

Hertsmere Local Development Framework

Development Plan Document

Revised Core Strategy

Statement on the National Planning Policy
Framework

April 2012



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Chapter 1: Introduction

- 1.1 On 27 March 2012 the Government published the National Planning Policy Framework (NPPF). This document sets out the Government's planning policies for England and how these are expected to be applied. It replaces all the Planning Policy Guidance notes (PPGs) and Planning Policy Statements (PPSs) (see Appendix A), and subsumes them in a single document. The document came into force on the day of publishing and reduces the previous, prescriptive national planning policy into a considerably shorter document. It is noted that technical guidance which previously supported national policy has not been cancelled, and that some has been incorporated into the final NPPF. Minor changes to the Revised Core Strategy (RCS) that are necessary as a result of PPGs/PPSs being replaced by the NPPF are set out within Appendix C.
- 1.2 This Statement provides an initial overview of the document; highlights some of the changes; and, sets out areas of note for Hertsmere. This Statement is submitted to the Planning Inspector in the context of the Examination in Public for the RCS.
- 1.3 The aspiration of the NPPF is to achieve sustainable development within the context of the UK Sustainable Development Strategy. At the centre of the NPPF, as set out at paragraph 14, is a presumption in favour of sustainable development, which is a focus for both plan-making and decision-taking.
- 1.4 For plan making it states, at paragraph 14, that Local Planning Authorities (LPA) should meet their development needs within their area, unless specific policies within the NPPF "significantly and demonstrably" outweigh the benefits of such development or "specific policies in this Framework indicate development should be restricted". In this regard, the NPPF reiterates the protection of the Green Belt, and as a result directs development to the urban areas, encouraging the development of previously developed land (PDL).
- 1.5 For development management, it requires approving development proposals that accord with the development plan without delay. Paragraph 14 states that where the development plan is absent, silent or relevant policies are out of date, LPAs should grant permission unless any adverse impacts of doing so would "significantly and demonstrably" outweigh benefits of such development or specific policies in the Framework indicate development should be restricted.
- 1.6 There is a clear emphasis on the economy and the role of sustainable development and positive plan making in securing jobs and housing growth. The Government has previously stated that the planning system has been a barrier to economic growth. Five key principles are highlighted at paragraph 9 including "making it easier for jobs to be created in cities, towns and villages" and "widening the choice of high quality homes". Paragraph 17 encourages planning to promote the vitality of our main urban areas, protect the Green Belts around them, recognise the character of the countryside and support rural communities within it.

Chapter 2: Implications for Hertsmere

Overall strategy

- 2.1 The NPPF's strategy on the Green Belt, at paragraphs 79 to 92, is broadly consistent with the previous national policy on Green Belt. The established aim of Green Belt and its five purposes are enshrined in national policy and such a designation can outweigh the need to meet local development needs.
- 2.2 The NPPF states in footnote 41 (page 49) that Regional Spatial Strategies (RSSs) continues to be part of the development plan until revoked. It is noted that no further details have been provided on the timescale for the completion of the revocation process. The Council considers that the RCS is in general conformity with the RSS.
- 2.3 The planning implication of the duty to cooperate was identified in the draft NPPF, and was previously made law in November 2011. This principle, at paragraphs 178 to 181 of the NPPF, emphasises the duty for LPAs to "cooperate" on planning issues crossing administrative boundaries, particularly with regard to strategic priorities such as housing and infrastructure development. Paragraph 178 states that such joint work is to be undertaken 'for the mutual benefit of neighbouring authorities.' This joint working is seen as a process for LPAs to work together where they cannot accommodate their own development requirements because of physical or other planning constraints.
- 2.4 The Council wishes to make particular reference to the Regulation 30(1)(e) Statement of Representation, and the Positive Preparation Statement in accordance with paragraph 182 of the NPPF. In these respects it is considered that the changes to the requirements in national policy have been sufficiently met for the RCS to be consistent with the NPPF.
- 2.5 The NPPF introduces a change in terminology and refers to "Local Plans", as opposed to Local Development Frameworks. To reflect this change the Council proposes that the title of the RCS is changed from *Local Development Framework: Revised Core Strategy* to *Local Plan: Core Strategy*. In addition to the minor amendments set out within Appendices B and C, all references to Local Development Framework and Revised Core Strategy will be changed to Local Plan and Core Strategy, respectively.
- 2.6 The NPPF has resulted in a policy shift across a number of land use issues but there are also significant areas where policy has been reduced, in terms of its length and prescription, rather than its core content changing. This statement has identified where material changes have occurred which have implications for the borough.

Housing

- 2.7 A notable change in policy, at paragraph 48, is where there is compelling evidence, the LPA can readily include windfall within housing land supply projections in the first years of housing land supply. This represents a partial return to how LPAs were able to assess housing land availability prior to

2007. The Council has not included windfall in first 10 years of housing land supply, as set out within the Strategic Housing Land Availability Assessment (SHLAA) (CD/94) and SHLAA Update (CD/95) and has been conservative in its inclusion of windfall from urban and rural broad locations in the final 5 years, as stated in the Council's Matter Statement 1. The Council may now include an allowance for windfall within the first 10 years as part of any review of the SHLAA.

- 2.8 The NPPF states that LPAs should identify and encourage empty homes to be brought back into use. It is noted that the Council is currently working on such as approach through the Communities and Local Government PLACE scheme, separately to the RCS.
- 2.9 The NPPF, at paragraph 51, states that policies should avoid "inappropriate development" within back gardens. Whilst this change was clearly signalled through the amendment to the definition of previously developed land in PPS3 (June 2011), local design guidance on back garden development is being produced through the review of the Council's Planning and Design Guide SPD. This will not necessarily preclude all back garden development but will focus on the types of tandem development largely precluded in paragraph 6.4 and Policy H10 of the existing Local Plan.
- 2.10 NPPF paragraph 51 also states that LPAs should normally approve the change of use from B use classes to residential where there is an identified housing need, and a lack of justification for the protection of employment space. The Council has undertaken an Employment Site Allocations Report (CD/74) which has informed several policies in the RCS, including Policies CS8 and CS10 on Employment Areas. It is likely to be easier for vacant commercial buildings, potentially within some designated employment areas, to be redeveloped for housing.
- 2.11 The NPPF, at paragraph 17, requires that the redevelopment of PDL is encouraged. Further to this, at paragraph 89, it sets out that limited infilling, or partial or complete redevelopment of PDL sites in the Green Belt is appropriate, provided there is no greater impact on the openness of the Green Belt and the purposes of including land within it. Previously such opportunities were limited to Major Developed Sites, as set out in Annex C of PPG2. Given that development, including residential, is capable of being acceptable on a greater number of Green Belt sites, it is noted that this could impact on housing land supply. The Council's assessment of this will be updated in as part of any review of the SHLAA.
- 2.12 A five-year supply of housing with either a 5% or 20% buffer (moved forward from later in the plan period) is required by the NPPF at paragraph 47. The higher of the two buffers is necessary in cases where local authorities have a persistent record of under-delivering housing. It should be noted that the Council's five-year supply of housing is set out within the SHLAA Update report. The housing trajectory (RCS Figure 2/SHLAA Update Appendix 7) identifies the most recently completed financial year (2011/12) as year 0 and the current financial year (2012/13) as year 1 of the Council's 15-year housing supply. There is currently no completed set of housing monitoring data for 2011/12 and, therefore, the SHLAA update housing trajectory shows the most up-to-date 5-year supply. It should be noted that this is consistent with the

NPPF, given that 1,819 units equates to approximately 7.5 years of housing supply at 237 units per year (a 50% buffer).

- 2.13 In addition to the publication of NPPF, the Government also published the Planning policy for traveller sites document in March 2012. It is considered that the criteria for guiding the selection of new sites within Policy CS6 are appropriate. Policy B of the Planning policy for traveller sites document requires that, where there is identified need, such as in Hertsmere, criteria are set out. It is also required that these criteria are fair and that they facilitate the traditional life of Gypsies and Travellers, whilst respecting the interests of the settled community. Given that the criteria within Policy CS6 are consistent with the overarching aim of the Planning policy for traveller sites document and that they reflect its specific policies, it is considered that this is the case. In relation to the assessment of planning applications for new Gypsy and Traveller accommodation, the criteria in Policy CS6 also provide a basis for determining any individual proposals, as per Policy B of the Planning policy for traveller sites document.

