

Hertsmere Local Development Framework

Development Plan Document

Revised Core Strategy

Statement of consultation for the Local Development Framework the submission of the Revised Core Strategy Development Plan Document

pursuant to Regulation 30 (1) (d) of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008

10th February 2012



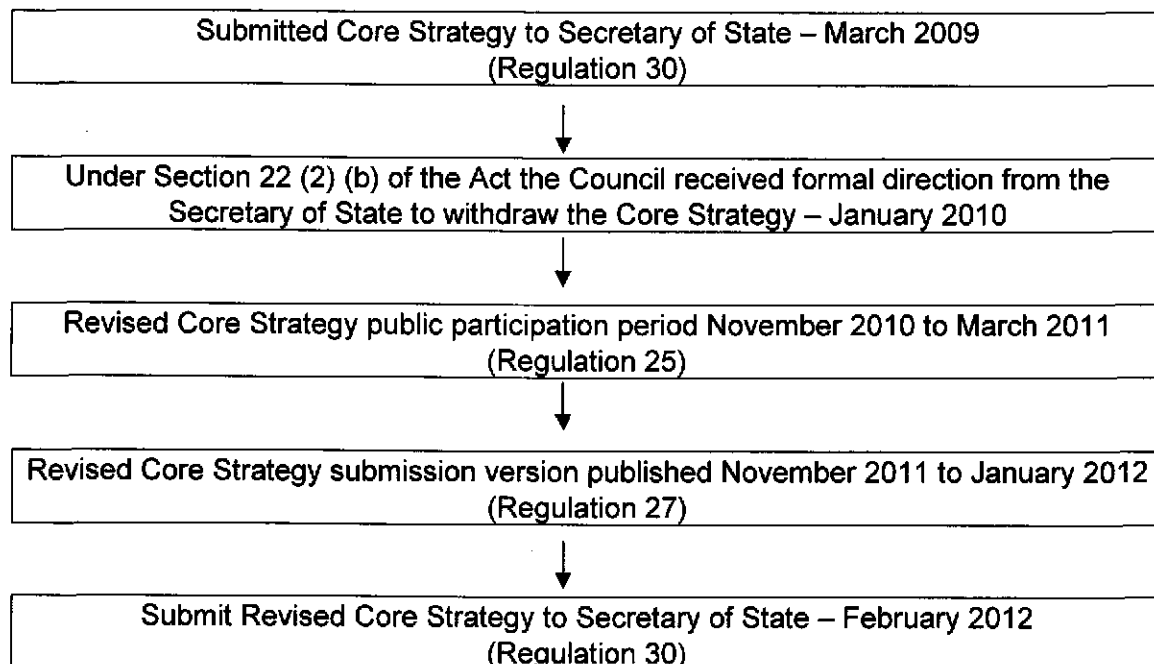
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1. Introduction

- 1.1. This document outlines how Hertsmere Borough Council has engaged the local community and other stakeholders to participate in the latest preparation stages of the Core Strategy Development Plan Document (DPD), as part of the Hertsmere Local Development Framework (LDF). This document, more specifically records:
- Who was consulted at the latest stage in the preparation of the submission Revised Core Strategy DPD;
 - The ways in which the local community and stakeholders were consulted;
 - The issues that were raised by the community and stakeholders; and
 - How the results of the consultation have been taken into account.
- 1.2. This Statement is supported by a comprehensive set of appendices, which supply further details of each consultation exercise, and should be read in conjunction with the Statement of Consultation 2009, which supported the previous submission draft of the Core Strategy.
- 1.3. This document was prepared in line with regulation 28 1 (c)¹ as a record of the continuous and extensive community and stakeholder involvement that was undertaken throughout the development of the Core Strategy DPD. It should be read in accordance with the Statement of Consultation as a record of the stages up to March 2009.
- 1.4. Figure 1 below outlines the principal stages undertaken in the preparation of the Core Strategy since March 2009.

Figure 1 - Dates and stages of preparation for the Core Strategy since March 2009



¹ Regulation 30 1 (d) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2009

2. Hertsmere's Statement of Community Involvement

- 2.1 One key change in the planning system introduced by The Planning and Compulsory Purchase Act 2004 was the requirement to undertake effective and meaningful consultation with the community and stakeholders. A Statement of Community Involvement (SCI) was adopted by the Council in 2006, which sets out how Hertsmere intends to consult the residents and other stakeholders in the Borough on documents in the LDF.
- 2.2 Hertsmere Borough Council recognises the benefits of effective community and stakeholder participation and has sought to pro-actively engage the wider community from the outset in the preparation of its LDF. This approach is reflected in the main objectives of the SCI which are to:
- Set out how Hertsmere Council would involve community and stakeholders in the development of the Core Strategy DPD;
 - Outline who should be involved in the development of each DPD and particularly the Core Strategy DPD at each stage including a list of the statutory and non-statutory consultees who make up the Council's LDF mailing database; and
 - Provide information on the range of documents that Hertsmere would be consulting on.
- 2.3 The SCI is important in providing ideas, as well as an overall framework, for the different measures that could be used to reach the community, so that participation and consultation can be most effective for the entire LDF process.

3. Summary of revised version consultation

- 3.1. Prior to the publication of the Revised Core Strategy for submission to the Secretary of State (November 2011), Hertsmere Borough Council had undertaken extensive public participation and consultation during the preparation of the Core Strategy, as detailed in the Statement of Consultation March 2009. The consultation process previously involved three separate consultation exercises (Issues Scoping, Issues and Options² and Preferred Options³). The detail on the process up to March 2009 can be read in the Council's first Statement of Consultation, which accompanied the previous submission of the DPD.
- 3.2. Following the withdrawal of the previous version of the Core Strategy in January 2010, further public participation was invited in January 2011 on a revised version of the document. The revised version had been informed by the findings of the previous public consultation and the pre hearing meeting in June 2009.
- 3.3. The draft Revised Core Strategy DPD was approved at a meeting of the Executive on 8th December 2010. Formal public participation for the draft Revised Core Strategy DPD ran for six weeks from 10 January to 21 February 2011, which was extended by 4 weeks to 21 March 2011.
- 3.4. The changes published in January 2011 included:
 - a new housing target reduced by 15% to just over 3,200 new homes between 2011 and 2026, in light of the then anticipated revocation of the East of England Plan (EEP) and associated Government advice on the planned revocation;
 - a reduction in the size of sites where Affordable Housing would be sought (from 15 units to 10 units);
 - amendments to the timescale, but not the annual requirement, for new Gypsy and Traveller pitches; and
 - the introduction of seven, smaller 'Local Significant Employment Sites', providing a degree of protection from redevelopment for residential uses;
 - consideration and references to the Strategic Housing Land Availability Assessment and Development Economic Study.
- 3.5. Public participation for the revised document was publicised on Hertsmere's website, in local libraries and Council offices, and through public notices (Appendix A) and articles (Appendix B) in the local press on the week beginning 10 January 2011. Some 1,500 residents, businesses, housing associations, town and parish councils, surrounding local authorities, interest groups and statutory bodies were notified of the revisions to the document (Appendix D). A summary leaflet was also produced to summarise the document and allow greater distribution of the document to the consultation bodies.

² Hertsmere Local Development Framework, Issues and Options (February 2006)

³ Core Strategy Preferred Options (November 2007)

- 3.6. A notification of the publication of the draft Revised Core Strategy was also sent to internal colleagues, including the Area Teams in Development Management, and at the County Council, including monitoring teams and the Hertfordshire Planning Group (HPG). The Policy and Transport Manager also presented the Revised Core Strategy at the Local Strategic Partnership meeting on 22nd March 2011.
- 3.7. The Council's Overview and Performance Committee considered an update report on the Core Strategy prior to its publication and again in January 2011, following a presentation from the Policy and Transport Manager. A number of the comments raised by Members (see Appendix C – the minutes of the Committee meeting of January 10th 2011) have been addressed in amendments to the Revised Core Strategy.
- 3.8. In November 2011 the Housing Forum within the Borough was updated on the status of the document and the nature of the representations received, and Homes and Communities Agency (HCA) were also briefed in the same month.
- 3.9. Around 500 comments were received from 58 respondents on the draft Revised Core Strategy with the greatest number made by or on behalf of developers through the response form provided by the Council. There were also notably a number of individual residents that responded, alongside several of the residents groups within the Borough. There were also a number of requested changes to contact details for any future correspondence.

4. Summary of the main issues raised in the representations

- 4.1 The comments received mostly challenged the Council's proposed reduction in housing numbers, questioning the data which justified this reduction, emphasising the importance of the East of England Plan, and highlighting a perceived lack of an alternative plan, should the identified sites not come forward. Comments on the supporting text, tables and policies were all recorded individually and considered, which are set out in Appendix E, which sets out the responses received and the Council's response individually.
- 4.2 Since public participation was undertaken on the draft Revised Core Strategy, three significant changes have led to amendments in the Revised Core Strategy November 2011: the Cala Homes case, the publication of the draft National Planning Policy Framework (NPPF) and the Localism Act receiving Royal Assent.
- 4.3 In light of the Cala Homes decision, the Council has ensured its housing target is in general conformity with the adopted EEP. The findings of the Council's updated Strategic Housing Land Availability Assessment (SHLAA) November 2011 projects that the Council has a 10 year land supply of potential housing sites, principally within built up areas, avoiding the need for greenfield, Green Belt releases. This includes 1,290 new homes in the pipeline such as more than 200 homes at International University, which have not been built, as well 800 new homes along the Elstree Way Corridor. The potential has also been identified for over 1,000 new homes on *potential* sites such as BBC Elstree and land next to Elstree and Borehamwood Station - as well as capacity beyond this period for up to 500 homes on windfall sites within built up areas based on previous trends e.g. flats replacing houses on large plots.
- 4.4 The SHLAA projects that just over 3,550 new homes could potentially be delivered through these sites and locations over the 15 years plan period. The SHLAA also includes greenfield sites promoted by developers but on the basis that the Council wishes to avoid Green Belt releases – and the EEP does not advocate a Green Belt review in Hertsmere – the revised housing target would be based on the non-greenfield capacity identified in the Borough. The revised Core Strategy recognises (in Policy CS3) that if sites do not come forward for development, a review of the phasing and location of housing allocations will be undertaken including consideration of land presently designated as Green Belt.
- 4.5 There is no change proposed to the size of sites where Affordable Housing would be sought (10 units/0.3 hectares) nor to the commitment to provide additional Gypsy and Traveller pitches over the next five years.
- 4.6 The other principal change in the Core Strategy relates to a proposed commitment to extend the Elstree Way employment area beyond Rowley Lane up to the A1. This area of land is located within the Green Belt and has limited environmental quality, including a significant area of hard standing used for car parking. It would be safeguarded for employment development should existing sites continue to come forward for housing beyond the Elstree Way Corridor, within the main employment area. Current government guidance, reinforced in the draft NPPF, seeks to prevent the retention of

vacant or surplus employment land that could be used for other purposes. However, the Council also has a requirement to plan for future jobs growth and the scope to extend Elstree Way employment area up to the A1 would enable a mix of B class development to be delivered in Borehamwood as and when the demand arises.

- 4.7 The other changes made to the Core Strategy are relatively minor, drafting changes and do not effect the overall strategy in terms of the quantum and distribution of development.
- 4.8 It is, however, proposed that there should be a commitment to change how the larger villages in the Green Belt are demarcated to enable village boundaries to be more clearly defined. Within identified 'envelopes' limited infilling or redevelopment would be acceptable (para.315 of the Revised Core Strategy 2011) whereas presently, only Shenley and Elstree provide any clear scope for a limited amount of infilling development. It is also proposed to consult on changes to the Green Belt boundary relating to the removal of the Porters Park area of Shenley, which has been developed for 900 new homes. This change to the Green Belt boundary was envisaged in the original planning brief for the Shenley hospital site. The precise boundaries will be considered through the Site Allocations DPD.

5. Conclusion

- 5.1. The Council considers that the process followed in the production of the Core Strategy has complied with both the relevant regulations and the Council's own SCI.
- 5.2. The public participation on the draft Revised Core Strategy period, which commenced in January 2011, resulted in 1,500 consultees being notified. There were 500 comments received from 58 respondents, of which the Council responded to all comments. Changes were made in response to some of the comments, as outlined in the Section 4 of this Statement.
- 5.3. The main changes that have taken place for the Revised Core Strategy November 2011 version relate to the housing target; the provision to include potential safeguarded land for employment use off Rowley Lane; and the need for envelopes to be drawn around various existing villages within the Green Belt for the purposes of 'infilling'. Other changes are minor relating to the clarification of phrases, typographical changes, and other wording changes and factual updates.
- 5.4. The Core Strategy is based on the principle of making the best use of previously developed land for housing and other development throughout the Plan period. The resulting submission Revised Core Strategy DPD includes 29 spatial and strategic policies and is considered to be in general conformity with the EEP as well as national planning policy requirements. The Core Strategy has been informed and guided by the outcome of public consultation set out and summarised above, as well as a substantial evidence base including the Strategic Housing Land Availability Assessment, Urban Capacity Study, Central Hertfordshire Employment Land Review, Strategic Flood Risk Assessment, and Town Centres Report.
- 5.5. It should be emphasised that it has not always been possible to find a consensus amongst stakeholders, particularly the contentious issues relating to the scale, distribution and location of future housing in the Borough. The Revised Core Strategy submission version, however, has sought to balance these conflicting interests by providing a degree of flexibility in key policy areas whilst, it is considered, providing a measure of certainty and clarity as to how growth in the Borough can occur over the next 15 years.

Appendix 1

***Press cuttings from the Watford Observer, Borehamwood Times and Herts.
Advertiser, specifying the Regulation 25 consultation period***

Public Notices

Hertfordshire County Council

THE HERTFORDSHIRE (ELDON AVENUE, BOREHAMWOOD)

PROHIBITION OF DRIVING EXCEPT PEDAL CYCLES ORDER 2011

NOTICE is given that the Hertfordshire County Council in order to facilitate the passage on a road for pedal cycles propose to make an Order under the Road Traffic Regulation Act 1984 to relax and replace an existing restriction. The general effect of the Order will be to relax and replace the current prohibition of driving restriction introduced in 1968 in Eton Avenue and located approximately 46.5 metres north west of its junction with Shireway Road so as to allow pedal cyclists to use the restricted length of highway.

Documents giving more detailed particulars of the proposals may be inspected during normal office hours at the offices of Hertsmere Borough Council, Civic Offices, Elstree Way, Borehamwood and at Main Reception, Hertfordshire County Council, County Hall, Pige Lane, Hertford from 13 January 2011. (Quoting Ref: H/003/10)

General enquiries relating to the proposals should be referred to the Hertfordshire Highways Engineer concerned Simon Flew tel: 01707 356252 or simon.flew@hertshighways.org.uk

Objections to the proposals should be made in writing to Terry Curtis, Hertfordshire Highways, Highways House, 41-45 Broadwater Road, Welwyn Garden City, Herts, AL7 3SF or terry.curtis@hertshighways.org.uk by 4 February 2011 stating the grounds on which they are made.

TEMPORARY CLOSING OF VARIOUS ROADS IN BOREHAMWOOD

NOTICE is given that the Hertfordshire County Council intend to make an Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all traffic from using the following lengths of roads, except for access:-

1. that length of Stickle Way, Borehamwood from its junction with the A5135 Elstree Way roundabout northwards for a distance of approximately 60 metres.
2. that length of Manor Way, Borehamwood from its junction with the A5135 Elstree Way roundabout southwards for a distance of approximately 30 metres.

It is anticipated that these sections of roads will each be closed between the hours of 7.00pm and 8.00pm for 1 Sunday, sometime during the period 1 February 2011 and 18 March 2011, when signs are in place. Alternative signed routes will be provided for traffic whilst the road closures are in place.

3. that length of Rowley Lane, Borehamwood from its junction with Well End Road north eastwards to its junction with Holmstall Lane, a distance of approximately 1280 metres.

It is anticipated that this section of road will be closed between the hours of 9.00am and 4.00pm (Mondays to Sundays inclusive) for up to 3 days, sometime during the period 1 February 2011 and 1 March 2011, when signs are in place. An alternative signed route will be provided for traffic whilst the road closure is in place.

4. that length of Hartford Road, Borehamwood from a point 40 metres south west of its junction with Wilshire Road north eastwards for a distance of approximately 80 metres.

5. that length of Wilshire Road, Borehamwood from its junction with Hartford Road north westwards for a distance of approximately 40 metres.

6. that length of Broadwater Road, Borehamwood from its junction with Hartford Road south eastwards for a distance of approximately 40 metres.

It is anticipated that these sections of roads will each be closed between the hours of 9.00am and 4.00pm (Mondays to Sundays inclusive) for up to 5 days, sometime during the period 1 February 2011 and 1 March 2011, when signs are in place. Alternative signed routes will be provided for traffic whilst the road closures are in place.

The purpose of the Order is to enable highway maintenance works to take place. If you have any queries about the highway maintenance works or the temporary road closures, please contact Peter Rautenbach tel: 0300 123 4047 at Hertfordshire Highways.

County Hall
Hertford
Herts SG13 8DN

13 January 2011
John Wood
Director of Environment



Transport for London



Road Traffic Regulation Act 1984

The A1 GLA Side Road and A41 GLA Road (Courtland Avenue and Edgware Way, London Borough of Barnet) (Temporary Prohibition of Traffic) Order 2011

1. Transport for London hereby gives notice that it has made the above named Traffic Order under section 14(1) of the Road Traffic Regulation Act 1984 for the purpose specified in paragraph 2. The effect of the Order is summarised in paragraph 3.
2. The purpose of the Order is to enable carriageway resurfacing and other maintenance works to take place on Courtland Avenue and A41 Edgware Way.
3. The effect of the Order is to prohibit any vehicle from:
 - (1) entering or exiting A1 Barnet Bypass at its junction with Courtland Avenue.
 - (2) entering, exiting or proceeding on the westbound carriageway of A41 Edgware Way between its junctions with Northway Circus, also known as Apex Corner, and Stonefields Lane.

The order will be effective at certain times between 17th January 2011 and 31st March 2011 Mon-Fri 9:30 PM to 5:30 AM or when the works have been completed whichever is the sooner. The prohibition will apply only during such times and to such extent as shall from time to time be indicated by traffic signs.

4. The prohibitions will not apply in respect of:
 - (1) any vehicle being used for the purposes of those works or for fire brigade, ambulance or police purposes;
 - (2) anything done with the permission or at the direction of a police constable in uniform or a person authorised by Transport for London.

5. At such times as the prohibition is in force an alternative route will be indicated by traffic signs via, for the Courtland Avenue closure, Harkins Lane to A5109 Marsh Lane, turning right toward A1 Junction with Apex Corner to normal route of travel. For the Edgware Way closure via A5109 Salvage Lane, Deans Lane, Deansbrook Road, A5 High Street, Stonegrove, A410 Spur Road to normal route of travel.

Dated this 13th day of January 2011

Andy Best
Senior Highways Operations Manager, Transport for London
Palestra, 197 Blackfriars Road, London, SE1 8NJ

MAYOR OF LONDON.

Transport for London



Road Traffic Regulation Act 1984

The A41 GLA Road (Hendon Way) (Cricklewood Lane) (London Borough of Barnet) (Temporary Banned Turn) Order 2011

1. Transport for London hereby gives notice that it has made the above named Traffic Order under section 14(1) of the Road Traffic Regulation Act 1984 for the purpose specified in paragraph 2. The effect of the Order is summarised in paragraph 3.
2. The purpose of the Order is to enable carriageway remarking works to take place on certain lengths of the A41 Hendon Way in the London Borough of Barnet.
3. The effect of the Order will be to prohibit any vehicle from turning right from the A41 Hendon Way Southbound carriageway onto the A407 Cricklewood Lane westbound carriageway. The Order will be effective at certain times between 17th January 2011 and 28th February 2011 Mon-Fri 9:30 PM to 6:00 AM, or until the works have been completed whichever is the sooner. The prohibition will apply only during such times and to such extent as shall from time to time be indicated by traffic signs.
4. The prohibition will not apply in respect of:
 - (1) any vehicle being used for the purposes of those works or for fire brigade, ambulance or police purposes;
 - (2) anything done with the permission or at the direction of a police constable in uniform or a person authorised by Transport for London.
5. At such times as the prohibition is in force an alternative route will be indicated by traffic signs via A41 Hendon Way, A598 Finchley Road and A407 Cricklewood Lane to normal route of travel.

Dated this 13th day of January 2011

Roger Pys
Forward Planning Manager, Transport for London
Palestra, 197 Blackfriars Road, London, SE1 8NJ

MAYOR OF LONDON

Public Notices

Public Notices

ELIZABETH LOUISE ROSS (Deceased)

Pursuant to the Testate Act 1925 any person having a claim against or an interest in the Estate of the above-named deceased, late of 35 Broadwater Road, Welwyn Garden City, Herts, SG13 8DN, who died on 28/03/2010, are required to send particulars thereof in writing to the undersigned Solicitors on or before 28/03/2011, after which date the Estate will be distributed having regard only to claims and interests of which they have had notice.

PAULINE WILLIAMS-JOHNSON
1 Colindale Parade
Colindale
Hendonshire EN4 8EX T06645

HERTSMERE BOROUGH COUNCIL TOWN AND COUNTRY PLANNING ACT 1990 Planning Permission is Sought For The Following:

TP/10/2442/JLT/ 29 King Charles Road, Shenley. Two storey rear extension, loft conversion and roof alterations, including internal alterations. Reason: Green Belt.

TP/10/2445/JLT/ 20 The Lawns, Shenley. Conversion of garage to habitable accommodation; Erection of single storey rear extension. Reason: Conservation Area & Green Belt.

TP/10/2446/JLT/ 20 The Lawns, Shenley. Demolition of internal & external walls for proposed development (Application for Conservation Area Consent). Reason: Conservation Area & Green Belt.

Plans may be inspected by visiting our website at www.herts.gov.uk/planning, at the Civic Offices, Elstree Way, Borehamwood (during normal office hours). Comments in writing, quoting the appropriate reference, to the Head of Planning at the Borehamwood offices within 21 days from the publication of this notice.

Under the provisions of the Local Government (Access to Information) Act 1985 my comments you wish to make in relation to this planning application will be held on a statutory register, which will be available for inspection at the Council Offices.

If an appeal is made against the refusal of a householders planning permission, which will be dealt with on the basis of written representations, any representations made about this application will be sent to the Secretary of State and there will be no further opportunity to comment at appeal stage.

Donald Graham
Chief Executive
13 January 2011



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learningforlife

To advertise in this section please call 020 8359 5810

7 out of 10 people say that the Times Group is the best local newspaper.

* Source: expertisemarketing 2004

Goods Vehicle Operator's Licence

2 Salisbury Tru Trading of Relay Drive, Relay Park, Tamworth, Staffordshire B77 8PB is applying to change an existing licence as follows, to keep an extra 20 goods vehicles and 65 trailers at the operating centre at Salisbury Drive, Tamworth, Staffs. The licence is currently held by Mr. David J. Salisbury, who died on 28/03/2010, are required to send particulars thereof in writing to the undersigned Solicitors on or before 28/03/2011, after which date the Estate will be distributed having regard only to claims and interests of which they have had notice.

PAULINE WILLIAMS-JOHNSON
1 Colindale Parade
Colindale
Hendonshire EN4 8EX T06645

GEORGE LEONARD HAYNES (Deceased)

Pursuant to the Testate Act 1925 any person having a claim against or an interest in the Estate of the above-named deceased, late of 160 Towner Road, Edgware, Middlesex HA8 6AG, who died on 28/03/2010, are required to send particulars thereof in writing to the undersigned Solicitors on or before 28/03/2011, after which date the Estate will be distributed having regard only to claims and interests of which they have had notice.

SHARON DAVIDSON (Deceased)

Pursuant to the Testate Act 1925 any person having a claim against or an interest in the Estate of the above-named deceased, late of 35 Broadwater Road, Welwyn Garden City, Herts, SG13 8DN, who died on 28/03/2010, are required to send particulars thereof in writing to the undersigned Solicitors on or before 28/03/2011, after which date the Estate will be distributed having regard only to claims and interests of which they have had notice.

PAULINE WILLIAMS-JOHNSON
1 Colindale Parade
Colindale
Hendonshire EN4 8EX T06645

Public notices

**HERTSMERE BOROUGH COUNCIL
PLANNING AND COMPULSORY
PURCHASE ACT (2004)
(as amended)**

**REGULATION 25 TOWN AND
COUNTRY PLANNING (LOCAL
DEVELOPMENT) (ENGLAND)
(AMENDMENT) REGULATIONS 2008**

**CONSULTATION ON DRAFT
REVISED CORE STRATEGY**

The Council have published a draft Revised Core Strategy for consultation and invite comments on the document from 10th January to 21st February 2011. The Core Strategy sets out a vision and high level planning policies for the District from 2011-2026, replacing the withdrawn submission Core Strategy (Dec 2008).

The document and updated sustainability report can be viewed at www.hertsmere.gov.uk/planning. It is also available to view at the Civic Offices in Borehamwood, Local Libraries, Area Offices and offices of Aldenham Parish Council, Radlett.

All comments received will be public information and should be made in writing by 5pm on Monday 21st February 2011. You can send responses by email to core.strategy@hertsmere.gov.uk, by post to Hertsmere Borough Council, Civic Offices, Elstree Way, Borehamwood, Herts WD6 4RA or by fax on 0208 207 7444.

**Dated 8th January 2011
Donald Graham
Chief Executive**



Appendix 2

Relevant Press Releases by Hertsmere Borough Council



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Shaping the future of your area

07-Jan-2011 15:07:43

Can you imagine what your local area will look like in 15 years' time? How would you like it to develop? Now is the chance to have your say and help shape your local area.

Hertsmere Borough Council has to put together a plan of what development there should be, and where, in the borough until 2026. Called the Core Strategy, it sets out the overall vision for the borough for the next 15 years with policies for a number of key areas including housing, the environment, employment, transport and retail.

The Core Strategy is quite complex, but it will guide future development in the borough in some key areas, including:

- Location of 3,200 new homes over 15 years
- Requirements for providing affordable housing
- Requirements for the provision of Gypsy and Traveller pitches including a commitment to review this after five years
- Identification of seven locally-significant employment sites where there will be a presumption against redevelopment for non-employment uses

Once adopted by us the plan will become the most important document for assessing planning applications in the future.

Your views on the plans are welcome. The consultation runs for six weeks from Monday 10 January to Monday 21 February. Responses will be used to inform the strategy, which should be published in mid 2011.

You can see the draft strategy and supporting documents [online](#) or visit the council offices in Elstree Way, Borehamwood; The Bushey Centre, High Street, Bushey or the Wylyotts Centre, Wylyotts Place, Darkes Lane, Potters Bar, your local libraries and parish council offices.

Responses can be sent by email to core.strategy@hertsmere.gov.uk, by post to Policy and Transport Team, Planning and Building Control, Civic Offices, Elstree Way, Borehamwood, Herts, WD6 4RA or by fax on 020 8207 7444.

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Welwyn and Hatfield Times

(Potters Bar Edition)

Online

Last chance to have your say on Potters Bar future

14 February 2011

TIME is running out to have your say on the future of Potters Bar.

A public consultation on Hertsmere Borough Council's Core Strategy closes on Monday, February 21.

The document outlines the overall vision for the borough for the next 15 years, detailing what sort of development there should be in the borough until 2026.

It focuses on areas including housing, the environment, employment, transport and retail.

Among the issues needing to be resolved is where to put 3,200 new homes in the borough, affordable housing provision, provision of gypsy and traveller sites and identifying seven new employment sites significant to the borough.

Once adopted, the plan will become the most important document for assessing planning applications in the future.

Residents' responses will be used to inform the strategy, due to be published in mid 2011.

Responses can be sent by email to core.strategy@hertsmere.gov.uk, by post to Policy and Transport Team, Planning and Building Control, Civic Offices, Elstree Way, Borehamwood, Herts, WD6 4RA, or by fax on 020 8207 7444.

You can view the draft strategy by visiting the council offices at both the Wyllyotts Centre off Darkes Lane or in Borehamwood, as well as libraries and parish council offices.

Welwyn and Hatfield Times

(Potters Bar Edition)

Wednesday 9 February 2011

Still time to have your say

TIME is running out to have your say on the future of Potters Bar.

A public consultation on Hertsmere Borough Council's Core Strategy closes on Monday, February 21.

The document outlines the overall vision for the borough for the next 15 years, detailing what sort of development there should be in the borough until 2026.

It focuses on areas including housing, the environment, employment, transport and retail.

Among the issues needing to be resolved is where to put 3,200 new homes in the borough, affordable housing provision, provision of gypsy and traveller sites and identifying seven new employment sites significant to the borough.

Once adopted, the plan will become the most important document for assessing planning applications in the future.

Residents' responses will be used to inform the strategy, due to be published in mid 2011.

You can view the draft strategy at www.hertsmere.gov.uk/planning, or by visiting the council offices at both the Wylyotts Centre off Darkes Lane or in Borehamwood, as well as libraries and parish council offices.

Appendix 3

Overview and performance committee meeting minutes

APPENDIX B

HERTSMERE BOROUGH COUNCIL

OVERVIEW AND PERFORMANCE COMMITTEE

**Minutes of the meeting held in Committee Rooms A and B, Civic Offices,
Elstree Way, Borehamwood**

10 January 2011

Voting Members Present:

Councillors Dr Cohen (Chairman), Choudhury, Gamble, Griffin and Hoeksma

Also Present:

Councillors Bright, Harrison, Goldstein, Strack, Wayne and P Morris

Officers:

D Gopal
M Silverman
P Harris-Gorf

Head of Financial Services
Policy and Transport Manager
Head of Planning & Building Control

614. **MEMBERSHIP**

Noted that, since the publication of the agenda, there had been no changes to the membership of the committee.

615. **COMMUNICATIONS AND APOLOGIES**

Apologies for absence received from Councillor Hodgson-Jones.
The Chair welcomed attendees who had come specifically to hear about the Revised Core Strategy.

616. **DECLARATIONS OF INTERESTS (IF ANY)**

None.

617. **MINUTES**

RESOLVED that the minutes of the meeting held on 8 November 2010 be approved and signed.

618. **FINANCIAL MONITORING UPDATE (REGULAR ITEM)**

The Head of Finance was in attendance for this item.

The Committee considered the Financial Monitoring report as at 31 October 2011. Officers advised that a £34 000 deficit was predicted for the year end.

The Committee asked why the increase in planning applications had not led to an increase in income as well as the stated increase on advertising and paper costs. The Committee was advised that income had not risen because the nationally-set fee had not increased for a few years, some applications were not liable for a fee (eg re-application subsequent to a negative decision, listed/conservation area consent) and some applications generate greater publicity costs. However in 2012 the Council would be pilot authority for the introduction of localised fee setting. The Localised framework would not allow free re-applications and would allow the build up of contingency funds.

The Committee requested information on how many units per week are used on Bed & Breakfast accommodation (on average).

Action by: Head of Finance

619. **REVISED CORE STRATEGY - COUNCILLOR CONSULTATION**

The Planning & Performance Portfolioholder, Head of Planning Building Control and the Policy and Transport Manager were in attendance.

The Committee received a presentation (attached as an appendix to these minutes) and raised a number of points, including:

- Policy CS26 – was there not too much retail space in Borehamwood – as borne out by the figures in Table 14. In particular, given the number of long-term, boarded-up vacant units in Shenley Road (and Clarendon Road), could such units not be redeveloped for housing? Local residents wanted to see improved retail spaces or housing units rather than vacant properties. It might be that landowners did not market the units and hoped to then redevelop them. Perhaps the Strategy could encourage housing on corner plots. Also not only was the parking inadequate for retailers but consumers no longer just shop in high streets – the Strategy must account for such changing conventions.
 - Officers advised that parking surveys had shown the spaces to be well-used and effective. Officers suggested that the periphery could be looked at for redevelopment whereas introducing ground-floor residential space in areas of greatest footfall would create dead frontage and fragment the shopping area. It would be better to find secondary areas for redevelopment. Another option would be Section 215 enforcement notices to encourage

landowners to tidy up vacant units. Additionally, the Brighter Towns initiative would improve the cosmetic appearance of the area once the film-themed streetscaping was completed. Officers and the Portfolio holder would discuss options for periphery sites and housing on corner plots.

Action by: Head of Planning & Building Control, Planning & Performance Portfolio holder

- The Leader suggested that the Council could be stronger in utilising its enforcement powers and perhaps Compulsory Purchase Powers. The key was to make the area look attractive. The High Street had a daily 1000 plus footfall on its crossing points and multiple options should be considered, such as improved links to the retail park or extending the retail park. Housing could be introduced but it should be from the first floor upwards.
- The Committee suggested that whilst the Core Strategy provided good guidelines, a proactive approach was required ie develop incentives that will encourage business to seek development opportunities in Borehamwood. If one or two such investors were confirmed, others would follow. In terms of retail, the Council should look at how to regenerate an area that is looking worn.
 - Officers advised that the soon-to-be completed Economic Development Strategy was linked to the Core Strategy and would cover broader issues such as regeneration. However getting a couple of landowners on-side would be the key to improving the area, because Section 215 enforcement was only applicable if the area was in a derelict condition. Compulsory purchases orders were rarely used, but the Strategy could include a general commitment to use such powers, sending a clear message to landowners who retain empty retail units on a long term basis.
- Paragraph 3.40 – the Committee asked how the affordable housing requirement was squared off against housing need numbers, and how a mix of property types was ensured.
 - Officers advised that the new housing targets were derived from national statistics and the Chelmer Population and Household Model. There were a lot of assumptions, as with any model, but it was considered to be robust in terms of projecting household growth. Officers initially negotiate with developers to ensure an adequate housing mix, as negotiation was more effective than a rigidly set percentage for mixed tenure. However, it was agreed that the Core Strategy could be clearer about which evidence would be used to inform negotiations and to establish current housing need e.g. latest housing register data.

- The Committee noted that some data was already out of date and that the new Census should provide more up-to-date demographic data for the borough.
 - Officers were aware that some data needed refreshing, but the Council did not have resources for continuous updates.
- The Committee asked if the Green Belt would be encroached upon.
 - Officers were reasonably optimistic about the Green Belt but this was dependent on achieving development targets in Elstree Way.
- Page 39 – the Committee referred to the daily traffic gridlock along Shenley Road. If 60% of homes were to be in that area, what would the traffic situation be in 15 years? If the county council was not investing in the infrastructure then the Planning Committee should refuse new build wherever transport links were poor.
 - Officers advised that there was approximately £2m of unspent Section 106 highways funds currently held and that a detailed traffic study by Colin Buchanan was about to be completed which identified the specific improvements – such as signalling the junction of Station Road and Shenley Road – needed to absorb additional growth along Elstree Way. However, for individual planning applications, if there was no supporting evidence via the County Council Engineer, the planning refusal would be overturned on appeal. The Community Infrastructure Levy arising from new dwellings could be used to support infrastructure improvements.
- Paragraph 7.10 - The Committee asked for a minimum level of parking spaces to be set.
 - Car ownership levels had risen in recent years - households had multiple cars because children remained in the parental home into adulthood and had their own car and cars had become generally more affordable and an essential priority. The Government had reissued its parking policy guidance and stated that there should not be a minimum level. Officers would shortly issue a briefing note to Members on the changes to PPG13. The 2011 Census was likely to collect data on car usage so more up-to-date data would become available.

The Committee thanked the Officers for an interesting presentation and hoped that the comments raised by the meeting would be taken on board.

Appendix 4

List of consultees, organisations and persons notified at Regulation 25 stage

Mrs B Gill	Dr E P Booth	Mr J Cummins
Mr & Mrs G Gillam	J H	Mr & Mrs Daly
Mr E Caprario	Mr S W Boland	Mrs C Cruickshank
Mr J W L Gillams	Mrs M Hamment	Mrs A Rowland
Mr & Mrs A Gladwin	Mr & Mrs D Hall	Mr E Cross
Mr C Cannon	Mr & Mrs I Steiner	Mr D Dover
Mr D Goddard	Mr & Mrs R M Hale	Mr P Draper
Ms M Goggin	Mrs K Blockley	Mr & Mrs Oke
Mr & Mrs R Gilbert	Mr & Mrs E C Hand	Mr & Mrs Fabiyi
Mr S Bury	Mr & Mrs D Hanson	Mr B Crouch
Mrs A Gibson	Mrs K Blake	Mrs E Craythorne
Mrs N Golding	Mr & Mrs Blake	Mrs P Child
Mr R C L Goodman	Ms M Hanson	Mr/Ms P Bird
Councillor J Graham	Mr & Mrs W Hanwell	Mr A R Davidson
Mr S Mahendran	Mrs M Biscoe	Mr G B Dawe
Mr & Mrs P Grahame	Mr J Biscoe	Mrs P Dawes
Mr & Mrs K B Butler	Mr & Mrs J P Boland	Mr M Dawson
Mr & Mrs Grant	Mr & Mrs D.C. Brothers	Mr D Davis
Miss J Bushell	Mr and Mrs A E Burr	Mrs J Davis
Mr N Green	Mr J Fort	Mrs & Miss E M Davies
Mrs M Byrne	Mr G Bund	Miss M F Dawson
Mr Gatfield	Manor Pharmacy	Ms B Dawson
Mr & Mrs L Frost	Mr K Bryan	Mr H Dawson
Mr & Mrs S Frot	Mr S Grossman	Mrs L J Curry
Mr L Fuller	Mr J Gruder	Ms J Dear
Mrs S Chaney	Mr D Gunn	Mr J Duncan
Mr & Mrs Chalkley	Mr & Mrs K & H Browne	Mr D DeRivaz
Mr and Mrs R Gale	Mr & Mrs L Brafman	Mrs E M Detheridge
Mr & Mrs S Caterer	Mr A Hadley	Mrs P Diamond
Mr & Mrs A Casman	Mrs M Barton	Mr & Mrs J A Dickson
Potters Bar Society	Mr P Hagger	Mrs V F Dimmer
Mrs J Garber	Mr & Mrs J Broad	Potters Bar Society
Mr & Mrs L Carlton	Mr & Mrs I Brittain	Mr J Davey
Mr/Ms D Garrett	Mr E Brewer	Mr R W Disborough
Mr & Mrs A Green	Mr and Mrs A Haines	Mr P Daly
Mrs T Carrington	A & M Simmons	Ms J G Dibley
Mr/Ms J Gavin	Mr R J Hershman	Mrs J R De Charriere
Mr & Mrs Gell	Mrs A Garcia	Ms B H Jordan
Mr & Mrs J Gerrard	Mr & Mrs R Brazell	Mrs D A Cranfield
Dr J C Carreras	Mr & Mrs W E Brant	Mr & Mrs A Fielden
Mr & Mrs M Gerred	Mrs M Brown	Mr D Connatty
Mr/Ms A Gibbs	Mr R Culnane	Mr P Findlay
Mr S B Gibbs	Mrs Craig	Mrs R Finestone
Mr & Mrs Griffiths	Mrs C Curran	S & M Building
Ms F Carmicheal	Ms P Gilby	Mr & Mrs Fitzgerald
Revd M Carter	Mr/Ms J Dodwell	Mr/Ms G Cohen
Mr L Kaneria	Mr/Ms M Doneo	Mr F Fitzjohn
Mr & Mrs Burton	Mr & Ms C Curran	Mr P Fenton
Dr & Mrs C Halliday	Mr T J Cunningham	Mr T J Flood
Friends of Fishers Field	Mr & Mrs M Donnelly	Mrs H Farkas
Mr R Hamilton	Mr J C Doughty	Mr D Fordham
Mr/Ms T Bowden	Mrs M Curtis	Mr D Clements

Mr & Ms A Shah	Frank Timothy Associated Ltd	Swift Dry Cleaners
Mrs L A Claydon	Architects	Countryside Management Service
Ms F Clarkson	Freeth Melhuish	Potters Bar Congregation of
Mr R Dacosta	Mr & Mrs D Galvin	Jehovah's Witnesses
Prof & Mrs R Clark	Mrs V Green	Yes
Mr/Ms R Clark	Mr & Mrs R A Garraway	HCC Passenger Transport Unit
Mrs L Davis	Highwood JMI School	Veolia Water Partnership
Mr M Freedman	Transco Network Analysis Department	Mr & Mrs C & J Cook
Herts Education Service	Haberdashers Aske's Boys School	St Margaret's School
Ms C Edwards	Architects Corporation Ltd	Fosters of Radlett
Mr/Ms D Cox	Mr J Godfrey	Balfour Newsagents - Co-operative
Mr P Cousins	Groundwork Hertfordshire	Group
Mr & Mrs J Court	Elstree and Borehamwood Green Belt	Newberries JMI School
Mrs L Worth	Society	Haringey Council
Mr/Ms L Dunham	Land Access & Recreation	Bushey Library - Community
Mr & Mrs J Durkin	Association	Information
Mr & Mrs K Costi	Slough Estates plc	Taylor Hobbs & Partners
Mr R Earl	Mrs V Lane	Mr G Christie
Mr & Mrs A Edmunds	Land Securities Trillium	Mr F Bulkan
Mr & Mrs H Field	The Woodman Inn	The Education Centre
Mr & Mrs Costello	St Albans City & District Council	Potters Bar and District Society for
Mr & Ms C Douglass	Ms J P Lindsell	Mencap
Mrs D M Corrie	London Essex and Hertfordshire	Mrs C Cant
Mr H Engelsman	Amphibian & Reptile Trust	Mr & Mrs P Cappuccinni
Mr M F Cornish	Airfields Environment Federation	Metropolitan Home Ownership
Mrs E Cootes	Mrs K Kennett	Mr R Creed
Mrs I L Evans	St Peter's Church	Greater London Authority
North Bushey Residents Group	Mr & Mrs I G Luetchford	Mr S B Richards
Mrs Cook	Aldenham War Memorial Hall Trust	Rt Hon J Clappison
J Cook	Village Homes	West Herts College
Ms R Lewin	Letchmore Heath Village Trust	Bushey Meads School
Mr & Mrs J Lemer	Mr M Marshall	Haberdashers Aske's School for Girls
Mr & Mrs W L Edwards	Longwood School and Nursery	Hertfordshire Friends of the Earth
Mr & Mrs Hawes	HM Prison Service Headquarters	Newlands Managements
Mr A D Silverbeck	Dr L Hirsch	Mr & Mrs M Brone
Oxhey Village Environment Group	Wimpey Homes	St Hilda's School
Great Bear Group	Mr R Horowitz	Local Studies Library
Mr W Griffiths	North Mymms District Green Belt	Hightown Praetorian HA
Old Road Securities PLC	Society	Church of Christ Evangelical
Mrs J Heyman	Miss J Hounsell	Borehamwood
Ministry of Defence	Mr B Howard	Countryside Properties (Southern) Ltd
Golfwatch Residents' Association	Mr & Mrs Lane	HSE Health & Safety Executive
Mr & Mrs P A Haworth	Hertfordshire County Council	The British Horse Society
English Golf Union	Mr & Mrs A T King	Mr T Bromley
WHOSE!	Hertfordshire County Library	The Ramblers' Association
Mr J & Mrs F Hellerman	National Farmers Union	Lafarge Aggregates Ltd.
Mr M Hemming	Barratt Homes Limited, North London	Mr S Drabble
Middlesex University Library	Division	Dr Dullforce
Mr MJ Hardwick	Jarvis Homes	Beacon (Mimms) Ltd
International University	Mr & Mrs J Kanena	Environment Agency
Mrs S Foster	Mr/Ms O Falworth	Attenborough Surgery
Mr M Francis	J S Hunter & Sons	Robin Bretherick Associates
	Imperial Cancer Research Fund	Lord Aldenham
	Apcar Smith Planning	

