. 38.

Q.9 Yes. See above para. 38.

e) Moving in South West Herts

39. The comparison between good north-south and relatively poorer east-west transport links is noted, together with high car reliance. There are predicted to be increasingly high levels of road congestion and underused cycle networks.

40. The density of population and economic conditions should enable detailed consideration of the role of public transport in both urban and rural areas and this is conspicuously lacking. The requirements of climate change should influence investment in alternatives to private car use which are increasingly incorporated into legislation but rarely implemented.

41. The Plan is largely silent on its ambitions for low carbon transport which is vitally necessary. There is no mention of the need to dramatically expand the routes, frequency and reliability of bus services (including the impact of the £30 million Hertfordshire Bus Improvement Strategy) and insufficient attention to the need to improve and connect up cycle and walkways.

CPRE Hertfordshire Feedback response:

Q.10 No. See above para. 40.

Q.11 Yes. See above para 36.

42. The document lists the components of infrastructure and relates these to ‘sustainable growth’ and suggests the need for cross council working to achieve major funding. Just two projects are identified as examples: the West Herts Hospitals NHS Trust, and the proposed Herts Rapid Transit (HERT) tramway.

43. Completely lacking is any consideration of rural infrastructure, or infrastructure related to the amelioration of climate change, loss of biodiversity, or any environmental improvement. This is entirely inappropriate where the majority of the South West Herts area is designated as protected, and the infrastructure needs listed are entirely oriented to the needs of growth.

CPRE Hertfordshire Feedback response:

Q.12 Yes. See above para. 43.

Section 5 - The draft vision – tell us what you think

44. “Our vision statement – Realising our potential” is presented as setting objectives which “will shape the lives of generations to come”. It is stated in terms of “sustainable growth” which is assumed to provide “a better future for everyone”.

45. The statement suggests that South West Herts still needs to realise its potential as “being globally connected, nationally recognised and locally cherished” which seriously undervalues its present role in the local and national economy. The “better future” is defined solely in terms of “sustainable growth” which is undefined and suggested to be linked almost solely to economic development objectives of more employment and housing.

46. A more appropriate vision would be one that recognises the full range of the area’s characteristics, including its rural areas and local communities’ stated preferences for sustainable development and protection of its assets and quality of life. These are the objectives which “should shape the lives of generations to come.”

CPRE Hertfordshire Feedback response:

Q.13) No. See above paras 45 and 46.

Q.14) Yes. See above paras 45 and 46.

Setting clear objectives

47. The document sets out “6 Pillars”(sic) to achieve the vision, which themselves lead to further objectives for the JSP. As noted above, these do not relate directly to the five policy areas outlined in the Introduction.

48. We are also concerned that the vision and “6 pillars” may be used to justify ‘growth’ options that would deliver significant large-scale development which local communities would expect to be taken through the Local Plan process. The JSP has the potential to take away the opportunity to prevent further major Green Belt loss and impacts on landscapes and nature.

Specific remarks are made about each “Pillar” as follows:

Living green in a healthy natural environment

49. Initial recognition is given to the fragility of the area's natural environment and green and open spaces, and the five objectives suggest the primacy of "green" concerns. Commitments to net zero carbon, sustainability and biodiversity are suggested.

50. The five objectives are unarguable as statements, but the treatment of "green and open spaces" effectively reduces the significance of the non built-up areas of South West Herts and the opportunities for sustainable development which can take full account of the environmental capital which exists. These initial statements can be seen as "green-washing" in the light of subsequent proposals for inappropriate development.

CPRE Hertfordshire Feedback response:

Q.15) N/A. See above para. 46.

Growing opportunities to work locally

51. South West Herts has a high performing economy with lower than average unemployment and labour shortages in many sectors. The five stated objectives are again unarguable, and recognition is given of the need to embrace new ways of working, which are happening anyway.

52. No indication is given of options other than standard economic growth, or of the opportunities for sustainable development which takes full account of the characteristics and assets of the area. In any case, the employment development objectives as stated can be viewed independently and should be subject to constraints which reflect local aspirations for the area.