Green Belt

- 2.14 The main principles contained within the NPPF, at paragraphs 79 to 92, continue the importance of Green Belts as a strategic planning constraint. This is consistent with the approach taken by the Council, and that presented in the RCS Policies SP1 and CS12.
- 2.15 The NPPF, at paragraph 89, does increase the scope for potential redevelopment, limited infilling or extension of brownfield sites within the Green Belt, with there being no specific need for sites to be redundant or vacant. The Council incorporated supporting text on infilling development in Service Villages in the 2010 version of the Core Strategy. This was consistent with PPG2, and now with the NPPF.
- 2.16 It is noted that, at paragraph 90, “local transport infrastructure” and development brought forward under a “Community Right to Build Order” are also identified as capable of being appropriate development in the Green Belt. This is within the scope of RCS Policy CS12.
- 2.17 The NPPF, at paragraph 85, retains the same approach to safeguarded land between the urban areas and the Green Belt “where necessary... to meet longer-term development needs stretching well beyond the plan period”. The Council have incorporated two areas of safeguarded land for employment use; this has been explained in detail in the Council’s Matter Statement 5, which also mentions why no safeguarded land for housing is required over the plan period.

Employment

- 2.18 The NPPF, at paragraph 21, states that “investment in business should not be over-burdened by the combined requirements of planning policy expectations”. LPAs should set out a clear economic vision and strategy for their area; and, identify strategic sites, to meet anticipated needs over the plan period. Such an approach will be included within the forthcoming revision of the Hertsmere Economic Development Strategy (CD/73).

- 2.19 Paragraph 22 of the NPPF states that “planning policies should be flexible and avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed.” Furthermore, “where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses” should be considered. Such an approach is advocated by the Council in the RCS.

Town centres

- 2.20 The NPPF, at paragraphs 23 and 24, recognises “town centres as the heart of their communities” and stipulates that LPAs pursue policies to support their viability and vitality, including those that require main town centre uses to locate in an existing centre. This is consistent with the approach established in Policy CS26 and CS27 of the RCS, although there is variance in the threshold applied to when a sequential or needs test is required. As detailed in the Council’s Matter Statement 4, Issue 2, as well as Appendix B, the Council accepts that there may be a need to change the text of this policy to continue to be consistent with the requirements of the NPPF.
- 2.21 Furthermore, at paragraph 23, LPAs are directed to “define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres.” These will be defined within the Council’s Site Allocations document. In the interim the hierarchy of the Hertsmere Local Plan (HLP), as defined on the Proposals Map, is still valid.
- 2.22 NPPF paragraph 23 also makes clear that it is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. It is considered that this principle is met in RCS Policies CS10 and CS26.
- 2.23 The NPPF, at paragraph 40, requires Councils to improve the quality of parking in town centres so that it is convenient, safe and secure. The NPPF states that parking charges should be set not to undermine the vitality of town centres and that parking enforcement should be proportionate. A review of the Council’s parking management strategy and consultation on parking charges is being undertaken as part of the Council’s budget review, and is consistent with the aspirations of the NPPF.

Rural economy

- 2.24 The NPPF, at paragraph 28, requires LPAs to support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings. It promotes the development and diversification of agricultural and other land-based rural businesses, and support rural tourism and leisure developments that benefit businesses in rural areas. These principles and policy requirements are within the scope of Policy CS12 and CS14.

Community facilities

- 2.25 At paragraphs 28 and 70 the NPPF stipulates that Local Plans should promote community integration, safer environments, and accessible development, together with the protection and provision of community facilities. Policies CS17 and CS18 of the RCS on Access to Services and Key Community Facilities are based on such principles, which reflects the requirements of the Localism Act and the Community Right to Build Order.

The historic environment

- 2.26 Whilst reflecting what was previously set out in national policy, the NPPF emphasises the positive contribution that heritage assets can make to sustainable communities. Policy CS13 of the RCS reflects the principle and wording contained in the NPPF at paragraphs 126 to 141.
- 2.27 The significance and role of non-designated heritage assets (such as buildings and structures on a local list) is now highlighted, at paragraph 135 of the NPPF, and should be taken into account in determining applications. The Council holds a comprehensive list of locally important buildings, and HLP Policy E18 supports this principle. Paragraph 5.18 of the RCS identifies this list as buildings of local architectural or historic interest.

Chapter 3: Conclusions

- 3.1 The NPPF has introduced a number of changes to national planning policy. However, as set out in Chapter 2 of this Statement, the Council considers that the RCS is consistent with the NPPF.
- 3.2 It is thought that some minor amendments are required to the RCS to refresh the terminology used and introduce some small changes to Policies CS5, CS6, CS10, CS12 and CS15. The changes to national policy, in respect of the development of previously developed land in the Green Belt and windfall housing within housing land supply, have provided the Council with the confidence to demonstrate that it would be capable of meeting 100% of an RSS target of 3,900 (As set out in Appendix D). If it was considered necessary to do so, the housing target could be updated in the Council's Core Strategy to reflect the changes introduced through the NPPF.
- 3.3 The proposed amendments are set out within Appendices B and C. It is not considered that these are substantial enough to warrant further consultation and sustainability appraisal.

Appendix A – List of superseded PPG/PPSs

1. Planning Policy Statement: *Delivering Sustainable Development*(31 January 2005)
2. Planning Policy Statement: *Planning and Climate Change – Supplement to Planning Policy Statement 1* (17 December 2007)
3. Planning Policy Guidance 2: *Green Belts* (24 January 1995)
4. Planning Policy Statement 3: *Housing* (9 June 2011)
5. Planning Policy Statement 4: *Planning for Sustainable Economic Growth* (29 December 2009)
6. Planning Policy Statement 5: *Planning for the Historic Environment*(23 March 2010)
7. Planning Policy Statement 7: *Sustainable Development in Rural Areas*(3 August 2004)
8. Planning Policy Guidance 8: *Telecommunications* (23 August 2001)
9. Planning Policy Statement 9: *Biodiversity and Geological Conservation*(16 August 2005)
10. Planning Policy Statement 12: *Local Spatial Planning* (4 June 2008)
11. Planning Policy Guidance 13: *Transport* (3 January 2011)
12. Planning Policy Guidance 14: *Development on Unstable Land* (30 April 1990)
13. Planning Policy Guidance 17: *Planning for Open Space, Sport and Recreation* (24 July 2002)
14. Planning Policy Guidance 18: *Enforcing Planning Control* (20 December 1991)
15. Planning Policy Guidance 19: *Outdoor Advertisement Control* (23 March 1992)
16. Planning Policy Guidance 20: *Coastal Planning* (1 October 1992)
17. Planning Policy Statement 22: *Renewable Energy* (10 August 2004)
18. Planning Policy Statement 23: *Planning and Pollution Control*(3 November 2004)
19. Planning Policy Guidance 24: *Planning and Noise* (3 October 1994)
20. Planning Policy Statement 25: *Development and Flood Risk* (29 March 2010)
21. Planning Policy Statement 25 Supplement: *Development and Coastal Change* (9 March 2010)
22. Minerals Policy Statement 1: *Planning and Minerals* (13 November 2006)
23. Minerals Policy Statement 2: *Controlling and Mitigating the Environmental Effects of Minerals Extraction In England*. This includes its Annex 1: *Dust* and Annex 2: *Noise* (23 March 2005 - Annex 1: 23 March 2005 and Annex 2: 23 May 2005)
24. Minerals Planning Guidance 2: *Applications, permissions and conditions*(10 July 1998)