Paradigm Housing Group	Mr D Ashbolt	Michael Shanly Homes
Hertfordshire Learning and Skills Council	Mrs DH Beare	Parish of Bushey
Hartwood Secondary School	Mr/Ms P J Blakeley	Cannon Morgan & Rheinberg
Hertfordshire Constabulary	Mr & Mrs J P Behrman	Mr R M Morgan
Radlett Library	Mr & Mrs S Bell	Mr & Mrs D Pampel
Mount Grace School	Mr & Mrs G & J Bell	Mr & Ms P Moss
Mr A Blane	Mr/Ms R Batter	Mr & Mrs S Paddison
The British Library	Mrs CAS Bennett	Sanctuary Housing Association
Hertfordshire Archaeological Trust	Mr N Bassett	Rolfe Judd Planning
Kent Jones and Done	Ms M Berman	Newland Brothers
Bellway Homes Ltd.	Mr P Berman	Leach Homes
A.C.P. Askew	Mr & Mrs M S Bermange	HCC Environment Department
Bushey United Reformed Church	Bushey Residents Action Group	Aldenham Sailing Club
The Bell Cornwell Partnership	Mr & Mrs F Biddle	Laboratory Cottage
Oakmere Library	Mr G F Biggs	Mr & Mrs A Smith & Mr & Mrs Peskin
Mrs L. A Edmunds	Mr P Belsman	Hertfordshire County Council
Mr & Mrs Wachtel	Mr M Ballard	Post Office Property Holdings
Hertfordshire Association for The Disabled	WHOSE!	Ms A Sinclair
Mr & Ms J Wiggs	Mr K Atkins	Mr A Sissons
Mr & Mrs Willaims	Mr F H. Atkinson	Patchetts Green, Roundbush & Aldenham Conservation Society
Advisory Council for the Education of Romany and o	Mr & Mrs B Austin	Watford Chamber of Commerce and Industry
Rapley's	Ms M Baker	Mr/Ms W Silver
Mrs M Adams	Mrs S Baker	The London Green Belt Council
Guinness Housing Trust	A.I.R Dev	RPS
Mr M Ahmad	Mr & Mrs R Baker	HCC Environment Department
Mrs C Allday	Mr & Mrs T J Ashby	Cherry Tree Lane Green Belt Protection Group
Mr R Allen	Mr M G Ballard	Trewins
Mrs B R Allen	Mr J Beardwell	Commission for Racial Equality
Mr & Mrs M Ames	Mrs S Barnes	Mrs M Stopps
Mr & Mrs H Anthony	Mr G T C Barnes	Hertfordshire County Council
Mr A Sigler	Mr/Ms E Bass	Potters Bar Society
Preston Bennett Partnership	Mr Gill & Miss Stammers	Bellissima Shoes Ltd
Crown Estate	Mr J C Baker	Dr & Mrs McDermott
London Borough of Enfield	Birchville Court Nursing Home	Railtrack plc
Mr R E Tavener	Mrs M D Pantlin	Watford Rural Parish Council
Radlett Society and Green Belt Association	Mr & Mrs C Pearce	Landmark Information Group
Theoco	Knight Strip Metals Limited	Mrs M Rouse
Mr & Mrs Thornton	British Land Company PLC	Mr B Lawrence
Oaklands College	Ridgehill Housing Association	Mr D A K Simmonds
Hepher Dixon Ltd	Darnhills Ltd	Mr J Larholt
Wakelin Associates	Beechwood Homes Ltd	Carter Jonas
Mr & Mrs J C Townshend	Wroxham Residents Action Group	HCC Forward Planning
Mr & Ms P Trevayne	E M Pick Planning	Ancient Monuments Society
Kestrel Grove Nursing Home	Colney Heath Parish Council	The Potters Bar Society & PBIF
Society for Protection of Ancient Buildings	North Mymms Parish Council	Mr & Mrs Scott
Mr G T Verghese	Mrs H Posner	Save the Green Belt Association
Mr & Mrs R Ashenden	HCC Fire & Rescue Service	Mr/Ms P R T Sheen
Mr R Tilbury	Mrs H M Pownall	David Russell Associates
Mr & Mrs A Benstead	Mr A W Perkins	Potters Bar Society
	Mr & Mrs L Mydat	Planning Potential
	Mr J D Birch	
	Marks and Spencer	

Ottaways Solicitors	Mr G Petley	Mr H C Young
Potters Bar Society	Mr D Hails	Mr G R Brazel
Mr Gwynn	Mrs A Wallace	Ms P Stacey
Mr Whitehead	Mr D Vickers	George Wimpey South Midlands Ltd.
Generics (UK) Ltd	Mr/Ms M Vine	McCarthy & Stone Ltd
Mrs Broad	Mrs E Wackrow	East Herts District Council
Lennon Planning	Mrs J Wilks	Mr & Mrs P Wyatt
HCC Forward Planning	Mr & Mrs G Walker	Mr A B Wiggs
St Albans City & District Council	Mr & Ms Walker	LEVVEL
Campaign for Real Ale	Thameslink	Mr T Wells
Bellway Homes North London Division	Mr & Mrs M Wallis	Mr D E Wetherly
Friends of the Earth	Mr P A Trotter	Ms M Wheatley
Cllr P Bourton	Mr & Ms Walton	Mr M E Whitehead
Mr and Mrs Herbert	Mr & Mrs M Warne	Mr M Whitcutt
John Martin & Associates	Mr & Mrs G A Watts	Mrs E Wicks
Mrs Price	Mr and Mrs V Patel	Mr & Mrs R Wise
John Slade	Ms L Webb	Mr E H Wiggins
Patchetts Green, Roundbush and Aldenham Conservation Society	Mr J Webber	Mrs B Welch
Hertfordshire County Council	Mr Webster	Mr D Wilkinson
Mr Whitby	Mr & Mrs R Wallace	Mr K Jones
Scott Land Properties	Ms L Thornton	British Heart Foundation
EDAW	Mrs J Large	Mrs M Williams
E G Harvey	Mr K Taylor	Borehamwood Youth Football club
Mr Rose	Ms K Taylor	Mr & Mrs R Willox
BADFA (The Bushey and District Footpaths Association)	Mr A R Taylor	Mrs R Wilson
Housing and Development Group,	Mr J Keaveney	Mr & Mrs G Winfield
Potters Bar in Focus	Mr G Taylor	Mr A Wien
Pegasus Planning Group	Mr A Theobald	Mr G Windsor-Lewis
Watford and District Friends of the Earth	Mr J Turner	Cllr Butler
RPS Planning (on behalf of Fairview New Homes Ltd)	Mr F G Thomas	Cllr Ernie Butler
Potters Bar Society - Town Goup	Mr & Miss J Turner	Environment Agency
Mr B Wilson	Mrs M Tobias	Watts
Mr/Ms C Tarrant	Mr N Todd	The Power Service
Clerk of the Council	Mrs R Todd	Mrs Wreks
Mr A Davey	Mr D A Tomsett	Mymmsmead Land Trust
Mr I Bell	Mr K Toombs	National Grid Property Holdings Limited
Drivers Jonas LLP	Mr & Mrs M Townsend	Planning Perspectives
Dr M B Connock	Mr D Traill-Stevenson	CGMS Consulting
Mr & Mrs R James	Mr B J Weller	GL Hearn Property Consultants
UKLI Ltd	Miss B E Thomas	GHM Rock Townsend
Ms L Hails	Mr & Mrs Yefet	St Modwen Developments Ltd
Scott	Mr N Weil	Mr G Windsor-Lewis
Mr E Symmons	Mr D Wood	Elstree Light & Power plc
Mrs H M King	Mr L Wood	W Stern
Mr G Taylor	Mrs J Woolgar	Mr & Mrs L Blustin
Miss P Wright	Mr A J. Woolidge	Caldecote Farm (Elstree) Limited
Mr C Owen	Mr G Wright	L M & RM Gomez
Mr and Mrs Thomas	Mr A W Wright	Mike Hastings Design
Potters Bar in Focus	Mr D Winton	ADER
Environment Agency	Mr J Landau	Mrs M Nickolds
	Mrs V Wintle	Mr Forman
	Mrs J M Young	Natural England, Four Counties

Government Team (Beds, Cambs, Herts & Essex)	Mrs Porter	Mrs C Matley
The Showmans's Guild of Great Britain	Mrs C Large	Mr A Konizi
English Heritage (East of England Region)	HCC Environment Department	Mr & Mr M J Martin
GO-East	Mr/Ms M Laurier	Mr B P Holt
Natural England (Four Counties Gov Team)	Mr A Lewis	Mr & Ms Hickey
St Modwen Developments Ltd.	Mrs M Lawson	Mr S Patel
Hertsmere Borough Council - Environmental Health Dpt	Mrs G B Lewis	Mr & Mrs C Hinds
M J Mapp LLP	M Tee	Mr & Mrs P J Hinshelwood
St Modwen Properties PLC	Mr & Mrs R Lees	M Hirsch
Mr T Willmott	Mrs R LeFort	Mr M Hoban
Phillips Planning Services Ltd	Ms L Leigh	Mr & Mrs G Hodgson
Bidwells	Mr R P Leon	Mrs N Lambe
Phillimore Trust	Mr & Mrs G M Leonard	Mr A M Howman
East of England Development Agency	Mr/Ms J Leslie	Mr M Helyer & Miss Allwright
RPS	Mrs E Makey	Mr J O'Keeffe
Ms Vine	Mr & Mrs M Lawrence	Mr & Mrs Hopkins
Aitchison Raffety	Mrs J M Meltzer	Mr D J Horobin
Mr Glover	Mrs B McCabe	Mr T Horrod
Peacock and Smith (on behalf of WM Morrison Supermarkets PLC)	Ms J McCarten	Mr & Mrs R Howard
William Sutton HA	Mr & Mrs A M McCarthy	Mrs B Howard
Ms C Cruickshank	Mr M McDonagh	Mrs I M Howard
Wrotham Park Settled Estates	Mr/Ms P McDonald	Mrs A Holland
Potters Bar in Focus	Mr & Mrs B M McFarlane	Mr & Mrs M Hatter
Sir R Sweetnam	McGuire Architecture & Design	Mr/Ms M Harman
Whose!	Mr L W Major	Mrs M Harris
Mr & Mrs K Lucas	Mr K McManus	Mr & Mrs M A Harris
Ms M Lewis	Mr A E Matthews	Ms Y Harris
Mr E E Lewis	Mr & Mrs D Melville	Mr & Mrs P Hartnell
Mr R Lewy	Mrs B Mernet	Mr and Mrs Harwin
Mr J Lickiss	Mrs T J Merrills	R Harwood
Mr J M Lickorish	Miss H M Miller	Mrs A Herman
Mr & Mrs Lim	Mr/Ms A Miller	Mr J Hathway
Mr J C G Lockety	Mrs A R Miller	Mr & Mrs A & J Henderson
Mrs J W Major	Mrs G Tarrant	Mr & Mrs Hatton
Mr & Mrs E Lowe	Mr D McKinley	Mr Hawkins
Mr/Ms L Leventhal	Mr & Mrs Dora	Mr & Mrs Hayward
Mrs C Lye	Mrs G Mapplebeck	Mr F Hayward
Mr & Mrs Lynch	Mr A Johnson	Ms R Haywood
Mrs A Mackintosh	Mr & Mrs S Marett	Mrs Y Hearn
Mrs A MacPherson	Mr P Marley	Mr B Heath & Ms J Arthur
Mr & Mrs R Mahoney	Mrs M C V Marsh	Mr B L Hurst
Miss M Mahony	Mr & Mrs W Marsterson	Mrs L Haselden
Mr & Mrs S Milne	Mr M Walters	Mr A King-Hamilton
Bushey Museum & Art Gallery	Ms J Mayes	Mrs E Hughes
Ms J Lee	Mr G Martin	Mr J. S Kempster
Mrs A Lambert	Mrs J G Mayers	Mr & Mrs Kenney
Mr/Ms D Landes	Mr H Martin	Mr B Kent
Mr D M Lane	Mr P C Marx	Mrs H Kibbler
	Mr & Mrs E J Marynoik	Mr R S Howard
	Mrs McMaster	Mrs H King
	Mr S Masters	Mr & Mrs S Katz
	Mrs M E Matley	Mr & Mrs R King

Mr M Jones	Mr D Richardson	Mr A G Snaith
Mrs M J Kings	Mr & Mrs L C Richardson	Miss N Syreti
Mr I L Bell	Mrs P C Richardson	Mrs S Rendle
Mr & Mrs L Kingston	Mr & Mrs C J Rickard	Mrs C M Smith
Mrs M Kirk	Mr & Mrs J Rickards	Mr & Mrs K Newstead
Mr D M Kirby	Mr D Gordon	Mr R Needleman
Ms J Lucas	Mr M J Ridley	Mr & Mrs S Greenfield
Ms J Knighton	Mrs P Rose	Mrs M Norcross
Mr N Taylor	Dr J R Ripley & Mr B Digby	Mr & Mrs C Newman
Mr J D King	Manor Court Residents Association	Mr & Mrs A D Nicholls
Mr S Jindal	Cllr E Roach	Mrs S Nichols
Mrs L Korn	Mr B Reynolds	Mr & Mrs S J Noakes
Mrs P J Hutchings	Mrs A J Castelow	Ms E Richards
Mr R Chrysanthon	Mr & Mrs K Robinson	Mr A M Norton
Mrs Jacobs	Ms J Baungally	Mrs J Murray
Mr M J James	Mr & Ms P Sherrard	Mr A O'Brien
Mr & Mrs J S D Jarvis	Mr & Mrs M Ridge	Mr M O'Brien
Mr/Ms T Jearrad	Mr and Mrs M E Stovey	Mr W R C Ogden
Mrs R Kay	Mr/Ms D Stern	Mr/Ms P Page
Mr & Mrs A J I Jennings	Mr/Ms C Stevens	Mr & Mrs K Panayiotou
Mr & Mrs T J Hurley	Ms S Solomons	Mr & Mrs D Pannick
Mrs Johnson	Mr D Stewart	Mr P Paraskevaides
Mrs F Jolly	Mr & Mrs Stickland	Mrs S Nolan
Mr and Mrs D Jolly	Mrs J Stilwell	Mrs C Dudman
The Ridgeway Road Association	Ms F Stoltzman	Mr E Minn
Mr E Jones	Mr K Sheppard	Dr P H Missen
Mr & Mrs K Jones	Mrs J A John	Mr D Mitchell
Mr D H Jones	Mrs D M Spencer	Mr & Mrs A Mitchell
Mrs J Jones	Mr & Mrs G Strack	Mr D Mitchell
Mr M A Jeens	Mrs J S Stranks	Mrs A Monsellato
Ms S Sandleson	Mr/Ms J D Sullivan	Mr & Mrs J & N Crawford
Mr A Rosenfeld	Mr/Ms J Swain	Mr & Mrs B P Nayar
Mr & Mrs I Livingston	Mr G D Swaine	Mr M J Morgan
Mr Ross	Dr & Mrs R Swaminathan	Haydon Hill House Flat Association
Mr/Ms A Rostron	Mr & Mrs S Sweeting	Heath-ways Residents Association
Mr/Ms G Rowe	Mr & Mrs H J Stoneham	Mrs H Moses
Mr C Rowson	Mr and Mrs Smith	Mrs M Moss
Mr & Mrs D J Rowson	Mrs A Short	Mr R Moss
Mr E Sheridan	Mr G Silver	Ms E McMorran
Mrs H Saletes	Mr & Ms K Simmonds	Ms C Munns & Mr P Crawley
Mrs R Rook	Mrs M Simpson	Mrs Yannagas
Mrs K Gerson	Mr & Mrs J Simpson	Mrs V.A. Parker
Bushey Conservative Club	Ms S Singer	Ms A Brooker
Mr & Mrs B Shah	Mr M Slyper	Dr A Puri
Mr & Mrs P Shayer	Mrs J Stephens	Mr & Mrs G Park
Mrs B Sheehan	Mrs DCM Smith	Mr M D Potter
Mr and Mrs Shepherd	Mr R Stephens	Mr S Powell
Mr & Mrs J Miller	Mr & Mrs H H Smith	Mr M P Price
Mr & Mrs P Saggars	Mrs D M Smith	Mr A Prigmore
Mr/Ms B Riley	Miss A Smith	Mrs M Pritchard
Mrs C M Oxley	Mr & Mrs A R Smith	Mrs E Pritchard
Mr/Ms E Richards	Mrs K Smith	Mr M Possener

Mr & Mrs Psaras	Letchmore Heath Village Trust
Mr D Popkin	McGuire Architecture & Design
Mr/Ms J Randall	Metropolitan Home Ownership
Mrs S Sheard	Murray
Mr M Rajabali	North Bushey Residents Group
Miss D M Richardson	North Mymms District Green Belt
Mrs S Radford	Society
Mr R Reid	Paradigm Housing Group
Mr & Ms D Reid	Patchetts Green, Round Bush &
Mr Y Haribhai	Aldenham Conservatio
Mrs M E Proctor	Patchetts Green, Roundbush &
Mr J W Payne	Aldenham Conservation
Mr & Mrs H & C Casman	Patchetts Green, Roundbush &
Mr/Ms Patel	Aldenham Conservation Society
Mr & Mrs Patel	Philip Wragg and Partners
North Bushey Newsagents	Rolfe Judd
Mrs H Paterson	Rolfe Judd Planning
Mr & Mrs Patrick	Southgate Associates
Mr & Mrs NL Payne	The London Green Belt Council
Mr L Potter	Whose!
Cllr N L Payne	Affinity Sutton HA
Mrs S Park	Metropolitan Housing Partnership
Mrs G Pdahtzur	National Grid Transco
Mr/Ms V Pearce	British Telecom (West London District)
Mr J Pepper	EDF NETWORKS
Mr & Mrs D & C Peten	Veolia Water Company
Mr A Brompton	NHS Hertfordshire
Mr J Plested	
Mrs Y Ponting	
Mr A Julius	
Mr & Mrs C Payne	
Mr S Milliken	
Doreen Scivyer	
Bayfordbury Estates Ltd	
Fibbens Fox Associates	
G L Hearn - Property Consultants	
KJD Solicitors	
Nathaniel Lichfield & Partners	
Network Rail (Town Planning)	
Potters Bar Society	
Bellway Homes	
Birchville Court Nursing Home	
Bushey in Balance Residents Group	
CBRE Richard Ellis	
Drivers Jonas	
East of England Development Agency	
Edward Symmons	
Elstree and Borehamwood Green Belt	
Society	
Environment Agency	
Genesis Housing Trust	
King Sturge	
King Sturge LLP	

Appendix 5

Summary of representations and responses

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 1 - Spatial Vision and Development Strategy Q1

<u>Summary of</u>	<u>Council Response</u> <u>Comments Noted</u>
NCS/R25/4520/6/C Hertfordshire County Council - Property C Whilst Herts Property have no comment on the settlement hierarchy the information on school place planning has been included to inform it.	
NCS/R25/4548/3/C English Heritage (East of England Region) C Policies for the main settlements: It would be beneficial to integrate consideration of the historic environment into the separate policies for the main settlements according to their individual challenges and characteristics.	Amend Text The spatial objectives by settlement set the context for policies in the Core Strategy and it is considered logical to integrate historic environment considerations into these objectives. Table 5 will be amended accordingly.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4635/17/C
 Rolfe Judd

C

Broadly support the Council's priority to locate major residential development within Bushey. However, policy seems to be very reliant upon Windfall developments to meet housing targets. This appears overly optimistic, particularly in the current economic climate and could result in a shortfall in provision if windfall site housing completions cannot be sustained at a similar rate to previous years.

No Change in Response to this Objection

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

This brings into focus an increased likelihood of selective small scale Green Belt release in the form of Safeguarded Land For Housing such as the Former West Herts College Annex Site.

Specific site representations will be the subject to the Site Allocations DPD in the future.

NCS/R25/1475/1/N
 Phillips Planning Services Ltd

N

Radlett should be identified as a 'Main Settlement' because of facilities, location and sustainable transport links.

No Change in Response to this Objection

Radlett is recognised as a main settlement in para 2.1, but in the settlement hierarchy in table 6 it is defined and illustrated as the smallest of the main four towns. Radlett in comparison to Borehamwood, Potters Bar and Bushey is smaller, identified as 'largely residential in character', and has a different role in terms of the services and business. The Core Strategy recognises the good location and transport links to London, and the north.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4427/1/N CGMS Consulting	N	This should allow for the release of Green Belt land where previously developed as highlighted at Para 2.35.	No Change in Response to this Objection Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites.
NCS/R25//4649/1/N JCPC Ltd	N	The Settlement Hierarchy should be amended such that South Mimms is recognised and identified as a Service Village given the range of facilities and services provided within the village. Furthermore, the settlement hierarchy should be extended to include smaller, rural settlements, with the balance of development (both housing and employment) re-distributed across settlements with a lesser urban focus than proposed at present. This would ensure some level of growth in smaller settlements which, given the trend for smaller household sizes, is necessary in order to maintain population levels and ensure the viability of important local services within the settlement.	No Change in Response to this Objection Consideration is being given to a commitment to define the boundaries of smaller villages in the Green Belt, in accordance with redevelopment of PDL and infill sites, for the future Site Allocations and Development Management DPD. It is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.
NCS/R25//4041/1/O RAID Residents Against Inappropriate Development	O	Wishes that the Green Belt round Potters Bar is considered in Table 5 and Table 6	No Change in Response to this Objection The representations regarding the Green Belt and Potters Bar are supported by the Council. Table 4 sets out the Core Strategy Objectives, number 2 seeks the protection of the Green Belt and prevention of coalescence which includes Potters Bar

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4429/1/O
GL Hearn Property Consultants

- O The housing target is not in general conformity with the RSS, and a failure to demonstrate a 15 year housing supply, which is in conflict with PPS3. Disregard for the evidence base of housing need. Recommended review of green field sites, together with a Strategic Landscape and Visual Impact Assessment. It is noted that there is an interest in accommodating required housing at Home Farm, Radlett

Amend Policy

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCACiv 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA update do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 1 - Spatial Vision and Development Strategy Q1

	<u>Summary of</u>	<u>Council Response</u>
NCS/R25/4520/6/C	C	Comments Noted
Hertfordshire County Council - Property	Whilst Herts Property have no comment on the settlement hierarchy the information on school place planning has been included to inform it.	Noted
NCS/R25/4548/3/C	C	Amend Text
English Heritage (East of England Region)	Policies for the main settlements: It would be beneficial to integrate consideration of the historic environment into the separate policies for the main settlements according to their individual challenges and characteristics.	The spatial objectives by settlement set the context for policies in the Core Strategy and it is considered logical to integrate historic environment considerations into these objectives. Table 5 will be amended accordingly.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4635/17/C
Roife Judd

C

Broadly support the Council's priority to locate major residential development within Bushey. However, policy seems to be very reliant upon Windfall developments to meet housing targets. This appears overly optimistic, particularly in the current economic climate and could result in a shortfall in provision if windfall site housing completions cannot be sustained at a similar rate to previous years.

Whilst Councils housing targets do not make provision for development on Greenfield land in the Green Belt, the allocation of small scale Green Belt land for development should be considered. As such, it is considered that small scale changes to the Green Belt Boundaries where anomalies exist, including previously developed land in the Green Belt and small infill sites could achieve the additional homes required.

This brings into focus an increased likelihood of selective small scale Green Belt release in the form of Safeguarded Land For Housing such as the Former West Herts College Annex Site.

NCS/R25/1475/1/N
Phillips Planning Services Ltd

N

Radlett should be identified as a 'Main Settlement' because of facilities, location and sustainable transport links.

No Change in Response to this Objection

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

Specific site representations will be the subject to the Site Allocations DPD in the future.

No Change in Response to this Objection

Radlett is recognised as a main settlement in para 2.1, but in the settlement hierarchy in table 6 it is defined and illustrated as the smallest of the main four towns. Radlett in comparison to Borehamwood, Potters Bar and Bushey is smaller, identified as 'largely residential in character', and has a different role in terms of the services and business. The Core Strategy recognises the good location and transport links to London, and the north.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4427/1/N CGMS Consulting	N	This should allow for the release of Green Belt land where previously developed as highlighted at Para 2.35.	No Change in Response to this Objection Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites.
NCS/R25//4649/1/N JCPC Ltd	N	The Settlement Hierarchy should be amended such that South Mimms is recognised and identified as a Service Village given the range of facilities and services provided within the village. Furthermore, the settlement hierarchy should be extended to include smaller, rural settlements, with the balance of development (both housing and employment) re-distributed across settlements with a lesser urban focus than proposed at present. This would ensure some level of growth in smaller settlements which, given the trend for smaller household sizes, is necessary in order to maintain population levels and ensure the viability of important local services within the settlement.	No Change in Response to this Objection Consideration is being given to a commitment to define the boundaries of smaller villages in the Green Belt, in accordance with redevelopment of PDL and infill sites, for the future Site Allocations and Development Management DPD. It is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.
NCS/R25//4041/1/O RAID Residents Against Inappropriate Development	O	Wishes that the Green Belt round Potters Bar is considered in Table 5 and Table 6	No Change in Response to this Objection The representations regarding the Green Belt and Potters Bar are supported by the Council. Table 4 sets out the Core Strategy Objectives, number 2 seeks the protection of the Green Belt and prevention of coalescence which includes Potters Bar

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4429/1/O
GL Hearn Property Consultants

O The housing target is not in general conformity with the RSS, and a failure to demonstrate a 15 year housing supply, which is in conflict with PPS3. Disregard for the evidence base of housing need. Recommended review of green field sites, together with a Strategic Landscape and Visual Impact Assessment. It is noted that there is an interest in accommodating required housing at Home Farm, Radlett

Amend Policy

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCACiv 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA update do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4429/3/O

GL Hearn Property Consultants

- O Broad support for the policy but objection to the disregard for a review of green belt boundaries to accommodate a 15 year supply of housing. Repetition of comments for Q1

No Change in Response to this Objection

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

NCS/R25/4492/8/O

Environment Agency

- O We are generally very supportive of this Core Strategy, however we are currently objecting due to our views on Policy CS15 Environmental Impact of Development. This policy should include high level strategic policy recommendations of the SFRA and could go beyond PPS 25 and have stronger flood risk policy. We believe our comments overall with regard to Climate Change adaptation and mitigation, contaminated land, sewage infrastructure, high water efficiency targets, river buffer zones and promoting river restoration will all contribute to a high level of Sustainable Development.

Amend Policy

Reference will be made in CS15 to the SFRA. (See other changes in relation to comments to other questions)

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4645/6/O
Turley Associates on behalf Potters Bar
Golf Course

O In terms of meeting local housing needs, Policy CS2 advises that the focus of new development will be within Borehamwood, Potters Bar and Bushey with no more than 60%, 15% and 25% respectively, along with up to 10% in Radlett and other suitable locations. We note these figures differ significantly from those in the previous Submission Version of the Core Strategy, with up to 50% in Borehamwood, up to 30% in Potters Bar and Bushey and up to 15% proposed in Radlett and elsewhere. There appears to be no explanation of this variation which also differs from distribution set out in Table 10 of the SHLAA. Although these locations are considered appropriate in terms of their suitability and sustainability, the imposition of percentages restricts the potential of these locations to deliver new housing at the intensification levels required to meet housing targets. It is considered that the percentages should be applied in a flexible manner and not as a cap. It is also noted that the percentages could add up to 125% without explanation.

The existing relative land areas of the main settlements appears to bear no resemblance to the overall development strategy and places a disproportionate amount of development in Borehamwood over the next 15 years.

Although we appreciate that the Green Belt needs to be protected in line with PPG2, it is our view that the Council's failure to adequately plan for the housing figures in the EEP necessitates a review of the existing Green Belt boundary.

It is our view that Green Belt land will be required to meet housing targets within the 15 year period. We advocate that the Council's previous identification of proposed broad areas of search for potential future housing sites in the Green Belt is re-instated.

No Change in Response to this Objection

The percentages policy states up to for each percentage and total up to 110%. The basis for this is explained in paragraph 3.13. However, the individual percentages aren't intended to be rigid caps but will inform the identification and phasing of any major sites to be allocated, as set out in paragraph 3.14. The difference in the percentages from the previous Core Strategy can be attributed to changes in anticipated land availability including the emergence of additional development opportunities along Eistree Way in Borehamwood.

Table 10 in the SHLAA only covers sites for which assessments have been made, rather than existing commitments.

The comments regarding the EEP are noted and the Council intends to review its housing target to ensure that it is in general conformity with the RSS, as a result of the result of *Gala Homes (South) Ltd v Secretary of State for Communities and Local Government* [2011] EWCA Civ 639 (27 May 2011).

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1463/4/S Natural England (Countryside Agency, EofE Region)	S	Support, the approach is considered more appropriate than other options and where the reduction in housing target is welcomed.	Support Noted and Welcomed
NCS/R25/1598/S Preston Bennett Partnership	S	There is no objection to the proposed settlement hierarchy, which is an appropriate structure based on the characteristics of the main settlements within the Borough.	Support Noted and Welcomed
NCS/R25/2250/1/S Radlett Society & Green Belt Association	S		Support Noted and Welcomed
NCS/R25/3990/2/S John Anderson Planning	S	Para 1.1-1.37 Set out the planning process and the progress to date. Provides a useful guide for the general public and specialist readers.	No Change in Response to this Objection No Change
NCS/R25/4196/3/S CPRE Herts	S	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)	Support Noted and Welcomed
NCS/R25/4491/1/S Phillips Planning services Ltd	S	Support for the settlement hierarchy, although it is considered that Shenley should be removed from the Green Belt.	Amend Text Support noted and welcomed. It is possible that in subsequent site allocations and development management DPDs a provision will be made for village 'envelopes', which will identify that there are built up areas 'washed over' by the Green Belt.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4586//S Bidwells on behalf of Barratt Strategic	S		Support Noted and Welcomed
NCS/R25//4625//S PPML Consulting Ltd	S	Support inclusion of Bushey as a strategic housing location	Support Noted and Welcomed
NCS/R25//4633//S Deloitte Drivers Jonas (on behalf of Cemex) 2011	S	Support inclusion of Radlett in proposed settlement hierarchy as it is an appropriate location for further growth and able to provide key services. Also support spatial objections for Radlett in Table and note DPD aims to enhance the town and maintain and expand key community services.	Support Noted and Welcomed
NCS/R25//4634//S Woolf Bond Planning (for Gilston Developments)	S	Borehamwood and Potters Bar are the two largest and therefore most sustainable settlements in Hertsmere. Accordingly, we support their identification within the RCS as representing the most appropriate locations to accommodate development needs commensurate with their position at the top of the Borough's settlement hierarchy.	Support Noted and Welcomed
NCS/R25//4635//S Rolfe Judd	S	We support the inclusion of Bushey as a Strategic Housing Location, with approximately 25% of new housing to be delivered in Bushey.	Support Noted and Welcomed
NCS/R25//4637//S Sworders Agricultural	S	Support for the Council's settlement hierarchy	Support Noted and Welcomed
NCS/R25//4641//S First Place Nurseries	S	This is considered to be acceptable, subject to the points set out in the response.	Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//1358/1/Y DLA Town Planning Ltd	Y	This is considered to be acceptable subject to the other points made.	Support Noted and Welcomed None.
NCS/R25//1631/4/Y Barton Willmore Planning Partnership	Y	The proposed distribution of development and Settlement Hierarchy is supported.	Support Noted and Welcomed Noted
NCS/R25//4539/1/Y Vincent & Gorbong	Y	We agree that Borehamwood is the key centre for development in Hertsmere, and is one of the Strategic Housing Locations.	Support Noted and Welcomed Welcomed
NCS/R25//4631/1/Y Peacock and Smith (Mr & Mrs D. Morley)	Y	The proposed settlement hierarchy is supported.	Support Noted and Welcomed
NCS/R25//4632/2/Y Peacock and Smith (Mr & Mrs D. Whiting)	Y	The proposed Settlement Hierarchy is supported.	Support Noted and Welcomed
NCS/R25//4644/1/Y First Place Nurseries @ land R/O Cobden Hill	Y	This is considered to be acceptable.	Support Noted and Welcomed
NCS/R25//4646/1/Y DPP LLP	Y	No comments.	
NCS/R25//4647/1/Y Daniel Rinsler & Co Ltd	Y	No comments.	Support Noted and Welcomed No response necessary.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 1 - Spatial Vision and Development Strategy Q2

NCS/R25/1210/1/
Shire Consulting

Summary of

The EEP remains in place at present and regard must be had to it as a material consideration. The household requirements are based upon evidence to of household formation and population projection. The Council provides no convincing evidence to supersede the figures in the EEP and should therefore continue to work to the EEP housing requirement. The Chelmer Model can produce desired results by manipulating the inputs. Hertsmere have no control over in-migration, ignoring the driver of household growth will exacerbate the problem of affordable housing.

Council Response

Amend Policy

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

NCS/R25/4196/4/C
CPRE Herts

C

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.

Comments Noted

housing Policy CS3 commits to regular monitoring and review of housing supply through the Annual Monitoring Report, which measures the national core indicators, and some locally set indicators on performance. The SHLAA undertaken cannot ever cover all possibilities for sites for development. The actual number of dwellings being delivered through the windfall mechanism in the future could be more or less of the projection in the SHLAA.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/14641/2/C First Place Nurseries	C	We would support the rolling forward of the East of England Plan target. This provides more homes in an area where there is a history of under provision of homes in the locality.	Comments Noted As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.
NCS/R25/14752/N Phillips Planning Services Ltd	N	The consultation draft lacks an adequate evidence base for assessing housing requirements. This would make the Core Strategy unsound because it would not be justified on account of not having a robust or credible evidence base. At least the RSS housing target should be planned for. The run of the Chelmer model that the Council relies on for the proposed housing target was criticised for underestimating household growth and has been shown to be inconsistent with national and regional projections. Therefore there is no evidence to show that the RSS target should not be planned for.	No Change in Response to this Objection As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1631/5/N
Barton Willmore Planning Partnership

N The Council has taken the desire to protect the Green Belt as the starting point, calculated how many homes can be built on brownfield sites in the SHLAA, and then fitted the Chelmer model to suit. Rather the likely growth in population should be the starting point.

No Change in Response to this Objection
The setting of the housing takes into account a number of different factors including housing need. A supporting Housing and population Topic Paper has been produced to demonstrate this, this will be published to support the next consultation draft Core Strategy. The need to provide affordable housing is great within Hertsmere, however, within the current climate, its impossible for all the need to be met within Hertsmere due to constraints. The need to accommodate this growth on greenfield sites would detrimentally affect the character of the Borough which is characterised by the Green Belt, high quality landscaping and well-defined settlement pattern of small towns and villages. As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

NCS/R25/4427/2/N
CGMS Consulting

N The target should remain at 3,900 as there is no guarantee allocated site will come forward as reflected at Para 2.29.

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS. The housing land supply will be monitored against the adopted target.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4539/2/N
Vincent & Gorbings

N

The development rate per annum proposed in policy CS1 is **No Change in Response to this Objection**

some 15% less than in the submission draft (December 2008), following the Government's intention to abolish the State for Communities and Local Government [2011] EWCA RSS. The Council has adopted the standard Chelmer model Civ 639 (27 May 2011), the Council intends to review its in calculating household formation, and thus housing requirement. However, it is recognised in the text that there are other projections of household formation rates which are higher than Chelmer (paragraph 3.4). This extremely important decision to adopt the Chelmer model as opposed to other possibilities is not explained and justified fully enough. Simply to say that the other options are not considered robust or realistic in Hertsmere does not demonstrate why 3,200 household/dwellings is appropriate. As such we consider that the Core Strategy is unsound by reason of being unjustified (the reasons why other options for household formation and thus housing requirement were rejected have not been demonstrated)

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4646/2/N
DPP LLP

N

TWNT consider the preferred target to be insufficient to meet current and future housing need in the borough. The target would seem to have evolved from a general wish to minimise the amount of housing development that needs to be accommodated during the Plan period, rather than an objective assessment of need.

While local authorities are being encouraged to set their own local housing targets, the scenario upon which the Council is basing its proposed target makes insufficient provision for in-migration and growth in what is a very attractive borough. Furthermore the RSS remains in place pending formal revocation through the Localism Bill, and consequently, the RCS target needs to make provision for at least a year of the RSS target.

The approach assumes that all sites identified will come forward during the Plan period. The reality is that they will not and the Council's approach does not, therefore, provide the flexible, rolling programme of land that PPS3 requires. The consequence is that opportunities will have to be sought from existing and proposed sites to maximise the yield of dwellings. The RCS target fails to take account of available sources of land, including those within the Green Belt which would provide a sufficient land supply to meet a higher identified need. This suggests that the Council has sought to reduce its housing target as far as possible, irrespective of the presence of a greater need than that identified at paras 2.26 and 2.27 of the RCS.

Amend Text

As a result of the *Calia Homes (South) Ltd v Secretary of State for Communities and Local Government* [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

In terms of a flexible approach to housing delivery, Paragraph 3.12 and Policy CS3 do, however, recognise that where housing sites do not come forward, a review of phasing and housing allocations will be undertaken. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4647/2/N Daniel Rinsler & Co Ltd	N	The Council fails to follow Government planning guidance in setting its revised housing target, not least for failing to justify the significant reduction in the target it had previously put forward. On that basis, it is considered that the RDCS should state in principle that in the absence of adequate land within the built-up areas of existing settlements, land will need to be released from the Borough's Green Belt to meet its housing land supply needs.	No Change in Response to this Objection Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites. The SHLAA, illustrates the potential supply within Hertsmere. The housing numbers within the Borough are based on population projections, however, these will be reviewed to ensure that they are in general conformity with RSS.
NCS/R25/4649/2/N JCPC Ltd	N	Support the rolling forward of the East of England Plan target which would enable and facilitate the more sustainable distribution of housing growth as identified in ('1) above.	Comments Noted As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS
NCS/R25/3990/3/O John Anderson Planning	O	Paragraph 2.1 sets out the geographical and demographic trends of the Borough. Whilst the population is ageing, older are getting fitter and the age they draw their pension is likely to increase. Information on the average age of marriage would be helpful. Further details on facilities such as Go-Karting and BMX tracks are ideas plus cross country horse riding. Incidentally in Liverpool there has been success in training children who have development problems to look after horses who have also had development problems.	Comments Noted The additional information and changes requested would not further the robustness of the document. The described activities which are of merit in the Borough, would be too prescriptive for a document of this strategic level.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4586/2/O
Bidwells on behalf of Barratt Strategic

The approach adopted by the Council thus far in order to determine the extent of housing targets is considered to be flawed and moreover is inconsistent with the clear guidance given by PPS3. The extent and nature of the evidence base used would appear to be limited and therefore cannot be considered as justified against the tests of PPS12. Bearing in mind that the Council previously showed support for higher targets via the EEP consultation process, compelling evidence must be provided to properly justify any reduction. At its current level, the RDCS housing target would fail to address identified needs for affordable housing and would also constrain local economic growth. What's more, past completion rates would also suggest that the market could support an increased level of delivery if the Council allowed it to do so. It is therefore considered that in order to secure a robust strategy the RDCS should seek to bring forward a combination of urban and appropriate greenfield sites to address identified housing needs. In order to achieve this, the Council are strongly urged to gather the necessary background evidence to ensure that the RDCS housing targets are a true reflection of housing need, capacity and potential.

Amend Policy
As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS. There is not requirement both in National and Regional Policy to undertake a review of the Green Belt. The SHLAA updated (2011) illustrated sufficient capacity within urban areas to meet the demand for housing.

NCS/R25/4625/O
PPML Consulting Ltd

The Examination Panel for the East of England determined that 260 dwellings per annum from 2011 to 2026 should be delivered in Hertsmere, meaning that there is not sufficient justification for the CS to propose 3,200 homes for that period.

Amend Policy
As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4633/2/O

O
Deloitte Drivers Jonas (on behalf of
Cemex) 2011

Strongly object to the reduction of proposed housing target to preferred target of 3,200 over 15 years. Question why Hertsmere does not consider national projections to be robust and not applicable to Hertsmere as set out para 3.4. No clear evidence base to justify such a reduction either in published evidence base or draft Core Strategy document.

There is strong evidence that the EoE Plan target equivalent to 3,900 over 15 years should be supported. Council appears to have co-joined the processes of considering how much new housing is required and where the development should be accommodated, as indicated in para 3.2b. This is not a sound way to plan for the need of the district's population.

Amend Policy

As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4634/3/O
Woolf Bond Planning (for Gilston
Developments)

- PPS3 requires LPAs to set out policies and strategies for delivering their strategic housing requirement to enable continuous delivery of housing for at least 15 years following adoption.

It is unlikely that RCS will be adopted until at least 2012. Accordingly, RCS should look to plan for the period to 2027.

Against background of legal challenges to the revocation of the RSSs, LPAs must have regard to the provisions of the RSS is preparing their LDF documents.

Draft RCS recommends housing provision of around 3,200 or 213 dwellings per year to 2026, subject to the revocation of the East of England Plan. This amounts to 37 fewer dwellings per year than that set out in the East of England Plan. It is also materially below the 351 dwellings per annum required to meet affordable needs during the plan period (SHMA).

Notwithstanding the Council's approach to delivering some 3,200 dwellings within the plan period 2011 to 2026, para 2.29 of the draft CS is hardly a resounding endorsement of the spatial strategy and fails to represent the most appropriate strategy when considered against the reasonable alternatives including GB releases.

Consider RCS should plan as a minimum for 6,500 dwellings in the period 2001 to 2027 (250dpa), with a residual requirement (following completions from 2001 to 2010) of 4272 (251 pa) - a shortfall of 1016 dwellings in the Council's strategy.

On a detailed assessment, there is likely to be a deficit against the five year housing requirement. SHLAA also relies upon the delivery of 307 dwellings from BBC Elstree

Amend Policy and Text

Given that the process of preparing a Core Strategy extends across a number of years, it is recognised that 15 years from the date of adoption is likely to be at least 2027. At the time of publishing the draft revised Core Strategy, the 15 year period ran through to 2026. However, in light of the need to plan for a 15 year period, the Council will amend relevant parts of the document so that the plan period is clearly not capped at 2026 with the housing target adjusted to reflect this.

As a result of the *Gala Homes (South) Ltd v Secretary of State for Communities and Local Government* [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

(SHLAA Ref S39). However, there is no certainty as to the site's availability.

The RCS should be reviewed, to include reference to the need for a local review of the Green Belt boundary at Borehamwood and Potters Bar, the principal urban areas within the Borough. As a minimum the CS should identify the broad areas and the circumstances in which the broad locations would be released for development in helping to meet identified housing needs.

NCS/R25/4635/2/O
Rolfe Judd

O

Support retention of the East of England Plan housing targets of 5,000 homes to 2021 (260 homes per year thereafter) (3,900 homes over 15 years to 2026) - based on rising population projections and housing need up to 2031. Planning for this level of growth is considered to be realistic rather than Councils preferred option of 3,200 homes 2011 to 2026, which may not provide sufficient policy guidance to ensure that housing targets can be adequately met. It is considered that small scale changes to the Green Belt Boundaries where anomalies exist, including previously developed land in the Green Belt and small infill sites could achieve the additional homes required.