53. There is no mention of farming, agriculture or rural based activities and their contribution to the area's economic base. The JSP should acknowledge the significant amount of productive farmland in South West Herts and commit to protect and maintain this farmland for agricultural use and food production.

54. This will help to improve domestic food security (growing our own food and reducing reliance on imported food from abroad) which is consistent with UK Government strategy. It will also ensure that farmland continues to act as a carbon sink to help mitigate climate change.

55. A consultative document should provide the opportunity to challenge the assertion that growth is automatically sought. Increasingly, notwithstanding the need to encourage employment in areas outside South East England where it is needed more, debate is increasing on the role and definitions of economic growth as noted above, and the JSP offers a suitable platform for the exploration of alternative scenarios.

CPRE Hertfordshire Feedback response:

Q.16 Yes, but... See above paras. 52 to 55.

Living in healthy, thriving local communities

56. Three objectives are stated relating to healthy places, local facilities and safe and supportive spaces. Again these may be seen as largely unarguable, albeit lacking in any qualification or detail.

57. Reference is made to “homes and neighbourhoods” and the emphasis is clearly on urban communities and expectations with no mention of rural activities or villages which make up a large part of the area. The contribution of open countryside to physical and mental health is undeniable and increasingly recognised.

58. The JSP should identify all components of healthy and thriving local communities and reflect the designations of protected areas which aid community well-being. The emphasis should be on strengthening and supporting existing communities rather than seeking to create additional communities where none exist.

CPRE Hertfordshire Feedback response:

Q.17) Yes, but... See above paras 57 and 58. .

Moving easily in connected places

59. Four objectives relate to transforming travel, connecting towns and villages and encouraging more carbon neutral activities. Public transport and walking and cycling are to be promoted.

60. These objectives are unexceptional and form part of virtually every statutory planning document being published. They are also subject to the requirements of legislation such as the Road Traffic Reduction Act 1997 which is universally ignored.

61. An increasingly critical lack of connectivity is affecting rural communities in South West Herts with detrimental effects and this is not addressed in the JSP. These effects are heightened by the construction of large car-oriented residential estate developments in protected areas which are the direct implications of an unconstrained growth agenda.

62. The effects of traffic congestion are worsening throughout the area and this stage of the JSP should seek potential solutions which do not involve infrastructure construction which attracts further car usage. Local investment decisions should favour public transport provision in line with other access obligations rather than large-scale and costly infrastructure projects.

CPRE Hertfordshire Feedback response:

Q.18) Yes but... See above paras 60 to 62.

Building homes and places that people are proud of

63. The attractive nature of the area is recognised, including its diversity of urban and rural environments. The JSP aims to recognise current and future housing needs.

64. Emerging Local Plans prepared by the District Councils in South West Herts have failed to take account of the latest data on household formation and projections, leading to excessive housing targets and the allocation of increasing amounts of designated Green Belt land. This is despite the National Planning Policy Framework directing local authorities to use the most up-to-date information.

65. Extensive public opposition to the magnitude and allocation of land for new housing has led to the temporary shelving or pausing of Local Plans. The JSP continues to assume that substantial new

residential development is inevitable with no alternative offered and housing quantities identified in the JSP would be binding on the District Councils

CPRE Hertfordshire Feedback response:

Q.19) No. See above paras 64 and 65.

Delivering robust and sustainable infrastructure

66. The objectives for infrastructure concentrate on providing new projects for growth, promoting local energy production, recycling and advanced digital connections. No reference is made to promoting the more efficient use of existing infrastructure other than noting the effects of climate change.

67. As already noted, the emphasis for infrastructure should be equally on the necessary improvement to existing provision as to new projects. This is likely to provide “a more resilient and sustainable future” and more efficient use of local resources than large-scale capital intensive programmes which are neither required nor sought.

CPRE Hertfordshire Feedback response:

Q.20) Yes but... See above paras. 66 and 67.