25. Minerals Planning Guidance 3: *Coal Mining and Colliery Spoil Disposal*(30 March 1999)
26. Minerals Planning Guidance 5: *Stability in surface mineral workings and tips* (28 January 2000)
27. Minerals Planning Guidance 7: *Reclamation of minerals workings*(29 November 1996)| **59** 28. Minerals Planning Guidance 10: *Provision of raw material for the cement industry* (20 November 1991)
29. Minerals Planning Guidance 13: *Guidance for peat provision in England*(13 July 1995)
30. Minerals Planning Guidance 15: *Provision of silica sand in England*(23 September 1996)
31. Circular 05/2005: *Planning Obligations* (18 July 2005)
32. Government Office London Circular 1/2008: *Strategic Planning in London*(4 April 2008)
33. Letter to Chief Planning Officers: *Town and Country Planning (Electronic Communications) (England) Order 2003* (2 April 2003)
34. Letter to Chief Planning Officers: *Planning Obligations and Planning Registers* (3 April 2002)
35. Letter to Chief Planning Officers: *Model Planning Conditions for development on land affected by contamination* (30 May 2008)
36. Letter to Chief Planning Officers: *Planning for Housing and Economic Recovery* (12 May 2009)
37. Letter to Chief Planning Officers: *Development and Flood Risk – Update to the Practice Guide to Planning Policy Statement 25* (14 December 2009)
38. Letter to Chief Planning Officers: *Implementation of Planning Policy Statement 25 (PPS25) – Development and Flood Risk* (7 May 2009)
39. Letter to Chief Planning Officers: *The Planning Bill – delivering well designed homes and high quality places* (23 February 2009)
40. Letter to Chief Planning Officers: *Planning and Climate Change – Update* (20 January 2009)
41. Letter to Chief Planning Officers: *New powers for local authorities to stop ‘garden- grabbing’* (15 June 2010)
42. Letter to Chief Planning Officer: *Area Based Grant: Climate Change New Burdens* (14 January 2010)
43. Letter to Chief Planning Officers: *The Localism Bill* (15 December 2010)
44. Letter to Chief Planning Officers: *Planning policy on residential parking standards, parking charges, and electric vehicle charging infrastructure* (14 January 2011)

Appendix B – Table of reviewed RCS Policies and supporting tables/text in light of the NPPF

Review of the Revised Core Strategy (November 2011) Development Plan Document policies in accordance with the National Planning Policy Framework:

Policy		Previous PPG / PPS	Relevant section of NPPF	Material differences (if any) between the RCS and NPPF	Is the RCS consistent with the NPPF?	Is a change required?	Is the change significant, thereby requiring further consultation and sustainability appraisal
SP1	<p>Creating Sustainable Development</p> <p>The Council will work with Hertfordshire County Council, Hertfordshire Constabulary, NHS Hertfordshire, Registered Housing Providers and other key local stakeholders to enable development in the Borough to make a sustainable contribution to delivering the Core Strategy Spatial Vision and Strategy. Accordingly new development will be required to prioritise the efficient use of brownfield land in delivering the land use requirements of the private sector, local service providers and the different needs of the hierarchy of settlements across the Borough. There will be a focus on prioritising development opportunities in Borehamwood but all existing built up areas within urban settlements will be expected to accommodate opportunities which arise for meeting local housing, jobs growth and other development and service needs. All development across the Borough should:</p> <p>i) ensure a safe, accessible and healthy living environment for residents and other users of a development;</p>	PPS1, PPG2, PPS3, PPS4, PPS5, PPS7, PPS9, PPS10, PPG13, PPG17, PPS22, PPS25	<p>Achieving sustainable development; Para 8 to 10</p> <p>The presumption in favour of sustainable development Para 11 to 16</p> <p>Core Planning Principle Para 17</p>	<p>Alterations to the definition of 'sustainable development' and the wording of particular criteria, and the explicit inclusion of the 'presumption in favour of sustainable development'</p> <p>Notwithstanding this, the RCS is in compliance with the NPPF and no amendments are required</p>	Yes	No	No

<p>ii) conserve and enhance biodiversity, protected trees, and sites of ecological value in the Borough and provide opportunities for habitat creation and enhancement throughout the life of a development;</p> <p>iii) mitigate the environmental impact of transport by promoting alternatives to the car for accessing new development and existing development and other destinations across the Borough, and opportunities for linked trips;</p> <p>iv) be of high quality design and appropriate in scale, appearance and function to the local context and settlement hierarchy, taking advantage of opportunity to improve the character and quality of an area;</p> <p>v) avoid prejudicing, either individually or cumulatively, characteristics and features of the natural and built environment;</p> <p>vi) minimise and mitigate the impact on local infrastructure and services;</p> <p>vii) avoid inappropriate development which causes harm to the openness and appearance of the Green Belt;</p> <p>viii) seek the maximum level of Affordable Housing on site;</p> <p>ix) do not create an unacceptable level of risk to occupiers of a site, the local community and the wider environment;</p> <p>x) ensure a safe, efficient and affordable transport system that allows access for all to everyday facilities;</p> <p>xi) be constructed and operated using a minimum amount of non-renewable sources and be required to use energy efficiently, such as from decentralised and renewable or low carbon sources;</p> <p>xii) as a minimum standard, achieve the required levels of the Code for Sustainable Homes for</p>						
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	<p>residential development and BREEAM Excellent or Outstanding for non-residential development;</p> <p>xiii) do not create an unacceptable level of risk to occupiers of a site, the local community and the wider environment;</p> <p>xiv) conserve or enhance the historic environment of the Borough in order to maintain and where possible improve local environmental quality;</p> <p>xv) avoiding development in the floodplain and close to river corridors unless the requirements of the sequential and exceptions tests have been met and flood prevention/mitigation measures are in place;</p> <p>xvi) incorporate the use of Sustainable Urban Drainage Systems (SUDS) where appropriate and where required by the Flood and Water Management Act 2010 to help reduce the risk of flooding;</p> <p>xvii) ensure that pollutants are minimised, including emissions to air, water, soil, light and noise; and</p> <p>xviii) make provision for waste minimisation and recycling within the development during the construction phase and following occupation.</p>						
CS1	<p>The supply of new homes</p> <p>The Council will make provision for 3,550 additional dwellings within the District between 2012 and 2027, a development rate of 237 dwellings per year. In providing for the new homes and identifying new locations for development in the Site Allocations DPD, the Council will take account of:</p> <p>i) environmental constraints and compliance with the key environmental policies set out in the Core Strategy (including Policies CS12, CS13, CS15 and CS16);</p> <p>ii) the character, pattern and density of the surrounding area;</p> <p>iii) the need to retain existing housing;</p>	<p>PPS3</p> <p>Various other PPG / PPS are relevant to the individual policy criteria</p>	<p>Part 6: Delivering a wide choice of high quality homes</p> <p>Para 47 to 55</p> <p>Various other sections are relevant to the individual policy criteria</p>	<p>Use of evidence base to demonstrate a full and objectively assessed need for market and affordable housing; inclusion of windfall sites in the land availability assessment where there is compelling</p>	Yes	No	No

	<p>iv) the need to locate new development in the most accessible locations taking account of local infrastructure capacity;</p> <p>v) the settlement hierarchy identified in the Hertsmere Core Strategy; and</p> <p>vi) the need to focus development within the boundaries of existing built-up areas.</p>			<p>evidence that they have and will continue to contribute to housing land supply; ability to demonstrate a housing land supply of a 5 years with a buffer of 5%, or 20% where there is persistent under delivery of supply</p> <p>Notwithstanding this, the RCS is in compliance with the NPPF and no amendments are required; the issues relating to housing are to be considered in a future refresh of the SHLAA</p>			
CS2	<p>The location of new homes</p> <p>Priority will be given to locating the majority of residential development within the main settlements of Borehamwood, Potters Bar and Bushey. Between 2012 - 2027, up to 60% of new housing will be sought in Borehamwood, at least 10% in Potters Bar, up to 25% in Bushey and at least 5% in Radlett and other suitable locations.</p>	PPS1, PPG2, PPS3, PPS9, PPS25	Part 6: Delivering a wide choice of high quality homes Para 47 to 55	None	Yes	No	No