Amend Policy

As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4637/2/O
Sworders Agricultural

- Insufficient information relating to the Chelmer Model has been provided to ascertain whether the 'preferred target' of 3,200 homes is appropriate for the district. A technical paper should have been produced providing further information on the assumptions made with consultation on the methodology adopted to determine the housing numbers. No consideration is given as to 'reasonable alternatives' in terms of housing numbers and whilst the Chelmer Model is one approach there are other reasonable approaches. Failing to consider 'reasonable alternatives' is not only unsound, it also fails to permit an adequate sustainability appraisal of the plan.

The SHMA sets out need, indicating the district has a requirement for 3,200 affordable houses which gives a gross housing requirement of 9,143 houses. Hertsmere is the least affordable local authority in the East of England. There is no basis for reducing the housing numbers to below the levels outlined in the soon to be cancelled RSS and the corresponding 'roll-forward' of these figures to 2031 as provided for in policy H1.

Amend Policy

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

The Sustainability Appraisal dealt with alternative plans for housing provision. Specific sites will be addressed in the Site Allocations DPD.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4645/1/O

O
Turley Associates on behalf Potters Bar
Golf Course

The Council's reasons for selecting its own housing target instead of the target stipulated by the EEP is said to be the proposed abolition of Regional Strategies by way of the Localism Bill. However, the current legal position is that the EEP is the strategic element of the statutory development plan for Hertsmere.

Amend Policy

As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

The Council's action in disregarding this fundamental statutory requirement is, therefore, unlawful.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4645/3/O
Turley Associates on behalf of Potters Bar Golf Course

The Council's evidence for a significantly lower dwelling figure is based on a Chelmer population run that identifies 3,200 households being formed over the period to 2026. The DRCS is patently in conflict with approved RSS and is therefore unsound for that reason. Para 3.4 of the DRCS fairly notes that there are alternative scenarios for household projections available but summarily concludes that these are not considered to be robust or realistic when applied to the Hertsmere situation. We regard this as an insufficiently rigorous analysis of the situation and not conducive to the proper forward planning of the District especially in a context where the EEP indicates a considerably higher dwelling requirement.

The Council is wrong to conclude that the number of expected households is equal to the future dwelling requirement. For this to be a robust measure of dwellings it would be necessary to identify precisely the likely household size by age cohort to undertake a more finely grained analysis for Hertsmere. It is not a straight correlation between household formation and dwelling numbers since other factors such as the extent to which there may be vacant properties means that a contingency needs to be applied of at least 10% to allow for variations around this figure. In that case, the requirement is at least 3,500.

Amend Policy
Noted. As a result of the proposed abolition of RSS and the Cala Homes Appeal Decisions the Council will review its housing target to ensure that this in general conformity of the RSS.

The options considered as part of the Core Strategy are reviewed in the Sustainability Appraisal. However, to provide a more transparent approach the Council intends to publish a population projections and housing numbers topic paper to support the next draft of the Core Strategy

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4658/O
Shire Consulting

- O The EEP remains in place at present and regard must be had to it as a material consideration. The household requirements are based upon evidence to of household formation and population projection. The Council provides no convincing evidence to supersede the figures in the EEP and should therefore continue to work to the EEP housing requirement. The Chelmer Model can produce desired results by manipulating the inputs. Hertsmere have no control over in-migration, ignoring the driver of household growth will exacerbate the problem of affordable housing.

Amend Policy

As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

NCS/R25/4658/9/O
Shire Consulting

- O The Council states the SHLAA indicates a potential of 3,200 dwellings, it is clearly no coincidence that this is the same amount as the reduction of the housing requirement. This is a political decision and as a result furthers the unsoundness of the Core Strategy. The assumptions make no allowance for slippage. Because a site was considered in the SHLAA process does not mean that it is 'available' under the PPS3 requirements for a 5 year supply

Amend Policy

As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

The 5 year housing Land Supply is consistent with both SHLAA guidance and paragraph 54 of PPS3. The SHLAA takes into account availability of sites, the respondent is aware the approaches in SHLAA having been a key stakeholder in the production process, and their organisation attended the SHLAA workshop.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1598/2/S
Preston Bennett Partnership

S

The preferred approach would be the carrying forward of the East of England Plan total of 3,900, being a figure that was reached following extensive studies drawing on detailed evidence and modelling work (Paragraph 6.3, Draft East of England Plan 2031). However, it is noted that Regional Planning has been revoked by the coalition Government, and it is now a role of Local Planning Authorities to set their own targets.

It is considered that the reduction by a total of 700 homes over the 15 year period, whilst not ideal, is still a robust plan for growth and certainly would result in ensuring sufficient growth when compared to the lower figures resulting from the Chelmer model. Based upon sites identified in the SHLAA, 3,200 homes is therefore not considered unreasonable, and the Council's preferred target is as a result endorsed. The annual rates should obviously be closely monitored, and policy amended if required in order to stimulate growth, should this be required.

Amend Policy
As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

NCS/R25/2250/2/S
Radlett Society & Green Belt Association

S

But the Radlett Society and Green Belt Association would prefer Borough housing numbers to be achieved by sustainable means. In this area of high population density the Borough's target should be to limit development as much as possible except for the renewal of existing buildings as necessary. We welcome revised Policy CS2 which confines housing development to non-Green Belt sites.

Support Noted and Welcomed

NCS/R25/4491/2/S
Phillips Planning services Ltd

S

Reference to Q1

Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1358/2/Y DLA Town Planning Ltd	Y	We would support the rolling forward of the East of England Plan target. This provides for more homes than are proposed for the 'preferred target' and I consider that it is important to bring forward additional home building given that there has been a history of an under provision of homes in the locality.	Amend Policy As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS
NCS/R25/4631/2/Y Peacock and Smith (Mr & Mrs D. Morley)	Y	The preferred target of 3,200 homes over 15 years is supported as it is considered the most appropriate and sustainable level of housing provision for the Borough over this period.	Support Noted and Welcomed
NCS/R25/4644/2/Y First Place Nurseries @ land R/O Cobden Hill	Y	We would support the rolling forward of the RSS target, given the under provision of new dwellings in the borough.	Amend Policy As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 1 - Spatial Vision and Development Strategy Q3

	<u>Summary of</u>	<u>Council Response</u>
NCS/R25//2392/1/C Mr and Mrs R Gale	C Support for the continued protection of the Green Belt, and the allocation of brownfield sites for future housing need.	Support, Noted and Welcomed
NCS/R25/4196/5/C CPRE Herts	C General support, although see response for Q2	Comments Noted
NCS/R25/4520//C Hertfordshire County Council - Property	C The overall aim of protecting the wider Green Belt from inappropriate housing development is generally supported. However, the Green Belt boundary is drawn tightly to include schools and often indented to wash over whole school sites on the edge of settlements. It would be helpful if consideration could be given to localised re-assessments of the Green Belt boundary to exclude land in the vicinity of school buildings or the inclusion of schools as Major Developed Sites within the Green Belt as outlined within PPG2. The situation is particularly acute within Borehamwood where depending on the proposed type and location of these dwellings, a reserve 2FE primary school site may be needed should a large number of dwellings be located in one area. Also with regard to Hertswood, secondary provision is likely to be compromised in the longer term unless there is realignment of the Green Belt boundary and/or reassessment of the MDS designation.	Comments Noted No change. MDS review technical paper to be published shortly. Revised MDS boundaries to be considered in the Site Allocations

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1358/3/N
DLA Town Planning Ltd

N

Whilst the release of large sites from the Green Belt is recognised as undesirable it is considered that the release of small sites from the Green Belt could provide additional housing in sustainable locations at the edge of settlements. In addition the release of such land at the edge of settlements could help to create a more logical and defensible Green Belt boundary.

In light of this Radlett could provide additional housing on small sites such as land rear of The Warren to provide sufficient levels of housing without overloading existing community services.

No Change in Response to this Objection

The strategy has been informed by the Council SHLAA, and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in para3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate, there may have to be need to review the focus on housing growth within existing built up areas.

Furthermore, there will be an assessment of the Green belt boundary which will be incorporated into the Site Allocations and Development Management DPD. Otherwise planning applications for development of Green Belt land will be dealt with on their own merits.

NCS/R25/1475/3/N

Phillips Planning Services Ltd

N

The Council should start by assessing housing requirements and should utilise land within and on the edge of towns. The Revised Core Strategy refers only to 'brownfield' land within settlements and the Council has not considered the alternative of urban intensification and the development of land on the edge of main settlements, including Radlett, which lies outside of the Green Belt and does not appear to have been considered.

Any option considered should also include land presently safeguarded for future development and sites identified within the SHLAA.

No Change in Response to this Objection

The strategy has been informed by the Council SHLAA, and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in para3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate, there may have to be need to review the focus on housing growth within existing built up areas.

Furthermore, there will be an assessment of the Green belt boundary which will be incorporated into the Site Allocations and Development Management DPD. Otherwise planning applications for development of Green Belt land will be dealt with on their own merits.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1631/6/N N There should be a Green Belt review, which would introduce more defensible boundaries and protect the Green Belt in the long term whilst allowing for development to deliver the objectives of the Core Strategy.

NCS/R25/4427/3/N N This should allow for the release of Green Belt land where CGMS Consulting previously developed as highlighted at Para 2.35.

NCS/R25/4644/3/N N "Whilst the release of large sites from the Green Belt is recognised as undesirable it is considered that the release of small sites from the GB is acceptable, particularly when this would help to create a more logical and defensible GB boundary"

No Change in Response to this Objection
Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites. There is not requirement both in National and Regional Policy to undertake a review of the Green Belt. The Core Strategy paragraph 2.29 states that the Housing Supply will be reviewed if strategic brownfield sites are not brought forward. Small scale amendments to the Green Belt Boundary.

No Change in Response to this Objection
Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites.

No Change in Response to this Objection
The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4647/3/N Daniel Rinsler & Co Ltd	N The Council fails to follow Government planning guidance in setting its revised housing target, not least for failing to justify the significant reduction in the target it had previously put forward. On that basis, it is considered that the RDCS should state in principle that in the absence of adequate land within the built-up areas of existing settlements, land will need to be released from the Borough's Green Belt to meet its housing land supply needs.	Amend Policy The SHLAA illustrates the Housing Land Supply within Hertsmere. As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS
NCS/R25/4649/3/N JCPC Ltd	N A more even distribution of housing growth across the Borough is appropriate. Whilst accepting that the majority of growth will be in the towns and larger villages, the strategy should allow for modest growth in smaller settlements.	Comments Noted Consideration is being given to a commitment to define the boundaries of smaller villages in the Green Belt, in accordance with redevelopment of PDL and infill sites, for the future Site Allocations and Development Management DPD. It is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.
NCS/R25/11210/2/O Shire Consulting	O The Council states the SHLAA indicates a potential of 3,200 dwellings, it is clearly no coincidence that this is the same amount as the reduction of the housing requirement. This is a political decision and as a result furthers the unsoundness of the Core Strategy. The assumptions make no allowance for slippage. Because a site was considered in the SHLAA process does not mean that it is 'available' under the PPS3 requirements for a 5 year supply	Amend Policy As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS. The 5 year housing Land Supply is consistent with both SHLAA guidance and paragraph 54 of PPS3. The SHLAA takes into account availability of sites, the respondent is aware the approaches in SHLAA having been a key stakeholder in the production process, and their organisation attended the SHLAA workshop.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/14633/O
Natural England (Countryside Agency,
EofE Region)

O It is considered that whilst para 2.32-33 and the Green Belt designation is supported, the quality of the habitats, which may be in the urban realm, should not be compromised, and where Green Belt release may be more appropriate.

No Change in Response to this Objection

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reasons for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

Quality of development, together with the impact on the environment continue to be a material consideration in the determination of planning applications. Greater detail on this is included in policies CS12 and CS13, and other policies also relating to Green Infrastructure will be incorporated into the Development Management DPD.

NCS/R25/39904/O
John Anderson Planning

O There is likely to be some pressure on the Green Belt, it would be good to see some recognition of future living pattern changes that could occur sooner than is present thought. Green Belts can contain open space facilities and do not have to remain unaltered.

No Change in Response to this Objection

PPG2 which is fully supported by the Core Strategy allows for the provision of essential sporting facilities. As a result no change is required.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4429/2/O GL Hearn Property Consultants	O	Reference to response for Q1	Comments Noted
NCS/R25/4581/2/O Gregory Gray Associates	O	Objection raised to objective 3 in the Spatial Vision and policy CS1, where there should be a greater flexibility for the adequate supply of land, with reference to previous developed land in the Green Belt. It is noted that the Potlagers Bar Garden Centre on Dancers Hill Road have existing extension hard standing and built footprint. Subsequently it argued that a B1, B2, or C3 use would be more appropriate, with a smaller built foot print and greater proportion of green open space, which would contribute to the openness of the Green Belt. Request that CS1 and Sections 2, 3, and 7 are altered to be more flexible and provide clarity to allow for PDL sites in the Green Belt. (Response also in relation to Questions 5, 7, 11 and 14)	No Change in Response to this Objection The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.
It should be noted that national Green Belt policy PPG2 and the Local Plan continues to apply to sites such as the one being promoted in this representation.			

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4586/3/O
Bidwells on behalf of Barratt Strategic

O Barratt Strategic have no objection to an approach which makes the most efficient use of urban sites, indeed this is consistent with the principles of PPS3. Nonetheless, for the reasons provided at our response to Question 2, it is considered that the RDCS significantly underestimates the number of new homes which are required in the district. Accordingly, it is likely that it will be necessary to release some Green Belt land in order to meet identified needs. Even at their current level, we have serious doubts as to whether the capacity of urban sites alone will be sufficient to satisfy the RDCS targets and as such some Green Belt release will be required.

The SHLAA has identified Green Belt sites where housing development could be accommodated without significant impact to openness and visual amenity of the Green Belt or the reasons for including land within it.

NCS/R25/4625/2/O
PPML Consulting Ltd

O It is considered that the CS should identify sufficient land in accordance with the housing requirement as stipulated by the RSS, which may involve the release of Green Belt land.

No Change in Response to this Objection

The number of new homes is considered in the response to question 2, however, the SHLAA study considers urban sites as well as greenfield and Green Belt land. This does not mean the Council have accepted the principle of the release any land from the Green Belt. The assessment made in the study that a site has potential does not amount to 'special circumstances' for development or alter its Green Belt status. The SHLAA does not consider the impact of development on the visual amenity or openness of the Green Belt.

Amend Policy

As a result of the *Cala Homes (South) Ltd v Secretary of State for Communities and Local Government* [2011] EWCACiv 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4634/4/O Woolf Bond Planning (for Gilston Developments) O	Object to the spatial strategy on the basis that it fails to plan for a review of the Green Belt in order to facilitate sustainable urban extensions. The RCS has not been prepared against the need to ensure an effective and flexible strategy in accordance with the requirements at paragraphs 4.36 to 4.38 and 4.44 to 4.47 of PPS12. A strategy is unlikely to be effective if it cannot deal with changing circumstances. The RCS, with its rigid application of an urban intensification approach, not founded upon any robust assessment of likely delivery, is in direct conflict with the spatial approach prescribed in PPS3 and PPS12. The LPA is seeking to protect the Green Belt whilst at the same time, seeking to maintain an adequate supply of suitable land for development and meeting affordable housing needs. We do not accept that an urban renaissance strategy that will lead to increasing pressures to develop land within the urban areas will result in the most appropriate strategy in the circumstances. Evident from our assessment of housing land supply is that the Council is unable to demonstrate a developable supply of housing land to meet the strategic requirement during the plan period to 2027. This therefore necessitates the release of land from the Green Belt. Such a need was previously acknowledged through preparation of the earlier CS but this need has been removed from the current draft RCS. This approach is wholly unsound but there is a demonstrable need to plan for a review of the Green Belt as a fundamental part of the spatial vision of the Borough. We are of the view that the only way in which the Council can meet its strategic housing requirement is through the provision of an urban extension(s) following a review of	Amend Text Would refer to previous response regarding amendments to the document to clarify that a review of the Core Strategy will be undertaken if sites in the SHLAA do not come forward for development. The response refers to an 'urban renaissance strategy' but with the exception of the Elstree Way Corridor, the Council is not specifically seeking a regeneration-led approach to delivering new housing. However, there has been a continuous churn of sites which have come forward over the past 15 years in the borough and the SHLAA projects that sites will continue to come forward within urban areas. As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.
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Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

the Green Belt boundary.

If as we suggest, there is insufficient developable land available at Borehamwood and Potters Bar (the principal settlements of the Borough), then the RCS approach to development will not be in general conformity with the East of England Plan and nor would it represent a flexible approach to meeting identified housing and growth related needs.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4635/3/O
Rolfe Judd

O Council assumes a significant proportion of housing coming forward will be on Windfall sites and states that it continues to have a five year supply of housing sites and it is not envisaged that any strategic housing development in the Green Belt would need to be considered within the plan period.

This appears overly optimistic, particularly in the current economic climate and could result in a shortfall if windfall site housing completions cannot be sustained at a similar rate to previous years. This brings into focus an increased likelihood of selective Green Belt release in the form of Safeguarded Land.

Para 2.35 of the Core Strategy suggests that Site Allocations will consider other development opportunities, which could take place throughout the Borough including any very minor, small-scale changes to Green Belt boundaries where anomalies exist and a more appropriate, defensible boundary can be set.

Some previously developed land in the Green belt, such as the Former West Herts College Annex site, particularly where it is located within one of the locations in the settlement hierarchy (i.e. Bushey) can offer some limited scope for new development. As such, sites safeguarded sites in the Local Plan, should be brought forward in the Core Strategy in order to assist with meeting housing targets.

No Change in Response to this Objection

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4637/3/O
Sworders Agricultural

- O We do not agree that the level of housing being proposed is 'appropriate'. As a result we do not believe it is possible to avoid Greenfield development. In maximizing the potential of sites within existing towns the Council must be realistic about likely delivery and the national guidance provided in this regard.

NCS/R25/4641/3/O
First Place Nurseries

- O The release of large sites from the Green Belt is undesirable, it is considered that the release of small sites from the Green Belt could provide additional housing in sustainable locations.

No Change in Response to this Objection

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

No Change in Response to this Objection

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4645/5/O

O
Turley Associates on behalf Potters Bar
Golf Course

Paragraph 1.22 purports to identify several issues as residents' priorities including the protection of the green belt. This statement is not a sound one.

First, the number of households in Hertsmere at the time of the survey was about 38,000, thus the return rate was a mere 1 : 38 in terms of households. The number of residents within Hertsmere in 2001 was 94,4504 and is currently 98,7005. The corresponding 2005 number of residents was 95,000, which suggests that the response rate represents 1:95 only.

Secondly, this global statement is not pertinent to any specific green belt site and was not set in the context of having to continue to plan for the number of houses in the EEP nor whether the

The recent Organisation for economic Co-operation and Development (OECD) report on the state of the British economy suggests that the UK should allow development in the green belt on the basis of its poor record in the supply of houses at a time when prices remain high and affordability is low.

No Change in Response to this Objection

Statement within the Core Strategy is sounds as the responses received to the survey were from residents of Hertsmere, providing their opinion. As a result the sentence is correct. A response of approximately 1,000 questionnaire provided a good sample from which to gauge overall resident priorities.

The OECD report is noted, however, the approach of the Core Strategy is consistent with UK national planning guidance set out in PPG2 and the emerging NPPF.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1598/3/S Preston Bennett Partnership	S	Yes, this approach is agreed. The Council have undertaken detailed work relating to the preparation and publication of a Strategic Housing Land Availability Assessment (SHLAA), which identified a number of sites within the identified settlements that would be appropriate to come forward for housing development. As stated at Paragraph 2.26, it is against the outcomes of this work that the suggested housing targets for the Borough have been set, and development coming forward at the SHLAA identified locations should be welcomed as a priority, minimising pressure on the Green Belt.	Support Noted and Welcomed
NCS/R25/2250/3/S Radlett Society & Green Belt Association	S	We support Core Objectives, the Strategic Objectives by settlement, and text in paras 2.35, 3.12, 2.37 which encourages development on brownfield sites, protecting the Green Belt, and indicates that Radlett is not suitable for accommodating significant housing development.	Support Noted and Welcomed
NCS/R25/4041/3/S RAID Residents Against Inappropriate Development	S	No Comment	Support Noted and Welcomed N/A
NCS/R25/4491/3/S Phillips Planning services Ltd	S	General support for the policy, and it is noted that previously developed site within the Green belt are mentioned in para 2.35. However it is preferred that the text in para 2.35 is in a policy rather supporting text.	Amend Text Support noted and welcomed. It is possible that in subsequent site allocations and development management DPDs a provision will be made for 'village envelopes', which will identify that there are built up areas 'washed over' by the Green Belt.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4651/4/S

The Planning Bureau Limited

S

Maximum potential should be made of sites within existing towns and policy support should be given to sustainable uses close to town centres. However, there should be a balance to ensure that sites do not become unduly competitive for lower value residential uses that might otherwise be seeking greenfield sites. A mix of greenfield and high density town centre and sustainable sites should be pursued.

No Change in Response to this Objection

As stated in Policy CS2, the Council will give priority to locating developments within the Borough's existing towns and, to a lesser extent, other settlements. In some circumstances it may be appropriate for greenfield locations within existing towns and settlements to be developed.

Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites. There is no requirement in either National or Regional Policy to undertake a review of the Green Belt. The Core Strategy paragraph 2.29 states that this approach will be reviewed if strategic brownfield sites are not brought forward.

Paragraph 3.19 provides guidance on the Council's position if the identified housing land supply does not come forward, it states that 'where housing completions during any following three year period are projected to fall below the proportion sought in each phase by 20% or more, as set out in Policy CS3, it will be necessary to review the phasing of all housing allocations and if necessary, either bring certain allocations forward or consider whether a wider review of the Strategy is required, including land presently designated as Green Belt'. Such a review will need to take account of housing land supply and trends in the wider housing market.

NCS/R25/4539/3/Y
Vincent & Gorbings

Y

We agree that priority should be given to the re-use of previously developed land before the use of Green Belt sites. We also agree that development on such sites should be maximized, whilst taking account of the impact on the surrounding area.

Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4631/3/Y Peacock and Smith (Mr & Mrs D. Morley)	Y The use of sites in urban areas in accordance with the SHLAA is supported for housing development, whilst protecting the Green Belt. In addition it is considered that former Safeguarded land in the Green Belt should be reinstated to Green Belt where it is not required for housing development.	Support Noted and Welcomed
NCS/R25/4632/3/Y Peacock and Smith (Mr & Mrs D. Whiting)	Y The use of sites in urban areas in accordance with the SHLAA is supported for housing development, whilst protecting the Green Belt. In addition it is considered that former Safeguarded land in the Green Belt should be reinstated to Green Belt where it is not required for housing development.	Support Noted and Welcomed
NCS/R25/4646/3/Y DPP LLP	Y In general terms, TWNT supports the Council's aim of providing as much housing as possible within existing towns to help protect the Green Belt. However, the land identified within urban areas in relation to the housing target set by the RCS is tight and so far as PPS3 requires the planning system to deliver a flexible, responsive supply of land, this will require a flexible approach by the Council. Firstly, it will need to be amenable to opportunities to maximise provision on existing/identified sites, and secondly, where legitimate opportunities on Green Belt land arise, they should be considered positively. Green Belt policy does not, after all, prohibit all development in perpetuity; the expectation being that the quality of land falling within the Green Belt and its contribution to its purpose will be kept under review and where circumstances dictate, such as housing need, land can and should be released for that purpose.	Amend Text The Council welcomes the support for its overall aim of maximising housing opportunities within existing towns. It is acknowledged that as a result of matters relating to the proposed abolition of RSS and the associated Cala Homes Appeal Decisions the Council will need to review its housing target to ensure that this in general conformity of the RSS. This will not necessarily require Green Belt releases to be prioritised or identified in order to meet this housing requirement and the SHLAA will be used to inform the strategy of how and where housing will be delivered.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 1 - Spatial Vision and Development Strategy Q4

Summary of

NCS/R25//4429/4/C
GL Hearn Property Consultants

C Suggest the release of green belt land for housing

Council Response

No Change in Response to this Objection

Refer to previous response regarding amendments to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development

NCS/R25/4581/2/C
Gregory Gray Associates

C That Green Belt sites are taken into account in considering the provision of housing.

Comments Noted

The strategy has been informed by the Council's SHLAA and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4633/3/C
Deloitte Drivers Jonas (on behalf of
Cemex) 2011

C

Encourage the Council to adopt a flexible approach to housing provision, whereby if identified sites cannot be developed, other sites including sustainably located Green Belt sites, can be brought forward for housing, in line with PPS3 para 10. Council urged to adopt a flexible approach to its housing modelling, should circumstances change.

Council encouraged to adopt a sequential approach to housing targets and their allocated sites in para 2.29. This does not firstly identify housing targets and where to allocate but instead approaches them at the same time. This lack of a sequential approach makes the Core Strategy unsound.

Amend Text

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

The Council has not chosen to identify housing targets and allocations at the same time. The Chelmer-derived target of 3,200 was identified as an appropriate housing target and if it had not been possible to identify sites within urban areas, the strategy would need to identify other options for accommodating the required housing in the borough.

As a result of the *Calia Homes (South) Ltd v Secretary of State for Communities and Local Government* [2011] EWCACiv 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4641/4/C First Place Nurseries	C	The release of small sites on the boundaries of settlements where a more logical boundary be created this could provide additional housing.	Comments Noted The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. Furthermore, there will be an assessment of the Green Belt boundary which will be incorporated into the Site Allocations and Development Management DPD.
NCS/R25/1475/4/N Phillips Planning Services Ltd	N	The Council should start by assessing housing requirements and should utilise land within and on the edge of towns. The Revised Core Strategy refers only to 'brownfield' land within settlements and the Council has not considered the alternative of urban intensification and the development of land on the edge of main settlements, including Radlett, which lies outside of the Green Belt and does not appear to have been considered. Any option considered should also include land presently safeguarded for future development and sites identified within the SHLAA."	No Change in Response to this Objection (repetition of NCS/R25/1475/3/N)
NCS/R25/4539/4/N Vincent & Gorbings	N		
NCS/R25/4646/4/N DPP LLP	N	Please see comments made in response to question 2.	

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4041/4/NC NC No

RAID Residents Against Inappropriate Development

Support Noted and Welcomed

NCS/R25/4586/4/O Bidwells on behalf of Barratt Strategic

The Key Diagram within the previous consultation version

Comments Noted

of the RDCS identified areas around the main settlements where Green Belt release would be appropriate. The current RDCS omits this information on the basis the Council no longer wish to release Green Belt land. This approach would however provide no fall back position if, for any reason, Green Belt release is required. At the very least, the RDCS should identify areas for growth, which lie outside of the urban area, in order that development is directed to the most appropriate location if and when Green Belt release is necessary. Indeed, it is considered that it would be wholly appropriate to identify individual sites on the edge of existing settlements, which are accepted to be appropriate for development, so that they may be available to meet housing targets if required to do so. Land North of Barnet Lane (SHLAA site S2) would be ideally suited to fulfilling this role. Not only is the site located on the edge of Borehamwood, where the RDCS seeks to focus growth, but it is also accepted by the SHLAA to represent an suitable, available and achievable housing site. It is therefore suggested that the RDCS should identify individual sites which could come forward to meet housing targets, should they be increased or if urban sites fail to deliver the anticipated level of development.

Paragraph 3.19 provides guidance on the Council's position if the identified housing land supply does not come forward, it states: Where housing completions during any following three year period are projected to fall below the proportion sought in each phase by 20% or more, as set out in Policy CS3, it will be necessary to review the phasing of all housing allocations and if necessary, either bring certain allocations forward or consider whether a wider review of the Strategy is required, including land presently designated as Green Belt. Such a review will need to take account of housing land supply and trends in the wider housing market.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4635/4/O Rolfe Judd	O	No comment.	No Change in Response to this Objection No response necessary
NCS/R25/4637/4/O Sworders Agricultural	O	Whilst there are no alternative development strategies suggested, the preferred strategy of accommodating the district's housing within existing development boundaries is not realistic. It is considered that it will be necessary to build on Greenfield sites. Previous drafts of the Core Strategy proposed 'areas of search' around Borehamwood and Potters Bar. A site is represented with these comments on Merry Hill Road in Bushey for residential development.	No Change in Response to this Objection The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development. Site representations are a matter for the Site Allocation DPD to consider, and specific mention of sites will not be taken into account for the purposes of the Core Strategy.
NCS/R25/4041/2/S RAID Residents Against Inappropriate Development	S	Agree with the target of 3,200 if not developing in the Green Belt. Object to 3,900 target (EofE) if includes Green Belt Development	Support Noted and Welcomed Noted
NCS/R25/4491/4/S Phillips Planning services Ltd	S	Support, although reference to comments made in Q1	Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4625/4/S
PPML Consulting Ltd

S That Green Belt land is identified for release for housing development, in particular previous safeguarded land in the Local Plan should be considered as a priority

No Change in Response to this Objection
The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

NCS/R25/1358/4/Y
DLA Town Planning Ltd

Y The release of small sites on the boundaries of settlements where a more logical boundary could be created would provide the additional housing required without overloading community services.

It would be possible to include land rear of The Warren (to the north-east of Radlett) within the settlement boundary. This could be done without any detrimental impact to the character or facilities and indeed would create a more logical boundary.

No Change in Response to this Objection
The strategy has been informed by the Council SHLAA, and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in para3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate, there may have to be need to review the focus on housing growth within existing built up areas. There will also be an assessment of the Green belt boundary which will be incorporated into the Site Allocations and Development Management DPD. Otherwise planning applications for development of Green Belt land will be dealt with on their own merits.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//1631/7/Y Barton Willmore Planning Partnership	Y	The Council should plan for an urban extension (as per para. 2.42) and urban intensification (as per para. 2.40) as this would allow for an appropriate level of growth without putting undue strain on existing centres. A Green Belt review would be necessary to implement these options.	No Change in Response to this Objection Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites. There is not requirement both in National and Regional Policy to undertake a review of the Green Belt. The Core Strategy paragraph 2.29 states that the Housing Supply will be review if strategic brownfield sites are not brought forward. Small scale amendments to the Green Belt Boundary.
NCS/R25/4427/4/Y CGMS Consulting	Y	The redevelopment of previously developed sites within the Green Belt.	No Change in Response to this Objection Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4644/Y Y The release of small sites in the Green belt, where it would contribute to a more defensible and logical boundary around a town, and with little impact on the openness and character of the Green Belt.

Comments Noted

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

The Green Belt boundary will also be assessed separately as part of the Site Allocations and Development Management DPD.

NCS/R25/4647/4/Y
Daniel Rinsler & Co Ltd

Y

Policy should recognise that green belt land which is in close proximity to the train station, that is suitable, available and capable of being implemented for residential development will meet objectives for the managed expansion of the built-up areas of the Borough, in particular Borehamwood.

No Change in Response to this Objection

The Core Strategy is in general compliance with National Policies. Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites. There is not requirement both in National and Regional Policy to undertake a review of the Green Belt.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4649/4/Y JCPC Ltd	Y	As outlined above, reduced focus to allow some modest growth in smaller settlements.	No Change in Response to this Objection Consideration is being given to a commitment to define the boundaries of smaller villages in the Green Belt, in accordance with redevelopment of PDL and infill sites, for the future Site Allocations and Development Management DPD. It is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.
NCS/R25/4652/1/Y Boyer Planning	Y	The Core Strategy should include a specific policy that relates to the Green Belt boundary, which acknowledges the need and potential for small-scale boundary reviews to reflect exceptional circumstances in line with statements in para. 2.35 of the supporting text. PPG2 requires that LPAs consider whether there are any exceptional circumstances that require the detailed changes to the Green Belt boundary when preparing an LDF. The absence of any proposal for a Green Belt boundary review in the RSS does not obviate the need or potential for more localised boundary changes.	No Change in Response to this Objection As stated in para. 2.35, although it is not considered that the any strategic releases of Green Belt land will be required, other small-scale Green Belt releases that are necessary to enable development and correct anomalies will be considered through the Site Allocations DPD.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 1 - Any Further Comments

NCS/R25//4548//

English Heritage (East of England Region)

Summary of

We are pleased to see that the historic environment is referred to in the strategic objectives and in the environmental policies. The reference in the spatial vision could be more explicit in terms of the distinctive qualities conferred by the district's heritage, and its future influence as a key asset in maintaining the attractiveness of the area.

Council Response

Amend Text

It is agreed that the spatial vision could be more explicit about the qualities of the borough's heritage. Table 3 will be amended.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//12441/C

Architects Corporation Ltd

C

Priority 3 "We note that you identify that 'development should focus upon brownfield sites within the principle towns' which takes no account for brownfield sites outside of towns"

Priority 15 " As Hertsmere is washed over Green Belt this policy appears to conflict with national policy and reduces the potential of development within the borough which would also frustrate this policy and policy 3 above"

Housing and employment: "Brownfield sites within the Green Belt should be developed to provide housing, especially affordable or rented housing, [live work accommodation on sites having some employment potential and located by major roads] within non urban locations."

Submission of a site representation for Gulimore Farm, Sandy Lane, Bushey for housing and commercial development.

Amend Policy

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS Specific sites will be assessed in the process for the Site Allocations and Development Management DPDs.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1358/5/C DLA Town Planning Ltd	C	Locating new housing development on brownfield sites in existing urban areas complies with relevant government guidance; however it is unlikely that sufficient suitable land will come forward from such sites.	No Change in Response to this Objection The strategy has been informed by the Council SHLAA, and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in para3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate, there may have to be need to review the focus on housing growth within existing built up areas.
NCS/R25/1463/1/C Natural England (Countryside Agency, EofE Region)	C	Prefer to see mention of green infrastructure in this section	Amend Text Yes - reference should be made to the recent HCC Green infrastructure study
NCS/R25/1463/2/C Natural England (Countryside Agency, EofE Region)	C	The link between the natural environment and the health and wellbeing of the local community should be accentuated in the objectives, along with a greater emphasis on protecting and enhancing the natural environment, and green infrastructure within towns.	Amend Text Reference will be made to green infrastructure within the objectives
NCS/R25/2250/4/C Radlett Society & Green Belt Association	C	Good rail links also extend to St. Albans, the next station to the north, where many secondary schools are attended by Radlett pupils	Support Noted and Welcomed
NCS/R25/3990/6/C John Anderson Planning	C	It will not be possible to let go the checking of all minor development, as suggested by central government. The strategy must be flexible to accommodate changes in infrastructure.	Comments Noted The strategy is flexible to changes to infrastructure and technology within the existing environmental constraints and satisfactory design.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4029/1/C Robson Planning Consultancy	C	Please treat letter of 19th March as a formal withdrawal of the submission on behalf of Jon Smith and others.	Comments Noted
NCS/R25/4196/10/C CPRE Herts	C	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.	Amend Policy As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS. The strategy itself has been informed by the Council's Strategic Housing Land Availability Assessment but it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development. Regarding the proposed new National Planning Policy Framework (NPPF), it is unclear as to whether this will result in a significant changes to existing policies. The timing of the adoption of a new NPPF will be important and this together with the extent of any significant changes to current policy, will determine if and when amendments to the Core Strategy would need to be made. Paragraph 1.15 will be amended to clarify this.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4492/1/C Environment Agency	C	On Page 21 Table 4, Core Strategy Objectives Number 5. 'To address issues arising from climate change, and all types of flooding and to take advantage of water and other natural recourses responsibly.' We feel this should be amended to include a commitment to address climate change adaptation as well as mitigation. Climate change will lead to an increase in rainfall and more intense rain storms, leading to more frequent flooding, including from surface water. Green roofs are one way that we can help stem this problem. Green roofs are an important example of design that can help us adapt to and mitigate climate change through surface water flood reduction, as well as enhancing biodiversity and keeping buildings cool in summer and warm in winter.	Amend Text Change reference in Core Objectives
NCS/R25//4520//C Hertfordshire County Council - Property	C	Typo noted - 'change' should read 'chance'.	Amend Text Noted
NCS/R25//4520/2/C Hertfordshire County Council - Property	C	The need to include the plans, programmes of local stakeholders is very much welcomed. Table 2 (Page 12) includes a reference to HCC School Organisation Plan - this should be amended to meet the rising demand for school places - Hertfordshire's strategy. This document has been updated in 2010 to provide a primary update. http://www.hertsdirect.org/schoollearn/aboutstatesch/risingdemand/	Comments Noted Support noted. Add reference to 2010 update to the plan, and bullet point in relevant outcomes and actions. 'Meeting the Rising Demand for School Places: 2010 update'
NCS/R25//4520/3/C Hertfordshire County Council - Property	C	Whilst the Police are now a separate authority, Hertfordshire County Council are the Fire and Rescue Authority. The text of any future document should be amended accordingly.	Amend Text Noted

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4520/5/C Hertfordshire County Council - Property	C	2.35 This paragraph gives detail about the Green Belt boundary and should be cross referred with paragraph 3.12 to give a composite picture on Green Belt release and possible boundary realignment/defensible boundaries.	Amend Text Noted
NCS/R25/4548/2/C English Heritage (East of England Region)	C	We suggest that the historic environment might be given some further consideration in the following policy: Policy SP1 Creating Sustainable Development The finite nature of the historic environment and the wider social, cultural, economic and environmental benefits of heritage conservation justify a more specific reference in this policy to the district's heritage (see paragraph 7, PPS 5 relating to sustainable development).	Amend Policy It is acknowledged that the finite nature of the historic environment and how this is addressed through the planning process, is an important part of creating sustainable development. Policy SP1 will be amended to reflect this.
NCS/R25/4552/1/C RPS on behalf of Willows farm	C	We consider that additions should be made to the Core Strategy, in Section 2 and Section 4, in order to make the Core Strategy consistent with national planning policy regarding tourism. In respect of Section 2 we propose the following to be inserted after existing paragraph 2.17, under the subheading Hertsmere's economy. "The NOMIS Labour Market Profile for the Borough (2009) shows that a greater proportion of the Borough's workforce (10.1%) is employed in tourism related industries than in the East region (7.7%) and in Great Britain (8.2%). The Willows Farm Park, which has an excellent strategic location close to M25 Junction 22, is one of the region's premier visitor attractions which receives around 500,000 visitors a year. It not only provides a significant amount of employment but also brings in substantial additional expenditure to the local economy."	Amend Text The Tourism data in NOMIS also includes the services industry so includes travel agents, libraries and archives. However, the a number of the visitor attractions will be acknowledged in chapter 2, paragraph 2.21.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4558/1/C
East of England Development Agency

C Note the legal status of Regional Strategies, including the RES, and would suggest Council monitors the position carefully. Notwithstanding, intended revocation of RSS, Councils should give consideration to their policies and the strategic evidence base underpinning those documents.

Amend Policy
As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCACiv 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

NCS/R25//4629/1/C
Jones Lang LaSalle

C Clare Hall and its recent extension should remain designated as an MDS if it is to remain in the Greenbelt.

Comments Noted
This will be the subject of the Site Allocations DPD

NCS/R25//4641/5/C
First Place Nurseries

C Locating new housing development on brownfield sites in existing urban areas complies with national guidance, however, it is unlikely that sufficient suitable land will come forward from such sites. Consideration should be given to amending the settlement boundaries around settlements such as Bushey.

Comments Noted
It is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.

Furthermore, there will be an assessment of the Green Belt boundary which will be incorporated into the Site Allocations and Development Management DPD.

NCS/R25//4644/5/C
First Place Nurseries @ land R/O Cobden Hill

C It is not considered that there is sufficient brownfield sites within urban areas to accommodate the required level of housing. It is thought that consideration should be given to the review of settlement boundaries.

Comments Noted
The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.

NCS/R25/4652/2/C

Boyer Planning

C

There should be a policy specific to the Green Belt and the control of development related to the Green Belt:

-Policy SP1 does not refer to any issues directly relevant to the Green Belt.

-Policy CS3 provides a mechanism for the consideration of alternative locations for housing development, but Green Belt options are only mentioned in the supporting text at para. 3.19.

-Policy CS8 provides no mechanism for the consideration of alternative locations for employment development, though the need to review allocations if sites in neighbouring boroughs do not come forward is mentioned at para. 4.18.

Amend Policy

Currently policies relevant to the control of development in the Green Belt are contained within the Hertsmere Local Plan (2003). Eventually these will be replaced by policies within the forthcoming Development Management Policies DPD.

In relation to housing and Policy CS3, the Core Strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paras. 3.12 and 3.19 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy that result in the identification of locations in the Green Belt for development.

With regard to employment and Policy CS8, the Council has based its assumptions about employment land provision on cross-boundary studies carried out by consultants. This work showed that there would be a small shortfall in both office space and industrial and warehousing accommodation. However, it is not thought that further substantial employment area allocations are required. This is on account of the ability to locate office development within existing town centres, and the very minor nature of the shortfall in industrial and warehousing accommodation, which would most likely fall within the margin of error, with any businesses in need of premises able to locate in vacant

units within existing employment areas. As such it is considered that the best approach would be for existing employment areas to be retained, subject to a review of boundaries in the forthcoming Site Allocations DPD, to ensure that these are still relevant, justified and defensible, and the allocation of Local Significant Employment Sites, which are intended, to help protect sites suitable for smaller businesses.

It is recognised in para. 4.18 that it may be necessary to review employment land allocations if new potential business parks in adjoining boroughs are not brought forward. Policy CS8 is being amended to clarify that new strategic employment land would be allocated through the Site Allocations DPD if these business parks are not developed.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1631/3/O

O
Barton Willmore Planning Partnership

*Comments on paragraph 2.4 and population data:

- Population growth to 2026 (the end of the plan period), and not just 2021, should be taken into account.
- The 2004 ONS projections have been used. The more up-to-date 2008 NS data, which projects more housing growth, should be used.
- The correct approach to housing projections (as above) would have implications for the amount of housing required to 2026.

Comments on spatial vision (table 3):

- This is generally supported.
- This should refer to 2026 as the date by which the vision should be achieved, rather than the mid 2020s.
- The statement is inflexible and not effective as it refers to 'the protection of the rural environment'. The Council will be required to consider a review of the Green Belt boundary in order to accommodate the necessary level of development over the plan period. The statement could prevent suitable greenfield sites coming forward. Therefore the sentence should read 'the APPROPRIATE protection of the rural environment'.

Comments in relation to the objectives (table 4):

- Objective 2 should be altered as a Green Belt review would be the most effective way of protecting the Green Belt.
- Objective 3 has been altered since the submission version to remove any reference to the RSS. This suggests that a lower level of development is planned. However, the RSS has been tested at examination and should be used as the starting point for any plan. Also, it is not clear that there would be sufficient brownfield sites to accommodate the required level of development. Therefore, objective 3 should, make reference to sustainable and deliverable sites rather than distinguish between greenfield and brownfield land.

Amend Paragraph

The population figures will be reviewed. To ensure that they are update in line the lifetime of the Core Strategy.

The vision will also be updated in light of amendments to the Community Strategy

As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

-Objective 8 should refer to sustainable locations and there should be no requirement for the provision of additional buildings that may render development unviable.

In relation to paragraph 2.45, the data in relation to concealed households is old and does not predict the number of the plan period

Policy SP1 should recognise the contribution of deliverable greenfield sites. Reference should be made to 'the efficient use of sustainable and deliverable sites' rather than 'brownfield land' throughout the text.

The seven criteria of Policy SP1 are also likely to prejudice certain types of development and undermine their viability. The requirements set out should only be imposed where feasible and viable, and this should be made clear in the text.

NCS/R25/4041//O
RAID Residents Against Inappropriate
Development

*Page 8 1.7 should include 'Protect the Green Belt'
*2.29 it should be clear that releasing developed land in rural areas for housing should not be classed as an exceptional circumstance
*Key diagram feels that strategic gaps should also be implemented around Potters Bar for a consistent approach with Bushey.