Q.21) Tick all boxes. These options are mainly unarguable as obvious statements of intent. Agreement to them as aspirations does not denote support for the way they are developed further in the options offered for public comment in this document.

Section 6 - Shaping the future

68. The document seeks to suggest that a series of growth options (1-6) follow from the previous discussion of the objectives in Section 5. The JSP asserts that South West Herts will grow and that “broad locations for sustainable growth” need to be allocated for Local Plans to detail further.

69. Seven “growth types”(A to F) are suggested; all of which would entail substantial additional development with the only qualification being that “we are required by Government to ensure that we have maximised the use of land that has been previously built on before considering any undeveloped land”. This requirement is effectively meaningless in present circumstances, as demonstrated by the amount of development taking place on open countryside.

70. Previously developed land frequently requires remediation or site preparation for redevelopment and developers are reluctant to undertake such works when undeveloped sites offer more profitable solutions. Public resources are also not available for regeneration and viability assessments are used to justify damaging development decisions.

71. The introduction of the “6 pillars and objectives” to assist consideration of the impact of the seven “growth types” is misleading when legitimate options for sustainable, limited or no development are not considered. “Sustainable growth” is undefined, and the three options noted above would be entirely appropriate for a consultative document, and to omit their consideration is a fundamental flaw of the JSP at this stage of its preparation.

72. There is no reference to the Hertfordshire Climate Change and Sustainability Strategic Action Plan which should influence directly sub-county strategic plans. The JSP is an opportunity to consider innovative solutions to the major challenges ahead and the development of partnerships between public, private and voluntary sector institutions.

CPRE Hertfordshire Feedback response:

Q.22) No ticks. See above paras. 68 to 72. It is inappropriate to omit options for no or limited sustainable development in a consultative document. There are many alternatives to what is termed “sustainable growth” which appears to be based on a purely economic development model dependent on increases in housing and employment. Such an approach is being increasingly challenged by models for sustainable development which take as their foundation, more efficient use of resources, less waste, tackling climate change and promoting ecological stability. The growth options proposed are likely to have seriously damaging implications for large areas of designated protected countryside and over-stretched services and facilities.

Q.23) Yes. See above

Section 7 - Making it happen

73. This section features a series of case studies of projects and programmes which indicate best practice for sustainable development, only three out of the nine being located in South West Herts. The remaining six examples are clearly intending to give the impression of practice likely to be followed by JSP proposals in the future.

74. There is no indication within the previous sections of the document that the practice demonstrated by these examples will be followed, and their inclusion appears gratuitous. A JSP which only offers standard, and increasingly inappropriate, growth options for the future is backward-looking in the light of the challenges urban and rural communities face.

75. For an area with a highly developed economic structure, a generally well educated population, high levels of accessibility and a high quality environment, this a huge opportunity missed. There is no indication in this document of promoting future development which maintains and enhances high quality urban and rural environments.

CPRE Hertfordshire Feedback response:

Q.24) Not appropriate.

Q.25) Yes. See paras. 73 to 78.

Section 8 - How to comment

76. It would also appear that key decisions affecting the JSP are in advanced stages of preparation. Reference is made in the supporting Sustainability Appraisal Scoping Report (SASR) and supporting papers to plans and strategies including the Accelerated Housing Delivery Programme, the ‘Hertfordshire proposition (Growth Deal) of the Hertfordshire Growth Board, and the Accelerated Housing Delivery Task Team’.

77. Topic paper 3 on housing (accompanying the SASR) includes “targeted interventions to remove key delivery barriers with the ‘end goal’ of freedoms and flexibilities that will enable up to 100,000 housing units to be delivered by 2031”. This gives little option to question whether such “growth” is appropriate in the context of climate change and protection of nationally designated areas from development as discussed previously.

78. No timeline is provided for the preparation of the JSP which provides the opportunity for a root and branch review of the objectives and outcomes. The inadequate scope and treatment of the JSP is a very significant cause for concern for the residents and businesses of the local authorities affected with its limited focus on a narrow and damaging definition of economic growth.

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