	<p>Windfall developments will be supported on appropriate sites in all towns, subject to local environmental constraints, the relationship with the surrounding pattern of development and the requirements of Policies SP1, CS12, CS15, CS16 and other relevant planning policies.</p> <p>Within rural locations and in particular, Shenley, Elstree and South Mimms limited, small scale infilling on suitable sites will be supported.</p>						
CS3	<p>Phasing of Development</p> <p>To facilitate a sustainable rate of housebuilding within the Borough under the terms of Policies CS1 and CS2, major housing sites will be phased in five year periods from 2011. Based on the findings of Annual Monitoring Reports, allocated land in later phases will be brought forward, if necessary, to maintain the five year supply of land for housing.</p> <p>To prevent the overdevelopment of housing in the Borough ahead of required infrastructure and community facilities, unimplemented residential land allocations and new residential proposals of 50 units (net) or more will not be permitted where the number of projected completions, as detailed in Annual Monitoring Report housing trajectory, is forecast to exceed 20% of the proportion sought in each phase. Where housing delivery is projected to fall below the proportion sought in each phase by at least 20% over the following three years, a review of the phasing and location of housing allocations will be undertaken including consideration of land presently designated as Green Belt.</p>	PPS3	<p>Part 6: Delivering a wide choice of high quality homes Para 47 to 55</p>	<p>Inclusion of windfall sites in the land availability assessment where there is compelling evidence that they have and will continue to contribute to housing land supply; ability to demonstrate a housing land supply of a 5 years with a buffer of 5%, or 20% where there is persistent under delivery of supply</p> <p>Notwithstanding this, the RCS is in compliance with</p>	Yes	No	No

				the NPPF and no amendments are required; the issues relating to housing are to be considered in a future refresh of the SHLAA			
CS4	<p>Affordable Housing</p> <p>To increase the supply of Affordable Housing, developments of 10 self-contained, residential units or more (gross), or residential sites of more than 0.3 hectares, should make provision for an element of Affordable Housing. On sites of fewer than 15 units, this may be delivered through the provision of intermediate housing (including shared ownership and share equity), with sites of 15 units or more containing a mix social rented housing, affordable rent and intermediate housing.</p> <p>On qualifying sites, 35% of the housing units should be affordable, equating to an Affordable Housing target of 995 homes from 2012 to 2027. The Council will seek the maximum level of Affordable Housing on site. A lower level of provision will not be acceptable unless the Council agrees that its Affordable Housing objectives are being met.</p> <p>As a guideline, on sites of 15 or more units (gross) or 0.5 hectares, the council expect that 75% of the Affordable Housing units will be delivered as social rented and/or affordable rent housing and the remainder as intermediate housing. The precise tenure and dwelling mix will be agreed with the Council on a site-by-site basis and reflecting current housing needs or updated supplementary guidance.</p>	PPS1, PPS3	<p>Part 6: Delivering a wide choice of high quality homes Para 47 to 55</p> <p>Plan Making: Using a proportionate evidence base: Ensuring viability and deliverability Para 173 to 174</p> <p>Annex 2: Glossary: Affordable Housing</p>	<p>Use of evidence base to demonstrate a full and objectively assessed need for market and affordable housing; inclusion of affordable housing as a proportion in the housing trajectory</p> <p>Notwithstanding this, the RCS is in compliance with the NPPF; no amendments are required, as the SHMA provides comprehensive information of the housing market and, more generally, the issues relating to housing are to be</p>	Yes	No	No

				considered in a future refresh of the SHLAA			
CS5	<p>Affordable Housing in rural areas on “Exception” sites</p> <p>The inclusion of small-scale Affordable Housing schemes, as an exception to normal policies, will be permitted in and immediately adjacent to settlements in the Green Belt, as identified on the Core Strategy Key Diagram. “Exception” sites should be small in scale in relation to the size of settlements and such schemes should meet the identified needs of people local to the village or settlement, remain affordable in perpetuity and be managed by a Registered Housing Providers. Priority will be given to sites located on previously developed land within settlements and the scale of development should not exceed the level of need identified or have adverse effects on the natural and built environment.</p>	PPS1, PPG2, PPS3	<p>Part 9: Protecting Green Belt land Para 89</p> <p>Annex 2: Glossary: Rural exception sites</p>	<p>LPAs are required to consider whether an element of market housing on rural exception sites would facilitate additional affordable housing to meet local need</p> <p>Notwithstanding this, the RCS is generally in compliance with the NPPF and only a minor amendment is required</p>	No	Yes – additional text to permit an element of market housing on rural exception sites where it can be robustly demonstrated that it would allow local need for affordable housing to be met	No
CS6	<p>Gypsy and Travellers sites</p> <p>The Council will provide for the further needs of Gypsies and Travellers on the basis of identified need within south and west Hertfordshire, the Council will seek to identify and allocate up to 9 additional pitches to meet the East of England Plan requirements to 2011 and a further 10 pitches by 2017 through the identification of land in the Site Allocations DPD. In identifying any required potential sites, consideration will be based on a range of criteria including:</p>	Circular 01/2006	Planning policy for traveller sites (separate document)	<p>LPAs are required to determine planning applications for sites from any travellers and not just those with local connections</p> <p>Notwithstanding</p>	No	Yes – criterion viii) should be deleted to comply with new policy	No

	<p>i) the potential of existing sites to accommodate additional pitches;</p> <p>ii) a sequential site selection process with an emphasis on land which has been previously developed;</p> <p>iii) safe and convenient access to the primary road network with proximity to the major road network and without blocking or inhibiting use of any existing rights of way;</p> <p>iv) avoiding prejudicing adjacent nearby residential or rural amenity as a result of visual intrusion, excessive noise, lighting, traffic generation or activity at unsocial hours;</p> <p>v) avoiding overdominating and respecting the size and scale of the nearest settled community, ensuring that there is not an undue level of Gypsy and Traveller pitches in any one part of the Borough which might result in an adverse impact on the local environment and / or infrastructure;</p> <p>vi) safe and acceptable environmental conditions within the site including the need to avoid air and noise pollution and significantly contaminated land;</p> <p>vii) an ability to receive essential services including water, sewerage, drainage and water disposal;</p> <p>viii) an ability for a site with over 5 pitches to be effectively managed for Gypsies and Travellers with local connections;</p> <p>ix) a location within reasonable proximity to key local services;</p> <p>x) the potential for a site to be effectively landscaped and where necessary, an adequate buffer between the site and any nearby housing;</p> <p>xi) the potential risk of flooding or the ability to mitigate this risk; and ensuring any other adverse effects on the built and natural environment are</p>			<p>this, the RCS is generally in compliance with the NPPF and only a minor amendment is required</p>			
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	avoided and / or mitigated including compliance with the key environmental policies set out in the Core Strategy (including Policies CS12, CS13, CS15, CS16 and CS17); and xii) the likely availability of the site to accommodate Gypsy and Traveller pitches.						
CS7	Housing Mix To help meet local housing needs, proposals for new housing should provide an appropriate mix and size of new homes in terms of housing size and type within each tenure. Development proposals will be permitted, subject to the requirements of other relevant DPD / Local Plan policies, so long as: i) housing developments in excess of 10 units (gross) contain some variation within their housing mix, with sites over 25 units or 1 hectare reflecting identified variations within the Borough's housing need, subject to proposals respecting the prevailing character of the area; and ii) on large sites allocated in the Site Allocations DPD, the need for a proportion of sheltered or extra care housing is considered as part of the overall housing mix. Consideration will be given to the incorporation of minimum floorspace guidance in revisions to Part D of the Planning and Design Guide Supplementary Planning Document in support of the provision of high quality residential environments.	PPS3	Part 6: Delivering a wide choice of high quality homes Para 50	None	Yes	No	No
CS8	Scale and distribution of employment land The Council will support development proposals in appropriate locations, which attract commercial investment, maintain economic competitiveness and provide employment opportunities for the local community. In order to encourage economic development and promote a competitive local	PPG2, PPS4	Part 1: Building a strong, competitive economy Part 9:	None	Yes	No	No

<p>economy, provision will be made for the supply of at least 110 ha of designated employment land for B-class development within the Borough up to 2027, focused on the following locations and as indicated on the Key Diagram:</p> <p>Employment Areas</p> <ul style="list-style-type: none"> • Elstree Way, Borehamwood • Stirling Way, Borehamwood • Cranborne Road, Potters Bar • Station Close, Potters Bar • Otterspool Way, Bushey <p>Key Employment Site</p> <ul style="list-style-type: none"> • Centennial Park, Elstree <p>The boundaries of these locations will be clarified in the Site Allocations DPD.</p> <p>The existing Safeguarded Land adjoining Cranborne Road Employment Area will be retained and a new area of land between the A1 and Rowley Lane, adjoining the Elstree Way Employment Area, will be designated as Safeguarded Land for a mix of phased, B class development. Any development should form part of a comprehensive integrated package measures to improve their respective adjoining Employment Areas and associated access. The boundaries of the area adjoining the Elstree Way Employment Area and parameters for development for the land adjoining Cranborne Road and Elstree Way will be clarified in the Site Allocations DPD. Any releases of vacant or surplus strategically designated employment land will only be considered following an assessment of the suitability of a site for continuing employment use and as required, an employment land needs assessment.</p> <p>Following the introduction of a Local Development</p>		Protecting Green Belt land				
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	Order to support economic development within the Elstree Way Employment Area, the Council will consider the promotion of similar Local Development Orders in other employment areas, which will grant permission for small-scale changes to properties within these locations.						
CS9	<p>Local Significant Employment Sites</p> <p>In order to sustain a competitive local economy with good access to employment for the local population, the Council will seek to maintain a supply of smaller, business units across the Borough. These designated local significant employment sites which are focused on employment generating uses are located at following locations and are indicated on the Key Diagram:</p> <ul style="list-style-type: none"> • Wrotham Business Park • Borehamwood Enterprise Centre and adjoining sites • Theobald Court and adjoining site, Borehamwood • Lismirrane Industrial Park, Elstree • Hollies Way Business Park, Potters Bar • Beaumont Gate, Radlett • Farm Close sites, Shenley <p>The boundaries of these locations will be clarified in the Site Allocations DPD. Any redevelopment of a Locally Significant Employment Site for housing or other development will be based on an assessment of the criteria in Policy CS8.</p>	PPS4	Part 1: Building a strong, competitive economy	None	Yes	No	No
CS10	<p>Land use within employment areas</p> <p>Activities within designated Employment Areas will be limited to office, industrial, warehousing and other B-class uses. The provision of training opportunities for the local workforce will be encouraged and sought as part of new employment development across the Borough.</p>	PPS4	Part 1: Building a strong, competitive economy Part 2:	LPAs are required to avoid protecting sites allocated for employment use where there is no reasonable	Yes	Yes – additional text to make clear that any redevelopment for	No