No Change in Response to this Objection

* Paragraph 1.7 quotes the themes of the Community Strategy, which cannot be amended as part of this consultation, however, the strategic objectives of the Core Strategy do seek the protection of the Green Belt.
* Sites in rural areas will have to meet the test within PPG2 that require very special circumstances to outweigh harm to the Green Belt.
*The Bushey/Watford Strategic Gap has been identified as this is the most vulnerable area of Green Belt in Hertsmere.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4539/5/O
Vincent & Goring

- O Core Strategy Objective number 3 is to 'maintain an adequate supply of suitable land, focussed on brownfield sites within the principal towns...'. Borehamwood is the principal town and SHL in the Borough and so it is to be expected that it will have an adequate supply of suitable land to meet the Borough's housing requirements. The lack of a clear objective for delivering housing in the Borough's main settlement (Borehamwood) is contrary to policy CS2 of the Draft Revised Core Strategy which states that, 'Priority will be given to locating major residential development within the main settlements of Borehamwood, Potters Bar and Bushey'. This important policy statement should be distilled into one of the spatial objectives for Borehamwood. An objective should be included for Borehamwood (Table 5) which states that Borehamwood will play its part in delivering the housing required. The first bullet point in the submission draft should be replaced by: 'Ensure an adequate supply of housing land in Borehamwood to meet the requirements for private and affordable housing, as set out in PPS'. As such we consider that the objectives in relation to Borehamwood are unsound by reason of lack of consistency with national policy (PPS3) and ineffective (lack of internal consistency within the document).

No Change in Response to this Objection
Table 5 includes the objective "Manage housing availability and affordability" in Borehamwood, this is consistent with Policy CS2 as this policy is based on the availability of supply based on the SHLAA. The Council will manage the housing availability on available sites in the locations specified in Table 5.

NCS/R25/4625/4/O
PPML Consulting Ltd

- O Reservations relating to the justification for housing projections and allocation, which is not considered to be in accordance with the East of England Plan, or the SHLAA. It is not thought that the SHLAA is sound and not sufficient justification for the housing projections for the CS

Amend Policy

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2014] EWCA Civ 639 (27 May 2014), the Council intends to review its housing target to ensure that it is in general conformity with the RSS. The SHLAA has been produced in compliance with Government guidance.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4634/1/O
Woolf Bond Planning (for Gilston
Developments)

- O We have a number of overarching concerns with the RCS. Our primary concern relates to the failure of the RCS to ensure a deliverable and developable supply of housing land in accordance with PPS3 (Housing). As drafted the RCS does not satisfy the effective test set out in PPS12 and does not represent the most appropriate strategy when considered against the reasonable alternatives. In order to satisfy the test of soundness the RCS should be redrafted to include a requirement to plan for sustainable urban extensions following a review of the Green Belt.

Amend Policy

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment which identifies what the Council considers to be a deliverable and developable supply of housing land in accordance with PPS3. It is not clear how this does not satisfy the 'effective' test in PPS12. However, other reasonable alternatives were considered through the Sustainability Appraisal and these options are set out on pages 27 and 28 of the revised Core Strategy.

As a result of the *Calahomes (South) Ltd v Secretary of State for Communities and Local Government* [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4645/2/O

O
Turley Associates on behalf of Pottery Bar Golf Course

Given the reasons for withdrawal of the Core Strategy Submission Document (March 2009), the Council will be well aware of the requirement that the policies in a Core Strategy must apply for a period of 15 years from the date of adoption. The DRCS does not comply with this requirement. Even on the Council's own timetable the adoption date is going to be in 2012, which means that the plan period for the DRCS should be from 2012 to 2027. Paragraph 4.13 of PPS12 states: "The time horizon of the core strategy should be at least 15 years from the date of adoption."

Paragraph 53 of PPS3 states: "At the local level, Local Planning Authorities should set out in Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption, taking account of the level of housing provision set out in the Regional Spatial Strategy." The effect of this, plainly, would be require the Council to provide at least a further years worth of housing.

Amend Policy

As a result of the anticipated date of adoption, the dates of the Core Strategy will be amended to ensure a 15 year time period.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4651/2/O
The Planning Bureau Limited

- O In relation to the Core Strategy priorities and objectives, specific reference should be made to the needs of the ageing population and particular emphasis made to the housing of this proportionately rising section of society. Within Table 4 of the draft specific reference to the needs of the ageing population should be included to identify the wide ranging issues that will be associated with a larger proportion of people in need of accommodation, care and other facilities which cannot be addressed under the wider residential heading.

Given the growth in the proportion of the population that is aged 65 or over, it is necessary to ensure that the housing needs of older persons are met with suitable choice. Some portion of this population will require specialist housing designed for those with impairments or housing that provides easy access to help and care, company, and a sense of safety. The private sector has a major role in the provision of this type of housing.

Amend Text
The SHLAA is currently being updated to inform the Core Strategy and the wider LDF. As part of this the Council is including some C2 uses within its SHLAA housing commitments. Sites capable of being delivered or developed for these certain C2 uses are also included as SHLAA sites.

Assessment of housing need should include the housing needs of the entire community, and it is recognised that the Borough has an increasingly high proportion of older people and that the provision of C2 uses is to play an important part of new housing supply. The text of the Core Strategy will be amended to reflect this and the update to the SHLAA.

NCS/R25/4658/2/O
Shire Consulting

- O Green Belt boundaries must be rational and up-to-date (PPG2) and the time to make adjustments is as part of the process of 'Development Plan' review. By not doing so the Council the is not allow for a fall back position.

No Change in Response to this Objection
Small scale changes to the Green Belt will be reviewed as part of the Site Allocations.

The terminology to Green Belt will be reviewed and amended within the Core Strategy.

NCS/R25/4196/1/S
CPRE Herts

- S General support for the strategic objectives, with particular reference to the protection of the Green Belt

Support, Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4520/4/S Hertfordshire County Council - Property	S	2.22 Table 3 Bullet point 4 is supported and welcomed - that the Hertsmere LDF will help deliver the objectives of the Community Strategy by providing a planning framework for the delivery of HCC public services. It is also considered that the land use implications for all these HCC services should be thoroughly embedded in the Core Strategy and all future emerging LDDs.	Support Noted and Welcomed Noted
NCS/R25/4631/4/Y Peacock and Smith (Mr & Mrs D. Morley)	Y	The proposed Core Strategy Objectives, Settlement Hierarchy, and paragraphs 2.31, 2.35 and 2.37 are supported. It is considered that this accurately reflects the situation in Radlett and recognises that further housing development in this location is not sustainable, as it would put pressure on limited resources and facilities.	Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 2 - Housing Q5

NCS/R25//4553//C
Hertfordshire County Council

C

Summary of

As it stands, the proposed approach to housing levels set out in the consultation document is not in conformity with the East of England Plan. However, the document quite rightly recognises the Government's intention to abolish regional spatial strategies and comes to the view that a housing growth level different to that within the RSS is more appropriate.

No specific reference appears to be made to the latest set of national household projections which suggest growth of in the order of 7,000 households over the next 15 years, or 466 per annum. The upper of the household growth ranges identified within paragraphs 2.27 and 2.28 however is broadly compatible with this scale of growth. To enable consultees to make better informed responses it might also have been helpful had the different growth levels been better sourced in terms of their origins and accompanied with a short and clear explanation of their pros and cons.

No doubt consideration is being given to whether the 2009 Chelmer projections remain sufficiently up-to-date in forming part of a robust evidence base.

NCS/R25/4634/5/C
Woolf Bond Planning (for Gilston Developments)

C

Our detailed objection to the Council's proposed approach to housing need, requirement and delivery, is set out in response to questions 2, 3 and 4 above.

Council Response

Amend Policy

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

A population and housing topic paper will be published to support the Core Strategy.

No Change in Response to this Objection

Noted. The Council has responded separately in the individual responses to questions 2, 3 and 4 made by the respondent.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4641/6/C
First Place Nurseries

C

This seems generally reasonable. The only change proposed would be in the final sentence, altered to: "The need to focus the majority of development within the boundaries of existing built-up areas." This would allow small sites in appropriate locations at the edge of sustainable settlements, within the Green Belt to be developed, subject to detailed policies.

Comments Noted

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.

Furthermore, there will be an assessment of the Green Belt boundary which will be incorporated into the Site Allocations and Development Management DPD.

NCS/R25/1475/5/N
Phillips Planning Services Ltd

N

The criteria needs to be clarified as point vi of CS1 excludes many sites identified in the SHLAA, which are required to implement the Council's preferred strategic option.

No Change in Response to this Objection

The strategy has been informed by the Council SHLAA, and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in para3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate, there may have to be need to review the focus on housing growth within existing built up areas.

NCS/R25/1631/9/N
Barton Willmore Planning Partnership

N

Policy CS1 does not reflect the likely level of growth in Hertsmere. The figure referred to should be at least 3,900. This would allow flexibility to exceed this number post-revocation of the RSS, as it likely based on CLG growth projections.

Amend Policy

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

Criterion vi, which directs growth to existing built-up areas, is also objected to, as a Green Belt review should take place to identify sites capable of accommodating growth in the long term.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4427//N
CGMS Consulting

N The criteria should be expanded to refer to major developed sites and previously developed sites within the Green Belt.

No Change in Response to this Objection
Major developed sites as defined by PPG2 are allocated in the Local Plan but for more community uses than housing and as such would be inappropriate for this policy. Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites and as a result would not be appropriate for this policy.

NCS/R25/4539/6/N
Vincent & Gorbng

N The development rate per annum proposed in policy CS1 is some 15% less than in the submission draft (December 2008), following the Government's intention to abolish the RSS. The Council has adopted the standard Chelmer model in calculating household formation, and thus housing requirement. However, it is recognised in the text that there are other projections of household formation rates which are higher than Chelmer (paragraph 3.4). This extremely important decision to adopt the Chelmer model as opposed to other possibilities is not explained and justified fully enough. Simply to say that the other options are not considered robust or realistic in Hertsmere does not demonstrate why 3,200 household/dwellings is appropriate. As such we consider that Policy CS1 is unsound by reason of being unjustified (the reasons why other options for household formation and thus housing requirement were rejected have not been demonstrated)

No Change in Response to this Objection
As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

NCS/R25/4649/5/N
JCPC Ltd

N Object to the inclusion of:

(iv) accessibility should not be the key determinant of all growth. It is important that modest growth be allowed in smaller, rural settlements where this helps to maintain population levels and services and facilities. As drafted (iv) would preclude this. (iv) should therefore be deleted; (v), unless the settlement hierarchy is amended to reflect the comments noted above (Questions 1-4)

No Change in Response to this Objection

Accessibility is one of six points for consideration in the determination of planning applications, and the Parking Standards shows a certain level of accessibility in each of the four main settlements.

The proportion of development for each settlement has been identified from a variety of sources, such as urban capacity and historical trends. It is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.

Furthermore, consideration is being given to a commitment to define the boundaries of smaller villages in the Green Belt, in accordance with redevelopment of PDL and infill sites, for the future Site Allocations and Development Management DPD.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1156/1/O
Stevenage Borough Council

- O The Plan fails the test of soundness as the proposed housing target is not in conformity with the EoE Plan, part of the statutory development plan - with a roll forward of 260 homes per annum after 2021. The EoE Plan is considered to have primacy until any legislative change is enacted.

It is noted the housing target is higher than zero net migration projections, suggesting capacity to absorb any underprovision in housing elsewhere, as proposed by a number of districts in Hertfordshire.

Following the findings of the Inspector's report into the Stevenage CS, Hertsmere may wish to see its housing target amended to reflect any reduced housing provision in Stevenage.

Amend Policy

As a result of the *Gala Homes (South) Ltd v Secretary of State for Communities and Local Government* [2011] EWCACiv 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

The comments regarding the ongoing preparation of the Stevenage Core Strategy, suggesting Hertsmere could have capacity to absorb any underprovision in housing elsewhere including any reduced housing provision in Stevenage, are noted. However, it is important to emphasise that in terms of housing market areas, Hertsmere forms part of the London Commuter Belt West sub-region. Stevenage formed part of a separate Strategic Housing Market Assessment (conducted with North Herts), and it would be difficult to justify an unconnected area (in housing and proximity terms) like Hertsmere directly planning for unmet growth in Stevenage.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//1168/1/O

Home Builders Federation

- O Policy CS1 is unsound as it not justified. Proposed level of housing provision is inadequate and the housing requirement should be for increased by 600 homes to 3,900 for the period 2011 to 2026, or 260 per year (260 x 15 years = 3,900).

Amend Policy

As a result of the Cala Homes (South) Ltd) v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

This would accord with rolled-forward target from the RSS and consistent with the recent CALA Homes legal judgement which established that the Regional Strategies (RS) are still part of the development plan. It would also broadly align with evidence from the London Commuter Belt (West) SHMA 2008 which has provided evidence to suggest the need for 3,600 homes over the period 2007 to 2021.

The SHMA itself is not required to be the sole driver for determining a housing target and it is noted that PPS3 states that SHMAs should be used to set housing mixes including tenure splits and dwelling sizes. As a snapshot of housing need and demand, it provides justification for the setting of Affordable Housing targets but it is not the role of the planning system alone to meet local housing needs. The Council's Housing Needs Survey which at the time set a target of 351 affordable homes a year and it would be difficult for any local planning authority on the edge of London to meet this level of demand (which included a significant number of concealed households between the ages of 18 - 25 who were not necessarily in housing 'need' but who desired to move out of the family home).

Council's Housing Needs Survey dates is out of date and does not constitute a Strategic Housing Market Assessment in the sense defined and required by PPS3. Even so, the Housing Needs Survey identified need for 351 affordable homes a year, exceeding the RSS target of 260 net additions for the period 2001 to 2021.

A further indicator of the extent of housing need in the district is provided by the housing waiting lists. Also, the deliverability of the economic agenda of the Core Strategy is contingent upon the housing levels proposed in the RSS and these being reflected in the Core Strategies of the constituent sub-regional local authorities, including Hertsmere.

Reference has been made to the Joint Hertfordshire SHLAA but no such report has been prepared which covers the whole county. A joint SHLAA was undertaken by Dacorum, Three Rivers and Watford in 2008.

We understand that the Joint Hertfordshire SHLAA has not been revised and reviewed since published in 2008. We hope that the SHLAA will be revisited and reviewed as a matter of urgency.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1598/O Preston Bennett Partnership	○ Whilst no objection is raised to any of the stated criteria, it is strongly considered that an additional criteria is added, which specifically identifies the SHLAA as a source from which locations for development in the Site Allocations DPD are drawn from. This is suggested at Paragraph 3.5, but should be specifically referenced in the formal Policy CS1.	Comments Noted The SHLAA will be a primary piece of evidence in the production of the Site Allocations, the
NCS/R25/4429/5/O GL Hearn Property Consultants	○ Together with the comments made in Q1, policy CS1 should reflect the allocation of green belt land for housing.	No Change in Response to this Objection See response made to comments on Q1
NCS/R25/4586/5/O Bidwells on behalf of Barratt Strategic	○ In part - For the reasons provided in our response to Questions 2 and 3 above, the identified housing target of 3,200 dwellings is considered to be insufficient. Assuming that this target is amended to reflect the outcomes of a robust evidence based approach then the remaining criteria of Policy CS1 are considered to be generally appropriate. Criteria (iv) does however require that the focus of development is within the boundaries of existing built up areas. Bearing in mind that it is considered that there will be a need to release some Green Belt land in order to meet identified housing needs, criteria (iv) should be amended to reflect this. It is suggested that Criteria (iv) be amended to read as follows: "the need to focus development within the boundaries of existing built up area, or on greenfield sites specifically identified within this strategy"	No Change in Response to this Objection Paragraph 3.19 provides guidance on the Council's position if the identified housing land supply does not come forward, it states: Where housing completions during any following three year period are projected to fall below the proportion sought in each phase by 20% or more, as set out in Policy CS3, it will be necessary to review the phasing of all housing allocations and if necessary, either bring certain allocations forward or consider whether a wider review of the Strategy is required, including land presently designated as Green Belt. Such a review will need to take account of housing land supply and trends in the wider housing market. There is no identified need for housing to be delivered on greenfield sites within the Green Belt.
NCS/R25/4625/5/O PPML Consulting Ltd	○ See comments from Q4. It is not considered that there is sufficient justification for the move away from the RSS	Comments Noted (See previous comments to representation)

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4633/4/O

Deloitte Drivers Jonas (on behalf of Cemex) 2011

- Support the need to locate new development in most accessible locations. Moreover, support point (v) in Policy CS1 which identifies Radlett as appropriate location for growth in the Settlement Hierarchy. However, object to point (vi) and the need to focus development within the boundaries of existing built up areas and urges Council to adopt a flexible approach to housing growth which includes development adjoining existing settlements.

Comments Noted

Support noted in respect of development in accessible locations, including Radlett. Regarding a flexible approach to housing growth on sites adjoining existing development, the strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.

NCS/R25/4635/5/O

Rolfe Judd

- Policy CS1 should make reference to previously developed land in the Green Belt which could also achieve the additional homes required.

Amend Policy and Text

Paragraph 2.38 does identify the scope for small-scale development on infill or previously developed land within rural areas. However, it is recognised that all villages (except a part of Elstree) are washed over by Green Belt designation and in the current absence of village 'envelopes', it can be difficult to identify what constitutes a developable site. It is therefore proposed to amend Policy CS2 to clarify the scope for the small scale development opportunities referred to in para 2.38 including the consideration of identifying village envelopes in the Site Allocations DPD. The envelopes would assist in clarifying the area within which very limited infilling could take place.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4645/4/O
Turley Associates on behalf Potters Bar
Golf Course

The Council's position is that the SHLAA, which it undertook itself, co-incidentally identifies a net dwelling supply of just over 3,200 dwellings which appears to give the Council the confidence to plan for this number of houses going forward.

It is apparent from reviewing paragraph 3.4 and Table 8 of the Core Strategy that the housing target trajectory only runs up to 2026. Given that it is likely that the Core Strategy will not be adopted before 2012, we consider that housing targets should extend to 2027 at least in line with PPS3.

We question how realistic it is for the Council to rely on the possibility of accepting some house building in existing residential areas at higher densities, especially given the constraints associated with brownfield land, the existing density and character of development in the borough and the fact that PPS3 no longer requires a minimum density of 30 dph which is likely to lead to pressure on the Council to plan for development at lower densities. We would therefore suggest that 40 dwellings per hectare would be the absolute maximum achievable, commensurate with environmental constraints, and a figure that should not be relied upon in housing projection analysis.

We note that the BBC has apparently advised the Council that it may seek to dispose of the 6 hectare studio site in the centre of Borehamwood by 2015.

In our view the BBC site and/or other identified development opportunities might not emerge during the Plan period at all or at the least early enough to make a meaningful contribution to supply by 2026/7. Even if the BBC site does come forward for development, the entire 6 hectares is unlikely to be used for housing because in line with prevailing policy it is a prime location for mixed-use development, meaning that potential housing provision on

No Change in Response to this Objection

The SHLAA was produced by the Council and was produced in compliance with the Practice Guidance document. This identifies a net supply of housing within the urban area. The housing trajectory will be extended to at least 2027 as part of the annual review of the SHLAA and production of the Annual Monitoring Report.

The assumptions regarding density are unfounded typically in Hertsmere the average density is around 40dph as developments are delivered within the main settlements.

the site is unlikely to supply a significant contribution to meeting the housing target for Hertsmere as alleged by the Council.

This brownfield site is constrained by existing development in Borehamwood which could further restrict the capacity the number of dwellings in terms of available infrastructure and impact on existing property and the environment/character of the area. In reality, when non developable parts of the site and an allowance for non-residential uses is taken into account, there may be as little as 3 hectares available for housing, representing about 100-150 dwellings.

The loss of the BBC site for development serving anything other than the film and television industry would be contrary to Policy CS11 of the Core Strategy, which promotes the retention and growth of studio facilities in Borehamwood.

Furthermore, the DRCS notes that a spatial objective for Borehamwood is to protect employment and industry in the town. Paragraph 2.6 highlights the need to stimulate enterprise and remove barriers to employment in the Cowley Hill Ward of Borehamwood, which contains the BBC site and is identified as one of the most deprived areas of Hertfordshire. As the Central Hertfordshire Employment Land Review (November 2006) is now over four years old, it is questionable whether the Council is able to demonstrate through up-to-date surveys that loss of employment land in such a sustainable location will not compromise local and regional targets for employment land provision throughout the Plan period. Hence we consider that the Council is premature in referring to the BBC site as a potential site for future development in the Core Strategy.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4658/3/O Shire Consulting	O	The Council states the SHLAA indicates a potential of 3,200 dwellings, it is clearly no coincidence that this is the same amount as the reduction of the housing requirement. This is a political decision and as a result furthers the unsoundness of the Core Strategy. The assumptions make no allowance for slippage. Because a site was considered in the SHLAA process does not mean that it is 'available' under the PPS3 requirements for a 5 year supply	Amend Policy As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS. The 5 year housing Land Supply is consistent with both SHLAA guidance and paragraph 54 of PPS3. The SHLAA takes into account availability of sites, the respondent is aware the approaches in SHLAA having been a key stakeholder in the production process, and their organisation attended the SHLAA workshop.
NCS/R25/2250/5/S Radlett Society & Green Belt Association	S	The Planning Authority should aim to reduce the prevalent replacement of medium sized houses in Radlett by buildings which are too large for their plots. The target should be to achieve a reasonable mix.	Support Noted and Welcomed
NCS/R25/4041/5/S RAID Residents Against Inappropriate Development	S	Wish that development in rural settlements be subject to current Green Belt protection.	Support Noted and Welcomed Policy CS12 protects development in the Green Belt.
NCS/R25/4196/6/S CPRE Herts	S	Support for CS1, although it is preferred that there is a separate policy relating to Green Belt	Support Noted and Welcomed Policy CS12 covers the principle policy in relation to the Green Belt. Further detailed policies will be included in the Site Allocations and Development Management DPD.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4491/5/S Phillips Planning services Ltd	S	It is noted that there are available commercial sites within the village of Shenley which should be made available for housing schemes. The appropriate policies should reflect this flexibility, rather than a 'one size fits all'.	Amend Policy It is noted that Shenley is washed over by the Green Belt. It is also recognised that there is some scope to redevelop sites within some of the small villages in the Green Belt to accommodate additional housing. It is proposed that wording will be added to the Core Strategy with a commitment to be made for envelopes to be drawn around villages where it may be more acceptable for redevelopment of previously developed sites and infill development to occur.
NCS/R25/1358/6/Y DLA Town Planning Ltd	Y	This seems generally reasonable. The only change proposed would be in the final sentence, altered to: 'The need to focus the majority of development within the boundaries of existing built up areas. This would allow small sites in appropriate locations at the edge of sustainable settlements within the Green Belt to be developed, subject to detailed policies.	No Change in Response to this Objection The strategy has been informed by the Council SHLAA, and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in para3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate, there may have to be need to review the focus on housing growth within existing built up areas. There will be an assessment of the Green belt boundary which will be incorporated into the Site Allocations and Development Management DPD. Otherwise planning applications for development of Green Belt land will be dealt with on their own merits.
NCS/R25/4631/5/Y Peacock and Smith (Mr & Mrs D. Morley)	Y	The criteria in policy CS1 is supported.	Support Noted and Welcomed
NCS/R25/4632/4/Y Peacock and Smith (Mr & Mrs D. Whiting)	Y	The criteria for allocating sites in policy CS1 is supported.	Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4644/6/Y Y Generally supportive, although proposed change to final First Place Nurseries @ land R/O Cobden sentence: 'the need to focus the majority of development within the boundaries of existing built up area.'

No Change in Response to this Objection
The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.

Amend Text

The overall support is noted and welcomed. Consideration will be given to a suitably worded criteria which reflects the need to have a flexible and responsive supply of land, albeit one which is consistent with the Council's overall strategy and is informed by up to date housing land supply information.

NCS/R25/4646/5/Y Y TWNT consider the criteria set out at Policy CS1, against which new housing proposals will be assessed, to be appropriate.

However, given the concerns of TWNT regarding the tight nature of the identified supply, they consider the following additional criteria should be added:
vii) The need to ensure the provision of a flexible and responsive supply of land.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4647/5/Y
Daniel Rinsler & Co Ltd

Y

with amendment:

Criterion vi) should be amended as follows:

vi) the need to focus development within the boundaries of existing built-up areas and land to be released from the Green Belt as defined in the Core Strategy.

This amendment is considered essential to reflect previous comments in this Response Form. Specifically, the total additional dwelling provision plus annual development rate need to be increased to reverse the unjustified reduction in the Council's previously proposed housing target and annual development rate; this only being realistically achievable through the release of currently designated Green Belt.

No Change in Response to this Objection

Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites. There is not requirement both in National and Regional Policy to undertake a review of the Green Belt. The Core Strategy paragraph 2.29 states that the Housing Supply will be reviewed if strategic brownfield sites are not brought forward.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 2 - Housing Q6

Summary of

Council Response

NCS/R25/4429/6/C
GL Hearn Property Consultants

C Support for Radlett as one of the 4 main settlements in Hertsmere, due to its good transport and road links. Additional housing sites should be allocated, to help support the district centre and other infrastructure.

No Change in Response to this Objection
Support for Radlett as one of the 4 main settlements is noted. However, the allocation of additional sites is a matter to be determined through the Site Allocations DPD.

NCS/R25/46417/C
First Place Nurseries

C Bushey is considered to have the potential to provide additional housing through some small Green Belt releases. Small alterations such as proposed at the former Bushey Swimming Pool would result in a more logical and defensible boundary.

Comments Noted
The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.

NCS/R25/4646/6/N
DPP LLP

N No comments.

Furthermore, there will be an assessment of the Green Belt boundary which will be incorporated into the Site Allocations and Development Management DPD.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4041/NC
RAID Residents Against Inappropriate Development

NC

Yes,

*Strategic gap between Potters Bar and LB of Barnet and Enfield, to prevent coalescence.

*Any employment sites in a strategic gap should be subject to Green Belt Protection.

*Protection and safeguard wildlife corridors and open countryside

*Additional Protection from Hertfordshire County Council.

No Change in Response to this Objection

Policy CS12 and PPG2 provide the required protection.

NCS/R25/4345/5/O
Thames Water Property Services Ltd

O

It is considered that the Water Cycle Study Scoping Report across Watford, Dacorum, Three Rivers, St Albans and Welwyn Hatfield should form part of the evidence base for the Core Strategy, with particular reference to Maple Lodge STW. Request that policy CS3 refers to the sufficient upgrade of infrastructure works being undertaken prior to new developments taking place, to avoid sewer flooding, pollution of land and watercourses, and problems of low or no water pressure.

Amend Policy

Include reference to document.

NCS/R25/2250/6/S
Radlett Society & Green Belt Association

S

Site S6 in SHLAA, Starveacres should be retained in the Green Belt and not brought forward for development. The site forms an attractive break to the north of Watford Road with large trees and shrubbery. We support the classification of all the other SHLAA Green Belt sites around Radlett:- S7, S17, S19, S22, S26, S60, S145, S147.

Support Noted and Welcomed

NCS/R25/4491/6/S
Phillips Planning services Ltd

S

No comments

Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4586/6/S
S
Bidwells on behalf of Barratt Strategic

Considerable weight should be given to Borehamwood as a location for significant development. This is not simply because of its position within the settlement hierarchy but also because of the potential to accommodate growth in and around the settlement without significant harm to the Green Belt. The SHLAA identifies a number of sites within the Green Belt, where housing development could be directed. Nevertheless PPG2 is quite clear that when defining settlement boundaries, it is necessary to create boundaries which will endure and thus will not leave other Green Belt land vulnerable to encroachment. As far as Borehamwood is concerned, it is therefore crucial that any Green Belt release is provided in locations which represent a natural extension to the existing settlement boundary and do not give rise to any further encroachment of the Green Belt in the future. The release of SHLAA Site S2 (Land North of Barnet Lane) would be consistent with this approach, such that it would not compromise surrounding Green Belt land and would not appear incongruous with the structure of the existing settlement.

Comments Noted

Borehamwood is located at the top of the settlement hierarchy for Hertsmere as it is an important economic centre for south Hertfordshire, rail and bus links to London and other key towns, an international reputation for film and television production, along with a retail centre with a growing presence of national multiples. This why it is identified within policy CS2 for the highest proportion of growth within the Borough. The Core Strategy does not seek to deliver housing within the Green Belt. As sufficient sites within the Urban Area have been identified within the SHLAA, the SHLAA study considers urban sites as well as greenfield and Green Belt land. This does not mean the Council have accepted the principle of the release any land from the Green Belt.

NCS/R25/4633/5/S
S
Deloitte Drivers Jonas (on behalf of Cemex) 2011

Support continued role of Radlett as focus of local shopping, employment and service provision. Urges Council to allocate housing at Radlett to create balanced sustainable community. Cemex's site is an appropriate location as it is not an island site and lies adjacent to developed housing land.

Support, Noted and Welcomed

Support noted although the identification of individual sites for development will be considered separately through the Site Allocations DPD.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4635/6/S
Rolf Judd

S

Locally, in Bushey, consideration should be given to Development proposals which provides significant local improvements and bring into use land that contains long term vacant land/previously developed land/derelict buildings.

The former West Herts College Annex site in Bushey, currently contains a number of redundant and unsympathetic former educational buildings on what constitutes previously developed land within a 'Green Belt Safeguarded Land for Housing' site.

Removal of these buildings and a more contained form of residential development would enable the rest of the site to be provided as publicly accessible open space, forming an extension to the Fishers Fields Nature Reserve and a strong defensible boundary to the Green Belt.

No Change in Response to this Objection

The comments are noted and clearly, the Core Strategy does seek to prioritise previously developed land for development, in Bushey and in other settlements across the Borough. However, individual allocations will be considered separately in a Site Allocations DPD.

NCS/R25/1358/7/Y
DLA Town Planning Ltd

Y

Radlett is considered to have the capacity to provide some additional housing through some small Green Belt releases. Small alterations which result in a more logical boundary would provide the required housing without compromising the five purposes of the Green Belt and without a detrimental impact on community facilities.

Alterations of limited size such as that proposed on land rear of The Warren would provide additional housing and result in a more logical, and therefore defensible, boundary to the benefit of the Green Belt into the future.

No Change in Response to this Objection

The strategy has been informed by the Council SHLAA, and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in para 3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate, there may have to be need to review the focus on housing growth within existing built up areas.

Furthermore, there will be an assessment of the Green belt boundary which will be incorporated into the Site Allocations and Development Management DPD. Otherwise planning applications for development of Green Belt land will be dealt with on their own merits.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4631/6/Y Peacock and Smith (Mr & Mrs D. Morley)	Y	Radlett's position in the settlement hierarchy is considered to accurately represent the town, in relation to its ability to accommodate new housing without allocating Green Belt sites.	Support Noted and Welcomed
NCS/R25/4632/6/Y Peacock and Smith (Mr & Mrs D. Whiting)	Y	Radlett's position in the settlement hierarchy is considered to accurately represent the town, in relation to its ability to accommodate new housing without allocating Green Belt sites.	Support Noted and Welcomed
NCS/R25/4644/7/Y First Place Nurseries @ land R/O Cobden Hill	Y	It is considered that Radlett has scope to accommodate small GB releases for housing development, such as the land at the rear of Cobden Hill	Comments Noted Site allocations will be considered for the assessment for that part of the LDF. The Core Strategy has also been informed by the Council's SHLAA, which does not specifically seek to release Green Belt land in order to meet the 15 year housing target set.
NCS/R25/4647/6/Y Daniel Rinsler & Co Ltd	Y	On the basis that certain Green Belt land is in close proximity to Elstree & Borehamwood train station, sites on such land which are the most suitable, available and capable of being implemented for residential development will enable the most sustainable, managed expansion of the built-up area of Borehamwood.	No Change in Response to this Objection Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites.
NCS/R25/4649/6/Y JCPC Ltd	Y	As outlined, the strategy should be flexible to allow modest growth in smaller settlements.	Comments Noted Consideration is being given to a commitment to define the boundaries of smaller villages in the Green Belt, in accordance with redevelopment of PDL and infill sites, for the future Site Allocations and Development Management DPD. It is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 2 - Housing Q7

	<u>Summary of</u>	<u>Council Response</u>
NCS/R25/4041/7/C RAID Residents Against Inappropriate Development	C Para 3.5, Development in rural settlements subject to current Green Belt Protection should be specified.	No Change In Response to this Objection The paragraph relates to the delivery of housing requirements. Any rural developments would have to be within the parameters of PPG2 and other Core Strategy Policies.
NCS/R25/4492/3/C Environment Agency	C A risk-based approach in terms of Flood Zones should also be used when determining the suitability of land for housing development in line with Planning Policy Statement 25: Development and Flood Risk.	Comments Noted Noted, although policy CS1 references the requirement for new housing development to comply with environment policies including CS15. Add the words 'in a risk-based approach' to 'but to promote such development in one of the higher flood risk zones' sentence in para 5.29

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4520/17/C C
Hertfordshire County Council - Property

The Core Strategy consultation document sets out that you are planning to facilitate the construction of 214 homes per year from 2011 to 2026. As a crude average across Hertfordshire, Hertfordshire Property has found that 1 form of entry (FE) of primary need is generated by 850 houses. In Hertsmere the total of 3,200 homes to 2026 generates a requirement for 3.75 forms of entry at primary level to 2026, assuming development takes place in appropriate concentrations to be served by a single primary. Due to the uncertainty of the tenure, phasing and location of much of the proposed housing, a 7.5% margin figure (mid point between 5-10%) seems appropriate in the calculations of need arising from the additional development proposed in the Core Strategy consultation document. This covers parental choice and year on year volatility.

Once further housing trajectory information is made available by the LPA, HCC would be happy to further consider the capacity of the areas used by CSF for school organisational purposes, the Primary Planning Areas (PPAs), to accommodate the child yield that could arise from development. This will also help to confirm the extent of additional primary school capacity that it would be prudent to plan for in the plan period to 2026, and depending upon where the housing development is located, will inform the extent to which Green Belt education allocations may be required to ensure there is sufficient capacity within the borough of Hertsmere for the full plan period to 2026.

The Core Strategy Consultation Document identifies strategic housing sites for 591 of the planned 3,200 homes, which effectively represents approximately three years of housing land. There are 968 allocated and committed sites, which together with the identified SHLAA sites equates to 1558 dwellings whose location is currently known. Additional Strategic Housing Locations to cover the remaining development plan period to 2026 have not been identified within this document. This equates to

Comments Noted

The provision of 213 dwellings per annum is set out in the Council's SHLAA and table 8 of the Core Strategy. Table 8 demonstrates that the Council has a housing land supply of 6.2 years. The table is sourced from the Council's SHLAA it demonstrates the available sites for housing delivery. Detailed trajectories are provided in both the SHLAA and AMR. This information can be easily provided to HCC.

As a result of the *Gala Homes (South) Ltd v Secretary of State for Communities and Local Government* [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

1642 dwellings whose location is not known. While the consultation identifies a policy of urban concentration, the consultation is not accompanied by a comprehensive housing trajectory or housing land supply paper covering the plan period to 2026. Without this information and information regarding tenure and phasing, planning for future educational provision within the District is very difficult. Further information relating to the housing trajectory is essential evidence in making informed judgments about the level, extent and location of new education allocations that it would be prudent to plan for to 2026.

NCS/R25//4641/8/C
First Place Nurseries

C

The planned distribution of housing across the borough is considered generally acceptable. However, it should be noted that the release of small sites from the Green Belt may provide some housing and indeed may have benefits, including a more logical boundary.

Comments Noted

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.

Furthermore, there will be an assessment of the Green Belt boundary which will be incorporated into the Site Allocations and Development Management DPD. Otherwise planning applications for development of Green Belt land will be dealt with on their own merits.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1475/6/N Phillips Planning Services Ltd	N	Plans should include sites that are on the edge of towns and not in the Green Belt.	No Change in Response to this Objection The strategy has been informed by the Council SHLAA, and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in para3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate, there may have to be need to review the focus on housing growth within existing built up areas.
NCS/R25/46477/N Daniel Rinsler & Co Ltd	N	It is considered that the Council's proposed strategy, relying on land within the existing built-up areas of the Borough and exclusion of residential development from the currently designated Green Belt is unjustified. The Core Strategy should recognise that Green belt land in close proximity to Elstree & Borehamwood train station, that is suitable, available and capable of being implemented for residential development will enable the most sustainable, managed expansion of the built-up area of Borehamwood; the town where new residential development is being prioritised in the Borough.	No Change in Response to this Objection Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites. The SHLAA, illustrates the potential supply within Hertsmere.
NCS/R25/46497/N JCPC Ltd	N	As worded the Policy is not sufficiently flexible. The Policy should be amended to allow some modest growth in smaller settlements.	Comments Noted Consideration is being given to a commitment to define the boundaries of smaller villages in the Green Belt, in accordance with redevelopment of PDL and infill sites, for the future Site Allocations and Development Management DPD. It is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/44297/O GL Hearn Property Consultants	☐	Reference to response to Q1-5 above	Comments Noted
NCS/R25/44917/O Phillips Planning services Ltd	☐	Reference to comment made to Q1-5	Comments Noted (See previous comments)
NCS/R25/45867/O Bidwells on behalf of Barratt Strategic	☐	It is agreed that development should be focused upon the main settlements of Borehamwood, Potters Bar and Bushey and that the greatest proportion of houses (60%) should be directed to Borehamwood. Nonetheless, as discussed in detail within our response to Question 2, it is considered that there is a fine margin between the amount of urban land identified by the SHLAA and the number of houses required to meet the RDCS target. Indeed, if targets are increased, as we consider they should be (also see our response to Question 2), available capacity on urban sites will not be insufficient to deliver the necessary number of dwellings. The distribution of housing across the borough should therefore take full account of the availability and appropriateness of land which lies outside of the settlement boundary. Our assessment of the information available would suggest that Borehamwood also offers the most appropriate location for the Green Belt release.	Comments Noted The location of development identified within the Core Strategy is consistent with the aims of PPS3, which seeks to direct land to previously developed land and within urban areas. The approach taken within the Core Strategy is an appropriate to accommodate the identified housing number.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4625/6/O
PPML Consulting Ltd

- O It is considered that there is too much reliance on the delivery of dwellings in Borehamwood, and it is not considered that the Council can rely on large sites in Elstree Way being available. It is thought that the percentage targets for settlements should be removed to allow flexibility. It is also thought that there is significant reliance on the delivery of windfall sites, which is not in compliance with PPS3.

No Change in Response to this Objection

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

NCS/R25/46357/O
Rolfe Judd

- O Broadly support the Councils priority to locate major residential development within Bushey. However this policy is reliant upon Windfall developments to meet housing targets and appears overly optimistic, particularly in the current economic climate.

This brings into focus an increased likelihood of selective Green Belt release in the form of Safeguarded Land for housing such as the Former West Herts College Annex Site.

No Change in Response to this Objection

The support for the priority of locating major residential development within Bushey is noted. However, the comment expressed that the policy is reliant upon windfall developments to meet housing targets is not considered to be accurate. The SHLAA relies on identified sites within years 1-10, in line with government guidance, and so it is unclear how this can be overly optimistic with regard to the current economic climate. Urban broad locations from year 11 take account of the sites which can reasonably be expected to come forward within urban areas and is based on a clear methodology for projecting the number of homes which might come forward from this source. The policy is not considered to be reliant on windfall developments although any sites to be considered for development will be done so through the Site Allocations DPD.

It is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4637/5/O
Sworders Agricultural

- O We do not consider it appropriate to limit housing in each settlement to a specific percentage of the total as is proposed in policy CS2. We do not consider this is appropriate given the affordability pressures in the district as clearly highlighted in the SHMA and the consequent pressure to deliver housing. Paragraph 52 of PPS3 states that the Government's objective is to ensure that the planning system delivers a flexible, responsive supply of land. Restricting supply land in the manner proposed by policy CS2 would not assist in achieving this objective.

Amend Policy

The proposed proportions are based on the Council's Strategic Housing Land Availability Assessment. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4642/1/O

Martin Robeson Planning Practice

O

Whilst the availability of sites within built up areas is a factor to be considered when determining the distribution of housing, it would not be appropriate to use this as the only basis for determining the number of houses that should be delivered in each of the settlements. Availability of employment, transportation and retail and social facilities should form an important input in order to ensure that the strategy for delivering housing results in the creation of sustainable communities. Paragraph 2.26 describes Borehamwood and Potters Bar as the two largest centres of employment. Yet Potters Bar is expected to accommodate only a very small percentage of future housing growth. Similarly paragraph 8.3 describes Borehamwood and Potters Bar as the preferred location for the development of any new retail, commercial or leisure development. The approach to the distribution of new housing is at odds with the strategy for the delivery of facilities needed by residents and the availability of employment.

Comments Noted

The level of available sites guides the housing levels for Potters Bar, and it is acknowledged that Potters Bar is a destination for employment and retail. However, the secondary schools within Potters Bar are at capacity where there is capacity within Borehamwood and Bushey. Within Borehamwood there is a greater level of infrastructure and available sites to meet the housing requirements identified in CS1.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/46457/O
Turley Associates on behalf of Potters Bar Golf Course

- O The Council's housing figures are questionnaire on the following basis:
- they are significantly (36%) below the EEP figures, which remain valid unless and until the EEP is revoked;
 - Even on the Council's own figures there is insufficient flexibility to adequately plan for additional housing as the Council's SHLAA only identifies the same number of dwellings that it considers are necessary over the Plan period;
 - The DRCS is conceived on the basis that the number of households is equivalent to the number of dwellings which is not the case;
 - Having regard to 2 above the strategy is heavily reliant on the bringing forward of development proposals at BBC Elstree and Elstree Way, neither of which are in any sense certain, either in a general sense, or in respect of their timing;
 - The Council's SHLAA is based on previous PPS3 guidance and more recent changes may well have the effect of requiring the Council to identify additional land to meet its housing targets.

No Change in Response to this Objection
As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

Details of the Elstree Way Masterplan will be published shortly, it is the Council's intention that development of this area will be brought forward as an Area Action Plan DPD.

With respect to the BBC site the Council is working with the BBC to ensure that it is kept up to date with any developments and to ensure that the Housing Land Supply is robust. However, representations on behalf of the BBC have been received confirming the possibility of this site becoming available for redevelopment and on that basis, it is not unreasonable to include such a site in the SHLAA.

Average densities were not used within the SHLAA, as a result the impact in the Changes to PPS3 were minimal, and the SHLAA was reviewed in light of these changes prior to publication.

Where a site is within or immediately adjacent to an urban area, the prevailing density was taken from the survey of Typical Urban Areas (TUAs) undertaken for the 2006 UCS. Whilst it is acknowledged that these TUAs were determined in 2006, it is the Council's view that they represent a minimum typical density, as housing development has been focussed almost entirely on urban areas over the intervening three years. Nevertheless, the Council's emerging AMR for 2010/11 does not suggest any significant change in overall densities. For sites outside or not adjoining an urban area, a low density has been assumed given the rural nature of these sites. The fact that the Council prepared the SHLAA itself has been highlighted by the respondent but this is

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

common practice and it must be emphasised that the methodology for the SHLAA and the SHLAA report itself were subject to considerable consultation with a significant number of stakeholders, including developers and consultants.