	Any new office development exceeding 2,500 sq m within Employment Areas will be limited to the Elstree Way, Borehamwood Employment Area, subject to meeting environmental and other relevant DPD / Local Plan Policies. Certain other uses will also be permitted within Employment Areas, comprising waste management, builders merchants, film / television studios and production, and car dealerships and trade counter operations where the extent of any (non-trade) retail or sales activity display remains ancillary to the principal use of the site. All development should meet the requirements of Policies CS12, CS15 and CS16 to ensure that potential contamination is minimised and remediated.		Ensuring the vitality of town centres Para 23	prospect of a site being used for that purpose; Requirements for a sequential approach and needs test Notwithstanding this, the RCS is generally in compliance with the NPPF and only minor amendments are required		housing or other development will be based on an assessment of the criteria in Policy CS8; additional text to clarify that any office development would be required to meet the sequential test	
CS11	Promoting film and television production in Hertsmere To promote film and television production industry in the Borough, the Council will support proposals relating to film and television production and ancillary or associated uses in Borehamwood. Proposals to develop, refurbish and upgrade film and television studios will be supported subject to environmental constraints and other relevant policies.	PPS1, PPS4	Part 1: Building a strong, competitive economy Para 18 to 22 Part 2: Ensuring the vitality of town centres Para 23	None	Yes	No	No
CS12	The Green Belt and Protection and enhancement of the natural environment All development proposals must conserve and	PPS1, PPG2, PPS7,	Part 9: Protecting Green Belt	The RCS refers to the PPG	Yes	Yes – references to national	No

	<p>enhance the natural environment of the Borough, including biodiversity, protected trees, landscape character, and sites of ecological and geological value, in order to maintain and improve environmental quality. Proposals should provide opportunities for habitat creation and enhancement throughout the life of a development. In the case of the highest quality agricultural land (Grades 1, 2 and 3a) and Preferred Areas of mineral extraction, proposals will only be permitted where there is no likelihood of the land being sterilised. There will also be a presumption against inappropriate development, which causes harm to the openness and appearance of the Green Belt, as defined in PPG2 (Green Belts). Strategic gaps in the Green Belt between Bushey and Watford and Bushey and Stanmore will be maintained within which any limited development, deemed acceptable in the Green Belt, should serve to retain the separation between the towns.</p>	PPS9	<p>land Para 79 to 80, 86 to 92</p> <p>Para 11: Conserving and enhancing the natural environment Para 109 to 125</p>	Notwithstanding this, the RCS is generally in compliance with the NPPF and only minor amendments are required		policy should be updated	
CS13	<p>Protection or enhancement of historic heritage assets</p> <p>All development proposals must conserve or enhance the historic environment of the Borough in order to maintain and where possible improve local environmental quality. Development proposals should be sensitively designed to a high quality and not cause harm to identified, protected sites, buildings or locations of heritage or archaeological value including Conservation Areas, Listed Buildings, Historic Parks and Gardens, Scheduled Ancient Monuments, and identified and as yet unidentified Archaeological Remains. The Council will take account of available historic environment characterisation work, including Conservation Area</p>	PPS5	Part 12: Conserving and enhancing the historic environment	None	Yes	No	No

	appraisals and archaeological assessments when making decisions affecting heritage assets and their settings.						
CS14	<p>Promoting recreational access to open spaces and the countryside</p> <p>The Council will work with its partners and relevant agencies to safeguard, enhance and facilitate access to parks, open spaces, rural visitor attractions and to the wider local countryside. Measures which secure the provision of safer and more secure car-free access including enhancements and additions to the rights of way / Greenways network as set out in the Council's Greenways Strategy, will be actively sought where they do not present a risk to the biodiversity value and intrinsic environmental quality of the locality. The provision or enhancement of visitor and appropriate facilities in the countryside, including Watling Chase Community Forest Gateway Sites and Historic Parks and Gardens, will be encouraged where this:</p> <ul style="list-style-type: none"> i) specifically enhances access for the local population; ii) does not harm the character, appearance and openness of the Green Belt, landscape and wider countryside; iii) does not cause new road congestion; iv) does not exacerbate existing road congestion; v) promotes uses which can be considered as appropriate in The Green Belt; and vi) will ensure that biodiversity is protected and enhanced in accordance with Policy CS12. 	PPG2, PPS5	<p>Part 9: Protecting Green Belt land Para 92</p> <p>Para 11: Conserving and enhancing the natural environment Para 109 to 125</p>	None	Yes	No	No
CS15	<p>Environmental impact of new development</p> <p>The Council will work with key partners, including the Environment Agency and Natural England, to ensure that development proposals do not create an</p>	PPS1, Planning and Climate	Part 10: Meeting the challenge of climate	The sequential and exception tests should be applied in relation	No	Yes – additional text at criterion i)	No

	<p>unacceptable level of risk to occupiers of a site, the local community and the wider environment. Development proposals should take account of the policy recommendations of the Council's SFRA and the guidance set out in the jointly produced guidance of the Hertfordshire Planning Authorities 'Building Futures' the Hertfordshire Guide to Promoting Sustainability in Development. Proposals will be required to incorporate sustainability principles, minimising their impact on the environment and ensuring prudent use of natural resources by measures including:</p> <ul style="list-style-type: none"> i) avoiding development in the floodplain and close to river corridors unless the requirements of the sequential and exceptions tests have been met and flood prevention/mitigation measures are in place as required by the Environment Agency; ii) improving water efficiency by reducing water consumption through measures such as water saving devices in line with the Code for Sustainable Homes and BREEAM as a minimum requirement; iii) incorporating the use of Sustainable Urban Drainage Systems (SUDS) where appropriate and where required by the Flood and Water Management Act 2010 to help reduce the risk of flooding; iv) ensuring that pollutants are minimised (including emissions to air, water, soil, light and noise); v) remediating land affected by instability and contamination, and maintaining appropriate distance from establishments containing hazardous substances; vi) ensuring efficient use is made of natural resources through their layout, design and construction, including locally sourced materials where possible in 	<p>Change - Supplement to PPS1, PPG14, PPS22, PSS23, PPG24, PPS25</p>	<p>change, flooding and coastal change</p> <p>Part 11: Conserving and enhancing the natural environment Para 120 to 121</p>	<p>to all development allocated or permitted within an area known to be at risk from any form of flooding</p> <p>Notwithstanding this, the RCS is generally in compliance with the NPPF and only a minor amendment is required</p>		<p>to clarify that development should be avoided in all areas at risk from any form of flooding, except where the sequential and exception tests are met</p>	
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	<p>line with the requirements of BREEAM on sustainable design;</p> <p>vii) achieving reduced levels of energy consumption and the use of energy from renewable resources;</p> <p>viii) making provision for waste minimisation and recycling within the development during the construction phase and following occupation; and</p> <p>ix) Development proposals must demonstrate that they accord with Policy CS12 and that any adverse effects can be overcome by appropriate alleviation and mitigation, which are capable of being secured through planning conditions or an obligation in accordance with Policy CS20.</p>						
CS16	<p>Energy and CO2 Reductions</p> <p>All new residential developments will be required to achieve the following levels of the Code for Sustainable Homes (Code) as a minimum as and when successive updates to Part L of the Building Regulations become mandatory:</p> <ul style="list-style-type: none"> • 2010 - Code level 3; • 2013 - Code level 4 once updates to Part L come into effect; • 2016 - Code level 6 once updates to Part L and the national Zero Carbon Homes policy come into effect. <p>All new non-domestic will be expected as a minimum to achieve CO2 emissions reductions in-line with the Building Regulations Part L. This requirement will not come into effect until successive updates to Part L of the Building Regulations become mandatory:</p> <ul style="list-style-type: none"> • 2010 - 25% reduction in the Building Emission Rate compared to the Target Emission Rate defined by the Building Regulations; • 2013 - 44% reduction in the Building Emission Rate compared to the Target Emission Rate defined by the Building Regulations (reductions above 70% can be 	<p>PPS1, Planning and Climate Change - Supplement to PPS1, PPS22</p>	<p>Part 10: Meeting the challenge of climate change, flooding and coastal change Para 95 to 98</p>	None	Yes	No	No

	<p>delivered using allowable solutions); • 2019 - Zero Carbon - no additional requirement.</p> <p>The Council will further encourage all new development or major refurbishment to incorporate energy from decentralised and renewable or low carbon sources. All large scale development will be required to incorporate on-site renewable energy generation, unless it is not feasible or viable or alternative decentralised and renewable, low carbon sources can be identified. The Council will also permit new development of sources of renewable energy generation subject to:</p> <ul style="list-style-type: none"> • local designated environmental assets and constraints, important landscape features and significant local biodiversity; • minimising any detriment to the amenity of neighbouring residents and land uses; and • meeting high standards of sustainable design and construction. 						
CS17	<p>Access to services</p> <p>The Council will work with local service providers to facilitate and promote their land use and buildings requirements through the identification of mixed-use and other development opportunities in the Site Allocations DPD. The Council will also require new development to contribute to the Community Strategy aim of achieving fair access to key community facilities and the wider goal of creating a safer and more sustainable environment. New proposals will be assessed against their impact on existing local infrastructure, services and resources and where necessary, new provision of required key community facilities should be made as part of the development in consultation with the local community and local service providers and in order to meet or fund any</p>	PPS1	Part 8: Promoting healthy communities Para 70	None	Yes	No	No

	infrastructure impact, having regard to the provisions of Policy CS20.						
CS18	Key community facilities Proposals for the provision or dual use of key community facilities, including educational, healthcare and recreational facilities, will be supported, subject to any environmental constraints and other relevant policies. The loss, reduction or displacement of facilities and sites will not be permitted unless it can be demonstrated that they are surplus to the needs of the local community or are no longer fit for purpose. It should also be demonstrated that there is no reasonable scope for alternative community uses to be provided and that any required, replacement accommodation elsewhere is satisfactory for all of its users, having regard to the provisions of Policy CS20. The conversion or redevelopment of residential properties for healthcare and elderly care will not be considered appropriate unless it can be demonstrated that there are no other suitable sites or buildings within the service provider catchment.	PPS1	Throughout including Para 7 (a social role), 17, 23, 70, and 156	None	Yes	No	No
CS19	Securing mixed use development Mixed-development will be sought on major development sites in Borehamwood town centre and in any other locations capable of satisfactorily accommodating a range of uses. The ability of any site to accommodate a mix of uses will be assessed on: i) the need for additional services and facilities in an area; ii) the potential to create linkages with other nearby land uses; iii) public transport accessibility and local road capacity; and	PPS1	Para 17 and 69	None	Yes	No	No

	<p>iv) the impact on the environment within and around the development site.</p> <p>The Council will work in partnership with local service providers, Parish and Town Councils and local community groups, in order to identify the need for additional services and facilities.</p>						
CS20	<p>Standard charges and other planning obligations</p> <p>Up until April 2014 (or until the Council has adopted a Community Infrastructure Levy (CIL) charging schedule), provision for on and off-site facilities, services and improvements, for which a need is known to arise from new residential development, in addition to obligations towards Affordable Housing, will be secured through:</p> <p>i) the use of individually negotiated planning obligations and / or any standard charge(s) on the approval of each new home on smaller sites, typically of fewer than 15 units (gross), to be secured through a planning obligation under Section 106 of the Town and Country Planning Act; and</p> <p>ii) the use of individually negotiated planning obligations entered into by the Council under Section 106 of the Town and Country Planning Act, on sites of 15 or more units (gross).</p> <p>The provision of Affordable Housing, together with on and off-site facilities, training, services and improvements necessitated by new commercial and other development, will be secured through planning conditions and obligations entered into by the Council and developers under Section 106 of the Town and Country Planning Act and related or equivalent legislation.</p> <p>The Council will seek to introduce a CIL charging schedule by April 2014. Following the introduction of a CIL charging schedule, planning obligations under</p>	None	<p>Plan Making: Using a proportionate evidence base: Ensuring viability and deliverability Para 175</p> <p>Annex 2: Glossary: Community Infrastructure Levy</p>	None	Yes	No	No

	Section 106 of the Town and Country Planning Act will only be sought to in relation to individual schemes where such contributions would be necessary to mitigate site-specific impacts and are not for items already covered in a CIL charging schedule.						
CS21	<p>Securing a high quality and accessible environment</p> <p>In line with the Planning and Design Guide SPD the Council will require all development to be of high quality design, which ensures the creation of attractive and usable places. Development proposals should take advantage of opportunities to improve the character and quality of an area and conserve the Borough's historic environment. The Council will take account of the cumulative impact of new development, including the impact arising from residential intensification and redevelopment. Development should be planned with the principles of crime prevention and community safety integrated. All new development should be designed to ensure that buildings and land within their curtilage are fully accessible to groups with special mobility requirements. Where practicably possible 100% of new residential units should be built to the Lifetime Homes Standards based on the Joseph Rowntree Foundation standards highlighted in the Council's Planning and Design Guide Supplementary Planning Document. The proportion of wheelchair accessible homes on new residential redevelopments of 15 or more units will be considered on a site by site basis, having regard to current needs in the Borough.</p>	PPS1, PPS3	Part 7: Requiring good design Para 56 to 68	<p>The terminology used is different to that included in Policy CS21, though it is considered to meet the same aims</p> <p>Notwithstanding this, the RCS is generally in compliance with the NPPF, and it is noted that more detailed policies will be included in the Development Management DPD on these principles.</p>	Yes	No	No
CS22	<p>Elstree Way Corridor</p> <p>Within the Elstree Way Corridor the continued development and refurbishment of Employment,</p>	PPS1, PPS3, PPS4	Achieving sustainable development	None	Yes	No	No

	<p>Civic and Community uses will be actively encouraged. Residential development on appropriate sites will be accepted, in accordance the Elstree Way SPG and any subsequent guidance or agreed masterplan. Any development should have regard to guidance set out in the Elstree Way Corridor Area Action Plan DPD and be brought forward in a coordinated manner. Proposals likely to result in a piecemeal or fragmented redevelopment of the corridor will be refused, and should also be in compliance with other policies in the Core Strategy, with particular reference to the requirements of policies CS21 and CS25. Development should also provide active frontages to Elstree Way where possible to promote the identity of the corridor as a civic and commercial gateway to the borough, should build on the accessibility location of the corridor and should ensure an appropriate demarcation of residential and non-residential uses within this part of the town.</p>		<p>Para 8 to 9</p> <p>Core Planning Principles Para 17</p> <p>Part 1 Building a strong, competitive economy Para 20</p>				
CS23	<p>Development and accessibility to services and employment</p> <p>The Council will work towards Hertfordshire County Council's vision of providing a safe, efficient and affordable transport system that allows access for all to everyday facilities. To obtain the best use of the existing highway network, major trip generating development should be focused principally on Transport Development Areas, Transport Corridors and town centres, as indicated on the Key Map. Major non-residential developments over 2,500 sq m or schemes of 25 residential units will only be permitted where:</p> <p>i) it does not conflict with the Transport Objectives of the Hertfordshire Local Transport Plan (April 2011)</p>	PPG13	<p>Part 4: Promoting sustainable transport Para 32 and 41</p>	<p>The concept of Transport Development Areas (TDAs) was not specifically identified in national planning policy and is not specifically included in the NPPF.</p> <p>Notwithstanding this, the NPPF</p>	Yes	No	No