NCS/R25/1598/5/S Preston Bennett Partnership	S	Whilst the broad approach to housing distribution set out in Policy CS2 is broadly endorsed, being based on the settlement hierarchy, it is clearly appropriate that the percentage figures for distribution are indicative and subject to review. It is important that sites that are otherwise appropriate for housing development to come forward are not automatically discounted if they would disrupt the stated balance. In line with this, Policy CS3 is supported.	Comments Noted Policy CS2 provides indicative guidelines on the location of development in urban areas to 2026, which reflects the distribution of land supply in the SHLAA. As a result these will be monitored within the Annual Monitoring Report.
NCS/R25/1631/10/S Barton Willmore Planning Partnership	S	The planned distribution of housing with 25% in Bushey is supported.	Support Noted and Welcomed Noted
NCS/R25/2250/7/S Radlett Society & Green Belt Association	S	(no comment)	Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4196/7/S
CPRE Herts

S

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).

No Change in Response to this Objection

This figure has partly come about from the Council's SHLAA, which takes account of many sites in the borough and several came forward within Radlett. It is considered that 10% is a small proportion of the Boroughs requirements and is to be spread over the next 15 years. The 10% of the overall provision also takes about of historical trends and existing commitments for housing delivery in the town. Notwithstanding this there is a provision in policy CSE which allows for the reassessment and review of these figures given that the required sites and housing numbers do not come forward.

NCS/R25/4633/6/S
Deloitte Drivers Jonas (on behalf of Cemex) 2011

S

Support planned distribution of housing across the borough, including dwellings at Radlett, an existing settlement capable of providing key services and appropriate for further housing growth.

Support Noted and Welcomed

NCS/R25/1358/8/Y
DLA Town Planning Ltd

Y

The planned distribution of housing across the borough is considered to be generally acceptable. However, it should be noted that the release of small sites from the Green Belt may provide some housing and indeed have benefits, including a more logical and defensible boundary.

Comments Noted

The strategy has been informed by the Council SHLAA, and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in para3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate, there may have to be need to review the focus on housing growth within existing built up areas.

Furthermore, there will be an assessment of the Green belt boundary which will be incorporated into the Site Allocations and Development Management DPD. Otherwise planning applications for development of Green Belt land will be dealt with on their own merits.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4539/7/Y Vincent & Gorbings	Y	It would seem appropriate that the availability of brownfield sites in particular settlements is a key factor in deciding where development should go. We have expressed concerns in comments to previous versions of the Core Strategy about the percentage figures of development allowable in different settlements. In the submission draft (December 2008) the figure of 50% development in Borehamwood appeared to be an arbitrary one, and there was no discussion of the methodology for coming up with these figures. The current Core Strategy at least gives some indication of the reasoning behind them, where it states that they are based on 'existing commitments and identified sites in the SHLAA' (3.13). Whilst we support the increase in the proportion of development being sought for Borehamwood being increased to 60%, these figures should be not considered absolute ceilings.	Support Noted and Welcomed The percentages are not ceiling paragraph 3.13 states that these are indicative.
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NCS/R25/4631/7/Y Peacock and Smith (Mr & Mrs D. Morley)	Y	(no comments)	Support Noted and Welcomed
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NCS/R25/4632/5/Y Peacock and Smith (Mr & Mrs D. Whiting)	Y	(no comments)	Support Noted and Welcomed
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Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4644/8/Y First Place Nurseries @ land R/O Cobden GB should be considered. Hill	Y Generally in agreement, although small releases from the	Comments Noted Support noted. The strategy has been informed by the Council SHLAA, and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in para3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate, there may have to be need to review the focus on housing growth within existing built up areas.
NCS/R25/4646/7/Y DPP LLP	Y Generally support subject to the comments already supplied in response to questions 2 and 4.	Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 2 - Housing Q8

Summary of

NCS/R25/1631/11/C
Barton Willmore Planning Partnership

C
Policy CS4 should recognise within the text that the 35% housing target should only be applied where this would not threaten the viability of an otherwise suitable and sustainable site. The policy should allow for assessments of viability to underpin and requests for lower levels of affordable housing. Para. 3.25 should be clarified to identify the affordable housing viability study.

Para. 3.22 shows that there is a substantial need for affordable housing. This backs the view that there is also a need for at least the level of housing required by the RSS target.

It is not thought likely that the 35% affordable housing requirement would be deliverable as the Core Strategy aims for all housing to be accommodated on brownfield sites, which would make costs higher. This again points to the need for a Green Belt review.

Para 3.28 should have the figure of 800 dwellings as the maximum target for monitoring purposes. The proposed figure of 975 should not be included as this would have to be based partly on windfall. Given the above, Policy CS4 is objected to.

NCS/R25/2392/2/C
Mr and Mrs R Gale

C

It is considered that the affordable housing threshold is high, and a lower threshold may be more appropriate, also that affordable housing should be allocated to 'local people'.

Council Response

No Change in Response to this Objection

The affordable housing requirement is based on the Development Economics Study. This illustrates that the requirements are affordable both on large and small scale developments. The study considers different sub areas of the borough and illustrates that the policy is affordable. The Core Strategy (para 3.31) and Affordable Housing SPD allow for the viability of schemes to be tested in specific circumstances.

No Change in Response to this Objection

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/44521/C
Mike Hastings Design

C

Resubmission of SHLAA representation for 'land off hartspring Lane' to the rear of Winfield Park. Reinforce the applicants support for policy CS4 and the provision of affordable housing, subject to the release from Green Belt land.

Comments Noted

The SHLAA was published in 2010, and revised version will be published to support the next iteration of the Core Strategy. The results will feed into the revised Core Strategy. The site was considered as part of the SHLAA, and will also be considered as part of the assessment for the Site Allocations and Development Management DPD. The Core Strategy has been informed by the Council's SHLAA and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

NCS/R25/13568/9/N
DLA Town Planning Ltd

N

The requirements set out in respect of affordable housing are too prescriptive and may prevent small sites coming forward due to viability issues. A sliding scale as used by other Authorities could be used for medium sized sites.

No Change in Response to this Objection

The affordable housing requirement is based on the Development Economics Study. This illustrates that the requirements are affordable both on large and small scale developments. The study considers different sub areas of the borough and illustrates that the policy is affordable. The study does suggest that an even smaller threshold is affordable within the Borough, however, the Council felt it would be prudent to set the threshold at 10 units. The Affordable Housing SPD and Core Strategy do include options for viability to be tested where appropriate.

NCS/R25/4539/8/A/
Vincent & Gorbings

N

On sites where there are major contamination issues (such as gas works sites) requirement for the full amount of affordable housing may cause a site to become unviable. These are often the sites which are in most need of re-use due to their contaminated state, and are often in central, sustainable locations. Government guidance in PPS3 supports the re-use of previously developed land. Re-development of such land is the government's priority, and in particular 'derelict sites and buildings' (PPS3, 36). We support the inclusion of the phrase, 'where contaminated land is being developed...', in the second sentence of paragraph 3.31 (paragraph 3.36 in submission document). In this paragraph the Council recognises that there are circumstances where providing the full affordable housing provision may make a site unviable. However, we consider that the policy itself should make clear that there will be circumstances where it may be unviable to provide the full amount of affordable housing. The policy should state that in order to make the best use of previously developed land, the Council will take a flexible approach to the provision of affordable housing on contaminated sites. This would clarify the Council's position on this matter and would be consistent with PPS3. Our comments are particularly pertinent now as the requirement for affordable housing has been increased from 25% in the preferred options document to 35% in the submission document. As such we consider that policy CS4 is unsound by reason of inconsistency with national policy (PPS3), and lack of effectiveness (the policy as written is inflexible and jeopardises the delivery of housing on previously developed land by lack of flexibility).

No Change in Response to this Objection

The affordable housing requirement is based on the Development Economics Study. This illustrates that the requirements are affordable both on large and small scale developments. The study considers different sub areas of the borough and illustrates that the policy is affordable. The Core Strategy (para 3.31) and Affordable Housing SPD allow for the viability of schemes to be tested in specific circumstances.

Given that the starting point for all development is to provide the maximum affordable housing, unless viability issues can be appropriately justified it would be inappropriate to amend the policy.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4644/9/N N It is considered that this policy is too prescriptive and may prevent small sites coming forward due to viability issues. First Place Nurseries @ land R/O Cobden Hill It is suggested that a 'sliding scale' could be used for medium sized sites.

No Change in Response to this Objection

The affordable housing requirement is based on the Development Economics Study. This illustrates that the requirements are affordable both on large and small scale developments. The study considers different sub areas of the borough and illustrates that the policy is affordable. The study does suggest that an even smaller threshold is affordable within the Borough, however, the Council felt it would be prudent to set the threshold at 10 units. The Affordable Housing SPD and Core Strategy do include options for viability to be tested where appropriate.

NCS/R25/4646/8/N
DPP LLP

N

The RCS proposes to reduce thresholds for developments that are required to provide affordable housing to 10 units, thus placing additional strain on the viability of housing developments at a time of considerable financial constraint.

When taken alongside the reduced housing target identified at paras 2.27 and 2.28, the proposed changes are such that our client considers that it is extremely unlikely that they will have a positive impact upon affordable housing completions during the Plan period, let alone provide a year on year increase. The changes will inevitably impact upon the viability of a number of future schemes, constraining the ability of the market to reach the required annual affordable housing target identified in the RCS.

In pursuing such an approach the Council at this time shows little regard for the difficulties that developers are currently facing, the importance of the development industry to the economic recovery and the absence of grant funding. What is needed is a more flexible approach that enables the burden to be spread across a number of developments. Such an approach is however dependent upon a higher housing target. The decision by the Council to opt for a reduced target simply means the burden will be placed on the shoulders of a few.

Therefore, in addition to adopting a more 'pro-growth' housing target as identified in our response to question 2, it is recommended that the threshold for the provision of affordable housing is retained at 15 dwellings to provide greater scope for developments to remain viable and to ensure a more consistent and manageable provision of affordable housing units throughout the Plan period.

No Change in Response to this Objection

The Hertsmere Development Economic Study tested a range of scenarios and concluded that a threshold of 10 units (or fewer), without grant, was achievable. The Council will review its housing target to ensure that this in general conformity of the RSS, in light of the Cala Homes Appeal Decisions but it is not considered that a housing target which falls short of that which the respondent may be seeking, would lead to a more consistent and manageable provision of Affordable Housing.

The Council is in the process of updating its Affordable Housing SPD and whilst the clear priority of the Council is for Affordable Housing to be delivered on site, there will be continue to be limited scope for off-site provision/appropriate payments in lieu to be agreed in exceptional circumstances.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4649/8/N JCPC Ltd	N	The requirement for affordable housing should be 'triggered' at the threshold of 15 units.
NCS/R25/4491/8/NC Phillips Planning services Ltd	NC	No comments
NCS/R25/1156/2/O Stevenage Borough Council	O	The housing target will not be sufficient to meet the affordable housing requirements identified by the SHMA.

No Change in Response to this Objection

The affordable housing requirement is based on the Development Economics Study. This illustrates that the requirements are affordable both on large and small scale developments. The study considers different sub areas of the borough and illustrates that the policy is affordable. The study does suggest that an even smaller threshold (potentially 2 units) is affordable within the Borough, however, the Council felt it would be prudent to set the threshold at 10 units. Given the potential delivery from smaller sites.

No Change in Response to this Objection

The housing target is derived from the Chelmer projections and is considered to represent an appropriate level of housing to meet anticipated population and household growth. The SHMA takes account of wider housing demand and is based on the RSS housing target; however, given that Affordable Housing can only constitute a proportion of overall housing supply in the borough, it is unrealistic to assume that the Core Strategy should deliver 2,700 intermediate homes and 500 social rented homes over 15 years as per the SHMA.

As a result of the *Gala Homes (South) Ltd v Secretary of State for Communities and Local Government* [2011] EWCACiv 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1168/2/O

Home Builders Federation

O

The policy requiring 35% affordable housing on schemes consisting of 10 or more units is unsound as it is not justified and it is ineffective.

Moving forwards, and into the foreseeable future, very few schemes will be eligible for HCA subsidy. No HCA grant will be available for s106 developments.

The Hertsmere Development Economic Study is flawed in this fundamental respect. It assumes grant will continue to be forthcoming (paragraph 3.18) but it will not, and especially not at the high levels that have informed the calculations in the report.

The viability report, for the purposes of modelling, also assumes that Code Level 3 will apply for the plan period, when all homes will be required to be built to the equivalent for Code Level 6 for energy efficiency from 2016 onwards.

No Change in Response to this Objection

The Council disagrees that the policy is not justified and that it is ineffective and no justification for this view has been provided by the respondent. The Affordable Housing policy was tested through the Development Economics Study and was found to be viable across the borough. The Study included a number of scenarios, including one where no grant was available.

Regarding Code Level 6 (CL6), it is clearly difficult to cost this code level at this moment in time but sites in Hertsmere are profitable for the delivery of Affordable Housing (down to 1 unit) and it is assumed that by the time of CL6 becomes mandatory, there will be some economies of scale within the development industry to help secure CL6 in a more cost effective manner.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1210/3/O
Shire Consulting

- O There is already an estimated shortfall of 351 affordable housing units which clearly cannot be met when the annual housing requirement is to be reduced by 214. The low supply of housing will increase house prices. The Council should understand that the District is a popular place to live. Seeking contributions for affordable housing from market housing can further cause price inflation as a buoyant market can sustain the necessary price.

No Change in Response to this Objection

The need to provide affordable housing is great within Hertsmere, however, within the current climate, it's impossible for all the need to be met within Hertsmere due to constraints. The need to accommodate this growth on greenfield sites would detrimentally affect the character of the Borough which is characterised by the Green Belt, high quality landscaping and well-defined settlement pattern of small towns and villages. The provision of further housing would be at the expense of employment land if unmanaged, which would exacerbate the existing high levels of out-commuting by residents of the Borough. The existing infrastructure of the Borough would not be able to support any additional housing development. In terms of transportation, the south west Herts area is the most congested part of the region. With no major transport infrastructure schemes proposed in the area, the situation will only worsen. Additional dwellings to meet the entire need will also put pressure on existing infrastructure. The proximity of the Borough to London and the South-East region, and growth associated with these areas put further pressure on the infrastructure in the Borough. The affordable housing policy will allow for the provision on new affordable housing units.

As a result of the *Gala Homes (South) Ltd v Secretary of State for Communities and Local Government* [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS. The level housing including affordable was considered at the EIP.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1598/6/O Preston Bennett Partnership	O	Whilst it is acknowledged that there is a need for increased provision of affordable housing within the borough, this should not be a consideration that constrains development. Policy CS2 has the potential to do this, and is not supported in its current form. The current threshold of 15 units or more or sites of 0.5 hectares or more should remain as the automatic 'trigger' for affordable housing as dropping the threshold to 10 units or 0.3 ha in Hertsmere would stifle appropriate growth, even with the proposed amendment that sites of 10 - 15 units provide intermediate housing only as their affordable element. It would also have the effect of significantly reducing land values on sites of all scales, in an economic climate where these are already under pressure.	Comments Noted Paragraph 3.13 of the Core Strategy states that there are recognised to be a limited number of situations where it may be unviable or physically or logistically impractical to provide such a high proportion of Affordable Housing. This may be the case on some smaller or remote sites, where contaminated land is being developed or in locations where the development density and residual values are restricted. There is therefore considered to be a need for limited flexibility to enable certain sites to provide a slightly reduced level of Affordable Housing where there is evidence, in exceptional circumstances, to demonstrate: 1. that it would be economically unviable to provide 35% of housing on the site in the form of Affordable Housing; or 2. that the requirement to provide a reasonable and practicable mix of unit sizes across a site would necessitate a reduction in the number of affordable homes.
It is noted that a viability study has been carried out, which has concluded that 35% affordable housing on qualifying sites is not unreasonable. It is accepted that, in most cases, this could be appropriate. However, particular concern is raised in respect of the comment included within the text of Policy CS4, which states: A lower level of affordable housing will not be acceptable unless the Council agrees that its Affordable Housing objectives are being met. If a development would become unfeasible if it provides the policy requirement of affordable housing, a lower figure should be able to be negotiated, backed up with feasibility evidence. The wording of Policy CS4 should be changed to reflect this.			

NCS/R25/2250/8/O Radlett Society & Green Belt Association	O	We cannot see why a lower threshold of, say, 5 units would not be appropriate provided they were of interesting and attractive design.	No Change in Response to this Objection
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Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4429/8/O
GL Hearn Property Consultants

- ☐ There should be flexibility in the wording of the policy, which is considered to be overly restrictive for housing tenures and threshold. Considered to be contrary to national policy. Suggested form of wording for the policy in the representation.

No Change in Response to this Objection

NCS/R25/4520/15/O
Hertfordshire County Council - Property

- ☐ Policy CS4 does not include the provision of affordable housing for people with learning, physical/mental disabilities or the elderly.

Amend Text

Specialist housing for the elderly will be provided in sustainable locations via specific schemes for elderly accommodation (e.g. Extra Care and Sheltered Accommodation), and through the requirement in Policy CS1 that an appropriate proportion of new residential units be designed specifically as accommodation suitable for the elderly.

Both frail elderly and special needs housing can constitute affordable housing (where provision is socially rented or intermediate rented) and these needs should be included in the target for the Borough, not as an additional requirement. Evidence of the demand and need for these two particular types of housing should be prepared in partnership with Health and Community Services (HCS) of the County Council on an ongoing basis.

The Core Strategy needs to identify both existing and potential need and clarify how accommodation might be delivered through new housing development.

NCS/R25/4625/7/O
PPML Consulting Ltd

- ☐ 'A level of 35% would be consistent with the RSS target. We would support a threshold level of 25 units or more.'

No Change in Response to this Objection

The affordable housing requirement is based on the Development Economics Study. This illustrates that the requirements are affordable both on large and small scale developments. The study considers different sub areas of the borough and illustrates that the policy is affordable. The study illustrates the affordable housing threshold is achievable across the borough on most development schemes.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4634/6/O

Woolf Bond Planning (for Gilston Developments)

- O We generally support the Council's strategy which seeks to reduce the threshold for qualifying sites from 25 dwellings or more to 10 dwellings or more. However, remain of the view that providing for housing numbers on previously developed sites, within the urban area, is not necessarily meeting identified housing needs in terms of mix.

No Change in Response to this Objection

The support for reduction in the qualifying threshold is noted but in respect of the view that the strategy would not meet identified housing in terms of mix. Policy CS7 seeks a mix of unit sizes on schemes of more than 10 units whilst the scope of the rural exceptions policy - which could cover sites beyond PDL in the urban area - has been expanded to include all rural settlements, rather than just Shenley and Elstree at present.

NCS/R25/4635/8/O

Rolfe Judd

- O Object to the inclusion of a provision of 35% affordable housing on sites of 10 units or more. This policy should be made more flexible, with the percentage of affordable housing provided, being based on individual site economic viability to deliver a percentage of affordable housing.

No Change in Response to this Objection

NCS/R25/4641/9/O

First Place Nurseries

- O The requirements of the affordable housing policy are too prescriptive and could prevent small sites being developed due to viability issues. A sliding scale used by other Authorities could be used for medium sized sites to provide affordable housing whilst ensuring that developments remain viable.

No Change in Response to this Objection

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4645/8/O
Turley Associates on behalf Potters Bar
Golf Course

O The Core Strategy reveals that the Council is also failing to meet its affordable housing targets (paragraph 3.30). The Core Strategy notes that the identified need for affordable provision is 351 units per annum (Housing Needs Survey 2005). Even if all of the new units being provided per annum (228 average: 2001-2007) were allocated for affordable provision, there would still be a deficit in provision of approximately one third. It is clearly easier to provide for significant numbers of affordable housing on greenfield sites where constraints are less and viability greater. At time when market conditions are less certain, the viability of smaller, constrained brownfield sites is likely to be even more marginal than it may be currently. Self-evidently, these issues do not exist to the same degree on larger greenfield sites which are more able to produce affordable housing in greater numbers and more quickly.

No Change in Response to this Objection

The need to provide affordable housing is great within Hertsmere, however, within the current climate, it is impossible for all the need to be met within Hertsmere due to constraints. The need to accommodate this growth on greenfield sites would detrimentally affect the character of the Borough which is characterised by the Green Belt, high quality landscaping and well-defined settlement pattern of small towns and villages. The provision of further housing would be at the expense of employment land if unmanaged, which would exacerbate the existing high levels of out-commuting by residents of the Borough. The existing infrastructure of the Borough would not be able to support any additional housing development. In terms of transportation, the south west Herts area is the most congested part of the region. With no major transport infrastructure schemes proposed in the area, the situation will only worsen. Additional dwellings to meet the entire need will also put pressure on existing infrastructure. The proximity of the Borough to London and the South-East region, and growth associated with these areas put further pressure on the infrastructure in the Borough. The affordable housing policy will allow for the provision on new affordable housing units.

As a result of the *Gala Homes (South) Ltd v Secretary of State for Communities and Local Government* [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS. The level housing including affordable was considered at the EIP.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4651/5/O

The Planning Bureau Limited

- O Clarity should be provided over the viability of a development and how this will be the determining factor as to when a scheme has sufficient value generated as to be able to deliver affordable housing. The wider community and housing need benefits of providing retirement housing or assisted living close care should be given greater weight and where appropriate should be balanced against the need to provide affordable housing. Greater flexibility in the policy should be included.

No Change in Response to this Objection

The affordable housing requirement is based on the Development Economics Study. This illustrates that the requirements are affordable both on large and small scale developments. The study considers different sub areas of the borough and illustrates that the policy is affordable. The Core Strategy (para 3.31) and Affordable Housing SPD allow for the viability of schemes to be tested in specific circumstances. Each proposed development will be dealt with on a case-by-case basis and any submitted information relating to affordable housing and viability would be considered on its merits.

The benefits associated with the provision of housing for older people are also capable of being a material consideration and, if appropriate, would also be taken into consideration. Notwithstanding this, it is not thought that a separate policy in relation to this issue is necessary.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4658/8/O
Shire Consulting

- O There is already an estimated shortfall of 351 affordable housing units which clearly cannot be met when the annual housing requirement is to be reduced by 214. The low supply of housing will increase house prices. The Council should understand that the District is a popular place to live. Seeking contributions for affordable housing from market housing can further cause price inflation as a buoyant market can sustain the necessary price.

No Charge in Response to this Objection

The need to provide affordable housing is great within Hertsmere, however, within the current climate, it is impossible for all the need to be met within Hertsmere due to constraints. The need to accommodate this growth on greenfield sites would detrimentally affect the character of the Borough which is characterised by the Green Belt, high quality landscaping and well-defined settlement pattern of small towns and villages. The provision of further housing would be at the expense of employment land if unmanaged, which would exacerbate the existing high levels of out-commuting by residents of the Borough. The existing infrastructure of the Borough would not be able to support any additional housing development. In terms of transportation, the south west Herts area is the most congested part of the region. With no major transport infrastructure schemes proposed in the area, the situation will only worsen. Additional dwellings to meet the entire need will also put pressure on existing infrastructure. The proximity of the Borough to London and the South-East region, and growth associated with these areas put further pressure on the infrastructure in the Borough. The affordable housing policy will allow for the provision on new affordable housing units.

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS. The level housing including affordable was considered at the EIP.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4041/8/S RAID Residents Against Inappropriate Development	S	Provided that there is flexibility within the target for local circumstances. Do not agree that affordable housing is a sufficient exception to normal policies. Should be judged on a case by case basis.	No Change in Response to this Objection The policy allows for flexibility where there are financial constraints. With respect to rural exception for affordable housing, such an approach is advocated in PPG2
NCS/R25/4041/9/S RAID Residents Against Inappropriate Development	S	New sites and expansions of current sites should be subject to current green belt protection	No Change in Response to this Objection Any sites would be assessed against Green Belt Policies.
NCS/R25/4196/8/S CPRE Herts	S	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.	No Change in Response to this Objection
NCS/R25/4586/8/S Bidwells on behalf of Barratt Strategic	S	The target of 35% affordable housing is supported by the findings of the Hertsmere Development Economics Study (2010). In light of this, it is agreed that a target of 35% affordable housing represents the maximum achievable level across much of the district and is therefore justified.	Support Noted and Welcomed Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4647/8/Y
Daniel Rinsler & Co Ltd

Y

But caveated:

Whilst a proportion of affordable housing may be acceptable in schemes of 10 or more units, it should not be exclusively or in the main geared to the provision of social rented accommodation. The needs of those who cannot access social rented housing yet cannot enter the private sector need to be met. When affordable housing is required, it should meet a range of intermediate housing needs including for those who need intermediate rented, low cost market, key worker and shared equity housing.

No Change in Response to this Objection

Policy CS4 allows for a mix of affordable housing tenure based on the SHMA. The mix is different for sites below and above 15 units. Policy states that the precise mix will be agreed with the council on a site by site basis.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 2 - Housing Q9

<u>Summary of</u>	<u>Council Response</u>
C NCS/R25/4196/9/C CPRE Herts 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.	Support Noted and Welcomed
C NCS/R25/4492/2/C Environment Agency It should be included in Policy CS6 page 43 that Gypsy and Traveller community sites are regarded as Highly Vulnerable in Planning Policy Statement 25: Development and Flood Risk and are not compatible in Flood Zone 3a or 3b known as functional floodplain and an exception test will need to be passed for these sites to be located in Flood Zone 2. Due to the highly vulnerable nature we would expect these sites to be located in Flood Zone 1 ahead of residential sites which are regarded as More Vulnerable. This ensures the most vulnerable uses are located in the areas at lowest risk.	Comments Noted It is considered that these definitions are sufficiently defined in PPS25, and the issue of flood risk has been noted within policy CS6 point xi) and it is recognised that this use is regarded as highly vulnerable.
C NCS/R25/4520/16/C Hertfordshire County Council - Property The HCC Mimms transit site is now being used to almost capacity on a weekly basis. It is currently unclear if any of the plots could be made permanent, or if the site could be extended, as there are third party ownership issues. HCC would encourage further dialogue with Hertsmere Borough on this matter. The feasibility of a minor extension of Sandy Lane by 3 plots is currently being examined.	Comments Noted The Council will continue to work with HCC in trying to ensure that the needs of Gypsies and Travellers are met.
NC NCS/R25/1358/10/NC DLA Town Planning Ltd No comment.	None.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1475/7/NC Phillips Planning Services Ltd	NC	No comment.	None.	
NCS/R25/4429/9/NC GL Hearn Property Consultants	NC	No comment.		
NCS/R25/4635//NC Rolfe Judd	NC		No Change in Response to this Objection	
NCS/R25/4641/10/NC First Place Nurseries	NC	No comment.	Comments Noted No response necessary	
NCS/R25/4644/10/NC First Place Nurseries @ land R/O Cobden Hill	NC	No comment.	Comments Noted No response necessary	
NCS/R25/4646/9/NC DPP LLP	NC	No comment.	Comments Noted No response necessary	
NCS/R25/4647/9/NC Daniel Rinsler & Co Ltd	NC	No comments.	Comments Noted No response necessary.	
NCS/R25/4649/9/NC JCPC Ltd	NC	No comment.	Comments Noted None.	

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/2250/9/S

S Radlett Society & Green Belt Association

We suggest that any additional accommodation requirement

Comments Noted

is met first by a reduction in pitch area. The site should have safe adequate parking provision and turning areas. The site should not adversely impact the visual amenity and character of the area or on the amenities of neighbouring land uses. The site should have safe and convenient access to schools.

The DCLG guidance 'Designing Gypsy and Traveller Sites - Good Practice Guide' (May 2008) outlines the recommended size of pitches. The Council's assessments are based on this good practice guide.

Policy CS6 is considered to cover the rest of the points raised in this comment.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 2 - Housing Q10

Summary of

NCS/R25/1475/8/C
Phillips Planning Services Ltd

C No objection or support at this stage, this would depend on the standards proposed.

Council Response

Comments Noted
Details would be the subject to the Site Allocations and Development Management DPD.

NCS/R25/4631/8/C
Peacock and Smith (Mr & Mrs D. Morley)

C Support for para 3.12 where housing development is focused towards existing built up areas, and it is not proposed that Green Belt land will be released for development, with reference to the revocation of the RSS.

Support/Noted and Welcomed

NCS/R25/4634/6/C
Woolf Bond Planning (for Gilston Developments)

C Providing for suitably located urban extensions as an important component part of the RCS will help to ensure the provision of an appropriate mix of housing types and tenures.

Comments Noted

Urban extensions were explored as one of a number of options for accommodating growth but was ruled out for the reasons summarised on P.27.

Reliance on housing delivery from previously developed sites within the urban areas often results in flatted development comprising of smaller units of 1 and 2 bedrooms. The release of greenfield sites can provide the quantum of development to help deliver a more varied mix of housing types and tenures.

See earlier response regarding comments on dwelling mix and PDL within urban areas.

NCS/R25/4635/10/C
Rofe Judd

C Recognise importance in achieving a mix of housing in housing developments and the development of minimum floorspace guidance in achieving high quality residential development. However would suggest that any minimum floorspace standards are applied flexibly and used for guidance purposes only. In particular mix should not only reflect identified local needs but also market demand.

Comments Noted

It is likely that the guidelines on minimum floorspace will contain sufficient flexibility through the use of clear criteria (e.g. double aspect, natural ventilation to kitchens/bathrooms, sufficient amenity space) to guide appropriate densities of development. Only where these are not criteria are not met, might minimum floorspace standards need to be applied more prescriptively.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4651/6/C

The Planning Bureau Limited

C

A retirement and care development contributes to the housing mix in a given area. By its nature it is a single entity with communal space and facilities and it is not possible to provide a mix of housing types and tenure within the same block.

If minimum floorspace standards are to be used then these must be guided by industry wide standards for specialist old persons housing. A catch-all general standard would be inappropriate.

Also, levels of car parking, amenity space and internal communal space are important in making a retirement scheme deliverable and viable.

No Change in Response to this Objection

Generic housing policies would not necessarily be applied to specialist types of residential use. Each proposed development would be judged on its own merits and standards would not be applied where this would be inappropriate.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4539/9/N
Vincent & Gorbing

N

We consider that the issue of viability is extremely important with regard to contaminated sites. The abnormal costs associated with making contaminated sites, such as former gas works, ready for development, mean that all local authority requirements must be considered carefully. A specified mix of uses, planning obligations and other additional costs can adversely affect the viability of a contaminated site. As set out in our comments on Policy CS4 above, this can then run contrary to government policy on re-using previously developed land. Policy CS7 should take account of the potential viability implications of requiring a specific housing mix on a contaminated site. Flexibility should be included within the policy to take account of these factors. It is suggested that point (i) is amended as follows '...subject to proposals respecting the prevailing character of the area; and that the required mix has no adverse impact on viability of the site; and' As such we consider that policy CS7 is unsound by reason of inconsistency with national policy (PPS3, promotion of redevelopment of previously developed land), and lack of effectiveness (the policy as written is inflexible and jeopardises the delivery of housing on previously developed land by lack of flexibility).

No Change in Response to this Objection

The Planning Obligations SPD considers scheme viability. It states that the Council recognises that in some cases it may need to be flexible in terms of the level of obligations/financial contributions sought in order to bring a scheme forward. The viability of potential development schemes in different areas of the borough is considered in the Development Economic Studies (May 2010) and is available on our website (<http://www.hertsmere.gov.uk/planning/planningpublications.jsp>), the Council will consider the viability of schemes using the Three Dragons Toolkit.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4646/10/N
DPP LLP

N

TwNT consider the wish to secure a mix of housing to be acceptable in principle so long there is sufficient flexibility within the policy to allow regard to the individual characteristics of sites and their ability to meet identified local needs.

TwNT is concerned by the proposal to develop minimum floorspace requirements within individual new homes. The purchase of a house is a matter of choice and developments by housebuilders such as TwNT are dictated by market demand. A restriction on minimum floorspace requirements will not only restrict housebuilders in their ability to meet market demand, but would have capacity to impact unnecessarily upon the viability of schemes, which is often marginal.

The support for the principle of securing a mix of housing, in principle, is noted and welcomed.

Regarding minimum floorspace requirements, it is likely that these guidelines will contain sufficient flexibility through the use of clear criteria (e.g. double aspect, natural ventilation to kitchens/bathrooms, sufficient amenity space) to guide appropriate densities of development.

NCS/R25/4649/10/N
JCPC Ltd

N

Support the principle of seeking a variety of unit sizes, subject to local characteristics, providing this is limited to schemes over 10 units. Flexibility should be retained for smaller schemes. Object to the inclusion of minimum size standards, this should be left to the market and, in any event, may compromise innovation in scheme design.

Comments Noted

Securing a mix of housing, and requiring particular internal floorspace standards are separate matters and address different concerns. A mix of housing in eligible developments is a requirement of the policy. The minimum floorspace standards would be consulted on in a different process as part of the existing Planning and Design Guide SPD. It should also be noted that any proposed floorspace standards will be a minimum.

NCS/R25/2250/10/O
Radlett Society & Green Belt Association

O

In Radlett, Policy CS7 would have minimal effect, since there are rarely any 10-unit sites that would qualify. The housing mix is under constant threat as bungalows, for example, are vulnerable to proposals for re-development as 5-bed 2-storey homes. The Policy needs to cater for this particular situation so that planning applications for demolition of small 2 or 3 bed homes can be regulated by the Borough.

No Change in Response to this Objection

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4429/10/O GL Hearn Property Consultants	O General support for appropriate mix of housing, however objection raised to minimum floorspace standards, as it is considered to 'stifle innovation and take away the ability of the market to decide what size of unit is appropriate'.	No Change in Response to this Objection Policy CS7 allows for a level of flexibility to provide housing with minimum floorspace standards as a 'minimum' level. These standards will not be over ambitious, and there will be flexibility to provide minimum or higher standards. The floorspace standards will be the subject to the review of Part D of the Planning and Design Guide, and there will be a separate consultation period for that.
NCS/R25/4491/9/O Phillips Planning services Ltd	O 'Securing a mix of housing is laudable, but internal floorspace provision should be left to housing developers'	
NCS/R25/4595/4000/O Silk Planning	O Housing schemes should be allowed flexibility to provide developments which continue to be viable, where the housing mix, type and tenure are appropriate	
NCS/R25/1598/7/S Preston Bennett Partnership	S There is no objection in principle to this policy, and our client looks forward to commenting on floorspace details when these are released for consultation.	Support Noted and Welcomed
NCS/R25/4041/10/S RAID Residents Against Inappropriate Development	S Yes	
		Support Noted and Welcomed N/A

Comments Noted

Securing a mix of housing, and requiring particular internal floorspace standards are separate matters and address different concerns. A mix of housing in eligible developments is a requirement of the policy. The minimum floorspace standards would be consulted on in a different process as part of the existing Planning and Design Guide SPD. It should also be noted that any proposed floorspace standards will be a minimum.

Amend Policy

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4625/8/S PPML Consulting Ltd	S	'Provided that there is sufficient flexibility to vary such standards based on market circumstances, viability and site considerations' in policy CS7	Comments Noted Policy CS7 allows for a level of flexibility to provide housing with minimum floorspace standards as a 'minimum' level. These standards will not be over ambitious, and there will be flexibility to provide minimum or higher standards. The floorspace standards will be the subject to the review of Part D of the Planning and Design Guide, and there will be a separate consultation period for that.
NCS/R25/4641/11/S First Place Nurseries	S	(No comments)	Support Noted and Welcomed
NCS/R25/1358/11/Y DLA Town Planning Ltd	Y	This is considered to be acceptable subject to the detailed requirements set out in later policies.	Support Noted and Welcomed None.
NCS/R25/4644/11/Y First Place Nurseries @ land R/O Cobden Hill	Y	"This is considered to be acceptable subject to detailed requirements set out in later policies."	Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 2 - Any Further Comments

NCS/R25/1475/9/C
Phillips Planning Services Ltd

C

Summary of

The Revised Core Strategy would not be sound because it would not be effective. This is because:
-it is inflexible as it neither meets housing requirements nor demonstrates a clear, implementable strategy; and
-it cannot be monitored because the strategy is unclear and relies on multiple assumptions and contingencies about possible brownfield sites coming forward.

PPS3 requires that LDFs should provide a clear strategy and housing land availability for at least 15 years from the date of adoption. As it is unlikely that the Revised Core Strategy would be adopted before 2012 the plan period should run up to 'at least 2017'.

Council Response

Comments Noted

The strategy has been informed by the Council SHLAA. It is recognised in para3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate, there may have to be need to review the focus on housing growth within existing built up areas.

NCS/R25//1568//C
Highways Agency

C

*The average household size of 3.4 that would result from an average population increase of 718 per year being accommodated within the proposed 213 average completed dwellings per year is greater than the average Hertsmere household size of 2.44 identified in the 2001 Census. It appears that the proposed supply of new homes is influenced more by the supply of land, as identified in the SHLAA, than demand. The Highways Agency seeks clarification regarding the proposed average household size.

Amend Text

Point 6. The housing target is derived from the Chelmer model which sets a rate of projected household growth, rather than population growth. Projected household growth amounts to 3,200 new households over this period. Nevertheless, in light of the Cala Homes decision, the Council will be reviewing its housing target so that it is in general conformity with the RSS.

Point 7. Table 8 in the RCS includes 800 dwellings through the Elstree Way Corridor which are not specifically included in Appendix 3a of the SHLAA but are specifically included in Table 12 of the SHLAA.

Point 8. The Urban Broad locations represent an allowance for windfall in years 11-15 reflecting trend based housing projections on sites within existing built up areas.

Point 9. There do appear to be some minor discrepancies between Table 8 and Appendix 2a - 2c, which amount to around 1% of the total allocation and commitments. These will be revisited as part of the review of the SHLAA.

Clarification is also sought in relation to the following matters:

-Why the SHLAA figures of 769 dwellings for 6-10 years and 400 dwellings for 11-15 years against Borehamwood presented in Table 8 do not match the figures in Appendix 3a of the SHLAA.

-Whether estimates of windfall development have been included in the SHLAA 11-15 years figures as quoted in Table 8.

-Why the 'Allocations and Commitments' housing figures in Table 8 do not match those provided in Appendix 2a-2c of the SHLAA.

Would the redevelopment of brownfield land lead to the loss of potential employment land? If this were the case would there be any provision of alternative employment sites or would this encourage out-commuting to other boroughs or the relocation of businesses to less sustainable sites within the Borough. Does the level of designated employment land proposed in Policy CS8 take into account any such impact from the development of brownfield sites for residential purposes.

A contingency plan should be set out to increase the necessary level of housing development does not come forward on brownfield land. This would ensure that any

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

greenfield sites are subject to robust examination, based on their sustainability. Including access to local shops and services, jobs and public transport.

NCS/R25/2250/11/C
C
Radlett Society & Green Belt Association

Policy CS12: The society would like to see the Green Belt gaps between Radlett and the settlements listed below treated as strategic gaps and locations where visible, unbroken countryside can be appreciated.

No Change in Response to this Objection

It is noted in the Core Strategy that the strategic gap between Stanmore and Bushey is under particular threat due to the level of development, and development pressure, and the short distance between the main urban areas. The area around the main towns in Hertsmere will continue to be Green Belt land and subject to the same protection. It is not considered necessary to use strategic gaps elsewhere in the borough due to existing distances from urban areas.

NCS/R25/4520/8/C
C
Hertfordshire County Council - Property

3.10 As mentioned above (2.26) with the Borough relying on Brownfield/PDL sites the SHLAA and the site allocations process becomes crucial to HCC in attempting to align services with the distribution of future housing.

Comments Noted

HCC propose that there is a continuing dialogue between the two authorities to provide as much certainty as possible with regard to the location of sites as the SHLAA moves forward into site allocations LDD. With school capacities being limited it is important to try to anticipate the impact of development coming forward in a planned fashion so as to be aligned with the Education and other service provision in the area. As you might expect HCC are particularly concerned with the geographical locations of sites and the lack of certainty (for example) of the years from 6-10 onwards in the SHLAA.

NCS/R25/4520/9/C Hertfordshire County Council - Property	C	3.12 It would be more coherent and transparent if this para acknowledges or cross refers to the earlier statements on Green Belt at 2.35. As mentioned in our response to Question 3 if there are to be no adjustments/realignments and also if this were not be considered for the next 15 years it may have an adverse impact on the provision of school sites and pupil places.	Amend Text Noted
NCS/R25/4520/11/C Hertfordshire County Council - Property	C	The identification of intensification/density targets to be incorporated in the Planning and Design SPD are welcomed but this raises the question as to how this is aligned to the current assumptions underpinning the SHLAA analysis and how this is accurately transposed into the area specific housing numbers contained in Table 8 The Projected Housing Supply 2011 - 2026.	Comments Noted The SHLAA considers densities that are appropriate to the location of the site. The Part D review will provide guidance on the qualities of appropriate densities rather than specify actual amounts. The anticipated density on each site was determined using multipliers relating to the area type, the prevailing density, accessibility and the likely housing type.
NCS/R25/4520/14/C Hertfordshire County Council - Property	C	Policy CS4 Affordable Housing should line 8 read - The priority for the council will therefore continue to be to increase the supply of homes for social rent?	Amend Text Noted

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4626/1/C C Clause for Greenbelt release - should allocated sites come forward too slowly (L&G)

No Change in Response to this Objection
The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

NCS/R25//4626//C C Phasing can create missed opportunities for Borough and Legal and General Life Fund Partnership Developers - Example: If sites in Phase 3 are not allowed in (L&G) Phase 1, market conditions may later change resulting in the sites allocated for phase 3 no longer being viable or available.

No Change in Response to this Objection

NCS/R25//4626/3/C C Affordable Housing clause (35%) must be flexible to Legal and General Life Fund Partnership account for financial viability of Housing projects. (L&G)

No Change in Response to this Objection
The affordable housing requirement is based on the Development Economics Study. This illustrates that the requirements are affordable both on large and small scale developments. The study considers different sub areas of the borough and illustrates that the policy is affordable. The Core Strategy (para 3.31) and Affordable Housing SPD allow for the viability of schemes to be tested in specific circumstances.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4626/4/C Legal and General Life Fund Partnership (L&G)	C	Sustainable Homes Levels - must also take into account financial viability of Housing Projects.	No Change in Response to this Objection Part L of the building regs is the minimum standard.
NCS/R25/4632/1/C Peacock and Smith (Mr & Mrs D. Whiting)	C	"Paragraph 3.12, which confirms that the Council does not propose to plan for any releases of land from the green belt to meet housing need in the next 15 years, is SUPPORTED. Whilst it is recognised that housing supply will need to be monitored, the publication of the Coalition Government's Localism Bill (December 2010) and the outcome of recent High Court Challenges in relation to Regional Spatial Strategies (RSSs), have confirmed that it is the Government's intention to revoke RSSs and thus there is unlikely to be a requirement to provide housing on the scale envisaged in the East of England Plan."	Amend Policy As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS
		A follow up letter was sent following this response: It was noted that the Localism Bill made it clear that the revocation of the housing targets in the RSS will proceed.	
		Housing supply will need to be continuously monitored. A review of the Green Belt, with a public consultation, should be undertaken if sites in the SHLAA do not come forward for housing at the anticipated rate.	

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NCS/R25/1631/8/O
Barton Willmore Planning Partnership

The Core Strategy uses the Chelmer model to project housing demand and its level of household growth may be higher than this model suggests. ONS and CLG projections predict much greater levels of growth. Although para. 3.4 of the Core Strategy states these include domestic and international migration levels that are 'not considered to be robust or realistic when applied to Hertsmere, it is not explained why. Hertsmere is not unique and at least the level of growth set out in the RSS should be planned for.

Other comments:

- Many of the sites included in the SHLAA with planning permission may no longer be deliverable because of the current market.
- The SHLAA only includes Urban Broad Locations within existing settlements and does not include any others. It is therefore relying on windfall supply for years 11-15. However, there is a very limited supply of brownfield land and the revisions to PPS3 regarding garden land have further reduced this supply.
- The figures given in table 8 do not seem to match with those in the SHLAA.
- The methodology for the SHLAA was not followed correctly as unsuitable sites were discounted prior to the assessment of capacity.
- Table 8 seems to include Green Belt sites (such as S42) and this casts aspersions on the claim of the Council that all required growth can be accommodated within urban locations on brownfield sites.
- It appears that the 50 Broad Urban Location dwellings for Bushey, Aldenham and Patchetts Green has been included within the 0-10 yr supply. This is an attempt to use windfall to make up the Chelmer projection figures.

The Core Strategy should include a mechanism for the release of Green Belt land if a comprehensive review is not planned at this stage. If monitoring shows that a

Amend Policy

The Council will publish a population topic paper to support the Core Strategy which illustrate the difference between the differences between the different population projections. As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

The respondent has commented on the way in which the SHLAA have been carried out. It must be emphasised that the methodology for the SHLAA and the SHLAA report itself were subject to considerable consultation with a significant number of stakeholders, including developers and consultants. The inclusion of Green Belt sites in the SHLAA, however, does not mean that the Council considers that it will not be possible to accommodate its housing requirements within urban locations. The SHLAA simply records available and developable land within the Borough, whether or not it is in Green Belt.

Paragraph 3.12 does refer to the implications of sites not coming forward for development, the need for continuous monitoring of development and the scope to undertake a review of where housing development takes place in the borough. However, in light of comments received from a number of respondents, the wording of paragraph 3.12 and Policy CS2 will be reviewed.

release is necessary this can be enacted.

Policy CS2 is objected to. Hertsmere will be unable to accommodate the necessary level of housing within existing settlements.

Policy CS3 states that planning permission will be refused for schemes of 50 or more dwellings where housing completions would exceed 20% of the proportion of development sought in any three year period. This could be better controlled through phasing and conditions. Also, large development is preferable as it is more likely that this will allow for infrastructure to be funded.

NC/S/R25/44277/O
CGMS Consulting

O Policy CS1 should be amended to include previously developed sites in the Green Belt in the criteria that the Council will take into consideration when identifying new locations for development in the Site Allocations DPD.

Policy CS2 should be amended to also give priority to locating major residential development at previously developed sites within the Green Belt. The policy should also state that windfall residential development would be acceptable at such locations.

No Change in Response to this Objection
Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites.

O Policy CS3 Phasing of Development - This proposed policy may prevent the provision of enhanced community facilities as it does not allow for cases where housing development is part of a package to secure improved community facilities.

No Change in Response to this Objection
The policy also allows for the protection for community facilities to that an undue burden is not placed on them. Such an approach would need to be balanced.

For example, from time to time HCC dispose of redundant buildings, or vacant sites, for residential development to substantially fund enhanced community facilities, such as new school buildings on another site in the locality. If the disposal of these sites is delayed because of the requirement to phase development, the provision of self-financing schemes to enhance HCC services and facilities for the benefit of Hertsmere residents may be compromised.

phasing periods. The basis of the policy is that the Council does not want an oversupply of new housing where there is not adequate infrastructure to deal with it. The Council has confirmed that they have not, and will not be producing an Infrastructure Plan, as part of the evidence base for the Core Strategy. In the Planning Inspectorate's 'Examining Development Plan Documents: Soundness Guidance - August 2009', three of the key questions which should be asked about the deliverability of a core strategy are: 1. Have the infrastructure implications of the strategy/policies clearly been identified? 2. Are the delivery mechanisms and timescales for the implementation of the policies clearly identified? 3. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescales of the core strategy/policies? Based on the lack of such information on these matters in the Core Strategy, and the lack of intention to produce an Implementation Plan, it would appear that the answer to these three key questions is no. We fail to see how Policy C3 can be justified when these key questions from the Planning Inspectorate's guidance do not appear to have been addressed. As such we consider it to be unsound by reason of lack of effectiveness (deliverability is unclear through lack of consideration to infrastructure), and unjustified (no evidence is produced to demonstrate that there is an issue with the provision of infrastructure in the settlements where housing is envisaged).

The Council has been in discussions with various infrastructure providers, including Hertfordshire County Council and utilities companies, regarding future needs and requirements and the impact on these of development planned for in the Revised Core Strategy. The Council has also undertaken work to produce a Planning Obligations SPD, which will help to secure funding for future infrastructure provision at a local level, and worked with other Local Planning Authorities in Hertfordshire on a study looking at more strategic future infrastructure requirements, as part of wider work on the Community Infrastructure Levy. The Council is now planning to produce an infrastructure delivery paper, following the representations received as a result of consultation. However, it should be noted that establishing the plans of some infrastructure providers, such as the NHS, has been problematic, especially in light of recent uncertainties that have arisen as a result of the comprehensive spending review; additionally many organisations plan over a different time period than that required for LDFs, which also presents problems in terms of establishing how infrastructure provision should respond to plans for the phasing of the supply of new homes and other development.

Peacock and Smith (Clients)

to the EEP, and the subsequent policy not to allocate sites in the Green Belt for housing development. Suggested consultation on Green Belt release.

As a result of the *Cala Homes (South) Ltd v Secretary of State for Communities and Local Government* [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

NCS/R25//4637/6/O
Sworders Agricultural

- O The proposed housing figure of 3,200 is predicted on the assumption of 100% delivery of unallocated sites with permission, allocated sites with permission and allocated sites without permission. Allowance must be made for sites which will not be delivered based on past experience. Plans should be able to show how they will handle contingencies and show what alternative strategies have been prepared to handle uncertainty Authorities should not necessarily rely on a review of the plan as a means of handling uncertainty. The Core Strategy needs to meet the requirements of paragraph 4.46 in regard to showing what alternative strategies have been prepared to handle uncertainty. It is considered that the phasing of any major sites to be allocated will need to take account of existing infrastructure and a need for any improvements such as highway measures required for the Elstree Way regeneration to be in place prior to development taking place. We do not consider this is appropriate given the affordability pressures in the district as clearly highlighted in the SHMA. Phasing land in the manner proposed by policy CS3 would not assist in achieving this objective. Whilst the RSS is in the process of being cancelled the EIP Panel Report on the RSS provided an analysis as to why rationing is not appropriate in areas with acute housing pressures which remains applicable in districts such as Hertsmere. Against the background of housing pressures throughout southern England, there are very few places in the region where it would be appropriate to regard the Plan provision as setting an upper limit to growth. Any phasing of housing relating to the requirement to deliver infrastructure should be contingent on the delivery of that infrastructure rather than choosing a date which is forecast to coincide with the delivery of that infrastructure.

Amend Policy

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS.

The Council has been in discussions with various infrastructure providers, including Hertfordshire County Council and utilities companies, regarding future needs and requirements and the impact on these of development planned for in the Revised Core Strategy. The Council has also undertaken work to produce a Planning Obligations SPD, which will help to secure funding for future infrastructure provision at a local level, and worked with other Local Planning Authorities in Hertfordshire on a study looking at more strategic future infrastructure requirements, as part of wider work on the Community Infrastructure Levy. The Council is now planning to produce a topic paper on future infrastructure requirements, following the representations received as a result of consultation. However, it should be noted that establishing the plans of some infrastructure providers, such as the NHS, has been problematic, especially in light of recent uncertainties that have arisen as a result of the comprehensive spending review; additionally many organisations plan over a different time period than that required for LDFs, which also presents problems in terms of establishing how infrastructure provision should respond to plans for the phasing of the supply of new homes and other development.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4640/1/O
Mrs R Gale

- ☐ Affordable Housing - figure too high (10 or more and 35%) should be 15 or more and 20%
Priority should be given to local people.

No Change in Response to this Objection
The affordable housing requirement is based on the Development Economics Study. This illustrates that the requirements are affordable both on large and small scale developments. The study considers different sub areas of the borough and illustrates that the policy is affordable. The Core Strategy (para 3.31) and Affordable Housing SPD allow for the viability of schemes to be tested in specific circumstances.

NCS/R25/4651/3/O
The Planning Bureau Limited

- ☐ Para. 3.47 identifies a need for 1,200 sheltered housing units by 2021. The Core Strategy should include a separate policy covering the housing need of the elderly population and this should recognise the important role that specialist retirement housing can play in meeting this need.

No Change in Response to this Objection
The Council does not intend to include a separate policy on the housing needs of the elderly population. However, assessment of housing need should include the housing needs of the entire community, and it is recognised that the Borough has an increasingly high proportion of older people and that the provision of C2 uses is to play an important part of new housing supply. As such, the Council is including some C2 uses in its update to the SHLAA and will amend the text of the Core Strategy accordingly.

NCS/R25/4520/10/S

S
Hertfordshire County Council - Property

- 3.14 HCC welcome the fact the Hertsmere BC will be closely monitoring the rate of housing development in order to maintain a balance between the availability of services and community infrastructure in the main towns - for the reasons mentioned at 3.10 above.

Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4520/12/S

S
Hertfordshire County Council - Property

The alignment of the release of sites with supporting infrastructure and community facilities is broadly welcomed, particularly the acknowledgment that HCC primary school place planning projects for a seven year period. Primary school planning has to be reactive to the birth rate and this in turn means that forecasts have to be short term but are reviewed annually to include updated birth data from the NHS. It should be noted that forecasting for secondary school places can take place over a longer period.

Support Noted and Welcomed
Support Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 3 - Employment Q11

NCS/R25/1631/14/C
Barton Willmore Planning Partnership

C

Summary of
There should be a policy in respect of new sites not falling under Policy CS8 and CS9. Any appropriately located sites that support the aims of the Spatial Vision and Objectives should be supported.

Council Response

No Change in Response to this Objection
No new policy is required. Appropriately located new facilities would be acceptable in light of national policies and the specific design of such facilities would be covered by the saved policies of the local plan or the emerging development control policies.

NCS/R25/4553/2/C
Hertfordshire County Council

C

No reference appears to be made of the latest East of England Forecasting Model which suggests job growth of around 13,300 in the period 2011-2026, substantially more than the job growth referred to in paragraph 4.14.

Amend Text

This particular forecasting model and the assumptions use in its projections, which are considered to overstate levels of jobs growth, are not endorsed by the Council.

The overall approach to Economic Development within the Plan is supported and many of the objectives set out in the document support a number of objectives set out in the countywide 'Hertfordshire Economic Development Strategy' (HEDS). However, there is no reference within the document to HEDS which has now replaced a number of the economic strategies identified in the report such as the 'Investing in Communities Programme' and 'Economic Participation Programme'. It is therefore important that the document is acknowledged.

The support for the overall approach to economic development is noted and reference will be made in the document to the countywide HEDS, in line with the representation made.

NCS/R25/4647/10/N
Daniel Rinsler & Co Ltd

N

The Council's reliance on the release of land currently in employment use to meet future residential land supply requirements is considered to be unrealistic. Such a strategy fails to reflect future economic growth for which such land needs to be safeguarded and is unjustifiably being used to withhold the essential release of appropriate green belt land, particularly such green belt land in close proximity to the train station.

No Change in Response to this Objection
The Core Strategy seeks to maintain the supply of employment land within the Borough. It provides protection to Employment Sites in CS8 and CS9.

NCS/R25/4652/4/N
Boyer Planning

N The Council relies on the CHELR and London Arc Study. However, these represent a snapshot and the volatility of the commercial market means that caution should be applied.

Moreover, the recent stagnation in the economy means that further caution should be applied as the recession should not be expected to continue long-term. The plan does nothing to guard against under provision in this respect, despite making passing reference to this issue at para. 2.48.

No Change in Response to this Objection

The Hertfordshire London Arc Jobs Growth and Employment Study, as stated in para. 4.16, showed high growth for Hertsmere, as figures were based on previous trends. The Central Hertfordshire Employment Land Review was carried out prior to recent stagnation in the economy. The assumptions about employment land provision in the Core Strategy are based upon these studies. Therefore, it is not considered that the Council has failed to consider longer-term growth once the economy has recovered.

Hertsmere is clearly located within a wider employment market and it is unrealistic to expect that all new jobs provision for Hertsmere residents should be allocated within the borough. However, paragraph 4.22 recognises that there may be need to consider compensatory allocations of employment land, where existing sites are redeveloped for housing and other uses and this will be further reviewed in light of ministerial statements and the provisions of the emerging NPPF.

NCS/R25/1210/4/O
Shire Consulting

- O Paragraph 4.8 states that the amount of resident who work in the borough should be increased, but the CS fails to provide a mechanism to address this. The Employment targets are reliant on two new business parks in other districts, this is undermined by the decision of St Albans Council to abandon their proposal for a new business park. Elstree Way Corridor is not in single ownership and so by necessity will be fragmented so CS22 may not be achievable.

Amend Policy

Paragraph 4.8 states that 'The Council recognises that there will always be a significant amount of out-commuting to both London and other nearby centres of employment. However, ensuring an employment land supply, which enables a proportion of the resident workforce to be able to work locally, represents an important measure of local economic and environmental sustainability.' The protection of employment areas will ensure that there are opportunities for local employment.

The Council has based its assumptions about employment land provision on cross-boundary studies carried out by consultants. This worked showed that there would be a small shortfall in both office space and industrial and warehousing accommodation. However, it is not thought that further substantial employment area allocations are required. This is on account of the ability to locate office development within existing town centres, and the very minor nature of the shortfall in industrial and warehousing accommodation, which would most likely fall within the margin of error, with any businesses in need of premises able to locate in vacant units within existing employment areas. As such it is considered that the best approach would be for existing employment areas to be retained, subject to a review of boundaries in the forthcoming Site Allocations DPD, to ensure that these are still relevant, justified and defensible, and the allocation of Local Significant Employment Sites, which are intended to help protect sites suitable for smaller businesses. The figures will be reviewed following the revised draft core strategy from St Albans District Council.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1568/2/O
Highways Agency

- O The Core Strategy proposes that residents travel outside of the Borough for work, which would result in a negative impact on the strategic road network. The Council should adopt a more sustainable approach and promote more local employment opportunities.

Amend Text

Points 16 and 17. Hertsmere is clearly located within a wider employment market and it is unrealistic to expect that all new jobs provision for Hertsmere residents should be allocated within the borough. However, paragraph 4.22 recognises that there may be need to consider compensatory allocations of employment land, where existing sites are redeveloped for housing and other uses and this will be further reviewed in light of ministerial statements and the provisions of the emerging NPPF. Notwithstanding potential scenarios in neighbouring authorities as highlighted by the respondent, it should be noted that other scenarios (such as the Strategic Railfreight Interchange near Radlett) could potentially result in a significant increase in commercial floorspace. The text of paragraph 4.22 will be reviewed to ensure that it fully reflects the changing nature of employment land supply and that any future compensatory allocations would need to be suitably and wherever possible sustainably located.

NCS/R25/3990/5/O
John Anderson Planning

- O Mixed development is encouraged as illustrated by Jane Jacob. Details on mixed developments in CS19 should be more prescriptive, and include a presumption for housing. It is noted again that older people are working longer and employed by organisations such as B&Q.

Comments Noted

Policy CS19 does not prohibit the delivery of housing development as part of mixed use development. Residential development would not always be appropriate on all development sites, for example on those in key employment areas as a result no change is required. The Council notes that people are working longer within their career, however, this is outside of the scope of the Core Strategy.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4552/2/O
RPS on behalf of Willows farm

O

We consider that additions should be made to the Core Strategy, in Section 2 and Section 4, in order to make the Core Strategy consistent with national planning policy regarding tourism. For Section 4, we again propose, in slightly amended form, what we sought in our letter to the Council of 27 January 2009 in relation to what was then the version of the Core Strategy to be submitted to the Secretary of State. We consider the proposed supporting text (which would become paragraph 4.30 if no other additional paragraphs are to be inserted) and the proposed Policy CS12 to be still appropriate in the circumstances.

Amend Policy

The comments are noted, in addition a Tourism Policy will be included in the DC policies. The significance of visitor attraction is acknowledge in Chapter 2.

"Tourism Development

The Council recognises that tourism is a fast-changing industry, and is keen to support tourism initiatives, particularly where the provision of facilities may help to provide all-year-round facilities for residents and visitors. The Council will support proposals for the extension, upgrade and improvement of existing tourist attractions.

Applications for new tourist attractions will require careful consideration given the need to balance potential benefits to the local economy from increased employment and visitor numbers against the need to protect the high quality landscape within which they are located.

Policy CS12 Promoting Tourism in Hertsmere

The Council will support proposals for the extension, upgrade and improvement of existing tourist attractions and sites. Any proposals for tourism development will be required to satisfactorily meet access, parking and environmental conditions and other relevant DPD / Local Plan policies."

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4558/2/O

O
East of England Development Agency

Hertsmere has a strong and diverse economy but the emerging findings of Hertfordshire Economic Assessment suggest some key challenges across the County. Hertsmere should seek to adopt comprehensive approach to its development strategy and given relationship to Watford, St Albans and London, an integrated response to the wider economic issues of the sub-region.

Concerned that a reduced overall housing provision will impact on the availability of labour supply within the district, required increases in commuting to fill job opportunities.

The CHELR study and follow up study suggests a more progressive approach with regard to economic growth is followed in the Core Strategy. Whilst retention of designated sites is supported, the RES seeks to ensure range of sites available are attractive and deliverable to meet market needs. London Arc study suggests 8,335 jobs forecast between 2006 and 2026. E of England forecasts growth of 17,100 jobs over same period. Policy CS8 could be considered too cautious to meet the 'business as usual' demand forecast in the E of England Forecast Model. Policy CS8 should set out clearly how it will engage positively with developing such business parks and how it will monitor job growth over the period.

Amend Text

It is not clear how a very modest reduction in the amount of new housing, which still proposes a further 3,200 homes over 15 years, would impact on labour supply in the borough. 37% of employees currently commute into the borough and it seems unrealistic to state that a small change in the number of new homes being built will impact on the availability of labour supply within the district. However, As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

The Council has based its assumptions about employment land provision on cross-boundary studies carried out by consultants. This work showed that there would be a small shortfall in both office space and industrial and warehousing accommodation. However, it is not thought that further substantial employment area allocations are required. This is on account of the ability to locate office development within existing town centres, and the very minor nature of the shortfall in industrial and warehousing accommodation, which would most likely fall within the margin of error, with any businesses in need of premises able to locate in vacant units within existing employment areas. As such it is considered that the best approach would be for existing employment areas to be retained, subject to a review of boundaries in the forthcoming Site Allocations DPD, to ensure that these are still relevant, justified and defensible, and the allocation of Local Significant Employment Sites, which are intended to help protect sites suitable for smaller businesses.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4586/9/O
Bidwells on behalf of Barratt Strategic

It is considered that the Council have underestimated the level of economic growth which is likely to occur in Hertsmere over the plan period. The East of England Forecast Model 2010 (EEFM) would suggest that the number of jobs created in the district by 2026 will be far higher than the level anticipated by either the Hertfordshire London Arc, Job Growth and Employment Land Study 2009 (ELR) or the RDCS. Although it would appear that the RDCS is generally consistent with the ELR, questions must be raised over the extent of disparity between findings of the ELR and the EEFM. This is particularly important as the EEFM provides a genuine forecasting tool rather than a simple projection of past trends, as is the case with the ELR. A higher level of employment growth in the district will inevitably have implications for the provision of housing and infrastructure which should be reflected in any amendments to the RDCS.

No Change in Response to this Objection
The Council does not support the findings of the The East of England Forecast Model 2010 (EEFM).

The forecast numbers do not take into account any policy or other constraints that might prevent their actual realisation on the ground. Forecasts of the demand for dwellings, for example, are the outcome of projected changes in employment, population, etc. If in reality planning constraints were to prevent this demand being satisfied, the associated forecast levels of GVA, employment, population, etc, would be less likely to materialise.

NCS/R25/4658/4/O
Shire Consulting

- O Paragraph 4.8 states that the amount of resident who work in the borough should be increased, but the CS fails to provide a mechanism to address this. The Employment targets are reliant on two new business parks in other districts, this is undermined by the decision of St Albans Council to abandon their proposal for a new business park. Elstree Way Corridor is not in single ownership and so by necessity will be fragmented so CS22 may not be achievable.

No Change in Response to this Objection

Paragraph 4.8 states that 'The Council recognises that there will always be a significant amount of out-commuting to both London and other nearby centres of employment. However, ensuring an employment land supply, which enables a proportion of the resident workforce to be able to work locally, represents an important measure of local economic and environmental sustainability'. The protection of employment areas will ensure that there are opportunities for local employment.

The Council has based its assumptions about employment land provision on cross-boundary studies carried out by consultants. This worked showed that there would be a small shortfall in both office space and industrial and warehousing accommodation. However, it is not thought that further substantial employment area allocations are required. This is on account of the ability to locate office development within existing town centres, and the very minor nature of the shortfall in industrial and warehousing accommodation, which would most likely fall within the margin of error, with any businesses in need of premises able to locate in vacant units within existing employment areas. As such it is considered that the best approach would be for existing employment areas to be retained, subject to a review of boundaries in the forthcoming Site Allocations DPD, to ensure that these are still relevant, justified and defensible, and the allocation of Local Significant Employment Sites, which are intended to help protect sites suitable for smaller businesses. The figures will be reviewed following the revised draft core strategy from St Albans District Council.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/2250/12/S	S	(no comments)	Support Noted and Welcomed
Radlett Society & Green Belt Association			

NCS/R25/4041/11/S	S	Yes	Support Noted and Welcomed
RAID Residents Against Inappropriate Development			

NCS/R25//4595/4/S	S	CS8- In support of the continued identification of Borehamwood for future development, and the avoidance of the need to allocate greenfield land	Support Noted and Welcomed
Silk Planning			

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 3 - Employment Q12

	C	<u>Summary of</u>	<u>Council Response</u>
NCS/R25/4647/11/C Daniel Rinsler & Co Ltd		An appropriate level of employment land should be protected for the reasons stated in response to 11) above.	No Change in Response to this Objection The Core Strategy seeks to maintain the supply of employment land within the Borough. It provides protection to Employment Sites in CS8 and CS9. This is supported by the London Arc Jobs Growth and Employment Land Study.
NCS/R25/4645/10/N Turley Associates on behalf Potters Bar Golf Course	N	A spatial objective for Borehamwood is to protect employment and industry in the town. Paragraph 2.6 highlights the need to stimulate enterprise and remove barriers to employment in the Cowley Hill Ward of Borehamwood, which contains the BBC site and is identified as one of the most deprived areas of Hertfordshire. As the Central Hertfordshire Employment Land Review (November 2006) is now over four years old, it is questionable whether the Council is able to demonstrate through up-to-date surveys that loss of employment land in such a sustainable location will not compromise local and regional targets for employment land provision throughout the Plan period. Hence we consider that the Council is premature in referring to the BBC site as a potential site for future development in the Core Strategy.	No Change in Response to this Objection The Council has a diverse range of employment data. As stated in paragraph 4.13 of the Core Strategy a follow up study to the Chair was published in 2009 The London Arc Jobs Growth and Employment Land Study. In addition Hertfordshire Strategic Employment Sites Study 2011 also reviews the Hertfordshire Employment Market.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4652/3/N
Boyer Planning

N

The CHELR and London Arc Study are relied upon in the Core Strategy. The London Arc Study points to growth in the office and industrial/warehousing sectors, which equates to a shortfall in allocated employment space of 5,013 and 14,634 sqm respectively.

The Core Strategy states that this would be within the margin of error, but also at para. 4.18 acknowledges that it would result in a site requirement of 3.66 ha. It would seem therefore that the Council has noted the findings of the study but chosen not to act upon them.

Para. 2.30 states that any shortfall can be accommodated within town centres and adjoining Boroughs. However, despite acknowledging that the sites within adjoining Boroughs may not come forward there is no mechanism to ensure that a review of employment land allocations takes place in the event of a shortfall.

Amend Policy

The Council has based its assumptions about employment land provision on cross-boundary studies carried out by consultants. This work showed that there would be a small shortfall in both office space and industrial and warehousing accommodation. However, it is not thought that further substantial employment area allocations are required. This is on account of the ability to locate office development within existing town centres, and the very minor nature of the shortfall in industrial and warehousing accommodation, which would most likely fall within the margin of error, with any businesses in need of premises able to locate in vacant units within existing employment areas. As such it is considered that the best approach would be for existing employment areas to be retained, subject to a review of boundaries in the forthcoming Site Allocations DPD, to ensure that these are still relevant, justified and defensible, and the allocation of Local Significant Employment Sites, which are intended to help protect sites suitable for smaller businesses.

It is recognised in para. 4.18 that it may be necessary to review employment land allocations if new potential business parks in adjoining boroughs are not brought forward. Policy CS8 is being amended to clarify that new strategic employment land would be allocated through the Site Allocations DPD if these business parks are not developed.

NCS/R25/4586/10/O

O Bidwells on behalf of Barratt Strategic

The RDCS currently identifies sufficient employment land to meet its targets for employment growth. The RDCS underestimates the level of economic growth which will occur in Hertsmere over the plan period. Accordingly, so long as the amount of employment land identified is sufficient to meet the anticipated needs of employment growth in the district it will be appropriate. If, as we have suggested, the level of employment growth in Hertsmere will be higher than anticipated then the RDCS will need to react to this by identifying additional land for both employment uses and new homes to support the working population.

Comments Noted

The Council has based its assumptions about employment land provision on cross-boundary studies carried out by consultants. This worked showed that there would be a small shortfall in both office space and industrial and warehousing accommodation. However, it is not thought that further substantial employment area allocations are required.

This is on account of the ability to locate office development within existing town centres, and the very minor nature of the shortfall in industrial and warehousing accommodation, which would most likely fall within the margin of error, with any businesses in need of premises able to locate in vacant units within existing employment areas. As such it is considered that the best approach would be for existing employment areas to be retained, subject to a review of boundaries in the forthcoming Site Allocations DPD, to ensure that these are still relevant, justified and defensible, and the allocation of Local Significant Employment Sites, which are intended to help protect sites suitable for smaller businesses.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4595/4/O Silk Planning	O Request for the reassessment of employment demand to reflect 'current and recent circumstances', to review the best locations for employment uses in Hertsmere and neighbouring boroughs. Reference made to the lack of RSS.	No Change in Response to this Objection The Council has based its assumptions about employment land provision on cross-boundary studies carried out by consultants. This worked showed that there would be a small shortfall in both office space and industrial and warehousing accommodation. However, it is not thought that further substantial employment area allocations are required. This is on account of the ability to locate office development within existing town centres, and the very minor nature of the shortfall in industrial and warehousing accommodation, which would most likely fall within the margin of error, with any businesses in need of premises able to locate in vacant units within existing employment areas. As such it is considered that the best approach would be for existing employment areas to be retained, subject to a review of boundaries in the forthcoming Site Allocations DPD, to ensure that these are still relevant, justified and defensible, and the allocation of Local Significant Employment Sites, which are intended to help protect sites suitable for smaller businesses.
NCS/R25/2250/13/S Radlett Society & Green Belt Association	S (no comments)	Support Noted and Welcomed
NCS/R25/4041/12/S RAID Residents Against Inappropriate Development	S Yes	Support Noted and Welcomed N/A

Issue 3 - Employment Q13

Summary of

NCS/R25/4645/11/N
Turley Associates on behalf Potters Bar
Golf Course

N The plan has an over reliance on reallocation of
employment land.

Council Response

No Change in Response to this Objection

The Council's approach is based on its diverse range of evidence base documents. Such as The Hertfordshire London Arc Jobs Growth and Employment Land Study and Hertfordshire Strategic Employment Sites Study 2011, and the Strategic Housing Land Availability Assessment.

NCS/R25/4652/5/N
Boyer Planning

N The CHELR and London Arc Study relate to B-class uses. Therefore, the Core Strategy, which relies on these, fails to account for the floorspace requirements of other forms of commercial activity.

No Change in Response to this Objection

Commercial forms of development, such as the examples cited, that fall outside of the B Use Classes are appropriate town centre uses, as set out in PPS4. Moreover, PPS4 generally requires that such uses are located within town centres. Policy CS26 addresses such uses and states that these types of development will be permitted within the Borough's designated town, district and neighbourhood centres. As such, it should be noted that the Core Strategy does address these forms of development.

Neither the Employment chapter nor the Town Centres and Shopping chapter sufficiently address other forms of commercial development such as commercial leisure or hotels.

Whereas separate designated employment areas are often necessary for certain types of B Uses, because these may adversely affect the amenity of other nearby uses, this is not normally the case with other types of commercial uses that fall outside of the B Use Classes. It is expected that, in conformity with PPS4, these use will locate within town centres. Therefore, it is not considered that there is any need to consider the floorspace demand of such uses as part of the Council's cross-boundary employment land studies, as these concentrate on whether it is necessary to allocate further employment areas.

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NCS/R25/4041/13/O O Do not feel that waste management should be specified
RAID Residents Against Inappropriate within the Policy
Development

No Change in Response to this Objection
The potential for waste management, is relevant to the
designated employment areas, in Policy CS8. These have the
potential for such uses subject to design and environmental
impact.

NCS/R25/2250/14/S S (no comments)
Radlett Society & Green Belt Association

Support Noted and Welcomed

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Issue 3 - Any Further Comments

NCS/R25/4595/4/ Silk Planning	Summary of The Core Strategy should emphasise the need for employment land to be assessed and allocated for potential housing sites in the future, particularly in east Borehamwood. The emphasis should be on viability of housing schemes to enable the delivery of new housing and 'avoid stagnation'.	Council Response Comments Noted The Council has based its assumptions about employment land provision on cross-boundary studies carried out by consultants. This worked showed that there would be a small shortfall in both office space and industrial and warehousing accommodation. However, it is not thought that further substantial employment area allocations are required. This is on account of the ability to locate office development within existing town centres, and the very minor nature of the shortfall in industrial and warehousing accommodation, which would most likely fall within the margin of error, with any businesses in need of premises able to locate in vacant units within existing employment areas. As such it is considered that the best approach would be for existing employment areas to be retained, subject to a review of boundaries in the forthcoming Site Allocations DPD.
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NCS/R25//1144/1/C Bio Products Laboratory	C General support for the Core Strategy, although consideration should be given to the review of the MDS and envelope boundaries. It is noted that this will take place in the Site Allocations DPD.	Comments Noted
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Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1568/2/C
Highways Agency

C

*The Highways Agency seeks clarification in relation to the following points:

- The number of jobs that would be created as a result of the proposed 110 hectares of new employment land proposed under Policy CS8.
- The way in which the proposed 110 hectares of new employment land will be divided between the employment areas identified in Policy CS8.
- Whether Policy CS11 would allow for the redevelopment of sites used for film and television production for other purposes.

When dealing with new employment land, consideration should be given to existing sustainable transport connections and the potential to secure and improve accessibility to increase sustainability and minimise car traffic generation.

Paragraphs 4.15-4.18 state that Hertsmere will rely on the provision of new business parks in Welwyn-Hatfield and St. Albans. The exact location of these should be confirmed. The Core Strategy should also detail what action the Council would take if these sites were not to come forward. This may require alterations to Policies SP1, CS8 and CS10.

Amend Text

Point 10. Consideration has been given to potential loss of employment sites and the identification of local significant employment sites is a response to the potential loss of smaller sites. Paragraph 4.22 recognises that there may be need to consider compensatory allocations of employment land, where existing sites are redeveloped for housing and other uses and this will be further reviewed in light of ministerial statements and the provisions of the emerging NPPF.

Point 11. The SHLAA identifies where potentially deliverable housing sites exist. However, the specific release of any currently allocated employment sites for housing will be undertaken through the Site Allocations DPD.

Points 12 and 13. The Core Strategy does not seek to allocate 110 hectares of new employment land and relates principally to existing designated sites.

Point 14. Noted. However, Policies CS23 and CS24 appear to address this point.

Point 15. The need for additional business accommodation is identified in the London Arc Jobs Growth and Employment Land Study.

Points 16 and 17. Hertsmere is clearly located within a wider employment market and it is unrealistic to expect that all new jobs provision for Hertsmere residents should be allocated within the borough. However, paragraph 4.22 recognises that there may be need to consider compensatory allocations of employment land, where existing sites are redeveloped for housing and other uses and this will be further reviewed in light of ministerial statements and the provisions of the emerging NPPF. Notwithstanding potential scenarios in neighbouring authorities as highlighted by the respondent, it

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should be noted that other scenarios (such as the Strategic Railfreight Interchange near Radlett) could potentially result in a significant increase in commercial floorspace. The text of paragraph 4.22 will be reviewed to ensure that it fully reflects the changing nature of employment land supply and that any future compensatory allocations would need to be suitably and wherever possible sustainably located.

NCS/R25//1631/12/C Barton Willmore Planning Partnership	C	No comment - computer error	Comments Noted
NCS/R25/22250/15/C Radlett Society & Green Belt Association	C	Verb disagreements in the para: 'Local authorities should support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area, such as those producing low carbon goods or services. However, policies should be flexible enough to accommodate sectors not anticipated in the plan and allow a quick response to changes in economic circumstances.'	No Change in Response to this Objection This paragraph is a quote from national planning policy PPS4 and cannot be changed as per the suggestion. The Government operate their own separate consultation period for PPSs.

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NCS/R25//4360/1/C Herts Biological Records Centre	C	Support for recognition of protection and enhancement of local biodiversity, and principles of sustainable development. It is not considered that the Core Strategy includes sufficient support for biodiversity. Information provided in representation on the pressures on the natural resources and environmental assets; green infrastructure; biodiversity as part of GI and development; peri-urban environments; sustainability; water supply and sewage; light pollution; recreation and amenity; providing high quality public open space; green corridors; town centres; and planning gain.	Comments Noted
NCS/R25/4520/18/C Hertfordshire County Council - Property	C	4.16 The reference to the location of waste facilities to be located in employment areas is supported.	Support Noted and Welcomed Noted
NCS/R25/4520/19/C Hertfordshire County Council - Property	C	4.26 Subject to rationalisation of other facilities it is likely that HCC will have a long term aspiration for a Household Waste Recycling Centre on the western side of Borehamwood. This will be followed up through the site allocations document and representations to the HCC Waste DPDs.	Comments Noted Noted

NCS/R25/4652/6/C
Boyer Planning

C

The land adjoining the LSES at Lismirrane Industrial Park, Elstree should be identified as a Strategic Development Location where a small-scale change in the Green Belt boundary would accord with PPG2 and the need for additional employment/commercial land.

No Change in Response to this Objection

The Council has based its assumptions about employment land provision on cross-boundary studies carried out by consultants. This work showed that there would be a small shortfall in both office space and industrial and warehousing accommodation. However, it is not thought that further substantial employment area allocations are required. This is on account of the ability to locate office development within existing town centres, and the very minor nature of the shortfall in industrial and warehousing accommodation, which would most likely fall within the margin of error, with any businesses in need of premises able to locate in vacant units within existing employment areas. As such it is considered that the best approach would be for existing employment areas to be retained, subject to a review of boundaries in the forthcoming Site Allocations DPD, to ensure that these are still relevant, justified and defensible, and the allocation of Local Significant Employment Sites, which are intended to help protect sites suitable for smaller businesses.

It should be noted, however, that provision is made in Policy CS8 for compensatory allocations of employment land through the forthcoming Site Allocations DPD. As stated, this would take place in exceptional circumstances, where the Council considers it necessary to compensate for any large releases of strategically designated employment land. Therefore, any allocation of new employment land, such as that suggested, should be considered through the Site Allocations DPD.

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NCS/R25/1631/3/O
Barton Willmore Planning Partnership

There is an objection to the approach to meeting the shortfall in industrial/warehousing accommodation as suggesting that this falls within the margin of error does not accord with Objective 11 of the Core Strategy. It appears that this approach is an attempt to avoid the release of Green Belt land close to the strategic road network.

The Council should take a proactive approach and plan for office and industrial/warehousing shortfalls in line with Objective 1.

Para. 4.21 states that there would be a shortfall of sufficient brownfield land to meet regional housebuilding requirements. This is in conflict with other statements in the Core Strategy, which suggest that there would be no such shortfall.

Amend Paragraph

The Shltaa is currently being updated (it will be published with the Core Strategy) and this paragraph will be reviewed in light of its findings. The Council has based its assumptions about employment land provision on cross-boundary studies carried out by consultants. This worked showed that there would be a small shortfall in both office space and industrial and warehousing accommodation. However, it is not thought that further substantial employment area allocations are required. This is on account of the ability to locate office development within existing town centres, and the very minor nature of the shortfall in industrial and warehousing accommodation, which would most likely fall within the margin of error, with any businesses in need of premises able to locate in vacant units within existing employment areas. As such it is considered that the best approach would be for existing employment areas to be retained, subject to a review of boundaries in the forthcoming Site Allocations DPD, to ensure that these are still relevant, justified and defensible, and the allocation of Local Significant Employment Sites, which are intended to help protect sites suitable for smaller businesses.

NCS/R25//4621/1/O
Kinetic Business Centre

- O Kinetic Business Centre is part of an area allocated as a Local Significant Employment Site. However, the Kinetic Business Centre site is linked more closely with the adjoining shopping park than the adjacent B-class uses that make up the remainder of the Local Significant Employment Site. As such the site would be better used for an extension to the retail park. Furthermore, even if the site were to be redeveloped for a non B-class use, then the Kinetic Business Centre could relocate to another location within Borehamwood and the existing use would not, therefore, be lost.

No Change in Response to this Objection

The Kinetic Business Centre was found in the Local Significant Employment Sites LDF Supporting Study to be important as part of the Borough's supply of smaller business units. These play a role in sustaining a competitive local economy with good access to employment for the local population. Notwithstanding this, whilst Policy CS9 identifies the general location of the designated Local Significant Employment Sites, it also commits the Council to clarifying the exact locations of these in the forthcoming Site Allocations DPD. If it is found at this later stage that circumstances have materially changed and that it would be inappropriate to include the Kinetic Business Centre as part of a Local Significant Employment Site then the boundary can be defined accordingly.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 4 - Open Land and Environment Q14

<u>Summary of</u>		<u>Council Response</u>
		<u>Amend Text</u>
NCS/R25/1463/5/C Natural England (Countryside Agency, EofE Region)	C Suggested inclusion of a section on landscape character, where it should state the assessments will take place.	Paragraph 5.10 and 5.24 make reference to landscape character assessments, particularly PPS7
NCS/R25/1463/7/C Natural England (Countryside Agency, EofE Region)	C General support for the use of SUDS, it is also recommended that a stronger policy stance is taken for other biodiversity enhancing measures could be added where appropriate, such as green/brown roofs/walls, and green infrastructure.	Comments Noted
NCS/R25/3990/9/C John Anderson Planning	C The use of the green belt in certain places is discussed in the paragraphs around 5.6. The document should provide greater detail on sporting facilities such as bmx tracks and go-karting.	Comments Noted Essential sports facilities are an acceptable use within the Green Belt. However, facilities such as go-karting tracks would have to demonstrate special circumstance and not be detrimental to the Green Belt.
NCS/R25/3990/10/C John Anderson Planning	C The development policies on flood relief have been well thought out. The problem will be the cost of the necessary measures and the getting of the required contributions. However there is now more expertise available. Finance needs to be allocated regularly and this should be written into the plan.	Comments Noted The Council adopted a Planning Obligations SPD in December 2010 which makes provision for drainage and flood measures to be secured by legal agreement. This is supported by CS20 of the RDCS. HCC's Building Futures includes various measures for flood management which CS15 endorses this approach.

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NCS/R25/3990/16/C John Anderson Planning	C	The development policies on flood relief have been well thought out. The problem will be the cost of the necessary measures and the getting of the required contributions. However there is now more expertise available. Finance needs to be allocated regularly and this should be written into the plan.	Comments Noted The Council adopted a Planning Obligations SPD in December 2010 which makes provision for drainage and flood measures to be secured by legal agreement. This is supported by CS20 of the RDCS. HCC's Building Futures includes various measures for flood management which CS15 endorses this approach.
NCS/R25/4548/C English Heritage (East of England Region)	C	Policy CS13 Protection or enhancement of historic assets We support this policy and consider that there would be benefit in expanding it to make it more locally distinctive and responsive to the evidence base behind the core strategy. The following words might be added to the end: 'The Council will take account of available historic environment characterisation work, including conservation area appraisals and archaeological assessments when making decisions affecting heritage assets and their settings.'	Amend Policy Comments noted and changes agreed with.
NCS/R25/4553/9/C Hertfordshire County Council	C	Various minor amendments are suggested, in addition to replacing the word historic with heritage and preserve with conserve, to reflect the new PPS5. Policy CS13 should refer to historic as well as listed building, and make allowance for as yet unidentified archaeological remains.	Amend Text The comments made are supported and the various amendments suggested will be made.
NCS/R25/4647/12/C Daniel Rinsler & Co Ltd	C	Subject to the Core Strategy providing recognition to the necessity of appropriate Green Belt release, particularly on well located sites in close proximity to Elstree & Borehamwood train station.	No Change in Response to this Objection Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites. There is not requirement both in National and Regional Policy to undertake a review of the Green Belt. The Core Strategy paragraph 2.29 states that the Housing Supply will be review if strategic brownfield sites are not brought forward.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1631/16/N Barton Willmore Planning Partnership	N	Policy CS15 fails to recognise feasibility or viability in the incorporation of some of the suggested measures.	No Change in Response to this Objection CS15 encourages approaches and methods that are consistent with national guidance and best practice by government organisations. Many are a statutory requirement, and a requirement on a site by site basis, as a result there is no need to amend the policy in light of the objection.
NCS/R25/4427/8/N CGMS Consulting	N	The strategic gap between Bushey and Watford should exclude all Major Developed and Previously Developed sites within the Green Belt to help facilitate the provision of new homes and recreational needs as required by policies elsewhere within the Core Strategy.	No Change in Response to this Objection Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites.
NCS/R25/4649/11/N JCPC Ltd	N	The approach should recognise that development can bring positive enhancements to the environment, including alternative land uses that foster more sustainable patterns of development. As worded, the policy is a negative planning 'tool' that does not encourage more forward-thinking options to enhancing the environment.	No Change in Response to this Objection The wording of the policy includes 'all development proposals must preserve or enhance the natural environment'. It is not considered that the policy is overly restrictive to development that would have a positive impact on the environment. It should also be noted that many of the designations in this policy are statutory (wildlife sites etc), and the appropriate stakeholders would be consulted on planning applications.

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NCS/R25/1210/5/O
Shire Consulting

O

Green Belt boundaries must be rational and up-to-date (PPG2) and the time to make adjustments is as part of the process of 'Development Plan' review. By not doing so the Council the is not allow for a fall back position.

Amend Paragraph

Small scale changes to the Green Belt will be reviewed as part of the Site Allocations.

The terminology to Green Belt will be reviewed and amended within the Core Strategy.

The Green Belt is referred to variously as a 'Natural Asset', a 'habitat, as well as an 'environmental constraint' in the draft Core Strategy document. This does not acknowledge that Green Belt is an entirely man-made land use policy designation that has no relationship to landscape quality, biodiversity, or environmental characteristics (PPG2, paragraph 1.7). Whilst, on occasions, Green Belts may also contain protected landscapes or species habitats this is coincidental to their land use planning role. We recommend that these erroneous references be removed from the draft.

NCS/R25/1210/6/O
Shire Consulting

O

Policies such as CS12, CS13 & CS16 contain a number of statements relating to development in the Green Belt, the historic and natural environment; or in areas of flood risk, that add

nothing to the Government policy already in place on these topics set out in PPG 2 or PPSs 5, 9 & 25. As we set out above there is no necessity to repeat national policy within the LDF, and unless something specific to Hertsmere Borough alone can be shown on these matters, an Inspector could well judge these policies as being 'unsound' at the public examination. By removing the unnecessary policy the Core Strategy could be very much more concise.