	<p>and associated Accessibility Strategy;</p> <p>ii) it is accompanied by a suitable Travel Plan (for developments over 2,500 sq m or 80 residential units), prepared in accordance with guidance set out in the Parking Supplementary Planning Document;</p> <p>iii) it is in accordance with Hertfordshire County Council guidance and relevant Local Plan / Development Plan Document policies relating to the operation of the Highways network and the achievement of vehicular, pedestrian and equestrian safety; and</p> <p>iv) it contributes, where required, to the provision or funding of new infrastructure or improved public transport services and non-motorised routes.</p>			<p>promotes the identification and protection of “sites and routes which could be critical in developing infrastructure” and there is evidence to promote this through TDAs which reflect accessibility zones</p>			
CS24	<p>Accessibility and parking</p> <p>In order to facilitate fair and convenient access to local services, the quantity of off-street parking for all modes of transport, to be provided at new developments, will be based on an assessment of:</p> <p>i) a site’s location;</p> <p>ii) local car ownership;</p> <p>iii) the proposed land use (having regard to Table 14 for residential development);</p> <p>iv) housing tenure;</p> <p>v) the potential for shared parking, over various times of the day and week, with other uses;</p> <p>vi) local on-street parking conditions and controls, including those likely to be available within the new development;</p> <p>vii) highway and pedestrian safety considerations including whether roads have been designed to an adoptable standard;</p> <p>viii) incentives to reduce dependency on the car and the provisions of any Travel Plan submitted;</p>	PPG13	Part 4: Promoting sustainable transport Para 39	<p>Policy CS24 includes items not included in the list in Para 39, including – whether a road has been adopted or not, the opportunity for shared parking facilities, Accessibility Zone (Parking Standards SPD), and local parking conditions; all items listed in para 39 of the NPPF are included in Policy</p>	Yes	No	No

	<p>ix) the Accessibility Zones for the Borough; together with the extent of compliance with requirements set out in the Parking Supplementary Planning Document; and</p> <p>x) the extent to which permeable and semi-permeable surfaces are incorporated into the area of off-street parking to be provided.</p>			<p>CS24</p> <p>Notwithstanding this, the RCS is in compliance with the NPPF and no amendment is required</p>			
CS25	<p>Promoting alternatives to the car</p> <p>The Council will support a wide range of measures to provide safer and more reliable alternatives to the car for accessing new development and existing development and other destinations across the Borough including:</p> <p>i) improved public transport facilities;</p> <p>ii) additional public transport routes and stops;</p> <p>iii) enhanced and new non-motorised links within and between urban and rural areas, along or additional to the existing rights of way and highways network, which increase walking, cycling or riding opportunities; and</p> <p>iv) the safeguarding of proposed non-motorised routes, where necessary, to preclude development occurring which would prevent their future implementation.</p> <p>New developments will be assessed in terms of their accessibility by a range of transport modes and where appropriate, measures to promote alternatives to the car will need to be provided as part of a proposed scheme, having regard to the requirements of the Parking Supplementary Planning Document.</p>	PPS1, PPG13	Part 4: Promoting sustainable transport Para 30	None	Yes	No	No
CS26	<p>Town centre strategy</p> <p>Development within the designated town, district or neighbourhood centres of Borehamwood, Potters Bar, Bushey and Radlett will be permitted provided</p>	PPS4	Part 2: Ensuring the vitality of town centres	Requirements for a sequential approach and needs test	No	Yes – the minimum floor space threshold	No

	<p>that it maintains their primary retail function and wider role as a focus for business, leisure, cultural and other appropriate town centre uses (as defined within PPS4). Retail activity elsewhere should be focused within local centres and parades, which will be expected to retain a core of local shopping facilities and accommodate any new retail development, commensurate to their position within the town, district and neighbourhood centre hierarchy.</p> <p>Proposals to create in excess of 2,500 sq m of new retail floorspace that is outside of an existing town centre will be subject to the sequential test.</p> <p>Proposals to create in excess of 2,500 sq m of new retail floorspace will be subject to the [significant adverse] impact assessment to enable the impact on existing shopping centres to be considered.</p>		Para 23 to 27	Notwithstanding this, the RCS is generally in compliance with the NPPF and only a minor amendment is required		for a sequential test should be deleted	
CS27	<p>Strengthening town centres</p> <p>The retail function and vitality of designated centres will be reinforced through the designation of primary and secondary shopping frontages in Borehamwood, Potters Bar, Bushey and Radlett. There will be a focus on (A1) retail uses within the primary frontages and scope for a wider range of activities in secondary frontages, with an emphasis on a mix of (A1) retail, (A2) financial and professional services and (A3) dining-in establishments. An appropriate proportion of other uses will also be permitted in secondary frontages, including (A4) pubs and bars and (A5) take away uses, together with other appropriate arts, leisure and entertainment uses. Around the periphery of both secondary frontages and local parades, the Council will identify where any opportunities exist for residential accommodation to replace long-term vacant commercial units.</p> <p>Details of frontages and uses will be set out in the</p>	PPS4	<p>Part 2: Ensuring the vitality of town centres Para 23</p> <p>Annex 2: Glossary: Primary shopping area; primary and secondary frontages</p>	None	Yes	No	No

	Site Allocations and Development Management DPD along with any planned measures for the Council to use compulsory purchase and other powers to address the long term neglect and abandonment of vacant commercial and other property within town centres. Proposals for rural diversification will be supported where they do not conflict with other policies although to protect the role of town centres, further retail development at Battlers Green Farm or further afield at the Willows Farm, will not be sought.						
CS28	<p>Retail and commercial development in Shenley</p> <p>Small scale retail and commercial development in Shenley should be restricted to suitable sites within existing commercial areas. Locations will be identified in the Site Allocations and Development Management DPD, based on those defined in the Shenley Parish Plan:</p> <ul style="list-style-type: none"> • along London Road in the south east of the village; and • at Andrew Close and the nearby junction between London Road and Porters Park Drive (excluding the reserve school site). <p>Retail and commercial development in identified locations in Shenley should be of a size and scale, which primarily serves the local community rather than drawing in large numbers of visitors from further afield.</p>	PPS4, PPS7	<p>Part 2: Ensuring the vitality of town centres Para 25</p> <p>Part 3: Supporting a prosperous rural economy Para 28</p>	None	Yes	No	No
CS29	<p>Safe and attractive evening economy</p> <p>The Council wishes to promote a range of uses in town centres that cater for the whole community, creating a balanced evening economy including entertainment and late night retailing as well as the provision of a range of eating and drinking establishments. The quantity, type and location of A3, A4, A5 and other evening or late night uses will</p>	PPS1, PPS4	<p>Part 8: Promoting Healthy Communities Para 69</p> <p>Annex 2: Glossary:</p>	None	Yes	No	No

	<p>be controlled, having regard to other Local Plan and Development Plan Document policies, together with the aims and objectives of the Hertsmere Crime and Disorder Reduction Partnership Plan, including the need to reduce anti-social behaviour, crime and the fear of crime. Where new A3, A4 and A5 uses are permitted, financial contributions will be sought for related town centre improvements including additional CCTV, improved lighting and improved signage for CCTV and Alcohol Free Zones. In relation to those areas where concentrations of drinking establishments, night clubs or other evening or late night uses have caused existing anti-social problems, there will be a presumption against further consents for such uses.</p>		Main Town Centre Uses					
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Appendix C: Table of proposed minor amendments as a result of the publication of the NPPF

Changes to the Revised Core Strategy (November 2011) Development Plan Document in accordance with the National Planning Policy Framework:

Ref.	Ch.	Page	Policy / Para / Table No	Proposed Change	Reason for change	Is further Regulation 27 consultation required	Is further Sustainability Appraisal required
NMA/1	1	9	1.6	The Council is aware that there are government proposals to reform the development plan system, as set out in the draft National Planning Policy Framework. The government reformed the development plan system as set out in the National Planning Policy Framework (NPPF), which was published in March 2012. These proposals may lead to a reversion to NPPF has altered the development plan terminology, and reverted to the in place prior to 2004 and a focus being on a single Local Plan, but t The Council considers it important to have a statutory plan in place, providing greater certainty for local residents, the business community community and other stakeholders, in terms of how future growth is being planned. The Core Strategy is being submitted on that basis rather than waiting for the required legislation and regulations to be introduced which may change the format or title of an individual development plan, but not its overall policy content.	Change to national planning policy Typographical error	No	No
NMA/2	1	11	1.10	The draft National Planning Policy Framework retains the requirement for plans to be 'sound' but with an additional focus on positively prepared plans which meet objectively assessed development and infrastructure requirements, as well as consistency with national policy.	Change to national planning policy	No	No
NMA/3	1	11	1.12	It needs to be borne in mind that the preparation of policies for Hertsmere, which reflect local needs and circumstances, must take account of an increasingly wide range of external influences. PPS12 The NPPF requires the Core Strategy to be in accordance with guidance in the Framework align with policies and guidance set nationally and regionally. Although the government has signalled its intention to revoke regional plans, the East of England Plan remains part of the development plan and unless revoked, the Core Strategy will need to be in general conformity with the regional plan.	Change to national planning policy	No	No
NMA/4		11	1.14	Ahead of Since the adoption of a consolidated national planning framework, which it is anticipated will incorporates some elements of	Change to national planning	No	No