No Change in Response to this Objection

In a currently evolving planning system, advice from the Planning Officers Society is that such policies are included in Core Strategies.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4041/14/O
RAID Residents Against Inappropriate Development

○ Question the significance of Wrotham Business Park as a Significant Employment Site, as it is of small scale, if the While House Light Industry Workshops are protected this should not encourage expansion into the Green Belt.

No Change in Response to this Objection
Policy CS9 seeks the protection of Local Significant Employment Sites, to ensure that a range of small scale employment sites are secured within the Borough. These sites have been assessed as part of the Local Significant Employment Sites LDF Supporting Study.

NCS/R25/4196/2/O
CPRE Herts

○ Would like to see a stronger policy along the lines of HLP C1 in the Core Strategy, where it is considered that CS12 is insufficient in addressing Green Belt policy and where GB is considered to be a different type of protection compared to TPOs and SSSIs.

No Change in Response to this Objection
The principle aims and policy stance in relation to the Green belt is included in policy CS12. This is reiterated in more detail in the supporting text around this policy, and also in the Spatial Vision chapter. Furthermore, it is likely that more detailed policies, particularly in relation to the Green Belt will be included in the Site Allocations and Development Management DPD.

NCS/R25/4429/11/O
GL Hearn Property Consultants

○ Generally supported, although it is considered that this policy should reflect the issues raised in Q1-7 relating to green belt releases for housing development.

No Change in Response to this Objection
The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development. Such a review would also need to establish the reason for sites not coming forward before considering any revisions to the Strategy which result in the identification of locations in the Green Belt for development.

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NCS/R25/4552/3/O

RPS on behalf of Willows farm

O

While we understand that the Council would wish to delegate detail around Major Developed Sites to subsequent DPDs in the way suggested by the final sentence of 5.5 and the first of 5.7, we consider that the number of existing MDSs in a relatively compact district consisting entirely of Green Belt outside its built up areas justifies giving them further and separate treatment in the Core Strategy, rather than under the rather misleading subheading of 'natural assets'.

We reiterate that land at Willows Farm Village shown on the attached drawing should be identified as a Major Developed Site in the Green Belt.

Notwithstanding the title of the subsection "Access to open spaces and countryside" we consider that the balance of this paragraph is inappropriate in the absence of any reference elsewhere to Willows Farm as an important feature of the local economy, and in the absence also of any policies (or general material) on tourism. We support the concept of community forests and principle of encouraging access to them and the countryside generally by means of Gateway Sites or equivalents. Paragraph 5.22, however, suggests that the very important visitor attraction at Willows Farm is a secondary and perhaps conflicting factor, less important than access to the countryside. It may be the case that many of the visitors to Willows Farm are those who do not normally otherwise seek recreation in the countryside. However, in this context Willows Farm and the Gateway Site should be seen as complementary, since their co-location has the potential to increase outdoor recreation, and also to benefit Willows Farm and by extension the local economy. This paragraph should be redrafted accordingly.

Amend Text

Comments noted. The Council will review this section including the title. Reference will be made to the Council's MDS reports. Paragraph 5.22 will be reviewed in light of the comments received by the way in which Willows Farm is presented, is not considered to downplay its significance or potential compatibility with its role as an access / gateway to the countryside.

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NCS/R25/4586/1/O
Bidwells on behalf of Barratt Strategic

○ It is accepted that protection against ad-hoc development on open land within the Green Belt is necessary and consistent with PPG2, so long as the RDCS allows for the release of strategic sites within the Green Belt to meet identified housing needs, where appropriate. Identification of appropriate development sites within the Green Belt is crucial if the Council are to prevent planning by appeal in the event that they are, for any reason, they are unable to identify a 5 year supply of housing (also see our response to Question 4

No Change in Response to this Objection

The Council currently has sufficient housing land supply of 6.2 years as demonstrated within the Annual Monitoring Report. Paragraph 3.19 provides guidance on the Council's position if the identified housing land supply does not come forward, it states: Where housing completions during any following three year period are projected to fall below the proportion sought in each phase by 20% or more, as set out in Policy ICS3, it will be necessary to review the phasing of all housing allocations and if necessary, either bring certain allocations forward or consider whether a wider review of the Strategy is required, including land presently designated as Green Belt. Such a review will need to take account of housing land supply and trends in the wider housing market.

NCS/R25/4637/1/O
Sworders Agricultural

○ We do not consider that the desire to maintain separation between the settlements should act as a blanket preclusion to small scale greenfield sites in this area being able to be considered to meet housing requirements. As such policy CS12 should be amended to read (final paragraph),
"Strategic gaps in the Green Belt between Bushey and Watford and Bushey and Stanmore will be maintained, within which any limited development, deemed to be acceptable in the Green Belt, should serve to retain the separation between the towns. This shall not prevent small scale releases being considered through the Site Allocations DPD if such releases, judged on a site by site basis, do not reduce the efficiency of the Strategic Gap in that location.

No Change in Response to this Objection

Paragraph 2.36 of the Core Strategy states that the purposes of the Green Belt will be emphasised between Stanmore and Bushey. Paragraph 5.7 goes on to say that the strategic gap is to preserve what space there is between Bushey and Stanmore/Watford. It is noted that there are significant major developed sites in the area, and the pressure for development here is great.
The main purposes of the Green Belt are reiterated, particularly noting the prevention of the merging of towns, the prevention of urban sprawl of large urban areas, to preserve the setting and character of historic towns, and the protection of the open countryside. The 'strategic gap' is considered appropriate to meet these aims in this instance. More specific policies may be necessary in the formation of the Site Allocations and Development Management DPD.

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NCS/R25//4643/O Edwards Covell	O	Policy CS12 reflects the general aims of PPG2 however, it is over restricting by stating that any development rather than just inappropriate development. Suggest that is removed.	Amend Policy "and other development" to be removed.
NCS/R25/4658/5/O Shire Consulting	O	The Green Belt is referred to variously as a 'Natural Asset', a 'habitat', as well as an 'environmental constraint' in the draft Core Strategy document. This does not acknowledge that Green Belt is an entirely man-made land use policy designation that has no relationship to landscape quality, biodiversity, or environmental characteristics (PPG2, paragraph 1.7). Whilst, on occasions, Green Belts may also contain protected landscapes or species habitats this is coincidental to their land use planning role. We recommend that these erroneous references be removed from the draft.	Amend Text Small scale changes to the Green Belt will be reviewed as part of the Site Allocations. The terminology to Green Belt will be reviewed and amended within the Core Strategy.
NCS/R25/1598/8/S Preston Bennett Partnership	S	With specific reference to access to open space, the objectives in Policy CS14 for Council's to work with partners to facilitate access to open space is supported. It should be recognised that new development often has the benefit of being able to open up otherwise unusable open spaces for the benefit of the community, and where this is proposed it should be supported.	Support Noted and Welcomed
NCS/R25/2250/16/S Radlett Society & Green Belt Association	S	We suggest dropping the word 'local' from Objective 7 as there could be many sources of pollution, e.g. EFW stacks, industrial processes and even traffic outside the Borough, which presumably aren't 'local'; the policy wording is too narrow.	No Change in Response to this Objection This is not the aim of the objective, other organisations such as DEFRA, HCC, EA look after other areas beyond the scope of this DPD

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4041/15/S RAID Residents Against Inappropriate Development	S Also include strategic gap between LB Barnet and LB Enfield and Potters Bar.	No Change in Response to this Objection There is a strategic gap between Watford and Bushey as this narrowest point of the Green Belt. It would had to define a strategic gap between the location suggested given the scale of the separation distances.
NCS/R25/4491/10/S Phillips Planning services Ltd	S Support, although there should be flexibility in the policy to allow for commercial sites within the Green Belt to be available for housing schemes.	Amend Policy Support noted and welcomed. It is proposed that wording will be added to the Core Strategy with a commitment to be made for envelopes to be drawn around villages where it may be more acceptable for redevelopment of previously developed sites and infill development to occur.
NCS/R25/4492/4/S Environment Agency	S We support the approach in paragraph 5.13 page 57 however we would like to highlight the importance of protecting and enhancing our river corridors and maintaining a development free buffer strip next to our watercourses. We would like to see a commitment within these policies to retaining and providing an 8 metre wide undeveloped buffer zone for all ordinary watercourses and designated Main Rivers with Hertsmere in order to make space for water and adapt to climate change. The Government's flood risk strategy 'Making Space for Water' (2005) highlights the importance of making room for water alongside watercourses as a measure of reducing flood risk, providing habitat benefit and an improved public amenity resource as well as improving biodiversity and water quality. River corridors also contribute to the green infrastructure network.	Comments Noted Para 5.13 can be added- 'to support the importance of river corridors and the 8m buffer around watercourses to help reduce flood risk, provide habitat benefit and an improved public amenity resource, to improve biodiversity and water quality, and to contribute to the green infrastructure network.

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NCS/R25/4635/11/S
Rolfe Judd

Support Noted and Welcomed

S Agree with Councils approach to environmental protection, particularly that the Council will support and work with developers who enhance and facilitate access to parks, open spaces and the local countryside.

Para 5.7 mentions that the Council will review and where necessary clarify the detailed criteria for considering the scale and extent of development in the Green Belt, in the Development Management DPD.

Our Client is a key local developer who is currently considering development proposals on at the Former West Herts Annex site, Bushey which is identified as 'safeguarded' land in the Local Plan. As a result, our client is keen to play a leading role in the formulation of future policy.

NCS/R25/4641/12/S
First Place Nurseries

Support Noted and Welcomed

S The protection of environmentally important sites, including SSSIs, town and village greens etc is considered to be acceptable. However, within the Green Belt small housing developments should be considered acceptable in this respect, subject to other designations. Limited extensions of settlements can provide additional housing in sustainable locations. Furthermore alterations to the Green Belt boundary can make it more logical and therefore defensible.

The strategy has been informed by the Council's Strategic Housing Land Availability Assessment and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. Furthermore, there will be an assessment of the Green Belt boundary which will be incorporated into the Site Allocations and Development Management DPD.

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NCS/R25/1358/12/Y DLA Town Planning Ltd	Y	The protection of environmentally important sites, including SSSIs, nature reserves, town and village greens etc. is considered to be acceptable. However, within the Green Belt small housing development should be considered acceptable in this respect, subject to other designations. Limited extensions to the settlement boundary can provide additional housing in sustainable locations. Furthermore alteration to the Green Belt boundary can make it more logical and therefore defensible, helping to protect the Green Belt into the future whilst providing much needed housing.	Comments Noted The strategy has been informed by the Council SHLAA, and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in para3.12 that housing supply will need to be continuously monitored and if sites in the SHLAA do not come forward at the anticipated rate, there may have to be need to review the focus on housing growth within existing built up areas. Furthermore, there will be an assessment of the Green belt boundary which will be incorporated into the Site Allocations and Development Management DPD. Otherwise planning applications for development of Green Belt land will be dealt with on their own merits.
NCS/R25/4644/12/Y First Place Nurseries @ and R/O Cobden Hill	Y	The protection of environmentally important site is supported. It is noted that the policy includes the Green Belt, and it is thought that small housing development should be considered acceptable.	Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 4 - Open Land and Environment Q15

<u>Summary of</u>	<u>Council Response</u>
NCS/R25/1598/9/C Preston Bennett Partnership C There is no objection raised to the environmental impact considerations of new development. It is considered that Policy CS16 should build in a degree of flexibility. In respect of both the Code Level requirements as well as the requirement for large scale developments to provide 10% on site renewable energy, it is considered that these should be 'targets' which, if shown would add an unacceptable degree of pressure on the feasibility of a development, could be negotiated on a site by site basis based upon circumstances.	Amend Paragraph The Code Level as specified in Policy CS16 is consistent with the national requirements of the building regulations. The 10% on site renewable energy target is a minimum for proposed development, and should be exceeded where possible.
NCS/R25/3990/12/C John Anderson Planning C In order to achieve some success with sustainable design and construction it could be useful to involve the Building Control section as a formal consultee on certain planning applications before they are granted. The National Planning Forum has written a useful paper on this type of local government organisation (This may be accessed on its website). This change in organisation should be a policy.	Comments Noted The Council's building control team is already a consultee on certain planning applications. They are consulted as required. Such a policy is not appropriate within the scope of the Core Strategy. The Council's move to the paradigm of Development Management also allows for close working with the Building Control team who are part of the Planning Department.
NCS/R25/4641/16/C First Place Nurseries C These policies are considered acceptable, subject to details of any further policies included within the LDF.	Comments Noted The requirement for more detailed policies in relation to policies CS15 and CS16 on environmental impact, and energy and CO2 reduction will be assessed in the formulation of the Site Allocations and Development Management DPD.

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NCS/R25/46517/C The Planning Bureau Limited	C Policies CS15 and CS16 should not exceed the requirements laid down by the building regulations.	No Change in Response to this Objection The Core Strategy sets out the standards laid down by the Building Regulations as a minimum requirement. However, Policy CS16 also encourages developers to exceed these standards where possible. Such measures may be appropriate where developers wish to exceed the minimum Building Regulations standards as a way of mitigating otherwise unsustainable forms of development.
NCS/R25/4649/12/N JCPC Ltd	N Compliance against Code Level requirements should be left to Building Regulations.	No Change in Response to this Objection This policy sets a minimum standard for energy and CO2 reductions, meaning that a greater level for Code of Sustainable Homes could be sought on development to mitigate its impact.
NCS/R25/1168/3/O Home Builders Federation	O Policy is unjustified because it is unnecessary. It duplicates what is already addressed through the Building Regulations and the Government's programme towards zero carbon homes.	No Change in Response to this Objection Policy CS16 is not solely concerned with housing but extends to all forms of new development. However, the relevant provisions of Part L of the Building Regulations have not yet taken effect and so the policy clarifies that how the Council will respond to code level requirements in the intervening period. It should also be noted that Policy CS16 seeks these code levels as minimum requirements rather than a ceiling and that the policy also covers renewable energy development.
NCS/R25/12107/O Shire Consulting	O Draft Policy CS16 requires developments to meet the terms of Part L of the Building Regulations by specified dates. Meeting the terms of such a policy may not be possible in relation to current technology and this is one of the reasons why PPS1 states that planning policy should not duplicate the terms of other legislation.	No Change in Response to this Objection The policy states as a minimum that these levels are to be met, as a result applicants are encouraged to go beyond the minimum requirements of the building regs.

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NCS/R25//3975/1/O
Indigo Planning Ltd.

- O Considers policy CS16 to be overly prescriptive, and lacks flexibility, which could result in development being unviable. It is also noted that Building Regulations Part L cover some of these aspects.

Amend Policy

It is recognised that this policy reflects that of the Building Regulations, however these requirements are minimum standards, and it should be noted that this policy contains a phased approach where each part will not be valid until the appropriate building regulations have come into affect. The third part of the policy relates to major developments being expected to incorporate energy from renewable sources. The policy then goes beyond what is required of development and expresses points that will be taken into account should an application come forward to provide renewable energy generation.

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NCS/R25/4492/5/O
Environment Agency

- O Policy CS15 pg 64 does not include the policy recommendations of the Council's SFRA, in accordance with PPS25, even though the supporting text on page 61 does make reference to the SFRA with regard to the Sequential Test. If the site specific policy recommendations are too detailed for this policy, high level recommendations should have been considered, including: Protect Greenfield functional floodplain; Preserve flood flow routes; Ensure residual risk is reduced behind defences; Safeguard land for future Flood Alleviation Schemes; Seek opportunities for developer contributions for Flood Alleviation Schemes; Avoid development where groundwater flooding is a significant and frequent risk.
- Amend Policy**
The Council will include reference to the Council's SFRA within Policy CS15- "Development proposals will be required to take account of the policy recommendations of the Council's SFRA" and 'sequential' will be added to point (i) to read- "sequential and exceptions test"
- However, many of the higher level requirements are development management matters and it is not considered necessary or appropriate to include these in Policy CS15. However, the Policy will be reviewed to include greater cross referencing to the text on P.61 which will be expanded to cover the SFRA in some additional detail.

As suggested in our previous response, the policy could include a sentence that states that "Development proposals will be required to take account of the policy recommendations of the Council's SFRA."

Add a bullet point to policy CS15 to include water efficiency requirement, and supporting text from para 5.32, also change title of 'climate change and flood risk' section to 'climate change and water'

We believe that policy CS15 is not consistent with PPS25 and the SFRA has not been used to inform the policy.

We are also unclear as to why these recommendations have not been included and how, or if they will be used in further DPDs.

Point (i) in Policy CS15 omits the Sequential Test, and should be revised to include that the requirements of the sequential test, as well as the exceptions test and only then will development be allowed to proceed. Development should lower flood risk and the flood plain should be seen as an asset to be protected.

In Policy CS16: Energy and CO2 Reductions page 64 we support the aims for new residential development to achieve Code Levels by set dates, although we believe that water efficiency targets could be included here also,

where the South East is an area of 'serious' water stress.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25//4553/8/O
Hertfordshire County Council

O

Although referencing the recent Hertfordshire Renewable and Low Carbon Energy Technical Report (2010), the proposed policy approach set out in CS16 is not supported by the study. The Herts RLC report identified that such an approach is not the most appropriate and cost effective means to achieving carbon reductions (Para 9.28). This is likely to be particularly relevant in Hertsmere where certain schemes (such as the Elstree Way Corridor) are well suited to a range of offsite measures (such as district heating schemes). The policy should be revised to allow a flexible approach to how developers achieve the prescribed carbon reduction targets. This would ensure that the approach to energy and CO2 reduction is sound in accordance with the tests set out in PPS12 (Para 4.52).

The County Council continues to support the policy approach adopted in the Revised Core Strategy for the promotion of sustainable waste management. It is not suggested that any further changes would be necessary to this effect.

Previously the County Council requested that the concept of sustainable construction and demolition methods should also be mentioned in policy EC15 to provide additional weight and compliment point vii) of the policy. This has not been added and at this stage it is considered that it could be covered by inserting some text from the supporting text in paragraph 5.48 at the end of point vii), 'during the construction phase and following occupation'. This would make it clearer that waste minimisation and recycling should occur during the life cycle of development.

In para 5.46 should refer to 'construction and demolition waste'.

Amend Policy and Text

It is not clear how or why Policy CS16 needs to be made more flexible. However, the policy does make provision for energy to be generated from decentralised or renewable sources and on a very schemes, it is anticipated that opportunities will come forward.

Sustainable construction and demolition matters will be considered in more detail in the preparation of development management policies in a separate DPD. However, paragraphs 5.46, 5.48 and point vii) in Policy CS15 will be amended in line with the comments made.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4658/O Shire Consulting	O	Policies such as CS12, CS13 & CS16 contain a number of statements relating to development in the Green Belt, the historic and natural environment; or in areas of flood risk, that add nothing to the Government policy already in place on these topics set out in PPG 2 or PPS 5, PPS99 & PPS25. As we set out above there is no necessity to repeat national policy within the LDF, and unless something specific to Hertsmere Borough alone can be shown on these matters, an Inspector could well judge these policies as being 'unsound' at the public examination. By removing the unnecessary policy the Core Strategy could be very much more concise.	No Change in Response to this Objection In a currently evolving planning system, advice from the Planning Officers Society is that such policies are included in Core Strategies. The council is unaware of PPS99?
NCS/R25/2250/17/S Radlett Society & Green Belt Association	S	(no comments)	Support Noted and Welcomed
NCS/R25/4041/16/S RAID Residents Against Inappropriate Development	S	Yes	Support Noted and Welcomed
NCS/R25/4635/12/S Rolfe Judd	S	Agree with the general principles of Policy CS15 and CS16. Also agree that the Code for Sustainable Homes levels should be in line with Part L of the Building Regulations as they become mandatory.	Support Noted and Welcomed
NCS/R25/1358/13/Y DLA Town Planning Ltd	Y	These policies are considered acceptable, subject to the details of any further policies included within the Local Development Framework.	Support Noted and Welcomed None.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4644/13/Y Y "These policies are considered acceptable, subject to the First Place Nurseries @ land R/O Cobden details of any further policies included within the LDF" Hill

Support Noted and Welcomed

The requirement for more detailed policies in relation to policies CS15 and CS16 on environmental impact, and energy and CO2 reduction will be assessed in the formulation of the Site Allocations and Development Management DPD.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 4 - Any Further Comments

Summary of

NCS/R25/2250/18/C

C Radlett Society & Green Belt Association

P54: 'Hertsmere Together partners' as a sentence subject sounds ambiguous and leads to confusing meaning.

Council Response

No Change in Response to this Objection

This term has been taken directly from the key aims of the Community Strategy and cannot be changed through this consultation process. The Core Strategy has been produced in general conformity with PPS12, para 4.34 states that 'key spatial planning objectives for the area should be in alignment with priorities identified in the SCS'

NCS/R25/3990/11/C

John Anderson Planning

C Air pollution has been considered but not the likely change of power source in vehicles. The latter may happen more rapidly than forecast, and it will help to mitigate the former. The current situation in North Africa may make national policy think more about electricity use and generation. It should be anticipated.

Comments Noted

It is perhaps outside of the scope of the core strategy to consider the use of electricity and power sources of cars. The document is flexible enough not to restrict such changes in power sources. The integration of charging points for electric cars for example is not restricted by the current policy framework, and if required could be facilitated with a DC management policy or SPD.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4492/6/C
Environment Agency

C

Pg 62 - reference should be made to PPS23 and CLR 11 relating to contaminated land; page 61 and 63 suggested form of wording relating to the delivery of infrastructure and services in line with new development; chapter 5 should emphasise the importance of river restoration with many specific examples in Hertsmere with suggested form of wording

Amend Text

Reference to PPS23 and CLR 11 will be made in para 5.35; Add to 'Climate Change and Flood Risk' - "The Council will continue to work with the water and sewerage providers to ensure that appropriate capacity is available to serve new development, and phase development in line with the available infrastructure capacity";
Add para to "Climate Change and Flood Risk" - "Where sites are located in close proximity to a river, the Council will, in appropriate circumstances, seek river restoration and/or financial contributions towards the restoration of rivers in consultation with the Environment Agency. In particular the restoration of banks, in-channel habitat enhancement, the removal of toe-boarding and deculverting."

NCS/R25/4520/20/C
Hertfordshire County Council - Property

C

To achieve the distribution of development set out in the Core Strategy additional school places may be needed. The presence of a Green Belt designation, washing over sites being used for education, acts as a constraint and obstacle in being able to respond to the need to provide new, or to enhance existing, facilities. It is noted that although some school sites in the Borough located within the Green Belt have Major Developed Site (MDS) status, this does not apply to them all. It is therefore appropriate to consider the necessity for the Green Belt designation washing over those primary and secondary schools that do not have MDS status to be reviewed.

Comments Noted

The MDS boundaries are to be reviewed as part of the Site Allocations DPD. However, it is also worth noting that the Green Belt designation does not preclude development where there are appropriate special circumstances. It would be expected the development of new schools to support housing growth in the Borough Should be able to demonstrate very special circumstances.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4520/21/C Hertfordshire County Council - Property C	Policies that restrict school expansion, such as their inclusion in the Green Belt, are not helpful to HCC in the provision of additional facilities. The intention at 5.5 to review and clarify MDSs in Hertsmere within a site allocations DPD and the potential minor realignment of Green Belt boundaries outlined at section 2.35.	Comments Noted The MDS boundaries are to be reviewed as part of the Site Allocations DPD. However, it is also worth noting that the Green Belt designation does not preclude development where there are appropriate special circumstances. It would be expected the development of new schools to support housing growth in the Borough Should be able to demonstrate very special circumstances, as a result it does not seem appropriate to remove schools from the Green Belt.
The County Council would therefore ask, in order of preference that consideration is given to	a) Where possible the removal of Green Belt designation from part or all of the school site; b) the identification of MDS status for those schools which are currently washed over by the Green Belt; c) the revision of those school sites with MDS status to review whether the boundaries of the site enable the growth required to meet any increase in needs as a result of further development in those areas and the requirements school expansion programmes.	
In addition, it should be noted that while the use of land within the Green Belt for outdoor sport and recreation is not in itself inappropriate, it would be important for the Local Planning Authority to consider the identification of additional/extended playing fields for some of the existing schools in the Borough.		
Policy CS12 also advocates the designation of a strategic gap between Bushey and Watford. HCC own land in this area, and in accordance with Planning Policy Statement 7 - Sustainable Development in Rural Areas (PPS7), would not wish the designation of the strategic gap to prevent any development that may be necessary to provide or enhance HCC services.		

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NCS/R25//4630/1/C
Hertfordshire Local Access Forum

C For inclusion in relevant paragraphs of the revised Core Strategy, the position statement on public access is attached to the representation. Statement relates to Rights of Way, and the Improvement Plan.

Comments Noted
Para 7.24-7.28 addresses 'non-motorised or Greenways routes' and includes support for rights of way.
A reference can be included for the 'HCC Rights of Way Improvement Plan' to para 7.24

NCS/R25/1631/15/O
Barton Willmore Planning Partnership

O The need to protect the Green Belt should be balanced against the need to support the economy and provide sufficient housing to accommodate a growing population. For this to happen a review of Green Belt boundaries needs to be undertaken. This would secure the long term protection of the Green Belt as defensible boundaries would be created.

No Change in Response to this Objection
Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites. There is not requirement both in National and Regional Policy to undertake a review of the Green Belt. The Core Strategy paragraph 2.29 states that the Housing Supply will be review if strategic brownfield sites are not brought forward. Small scale amendments to the Green Belt Boundary.

In respect of Bushey the strategic gap should be maintained, but there is scope for the settlement to be extended as far as the M1.

In respect of contaminated land it is considered that the costs of remediation should be taken into account when payments towards affordable housing and other infrastructure costs are requested.

There are objections to Policy CS15 as this does not recognise the viability of developments and how the requirements of this policy may impact on viability. The second paragraph of the policy should read 'Where feasible and viable, proposals will be required to incorporate...'

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4041/17/O

RAID Residents Against Inappropriate Development

O 5.23-5.25 Measures to providing access to the countryside should not be used as a mitigating circumstance for inappropriate green belt development. The countryside should not be converted into parks, and left as natural as possible.

No Change in Response to this Objection

5.23-5.25 support access to the countryside within the Watling Chase Community Forest Strategy. Such an approach is to allow greater access to the countryside and is acceptable development within PPG2.

5.35 Previous Landfill sites may now be part of the countryside and should be subject to current green belt protection.

Whilst paragraph 5.35 makes no reference to landfill sites, any sites within the green belt would have to meet local and national green belt policies.

NCS/R25/4658/7/O

Shire Consulting

O Draft Policy CS16 requires developments to meet the terms of Part L of the Building Regulations by specified dates. Meeting the terms of such a policy may not be possible in relation to current technology and this is one of the reasons why PPS1 states that planning policy should not duplicate the terms of other legislation.

No Change in Response to this Objection

The policy states as a minimum that these levels are to be met, as a result applicants are encouraged to go beyond the minimum requirements of the building regs.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1463/6/S S
Natural England (Countryside Agency,
EofE Region)

Support for para 5.8-13 and table 9. It is noted that although Green Belt land should be protected in relation to the protection of biodiversity, it should be recognised that brownfield sites can also contain rare or protected species.

No Change in Response to this Objection
Quality of development, together with the impact on the environment continue to be a material consideration in the determination of planning applications. Greater detail on this is included in policies CS12 and CS13, and other policies also relating to Green Infrastructure will be incorporated into the Development Management DPD.

The strategy has been informed by the Council's SHLAA and does not specifically seek to release Green Belt land in order to meet the 15 year housing target set. However, it is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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. A number of respondents have stated that the Core Strategy does not contain adequate provision for any alternative scenario and Policy CS2 is being amended to clarify that a review of the Core Strategy would be undertaken if sites in the SHLAA do not come forward for development.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 5 - Sustainable Development Q16

NCS/R25//3990/7/C	John Anderson Planning	C	<u>Summary of</u>	<u>Council Response</u>
			Although infrastructure is mentioned as a main theme of the plan it is the only one, which is currently not really in the control of the council. For example demand for electricity is likely to increase but there is little that a district council can do except to lobby. The strategy has to be flexible to accommodate changes in the provision of infrastructure as well as the vagaries of government thinking. It cannot be rigid. Educational facilities can be combined in certain cases with leisure facilities. It is noted that Radlett is shown as being short of and needing further educational facilities. School playing fields can be sited at the edge of green belts particularly where they are near to good communications.	Comments Noted The strategy is flexible to changes to infrastructure and technology within the existing environmental constraints and satisfactory design. The strategy and PPG2 would allow for the delivery of school playing fields in the green belt, as essential sports facilities are an acceptable use within the Green Belt.
NCS/R25//4458/1/C		C	*We request that you give consideration to the allocation of land for D1 uses, specifically places of worship.	No Change in Response to this Objection The Council is currently undertaking a faith communities needs assessment as part of its LDF evidence base. The outcome, and related policy implications, is not yet known. However, it may be that the Council response to the findings of this assessment through the issue of Supplementary Planning Guidance or the allocation of land in the Site Allocations DPD.
NCS/R25/4520/24/N	Hertfordshire County Council - Property	N	No - the reference to emergency services should be deleted as they are assets owned by the community as opposed to facilities used by the community	No Change in Response to this Objection Some emergency services are visited by the public, and emergency services by definition serve the community.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4646/11/N
DPP LLP

N

TWNT agree that it is important for the RCS to promote the protection of key community facilities but consider it is difficult for such a policy to be implemented in the absence of an up-to-date Community Needs Assessment. Such an assessment must be progressed as an urgent priority if this policy is to be based upon a sufficiently robust evidence base and therefore be considered sound.

TWNT considers that the wording of Policy CS18 is overly onerous so far as it requires three separate circumstances to be demonstrated before even proposals for the relocation of community facilities will be permitted. It is considered that changing the 'and' separating the second and third circumstances to 'or' will ensure that the policy provides sufficient scope and flexibility to enable proposals which involve the relocation or replacement of community facilities to gain permission without being unnecessarily constrained by an overly-prescriptive policy.

In addition, Policy CS18 should acknowledge that the means by which such facilities are protected may differ from site to site, dependent upon its nature, location and proposal for redevelopment. For instance, greater weight should be attached to proposals for the relocation of such facilities as part of the redevelopment of sites. Such proposals would have the potential to avoid the loss of floor space in community use, whilst providing the added benefit of bringing two sites into more viable and beneficial use.

Any policy designed to protect community facilities should be sufficiently flexible to take account of the individual circumstances of different application proposals and to ensure the need to protect key community facilities is balanced against the need for redevelopment to make the

Amend Text

The Council has already undertaken a significant amount of work on requirements for community facilities/infrastructure, including a detailed Open Spaces Study, Green Infrastructure Study and (jointly with other Hertfordshire authorities) the Hertfordshire Infrastructure and Investment Study. A paper setting out Infrastructure Delivery requirements will be prepared.

The three criteria in the second sentence of Policy CS18 are considered to be appropriately worded as they are and do not infer that replacement accommodation must be found, given that there may be a limited number of scenarios where replacement accommodation is not required or needed. However, whilst Policy CS18 rightly seeks to protect community facilities and as such reflects the government's approach of empowering local communities through the Community Right to Buy, the supporting text will be reviewed to ensure that it is not unduly onerous where sites very clearly have no scope for re-use by the community.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

most effective use of previously developed land to improve people's quality of life and contribute to sustainable economic development, in accordance with the provisions of national planning policy.

- | | | |
|---|--|---|
| NCS/R25/1487/2/O
Sport England (East Region) | O CS17 and CS18 - supported in principle, although there is concern that there is a lack of sufficient evidence to support the request for financial contributions towards sport and community provision | No Change in Response to this Objection |
|---|--|---|

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4520/22/O
Hertfordshire County Council - Property

O

6.4 leading to Policy CS18 Key Community Facilities

In terms of the loss of key community facilities, from time to time there may be a closure of a County Council facility, such as a school or a day centre. The proposed policy states that the loss, reduction or displacement of key community will not be permitted unless the facilities are genuinely surplus and any replacement accommodation is satisfactory for all of its users.

No Change in Response to this Objection

The displacement of facilities would have to be considered on a case by case basis as where and how a facility is displaced could be quite significant to the community it serves.

Some emergency services are visited by the public, and emergency services by definition serve the community.

If facilities are 'displaced' then by definition they are being reprovided elsewhere. It is highly likely that these would be reprovided with more modern facilities. It is therefore considered unreasonable to include 'displacement' of facilities in this policy.

In addition, the inclusion of the wording 'that any replacement accommodation elsewhere is satisfactory for all of its users' is so general that it could be used by anyone wanting to object to a proposal.

The County Council as a major provider of community services and facilities needs to be able to recycle its property assets as it sees fit. It should be borne in mind that capital receipts from the disposal of surplus County Council property assets are reinvested in public facilities and services.

There is also a need for clarity in the definition of community uses when, for example, emergency service accommodation is included in the preamble to the policy. The policy is designed to protect community facilities i.e. a building or use that the general public visited or used. There is a danger that this lack of precision could be allowed to fetter the proper recycling of any community asset.

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NCS/R25/4643/2/O Edwards Covell	O	CS17 should be amended to include Cemetery as a key community facility in paragraph 6.4.	Amend Text Add cemeteries to "places of worship" in paragraph 6.4.
NCS/R25/2250/19/S Radlett Society & Green Belt Association	S	(no comments)	Support Noted and Welcomed
NCS/R25/4586/12/S Bidwells on behalf of Barratt Strategic	S	No comment.	Support Noted and Welcomed
NCS/R25/4635/13/S Rolfe Judd	S	We generally support the principle of Policy CS18. However we believe all S.106 contributions should be negotiated on the individual merits of the site and overall viability of the scheme.	Comments Noted Support for Policy CS18 is noted although it is not clear how this relates to the second part of the response in respect of s106 agreements. However, the Council's approach of using a standard charge calculation for s106 on smaller schemes is based on a robust methodology and intended to provide greater certainty for the development industry - thereby enabling likely s106 costs to be factored into the cost of development/site acquisition at an early stage, assisting the viability process.
NCS/R25/4641/13/S First Place Nurseries	S	Community facilities are necessary to ensure the vitality of settlements, however, it should be noted that development will help to promote and protect community facilities by providing additional funding and additional need.	Support Noted and Welcomed
NCS/R25/1358/14/Y DLA Town Planning Ltd	Y	Community facilities are necessary to ensure the vitality of settlements, however it should be noted that development will help to promote and protect community facilities by providing additional funding and additional need.	Comments Noted Support noted, it should be noted that policy CS18 allows for such change of use, where it can be demonstrated that the is no longer a need and there is no scope for other community uses.

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NCS/R25/4644/14/Y Y "Community facilities are necessary to ensure the vitality of First Place Nurseries @ land R/O Cobden settlements, however it should be noted that development will help to promote and protect community facilities by providing additional funding and additional need." **Support Noted and Welcomed**

NCS/R25/4649/13/Y Y Whilst supportive of the Policy, there needs to be greater emphasis on promoting and securing new community facilities, especially in the villages and rural areas where the lack of such can stifle community integration. Indeed, notwithstanding Green Belt limitations, there should be a mechanism for supporting well considered applications for new community facilities.

No Change in Response to this Objection
Support noted. Policy CS18 is considered to be supportive of community facilities, and there must not be a loss, reduction or displacement of facilities without sufficient supporting evidence. The loss, reduction or displacement of facilities can also be counteract by appropriate financial contributions. The allocation of sites for community facilities will also be considered as part of the Site Allocation and Development Management DPD.

Issue 5 - Sustainable Development Q17

Summary of

NCS/R25/1631/18/C
Barton Willmore Planning Partnership

C Financial contributions should be determined on a site by site basis. However, should a standard charge be introduced then this should be subject to public consultation and have regard to viability.

Council Response

No Change in Response to this Objection

The standards charge is calculated on a site by site basis, in accordance with the Planning Obligations SPD adopted in December 2010. The Planning Obligations SPD considers scheme viability. It states that the Council recognises that in some cases it may need to be flexible in terms of the level of obligations/financial contributions sought in order to bring a scheme forward. The viability of potential development schemes in different areas of the borough is considered in the Development Economic Studies (May 2010).

The Planning Obligation SPD which includes the standard charge, under went public consultation in July, October and November 2010.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4646/12/N
DPP LLP

N

TWNT consider that the level of financial contributions made as part of planning applications should be determined on a site by site basis for all developments and in line with the requirements set out by the Council's Planning Obligations SPD, approved in December 2010.

The instigation of a standard charge for smaller developments will be likely to deter developers from applying for such schemes in light of the additional strain such a requirement could place on their economic viability.

Obligations should therefore be negotiated based upon any likely impact or additional burden an individual scheme may have on existing infrastructure and local facilities.

No Change in Response to this Objection

The Council's current standard charge, through s106 agreements in its Planning Obligations SPD, is based on a clear methodology which was subject to public and stakeholder consultation. No objections were received from the development industry with regard to the methodology for what are relatively modest contributions to local facilities, primarily delivered by Hertsmere Borough Council.

A site-by-site approach to these smaller developments would result in greater delays and uncertainty for all parties concerned with the development process.

NCS/R25/4649/14/N
JCPC Ltd

N

Do not support the principle of a standard charge for all development. There should be a threshold (say 10 dwellings) above which the principle of financial contributions is accepted. Below this level contributions should not be sought as they may seriously undermine development economics. All such contributions sought should be consistent with Government Guidance and, in light of such, determination on a site-by-site basis is essential to ensuring compliance.

No Change in Response to this Objection

The standard charge is set by the Planning Obligations SPD (2010) and is enabled by the Core Strategy, and Local Plan policies. The SPD is a justified document in accordance with national policy that is tailor made to address the impact of specific development.

The standards charge is applies to all additional net residential units, which is assessed on a site by site basis.

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NCS/R25/1168/4/O

Home Builders Federation

O

The Council maintains it will be able to retain option of negotiating s106 agreements on site-by-site basis as well as operating a CIL. It will not be able to do so. It must set a CIL Charging Schedule for any items of infrastructure it wishes to pay for through use of standard charges. The S106 regime will remain in place to levy contributions for elements that are necessary to mitigate the impact of particular schemes but which do not appear for items in the CIL Charging Schedule.

Para 6.11 should be deleted. Table 11 should also be deleted or else re-titled as items that might possibly be included in a future CIL Charging Schedule. Affordable housing should be omitted from the table as this should sit without the CIL, to be funded via s106 mechanism.

Policy CS20 needs to be reworded so it is compliant with the CIL Regulations. District will not be able to operate a planning obligations standard charging regime alongside a CIL arrangement - it will not be able to double charge.

Bullet (ii) is unsound and should be deleted as Council will not be able to exempt larger developments (15 or more units) from the CIL.

Amend Text

The CIL regulations will take effect from April 2014 and only then will it cease to be possible to pool large numbers of s106 contributions. The Council, however, intends to prepare a CIL charging schedule in the intervening period.

It is not clear why paragraph 6.11 should be deleted given that the Council is legitimately able to secure and pool s106 contributions up until April 2014. Clearly, once a CIL is in place, it will not appropriate to double charge. Policy CS20 will be amended to clarify the scope to use s106 once a CIL charging schedule has been adopted.

Affordable Housing will be removed from the table as it is not something likely to be secured through a s106 standard charge, although it is understood that the CIL regulations may be amended to enable Affordable Housing to be funded through CIL.

NCS/R25/1487/3/O

Sport England (East Region)

O

CS20 - supported in principle, although there is concern that there is a lack of sufficient evidence to support the request for financial contributions towards sport and community provision

No Change in Response to this Objection

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/2250/20/O O For residential developments, a charge related to the Council Tax Band of the unit would seem to be fairest, so site-by-site.

No Change in Response to this Objection
The standards charge would be calculated on a site by site basis, in accordance with the Planning Obligations SPD adopted in December 2010. If the Council Tax band were used for a standard charge, local issues of access to facilities and impacts wouldn't be taken in account. The standard charge calculates the required contributions in relation to land values, the size of the development, and any particular issues, such as lack of amenity provision, or increased pressure of services. It is not considered that Council Tax bands would sufficiently address the issues, which would be contrary to Circular 05/05.

NCS/R25/4345/1/O O Thames Water Property Services Ltd

It is noted that S106 contributions cannot be requested for works to water and sewage infrastructure. In this instance it is important for developers to implement upgraded infrastructure before building new dwellings. Suggested supporting text and policy to support water and sewerage infrastructure (see wording of proposed policy in representation)

Amend Policy
Reference to SUDS in 5.32 to be amended.

The waste water and water infrastructure to be considered in CS15.

Suggest that the use of SUDs are not appropriate in all locations, and this should be specified in paragraph 5.32 of the supporting text. It is also noted that only well maintained and managed SUDs are required for them to be effective.

NCS/R25/4429/12/O O GL Hearn Property Consultants

Considers the pooling of contributions in this context to fail to meet the tests of Circular 05/05 on Planning Obligations

No Change in Response to this Objection

NCS/R25/4491/11/O O Phillips Planning services Ltd

This policy should reflect the request for Green Belt release for housing in accordance with comments made to Q1-7.

Comments Noted
(see comments in relation to Q1-7 for respondent)

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4491/12/O Phillips Planning services Ltd	O	Object to standard changes for developments, which is contrary to national guidance and becomes a form of 'development tax'. Would prefer to see developers being required to address the impact of their developments	Comments Noted The standard charge is set by the Planning Obligations SPD (2010) and is enabled by the Core Strategy, and Local Plan policies. The SPD is a justified document in accordance with national policy that is tailor made to address the impact of specific development.
NCS/R25/4635/14/O Roife Judd	O	Promotion of a standard charge in relation to planning obligations for smaller developments is unreasonable and has little regard to the individual circumstances of a particular site. The inclusion of a standard charge could result in schemes becoming unviable and this could result in a lesser number of windfall sites coming forward and consequently will affect the overall housing completion targets. All S.106 contributions should be negotiated on the individual merits of the site.	No Change in Response to this Objection See response to previous comment from respondent regarding the justification and rationale behind a standard charge for smaller development.
NCS/R25/4651/8/O The Planning Bureau Limited	O	The use of any standard tariff for infrastructure should only be used if the correct CIL procedure and thorough examination has been completed and the Levy formally adopted. The interim use of SPDs that have not been through the process or do not comply with the legal requirements of CIL Regulation 122 should be disregarded.	No Change in Response to this Objection The standard tariff is calculated on a site by site basis, in accordance with the Planning Obligations SPD adopted in December 2010. The standard charge calculates contributions in relation to land values, the size of the development, and any additional location-specified issues, such as lack of amenity provision, or increased pressure of services. This approach reflects the provisions of the Community Infrastructure Regulations 2010 and the statutory requirement for planning obligations to meet the tests set out by Circular 05/05. The CIL regulations will take effect from April 2014 and only then will it cease to be possible to pool large numbers of s106 contributions. The Council, however, intends to prepare a CIL charging schedule in the intervening period.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4586/13/S Bidwells on behalf of Barratt Strategic	S	Barratt Strategic support the introduction of a standard charge for smaller schemes as these often negotiate the planning process with minimal contributions towards local services and facilities, despite their cumulative impact. It is however crucial that the RDCS allows for the standard charge to be reduced or forfeited where it would compromise the development of less viable sites or inhibit growth when the economy is weak. Policy CS20 currently states that regard will be had to the viability of developing land in the borough but in our view it does not go far enough to ensure that matters of viability are taken seriously when applying the standard charge. Accordingly we consider that Policy CS20 should be amended to require the standard charge unless it would render a development site unviable.	Comments Noted The Planning Obligations SPD considers scheme viability. It states that the Council recognises that in some cases it may need to be flexible in terms of the level of obligations/financial contributions sought in order to bring a scheme forward. The viability of potential development schemes in different areas of the borough is considered in the Development Economic Studies (May 2010) and is available on our website (http://www.hertsmere.gov.uk/planning/planningpublications.jsp), the Council will consider the viability of schemes using the Three Dragons Toolkit.
NCS/R25/4641/14/S First Place Nurseries	S	These policies are considered to be acceptable as this creates a level playing field for developers and furthermore helps to ensure that development remains viable as costs are clear from the outset. This is subject to further detail and the standard charge calculations.	Support Noted and Welcomed
NCS/R25/1358/15/Y DLA Town Planning Ltd	Y	These policies are considered to be acceptable as this creates a level playing field for developers and furthermore helps to ensure that development remains viable as costs are clear from the outset. This is subject to the details of further policies set out in the Local Development Framework and the calculation of these standard charges. This is subject to the details of further policies set out in the Local Development Framework and the calculation of these standard charges.	Support Noted and Welcomed None.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4644/15/Y

Y

First Place Nurseries @ land R/O Cobden Hill

Support Noted and Welcomed

"These policies are considered to be acceptable as this helps to ensure that development remains viable as cost are clear from the outset. This is subject to the details of further policies set out in the LDF and calculation of these standard charges."

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 5 - Sustainable Development Q18

<u>Summary of</u>		<u>Council Response</u>
NCS/R25/1358/16/C DLA Town Planning Ltd	C This question should refer to Table 11. I do not consider that there are other items which need to be covered in this table.	Comments Noted None.
	NCS/R25/2250/21/C Radlett Society & Green Belt Association	Comments Noted This site is recognised as a RIGS and is a non-statutory designation. It would not be within this table under this designation. This site has not been added by Herts and Middlesex Wildlife Trust or Herts Biological Records Centre, although it would still be recognised as an important geological site.
NCS/R25/3990/13/C John Anderson Planning	C The policies set out are what one would expect. Bearing in mind current central government thinking more consideration should be given to involving the private sector in the provision of such facilities. It is no good just listing items. The plan must give some indication as to how they will be achieved. What encouragement will be given? Is local finance to be involved? Does it come from public and or private sources, and how will it be managed?	Comments Noted The Core Strategy provides the spatial direction for the development of facilities. Specific technical evidence base documents and the site allocations guide the development of such facilities. The Infrastructure Topic Paper to be produced to support the Core Strategy will consider delivery mechanisms and finance arrangements for new infrastructure.
NCS/R25/4492/7/C Environment Agency	C Some suggestions must be made to get people thinking about putting in more ideas. Otherwise the plans will not move ahead. Suggested change of wording in table 11 'flood management, drainage and water engineering' to 'flood management, drainage and water infrastructure'.	Amend Text Change 'engineering' to 'infrastructure'.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4520/25/C	C	The reference in Table 11 to Education, Housing and Community should refer to fire and rescue facilities not fire hydrants, standard charge is currently sought for these services, but may be as a part of CIL. Adult care services should also be included here, although a standard charge does not exist yet, it could in the future be used to fund facilities such as day centres.	Amend Text Include items suggested.
NCS/R25/4553/8/C Hertfordshire County Council	C	Table 11 should include the provision for off-site highways improvements.	Amend Text The Table will be amended to include on and off-site highway improvements
NCS/R25/4644/16/C First Place Nurseries @ land R/O Cobden Hill	C	"This question should refer to Table 11. I do not consider that there are other items which need to be covered in this table."	Comments Noted

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 5 - Any Further Comments

NCS/R25/1568/5/C
Highways Agency

Summary of
C The proposed Elstree Way Corridor masterplan should enhance public transport services and walk/cycle linkages to maximise the sustainability of this as an employment location.

Council Response
Amend Policy and Text
Point 18. The EWC masterplan is intended to build on its accessible location but Policy CS22 will be reviewed to ensure that this is emphasised.

NCS/R25/1631/17/C
Barton Willmore Planning Partnership

C A standard charge should not necessarily be applied to dwellings across the board as this could threaten the delivery of certain sites, especially where large-scale remediation work is required. Any requests for financial contributions should be acceptable under the terms of Circ. 05/05.

The is an objection to Policy CS20 as affordable housing is separated out from other requirements and is to be provided in addition to other obligations. All obligations on developers should be considered together to ensure the delivery of sites.

Amend Text
The Planning Obligations SPD considers scheme viability. It states that the Council recognises that in some cases it may need to be flexible in terms of the level of obligations/financial contributions sought in order to bring a scheme forward. The viability of potential development schemes in different areas of the borough is considered in the Development Economic Studies (May 2010). Methods for the review of viability are considered in the Core Strategy. Affordable Housing SPD and Planning Obligations SPD. The cost of lifetime homes is consider in the Development Economics Study, in addition to the cost of CSH levels.

Policy CS21 should be more specific about what constitutes high quality design. The preparation of an SPD may be appropriate and any SPD should be referred to in this document. It should also recognise the financial implications of building all homes to the Lifetimes Homes Standards.

The Planning and Design Guide SPD provides advice on what constitutes good design, this will be referenced in the text.

NCS/R25/2250/22/C
Radlett Society & Green Belt Association

C 6.15 Phrases like 'at the heart of this is jargon and doesn't convey much substance!
6.21 Commercial, Civic and Community Corridor, Elstree Way, Borehamwood?

Amend Text
Para 6.15 change 'at the heart of to read 'at the centre of.
No change to para 6.21 where the corridor has been titled 'Elstree Way Corridor' and includes those aspects as listed in the paragraph.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/2392/3/C
Mr and Mrs R Gale

C Increased housing development should only continue if infrastructure is developed at the same time.

Comments Noted

The Council has been in discussions with various infrastructure providers, including Hertfordshire County Council and utilities companies, regarding future needs and requirements and the impact on these of development planned for in the Revised Core Strategy. The Council has also undertaken work to produce a Planning Obligations SPD, which will help to secure funding for future infrastructure provision at a local level, and worked with other Local Planning Authorities in Hertfordshire on a study looking at more strategic future infrastructure requirements, as part of wider work on the Community Infrastructure Levy. The Council is now planning to produce a topic paper on future infrastructure requirements, following the representations received as a result of consultation. However, it should be noted that establishing the plans of some infrastructure providers, such as the NHS, has been problematic, especially in light of recent uncertainties that have arisen as a result of the comprehensive spending review; additionally many organisations plan over a different time period than that required for LDFs, which also presents problems in terms of establishing how infrastructure provision should respond to plans for the phasing of the supply of new homes and other development.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/3990/8/C John Anderson Planning	C The current situation on control of minor development is confused. It will not be possible to let go the checking of all minor development, as now being suggested by central government, particularly in the countryside, as very often this is limited by poor infrastructure.	Comments Noted The Council will work with the new Localism Bill once it is adopted.
NCS/R25/4520/23/C Hertfordshire County Council - Property	C There is further confusion shown up in para 1.27 on the change in the housing forecasts. This also affects the life style of young people. Facilities for young people should include sporting Facilities. This area is one where older people and younger ones can meet when coaching and training provision is also found. Some of this is on a voluntary basis but encouragement is needed. It needs further thought at this stage. There should be some indication as to how this will happen. Just listing points will not create action.	Comments Noted Noted
NCS/R25/4548/5/C English Heritage (East of England Region)	C 6.8 leading to CS19 Securing Mixed Use Development It is important that in considering any mixed use developments the capacity of existing services is assessed prior to approving schemes to ensure no further burdens are placed on services that are already operating at capacity.	Amend Policy Reference to historic environment to be made in CS21
C We suggest that the historic environment might be given some further consideration in the following policy: Policy CS21 Securing a high quality and accessible environment It may be appropriate to consider whether this policy should be more specific in terms of the contribution of the historic environment to place-shaping, or whether this should be added to in a separate policy dealing with townscape and aesthetic quality.		

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/45537/C Hertfordshire County Council	C	The infrastructure requirements of the Core Strategy, although referred to, are not clearly set out in the plan, alongside information about who is to provide them and how they are to be funded. It is expected that any future iteration of the document is accompanied by a tangible infrastructure delivery plan. By way of example, the Harlow Core Strategy is being informed by a Harlow Infrastructure Study (March 2010) containing detailed infrastructure requirements, costings, funding sources and delivery responsibilities. The County Council wish to ensure that any new development is accompanied by the necessary and relevant infrastructure and wish to engage with the Borough Council as early as possible during the preparation of such plan with regards to identifying the necessary infrastructure in relation to the services it provides.	Comments Noted A separate infrastructure delivery report is being prepared in support of the submission Core Strategy which would address the point raised.
NCS/R25/4629/2/C Jones Lang LaSalle	C	Although there is support for the phased approach to reducing emissions, it is felt that a clause is added which allows applicants to demonstrate feasibility of sustainability measures	No Change in Response to this Objection
NCS/R25/4643/3/C Edwards Covell	C	Suggest a policy for Cemeteries, similar to the approach taken by Stockport and Cherwell. The Core Strategy will facilitate the provision of an adequate supply of suitable land in appropriate locations for cemetery and crematoria development and ancillary facilities to meet the needs of the borough's population through the plan period. This may involve woodland burial, the expansion of existing cemeteries and / or the provision of a new cemetery/cemeteries.	Comments Noted With cemeteries added to paragraph 6.4, Policy CS18 would allow for the provision of new cemeteries in the Borough subject to any environmental constraints.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4640/3/O
Mrs R Gale

☐ Housing - Development of supporting infrastructure.

No Change in Response to this Objection

The Council has been in discussions with various infrastructure providers, including Hertfordshire County Council and utilities companies, regarding future needs and requirements and the impact on these of development planned for in the Revised Core Strategy. The Council has also undertaken work to produce a Planning Obligations SPD, which will help to secure funding for future infrastructure provision at a local level, and worked with other Local Planning Authorities in Hertfordshire on a study looking at more strategic future infrastructure requirements, as part of wider work on the Community Infrastructure Levy. The Council is now planning to produce a topic paper on future infrastructure requirements, following the representations received as a result of consultation. However, it should be noted that establishing the plans of some infrastructure providers, such as the NHS, has been problematic, especially in light of recent uncertainties that have arisen as a result of the comprehensive spending review; additionally many organisations plan over a different time period than that required for LDFs, which also presents problems in terms of establishing how infrastructure provision should respond to plans for the phasing of the supply of new homes and other development.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 6 - Transport and Parking Q19

Summary of

NCS/R25/2250/23/C Radlett Society & Green Belt Association	C	More emphasis should be put on access to town centres by bicycles - eg in Radlett, cycling to shops and other facilities entails ever-increasing safety hazards from traffic and drivers and this almost certainly applies to other towns in Hertsmere.	<u>Council Response</u>	No Change in Response to this Objection Policy CS23 relates to the impact of new development on accessibility to services and employment, and non-motorised routes are covered generally by point iv) and in greater detail in policy CS25 on promoting alternatives to the car. More specific aims of the policy could be an option for the Site Allocations and Development Management DPD. It is also noted that financial contributions could be sought on these types of improvements on individual routes as a result of different types of schemes.
NCS/R25/4553/4/C Hertfordshire County Council	C	The Local Highway Authority uses the thresholds set out in table 4.1 of 'Good Practice Guidelines: Delivering Travel Plans through the Planning Process' to determine when a travel plan is required. The thresholds set out in the document are 80 units for residential developments and 2,500sqm for non-residential units. The Local Highways Authority also encourage applicants to submit Travel Plan Statements for slightly smaller developments, again in accordance with the same document. Policy CS23 should reflect this.	Amend Policy	The national guidance recommends the provision of a travel plan statement on schemes of between 50 and 80 dwellings and a travel plan on schemes of more than 80 dwellings. The Council's SPD, was adopted in 2008 prior to the issuing of the national guidance and its threshold of 25 units was increased to 100 units in Policy CS23. The policy will be amended to reflect the national guidance albeit with reference to the need for more concise travel plan statements on schemes of between 50 and 80 dwellings.
NCS/R25/4647/13/C Daniel Rinsler & Co Ltd	C	Should refer to Policy CS23.	Comments Noted	No response necessary.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4651/9/C The Planning Bureau Limited	C	It should be clear in the requirements for a travel plan that a degree of flexibility should be employed in relation to retirement housing, which has a comparatively low level of car ownership per head and negligible vehicle movement.	No Change in Response to this Objection It is not considered necessary to include any text to this effect. Where a travel plan is required for any development that exceeds the threshold set out within Policy CS23 the specific travel requirements of the use proposed, including the likely levels of car ownership, should be demonstrated and planned for accordingly. This applies to housing for older people and it is not thought appropriate to make an exception for this use or any other.
NCS/R25/1358/17/NC DLA Town Planning Ltd	NC	This should relate to Policy CS23 not CS22.	Comments Noted None.
NCS/R25/4644/17/NC First Place Nurseries @ land R/O Cobden Hill	NC	"This should relate to Policy CS23 and CS22."	Comments Noted Policy CS22 regarding the Elstree Way Corridor does not just relate to transport and parking, but development in general, and in relation to all areas that planning is concerned with.
NCS/R25/4646/13/NC DPP LLP	NC	We assume the question should refer to Policy CS23. Policy CS22 refers to development in the Elstree Way Corridor and makes no mention of Travel Plan thresholds.	Comments Noted Noted. This was an error on the response form, although the same question in the main Core Strategy document does refer to Policy CS23.
NCS/R25/4649/15/NC JCPC Ltd	NC	No comment.	Comments Noted None.
NCS/R25/1598/10/S Preston Bennett Partnership	S	The threshold of 100 residential units or more is supported as appropriate	Support Noted and Welcomed

The response box with the question allows for comments to be submitted in a flexible manner.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4586/14/S Bidwells on behalf of Barratt Strategic	S	No comments.	Support Noted and Welcomed
NCS/R25/4635/15/S Rolfe Judd	S	Agree that major non residential developments over 2,500 sqm or residential schemes of 25 units should be accompanied by a travel plan, which sets out measures for reducing car dependency.	Support Noted and Welcomed However, the policy itself has a threshold of 100 residential units. Please see response to HCC representations for more detail.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 6 - Transport and Parking Q20

NCS/R25/3990/14/C
John Anderson Planning

C

Summary of

These items follow the usual patterns. Bearing in mind earlier comments about the change of power sources affecting vehicles which will occur during the plan period it would be useful to consider the provision of electric power charging points in car parks and how this might be achieved. What level of provision per parking space, and how customers will be charged are also policy matters. Then there is also the safety aspect and the consideration of anti vandalism measures.

Council Response

Comments Noted

The level and design of parking provision is covered within the Council's Parking Provision SPD. The scale of car parking charges is outside of the remit of the planning department and outside the scope of the Core Strategy. The integration of charging points for electric cars for example is not restricted by the current policy framework, and if required could be facilitated with a DC management policy or SPD.

NCS/R25/4553/5/C
Hertfordshire County Council

C

The Core Strategy section on parking should be reviewed in light of the changes set out in the revised PPG13.

Amend Text

The changes to PPG13 are not entirely clear given that the reference to requiring maximum standards has been removed but elsewhere in the document, it states that minimum standards should not be used. Clear parameters for setting parking standards do not seem to exist, but the text and Table 14 within the Core Strategy will be review where possible in light of these changes.

NCS/R25/4647/14/C
Daniel Rinsler & Co Ltd

C

Should refer to Policy CS24.

Comments Noted

No response necessary.

NCS/R25/4651/10/C
The Planning Bureau Limited

C

Car parking requirements should be considered on a site by site basis and take into account the nature and characteristics of specialist retirement housing.

No Change in Response to this Objection

Policy CS24 provides the basis for considering car parking on a case-by-case basis. Points iii) and iv) of Policy CS24 allow the Council to consider the nature and characteristics of any proposed development, including those of housing for older people.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4646/14/N DPP LLP	N	Policy CS24 refers to the assessment of off-street parking development. TWNT accepts the need for the criteria identified in Policy CS24 to ensure that fair and convenient parking is provided for new development. However, the Policy should be sufficiently flexible to take account of individual site circumstances and the RCS should make provision for the removal of maximum parking standards following amendments to PPG13. It is important that Policy CS24 contributes to the successful development of sites through the fair and reasonable regulation of off-street parking provision. However, it is equally important that it is sufficiently flexible and not overly-prescriptive to prevent it becoming an obstacle to high quality development.	Amend Policy Policy CS24 is considered to be provide a degree of flexibility given the range of criteria and its linkages to the parking standards SPD. The SPD contains accessibility zones which by definition offer flexibility and the scope for discounted levels of off-street parking. It is recognised that following changes to PPG13, references to maximum parking standards will need to be reviewed and the policy and supporting text will be amended accordingly.
NCS/R25/4635/16/O Rolfe Judd	O	Believe that the maximum parking standards should reflect the average car ownership in Hertsmere as indicated in Table 12. As such, in order to promote sustainable development and less reliance on car usage, the maximum parking standards as imposed by Policy CS23 should be reflective of average car ownership in the borough. i.e. 1.5 spaces for 1 and 2 bedroom units and 2 spaces for 3 + bedroom units. With respect to sustainability, In areas of high accessibility the Council should require a lower provision of car parking.	No Change in Response to this Objection The application of accessibility zones, as set out in the Council's parking standards SPD, provide a basis for discounting the amount of parking in certain locations. These are considered to provide a logical means of considering reduced levels of off-street car parking in certain locations, taking account of other factors such as local levels of car ownership, as well as on street parking conditions and so on.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1598/1/S	S	It is considered that the comprehensive site-by-site basis for assessing appropriate car parking levels set out in Policy CS24 are wholly appropriate. As such, the indicative parking standards for residential development referred to at Table 14 are also appropriate, given that these are maximum requirements.	Support Noted and Welcomed This section will need to be reviewed following the amendments to PPG13 published in January 2011.
Preston Bennett Partnership			
NCS/R25/2250/24/S	S		Support Noted and Welcomed
Radlett Society & Green Belt Association			
NCS/R25/4586/15/S	S	No comments.	Support Noted and Welcomed
Bidwells on behalf of Barratt Strategic			
NCS/R25/1358/18/Y	Y	This relates to Policy CS24 not CS23.	Comments Noted None.
DLA Town Planning Ltd			
NCS/R25/4644/18/Y	Y	"This relates to Policy CS24 not CS23."	Comments Noted
First Place Nurseries @ land R/O Cobden Hill			
NCS/R25/4649/16/Y	Y	No comments.	Comments Noted No response necessary.
JCPC Ltd			

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 6 - Any Further Comments

<u>Summary of</u>	<u>Council Response</u>
NCS/R25/1568/4/C Highways Agency C The Highways Agency seeks clarification in relation to the following points: -Whether the Council has undertaken a quantitative assessment (e.g. DIAMOND) as part of its transport evidence base. -What the impact of the development strategy would be on the scale and distribution of any traffic impact on the Strategic Road Network. A sustainable and sensible approach towards managing the impact of the development strategy on the Strategic Road Network would be to direct growth towards large urban settlements, principally Borehamwood.	Comments Noted Points 21 - 24. Detailed transport modelling is largely the responsibility of Herts Highways, who recently developed a new model for the Borehamwood area. This considered the quantitative impact of proposed housing growth on the town and possible highway solutions and their impact. The model extended to roads outside of the town which are the responsibility of the HA. Other settlements' transport needs have been considered most recently through the current review of the Potters Bar UTP and the SW Herts Transport Strategy, the Council being involved in both exercises, as well as the preparation of a County-wide Inter Urban Route Strategy.
It would be useful, however, if the HA could provide additional detail over any concerns they regarding the capacity of their network in Hertsmere area. It is noted that improvements to the capacity of the M25 should be completed within the next year whilst improvements to the Hatfield Tunnel/A1 have now been completed.	

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1568/7/C
Highways Agency

C

The general ethos of directing development towards sites within existing urban areas is considered reasonable, it is considered that there is still potential for residual impact of the local and Strategic Road Network through car traffic generation. Any impact that does arise could be minimised through demand management measures and it is recommended that consideration be given to area-wide travel plans that coordinate demand management measures in combination with improvements to inter-urban public transport links.

Comments Noted

Points 31 - 34 See response to Points 21-24. It should also be emphasised that the Council has started work on a CIL which can be expected to take account of strategic highway infrastructure requirements.

Policy CS25 suggests that a site-by-site approach will be taken in determining whether public transport improvements need to be secured as a result of new development. However, this may inhibit the pooling of finance necessary for the funding of large scale public transport improvements. Consideration should be given to how strategic gaps in public transport services could be addressed.

Comments Noted

The Greenways Strategy is considered to work along side policy CS25 on promoting alternatives to the car, subject to funding, land ownership and delivery of such schemes. The policy talks of 'non-motorised routes', which is the definition of Greenways.

NCS/R25/2250/25/C
Radlett Society & Green Belt Association

C

While work on Greenway routes is welcomed, nothing is mentioned in Policy CS23 to promote Greenways as commuter routes to work. If implemented, there would be safer routes from Radlett, encouraging more cycling. Planned Greenways around Radlett should be actioned: the route from Radlett to Shenley that would encourage rail users/commuters living in Porters Park to leave their cars at home, alongside Theobald Street, B462 to Bushey/Watford which is dangerous for cyclists. The provision of covered cycle racks in Radlett's main shopping centre would be welcomed.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/2392/4/C
Mr and Mrs R Gale

C Support for public transport routes to and from Borehamwood. There is a concern that there is insufficient car parking for commuters close to the railway station, which causes highway safety problems.

Comments Noted

The Core Strategy allocates Shenley Road and Elstree Way as a Transport Corridor and the area around Elstree and Borehamwood railway station and the town centre as a Transport Development Area, meaning that development schemes, funding and projects can be focused towards alleviating congestion, and also promoting non motorised forms of transport in and around this area.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4553/C
Hertfordshire County Council

C

Overall approach to maintaining the highway network and managing transport is supported. However, aim of 'reducing' traffic congestion in Borehamwood and Potters Bar (Table 5) might be more realistically replaced with 'manage' is used in respect of Bushey.

Might be helpful if key highway network pressure points could be included somewhere in the document and these could include the South Mimms motorway service area, Bushey Arches gyratory system, the Hartspring roundabout on the A41, Elstree crossroads and Stirling Corner, all of which are recognised as having existing highway network issues.

Infrastructure Table 11 should include provision for off-site highways improvements. Policy CS23 bullet iv) should be more detailed and it is suggested that it reads 'it contributes, where required to the provision or funding of new infrastructure or improved public transport services and non-motorised routes'.

In terms of funding the transport facilities referred to in Policy CS25 there is a need for the source of funding to be made clearer. It is unlikely that the County Council will be in a position to fund any of these improvements. Great clarity about what development is proposed along the Transport Corridors would be beneficial due to the likely increase in traffic congestion that would arise from any new development.

The new LTP3 is due to be published in April 2011 and should be the new document for reference in any future iterations. Transport plan referred to in Para 6.23 is wrong and should be referred to as the 'Borehamwood and Elstree Urban Transport Plan'. This para should also recognise the ongoing work being carried out by Colin Buchanan in conjunction with Hertfordshire Highways in

Amend Policy

The Council is not seeking through its Core Strategy to reduce traffic levels merely congestion itself and this is considered to be a realistic objective. Therefore 'reducing' is considered to be a reasonable aim rather than 'manage' in relation to congestion.

With regard to press points on the highway network, a separate plan will be produced to illustrate this as it may difficult to illustrate this on the key diagram.

See previous response on Table 11 and off-site improvements. However, Policy CS23 iv will be amended in light of the comment made.

The funding of transport facilities will be clarified further in the text but a separate Infrastructure Delivery report will be prepared in support of the submission Core Strategy.

Other minor typographical changes will be made as suggested.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

analysing the operation of Elstree Way as part of the Borehamwood and Elstree Transport study. Potters Bar Bus Station should be the Potters Bar Bus Garage.

Support the acknowledgment of the potential for new access to open space (CS14) and the Rights of Way Improvement Plan (RoWIP) should be referenced where appropriate, including in Para 5.24 and 7.24. The information on Greenways is out of date.

NCS/R25/4640/C
Mrs R Gale

C Lack of parking for commuters

Comments Noted

Commuter car parking is outside of the context of the Core Strategy.

NCS/R25/1463/8/S
Natural England (Countryside Agency,
EofE Region)

S Support the inclusion of greenway routes in the borough,
and measures to lessen reliance on the car.

Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 7 - Town Centres and Shopping Q22

Summary of

Council Response

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4552/4/O

RPS on behalf of Willows farm

O

Paragraph 8.14/Policy CS27 Strengthening Town Centres

Paragraph 8.14 appears under the subheading of Shenley, a settlement whose rapid growth is acknowledged but which remains below most other settlements of significant size in the Borough's hierarchy. Willows Farm is referred to in the final sentence of paragraph 8.14. We consider that the policy stance is not justified in the circumstances. It may be true that Willows Farm is located "beyond the settlement hierarchy" and outside any designated centre, but this takes no account of the function of the retail element of activities at Willows Farm, which is primarily to serve visitors. We acknowledge that the categories 'visitor' and 'resident' may not be mutually exclusive (indeed a note of a meeting involving RPS and Council officers on 14 October 2008 records that 42% of visitors live within 20 minutes of the site). Nevertheless, given their function, we consider that the retail facilities at Willows Farm should not be treated in the same way as those in established settlements. The farm shop sells produce from Willows Farm itself and also that from nearby

farms. In our view the sale of local produce should be supported on the grounds of sustainability. On the other hand, the Council's stance as set out in the final sentence of this paragraph may well be inimical to the maintenance of the attractiveness of Willows Farm and its ability to contribute to the local economy. We consider it extremely unlikely that the retail facilities at Willows Farm will have any adverse effect on those in settlements. We believe the same considerations apply to Policy CS27. We therefore seek the following changes:

*the deletion of all after retail activities in the final sentence of paragraph 8.14

*the deletion of all after other policies in the final sentence

No Change in Response to this Objection

The Council acknowledges and supports the sale of local produce on site, particular where it is supporting local agriculture. However, the range of retail at Willows Farm is beyond just that of produce. At the farm there is a Binoculars Store, Children's Fashion Shop, Two furniture Show Rooms, Children Play Equipment Shop and a photo studio. These are outside of what is expected at a farm/tourist attraction, any additional retail at this location could create a retail destination of its own right which could effect other locations

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

of Policy CS27

NCS/R25/2250/26/S S (no comments)
Radlett Society & Green Belt Association

Support Noted and Welcomed

NCS/R25/3975/2/S S General support for the retail hierarchy, where it is considered that the Sainsbury's store off Darkes Lane should be included in primary retail frontage.
Indigo Planning Ltd.

Support Noted and Welcomed
The retail frontages will be the subject of the Site Allocations and Development Management DPD.

Issue 7 - Town Centres and Shopping Q23

NCS/R25/4642/2/O O Summary of
Martin Robeson Planning Practice Text at para 8.2 explains that shopping patterns are heavily influenced by nearby major shopping destinations. Retail facilities at these destinations, inevitably, will continue to improve. Merely maintaining existing supply within Hertsmere centres will result in gradual decline as the attractiveness of other centres continue to improve. The Core Strategy should seek to enhance existing facilities.

Council Response
Amend Paragraph
The wording of the paragraph will be reviewed within the context of the retail hierarchy and town centre boundaries.

NCS/R25/2250/27/S S (no comments)
Radlett Society & Green Belt Association

Support Noted and Welcomed

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Issue 7 - Any Further Comments

<u>Summary of</u>	<u>Council Response</u>
NCS/R25/1283/C Ministry of Defence C There are no objections to the Core Strategy. It has been noted that there are height and signal constraints of proposed development within Statutory Safe Guarded Areas, in relation to woodland, habitats, and any proposed wind farms.	Comments Noted Support noted and welcome. Other comments noted, although this is considered to be more relevant to the Site Allocations and Development Management DPD
NCS/R25/2250/28/C Radlett Society & Green Belt Association C 8.3 Town Centre Strategy: According to Table 16, Radlett is the largest District Centre, in terms of retail floor space, and is even larger than a Local Town Centre, Potters Bar, Darkes Lane, yet it is listed 6th, why? 8.11 The comments about Battlers Green Farm, Radlett seem rather drastic, considering that the retail outlets there supply many products that aren't available in the main shopping centre of Watling Street.	No Change in Response to this Objection The list of town and district centres are not in any kind of order, the table is for comparison purposes and not in a rank of preference. Potters Bar is listed as a local town centre because Potters Bar is the second largest town in Hertsmere, and it is the main centre within the town. It is an unusual case where a town has two retail centres. It is noted that Radlett is the largest of the district centres in terms of retail floorspace. Battlers Green farm is located within the Green Belt, and is an out of centre retail provision. It is noted that this site provides for products that the main district centre might not, but should an application come forward for additional retail floorspace, it should not detract from the vitality and viability of the offer on Watling Street.
NCS/R25/3990/15/C John Anderson Planning C It is welcoming to see that life in the evening is being considered. This should be extended to include ideas on flood lighting, generally, with the high-lighting of feature buildings both old and new being a key principle. Architectural details sometimes can only really be appreciated under flood lights.	Comments Noted The public realm and lighting of shopping areas is covered in the Council's Shop Fronts SPD and Streetscape Manual.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4041/18/NC NC Any development to not affect greenbelt
RAID Residents Against Inappropriate
Development

No Change in Response to this Objection
The Core Strategy was been produced in conformity with
PPG2

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4552/5/O

RPS on behalf of Willows farm

O

It is disappointing to see that the new Draft Core Strategy does not reflect the representations we made at earlier stages in its treatment of one of the region's premier visitor attractions, Willows Farm Village.

There appear to be only two references to Willows Farm in the whole of the DRCS (paragraph 5.22 and paragraph 8.14/Policy CS27).

First, reference is made to the retail facilities at Willows Farm in a section with the subheading
Shenley. This we consider inappropriate given that the village and the farm are more than 3km apart and on opposite sides of the M25. The more fundamental point is that it is precisely because Willows Farm lies outside the settlement hierarchy that its retail facilities should be treated separately.

Secondly, reference is made to Major Developed Sites under a subheading 'natural assets'. Again we consider this to be inappropriate, as the Green Belt itself should not be regarded as a natural asset in the sense that it is defined only because of its location and not for any other attribute. It is even less appropriate in our opinion to refer to Major Developed Sites under such a subheading.

We consider that material on MDSs should be relocated to follow existing paragraph 3.12 under the subheading Green Belt.

Thirdly, we consider it inappropriate that the first of the references to Willows Farm should be under the subheading Access to Open Spaces and the Countryside. Reference to it should be made first in Section 2 as part of the Spatial Portrait, in the context of the Borough's economy. Hertsmere may not be among the best known of Britain's tourist destinations, but the NOMIS Labour Market Profile shows that there are

Amend Text

Agreed, Willows Farm to be considered on its own, not in the context of Shenley. In addition greater consideration of tourism will be considered within the Core Strategy. The information on MDS sites should not be relocated to 3.12 as this chapter deals with housing whereas a number the MDS sites are not housing sites. It is also recognised that the Green Belt is not a 'natural asset' and the relevant text will be reviewed.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

4,500 tourism-related employee jobs in the Borough, 10.1% of the total compared with 7.7% in the East region and 8.2% in Great Britain. These figures are significant, and our proposals for additions to the text of the Core Strategy set out at the end of these representations, include them.

NCS/R25/4586/16/O
Bidwells on behalf of Barratt Strategic

On the basis of our response, it is considered that the RDCS is currently unsound. Additional supporting evidence must be provided to justify the level of housing targets proposed. At present these seem to have been derived solely from the Council desire to avoid Green Belt release, rather than being a true reflection of housing need, potential and capacity in borough.

Furthermore, additional consideration should be given to the deliverability of all urban sites and the ability of the RDCS to continue to secure the necessary level of housing provision, in the event that identified urban land fails to come forward. It is our view that in order to offer sufficient certainty over the delivery of housing there will be a need to release individual Green Belt sites which are well located and deliverable.

Amend Policy

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4642/3/O

Martin Robeson Planning Practice

O

Paragraph 8.5 refers to retailers demonstrating a need for any additional large supermarket(s). The drafting of the first part of this sentence suggests that an application from a retailer should include analysis that demonstrates retail need for the development in question. This test is no longer required by PPS4 in the context of assessing a planning application. The sentence should be amended to remove reference to need. Suggested wording: "Proposals for any additional large supermarket(s) will need to satisfy the significant adverse impact test as required by PPS4. The Council will ensure that proposals within Borehamwood, Potters Bar, Radlett and Bushey town centres are." Paragraph 8.5 states that "it is likely that no further need exists for significant new food retailing floorspace at present." No Hertsmere specific retail analysis has considered the issue of retail need within the district's centres. The statement appears to be based on the presence of supermarkets in surrounding towns. The Retail Topic Paper is reliant upon consideration of the conclusions and survey results from a number of different studies carried out by adjoining Local Authorities. The statement is unsubstantiated and should be deleted from the paragraph. Policy CS26 third sentence "Proposals to create in excess of 2,500sqm of new retail floorspace that is outside of an existing town centre will be subject to the sequential test". This policy refers to "Development within the designated town, district or neighbourhood centres of Borehamwood, Potters Bar, Bushey and Radlett". Paragraph 8.5 refers to the need to ensure that retail proposals within Borehamwood, Potters Bar Radlett and Bushey town centres are of an appropriate scale and size. Presumably the words 'existing town centre' within Policy CS26 refer to the town, district and neighbourhood centres within these four centres.

Amend Paragraph

Paragraph 8.5 to be amended in regard to PPS4.

The words 'existing town centre' within Policy CS26 refer to the town, district and neighbourhood centres within these four centres, the wording will be amended to clarify this.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4641/15/S First Place Nurseries	S	The overall thrust of the Core Strategy is acceptable. However, small scale sites on the edge of the Green Belt can be acceptable, this would add additional housing in the locality. Small to medium, sized developments should not be stifled by over prescriptive policies, it would be a concern if any more prescriptive policies were introduced.	Comments Noted Overall support noted and welcomed. There will be an assessment of the Green Belt boundary which will be incorporated into the Site Allocations and Development Management DPD.
NCS/R25/1113 Ms A Brown	Y	The main priorities are clearly set out but lack some imagination. The extension of life expectancy and changes to travel modes are paramount. Trams, trolley buses and electric cars will become much more common. The Olympics is likely to result in an increase in sporting activities.	Comments Noted

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

Overall Opinion

Summary of	Council Response
C NCS/R25//1568/6/C Highways Agency The Core Strategy evidence base should identify potential infrastructure deficits and requirements that could result from planned and unplanned growth. The Core Strategy evidence base should demonstrate that it is deliverable and demonstrate its soundness. Clarification is sought as to whether reasonable alternatives were considered prior to the publication of the Core Strategy. It is noted that the development quantum proposed is a reduction from that proposed in the previous version.	Comments Noted Points 25 and 26. The Sustainability Appraisal documents the alternative strategies which were considered, as summarised in paragraphs 2.39 to 2.44. Points 27 to 30. The SHLAA itself sought to rule out sites which were considered to be particularly inaccessible, against clear accessibility criteria. The Strategy itself does not advocate Green Belt releases but were there to be a need to review the Strategy should sites not come forward, any identification of Green Belt sites would need to carefully consider accessibility and/or the scope to deliver accessibility improvements. It is not considered necessary to undertake that detailed assessment at this particular stage, as part of a transport evidence base.
C NCS/R25//3990/1/C John Anderson Planning The main priorities are clearly presented, but would like to see more outward thinking including the change of of pattern of life and leisure and change of travel modes - use of electric power.	Comments Noted The main priorities were produced in through extensive consultation with local residents.
C NCS/R25//4599/1/C Entec UK *General information about National Grid infrastructure submitted. No comments made directly in relation to the Revised Core Strategy.	Comments Noted No response.
C NCS/R25//4639/C Mr & Mrs C Sigler A need has been identified for a place of worship in Shenley village, but it is recognised that 'earmarking' sites may be beyond the scope of the Core Strategy. It is noted that the Shenley Jewish community is growing and who currently do not occupy their own premises.	Comments Noted This will be the subject of Site Allocations and Development Management policies, where a faith communities audit is currently being undertaken for input into the following DPDs.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4645/C Turley Associates on behalf Potters Bar Golf Course	C	The Potters Bar Golf Course site is deliverable under the terms of PPS3, para 54. The site could be available from August 2013 under the terms of the existing lease arrangements with the operator of the Golf Club. Whenever the site becomes available, the Golf Club would receive a substantial payment from the Owners and, under those circumstances, has arranged to merge with another golf club in the vicinity, which would retain the existing membership and enhance and assist the ongoing commercial viability of both clubs. Moreover, it has always been the intention of the owners of PBGC to dedicate the northern part of the site as a country park, which could be done readily, and as a first stage following vacation of the site by the existing Golf Club. This would have the effect of bringing forward an important and sizeable area of open space for the use by existing and future residents alike, independent of any residential development and, at the same time, creating a defensible and enduring boundary to the Green Belt for the future.	Comments Noted To be considered as part of Site Allocations process
NCS/R25/4547/1/NC The Coal Authority	NC	"no specific comments to make on this document at this stage"	Comments Noted None

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1631/1/O

O Barton Willmore Planning Partnership

Paragraphs 1.1, 1.2 and 1.3 are vague.

-1.1 states that the plan period is over the next 15 years, however the plan actually runs from 2011 to 2026.

-In 1.2 it is not clear whether the Council has approved the existing Local Plan or the Revised Core Strategy for interim DC purposes.

Amend Text

The plan period will be amended, to ensure that a 15 year plan period is included from the adoption of this plan.

The Core Strategy is adopted by the Council as a material consideration in planning applications, in parallel with the Local Plan. This approach has been upheld in planning appeal decisions. The text will be reviewed and updated where necessary, prior to its adoption.

It is considered that it is not appropriate that the Revised Core Strategy, which has not been examined in public for soundness, is being used in the determination of planning applications. The Council should only rely on the Local Plan and regional and national policies for the time being.

NCS/R25/1631/2/O

O Barton Willmore Planning Partnership

*It is considered that it is correct to have regard for the intended revocation of the RSS, though the Localism Bill is still at an early stage.

However, there is an objection to proposed target for housing provision as it appears that the Council has used the revocation of the RSS as an excuse to provide a lower level of housing. The Core Strategy does not provide any robust evidence to demonstrate that the RSS (which has been tested at examination) should not be used in planning for future growth.

Amend Policy

As a result of the Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 (27 May 2011), the Council intends to review its housing target to ensure that it is in general conformity with the RSS. A housing and population topic paper will publish to support the next draft of the Core Strategy.

In paragraph 4.14, the Core Strategy refers to 'natural growth' as opposed to the targets set in the RSS. What does 'natural growth' mean?

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4646/15/O
DPP LLP

O See earlier responses.

TWNT would like however to take this opportunity to comment on Policy CS22 relating to the Elstree Way Corridor.

TWNT welcomes the support given by Policy CS22 to the regeneration of the Elstree Way Corridor. To ensure that development can come forward in a viable and sustainable manner, and is able to secure the regeneration of the area, a flexible approach will need to be adopted towards the location of employment, civic and community uses. Furthermore, given the tight nature of the housing land supply over the plan period, and more particularly, the Council's wish to avoid development in the Green Belt and locate new housing in accessible locations, where opportunities arise to provide new housing in the corridor these should be seized.

NCS/R25/4647/15/O
Daniel Rinsler & Co Ltd

O

The Core Strategy is considered to be unsound in that it fails to make adequate provision for the future supply of housing land; it could be made sound if it provides for the selected release of appropriate land currently designated as Green Belt.

Comments Noted

It is not clear how this specific representation is an 'objection' (as indicated on the response form) but the overall comments on the Elstree Way corridor are noted. The Council intends to prepare a separate Elstree Way Corridor Area Action Plan DPD which will set out clear parameters for how the Elstree Way Corridor plans can be accommodated.

No Change in Response to this Objection

Development in the Green Belt by definition would be inappropriate. Very special circumstances would need to be demonstrated for the development of such sites. The SHLAA, illustrates the potential supply within Hertsmere. The housing numbers within the Borough are based on population projections, however, these will be reviewed to ensure that they are in general conformity with RSS.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4649/17/O
JCPC Ltd

- O As outlined above, the strategic policies contain an urban bias that ignores the needs of rural villages and settlements that require a level of growth in order to maintain population sizes, and the viability of existing local services and facilities. As such, a more balanced distribution of growth is appropriate, that includes the potential for modest scale development in smaller villages. The policies also need to be more positive in promoting the provision of community facilities, and recognising that development can achieve environmental enhancements.

Comments Noted

Consideration is being given to a commitment to define the boundaries of smaller villages in the Green Belt, in accordance with redevelopment of PDL and infill sites, for the future Site Allocations and Development Management DPD. It is recognised in paragraph 3.12 that housing supply will need to be continuously monitored and 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.

More detailed policies and site allocations will be the subject of a subsequent DPD

NCS/R25//4651/1/O
The Planning Bureau Limited

- O Unless it is properly planned for over the next 20 years there is likely to be a serious short fall in specialist accommodation for the older population, which will have a knock on effect in meeting housing needs of the whole area.

Amend Text

The SHLAA is currently being updated to inform the Core Strategy and the wider LDF. As part of this the Council is including some C2 uses within its SHLAA housing commitments. Sites capable of being delivered or developed for these certain C2 uses are also included as SHLAA sites.

Assessment of housing need should include the housing needs of the entire community, and it is recognised that the Borough has an increasingly high proportion of older people and that the provision of C2 uses is to play an important part of new housing supply. The text of the Core Strategy will be amended to reflect this and the update to the SHLAA.

Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/1358/19/S
DLA Town Planning Ltd

S	The overall thrust of the Hertsmere Local Development Framework Draft Revised Core Strategy is considered acceptable, subject to the detailed policies which will also form a part of this framework.	Support Noted and Welcomed None.
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However, I note that the provision of additional housing through the release of small sites in sustainable locations on the edge of settlements in the Green Belt can be acceptable. This would add additional housing in the locality, helping to ensure that sufficient land is available in the Borough to meet the required level of housing development.

Such development can also provide benefits to the locality, including adding to the vitality of a settlement, helping to maintain its core services and ensuring that the settlement remains sustainable into the future.

Furthermore such development including an alteration to the settlement / Green Belt boundary can provide a more logical boundary which would be defensible into the future.

Small to medium sized development should not be stifled by over-prescriptive development plan policies. This core strategy already provides a reasonable amount of prescriptive policies and it would be a concern if this were to develop further in the remainder of the framework.

NCS/R25/2392/5/S Mr and Mrs R Gale	S	It is considered that the Council has taken into account the needs and interests of local residents, support for the future of the Core Strategy.	Support Noted and Welcomed
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Hertsmere Local Development Framework - Responses to the New Core Strategy Consultation (Regulation 25)

NCS/R25/4631/9/S Peacock and Smith (Mr & Mrs D. Morley)	S (no comments)	Support Noted and Welcomed
NCS/R25/4632/7/S Peacock and Smith (Mr & Mrs D. Whiting)	S (no comments)	Support Noted and Welcomed
NCS/R25/4644/19/S First Place Nurseries @ land R/O Cobden Hill	S General support for the Core Strategy, subject to detailed policies which will also form part of this framework.	Support Noted and Welcomed