				<p>existing national from previous planning policy statements and guidance, a range of existing national policies remain relevant to the Core Strategy:</p> <ul style="list-style-type: none"> • The promotion of sustainable development to meet community development needs and the promotion of high quality design • <u>The continued presumption against inappropriate development in the Green Belt (PPG2)</u> • A proposed reduction in the minimum size of privately developed sites on which affordable housing must be provided, from 25 units to 15 units (PPS3, Housing) • The allocation of a 'rolling' five year supply of housing sites (PPS3) • Identification of housing land for a further 10 years, to enable 15 years total supply (PPS3) • Promotion of commercial activity within existing centres (PPS4, Planning for Sustainable Economic Growth) 	policy		
NMA/5	2	26	2.34	<p>Clear criteria will need to be provided to ensure that the focus on brownfield land does not lead to development at densities, which harm the character and appearance of established residential areas. In particular, following changes to the definition of previously developed land in <u>the previous PPS3 and now in the NPPF</u> in respect of private garden land, it will be necessary to provide greater clarity as to where any 'backland' development will be considered acceptable. A flexible, criteria-based approach, reflecting the different local character and pattern of development across the Borough, is likely to be more appropriate than any single borough-wide policy</p>	Change to national planning policy	No	No
NMA/6	3	35	3.5	<p>Following <u>the Strategic Housing Land Availability Assessment Practice Guidance</u> publication in July 2007 in PPS3, the <u>Council's</u> SHLAA separates the land supply on the basis of their prospects for delivery. In the first five years, it estimates the potential of deliverable sites...</p>	Change to national planning policy	No	No
NMA/7	3	37	3.14	<p>Residential intensification through the redevelopment of existing homes and garden land have represented a significant source of windfall housing supply in recent decades. Following changes to the definition of previously developed land in <u>the previous PPS3</u> and the exclusion of private garden land from this category of land, it will be was necessary to provide greater clarity as to the type and location of residential intensification which will be considered acceptable. <u>This was maintained in the NPPF.</u></p>	Change to national planning policy	No	No
NMA/8	3	38	3.16	<p>Government policy in PPS3<u>the NPPF</u> emphasises the need to identify</p>	Change to	No	No

				land to enable continuous delivery of housing for at least 15 years from the date of adoption of DPDs...	national planning policy		
NMA/9	3	39	3.22	Such Affordable Housing, as set out in the Core Strategy and as defined in Annex 2 B of the NPPF PPS3 (Housing) , refers to the provision of new housing with an element of subsidy, for rent or shared ownership, rather than the development of low-cost private houses and flats. This may be delivered with public subsidy (grant) but increasingly, in the absence of any grant, through the value generated from the development of private housing on a site. Affordable Housing does not include the provision of low cost market housing.	Change to national planning policy	No	No
NMA/10	3	40	3.25	National guidance in <u>the NPPF now states that Local Planning Authorities should identify the need for affordable housing, and set policies to meet that need.</u> PPS3 sets out national minimum thresholds above, which a A developer would be expected to provide affordable housing but allows planning authorities to set local thresholds, provided these can be demonstrated to be viable.	Change to national planning policy	No	No
NMA/11	3	42	3.36	To enable Affordable Housing to be provided in rural settlements to meet local needs, PPS3 The NPPF allows new Affordable Housing to be permitted on small sites in or adjoining existing settlements. These are sites, which would not normally be released for market housing but in the case of specified rural settlements; housing can be accommodated as an exception to normal policies.	Change to national planning policy	No	No
NMA/12	3	3.43	44	Government guidance in PPS3 (Housing) the NPPF requires provision to be made in LDFs Local Plans for a balance between different household types across the Plan period.	Change to national planning policy	No	No
NMA/13	4	(Box at start of chapter)	47	“Local planning authorities should support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify ies and plans for new or emerging sectors likely to locate in their area, such as those producing low carbon goods or services. However, p. Policies should be flexible enough to accommodate sectors not anticipated in the plan and to allow a quick rapid response to changes in economic circumstances” EC2.1 section (b) Planning Policy Statement 4: Planning for Sustainable Economic Growth... Paragraph 21 of the National Planning Policy Framework	Change to national planning policy	No	No
NMA/14	4	48	4.9	Despite the relative strength of the local economy, there are significant pressures to develop employment land and buildings for other land uses and in particular, for residential development. Government policy in	Change to national planning policy	No	No

				PPS3 the NPPF requires Local Planning Authorities to consider whether sites currently allocated for industrial or commercial use could be more appropriately re-allocated for <u>different land uses to support sustainable local communities housing development.</u>			
NMA/15	5	56	5.5	Within the Green Belt, there is a need to maintain strict controls over the types of development, which can be permitted. The types of uses permitted in the Green Belt are limited by central Government in PPG2 (Green Belts) the NPPF to a limited range of 'open land' uses, in order to protect its openness and prevent urban sprawl or the merging of towns.	Change to national planning policy	No	No
NMA/16	5	57	5.11	Government policy (PPS7 NPPF) promotes the use of criteria-based policies, utilising tools such as landscape character assessment, ahead of rigid, blanket designations. The draft consolidated PPS issued in 2010 (Planning for a Natural and Healthy Environment) advised existing local landscape designations should only be maintained where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection.	Change to national planning policy – publication of NPPF 27 March 2012	No	No
NMA/17	5	58	5.15	Government policy (PPS9, Biodiversity and Geological Conservation) endorses this principle advising that where no suitable alternative sites exist and adequate mitigation and / or compensation cannot be provided on the affected site, proposals should be refused. (NPPF) advocates criteria-based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Appropriate weight should be given to the sites status , importance and contribution it makes to the wider ecological network. The Council supports this approach and will seek	Change to national planning policy	No	No
NMA/18	5	59	CS12	There will also be a presumption against inappropriate development, which causes harm to the openness and appearance of the Green Belt, as defined in the NPPF PPG2 (Green Belts).	Change to national planning policy	No	No
NMA/19	5	62	5.29	There are a number of identified areas in the Borough which fall within these areas of greatest flood risk, including the functional flood plain and the Council will need to follow the Government's required sequential approach, as set out in PPS25 the NPPF , when allocating new sites for development. Areas of least flood risk will need to be prioritised when allocating land for new development and the NPPF PPS25 exception test will be followed when there is no option but to promote such development in one of the higher risk flood zones. Account will also be taken of the Thames Catchment Flood Management Plan, Water Framework Directive,	Change to national planning policy Typographical error	No	No

				the Water Framework Directive and the government's Making Space for Water programme.			
NMA/20	5	63	5.38	Consequently, where development is proposed, the primary responsibility for ensuring that a development is safe and 'suitable for use' will rest with a developer <u>and/or landowner</u> , including the preparation of any remediation strategy. Proposals must be in compliance with PPS23 <u>the NPPF</u> and the Envrionment <u>Environment</u> Agency technical note on managing land contamination (CLR 11).	Change to national planning policy Typographical error	No	No
NMA/21	6	69	6.8	The promotion of mixed use development is a central tenet of government planning policy (PPS4 <u>NPPF</u>). The Council recognises that proposals containing a mix of uses, which can <u>complement</u> compliment each other, are a prerequisite for creating sustainable communities.	Change to national planning policy Typographical error	No	No
NMA/22	6	71	6.14	At the centre of creating sustainable communities is the need to deliver high standards of design whilst ensuring that buildings and the wider public realm are physically accessible to all sections of the community. This is recognised in the government's overarching guidance on the planning system in PPS4 <u>the NPPF</u> , requiring the planning system to address physical access to land and buildings for all members of the community.	Change to national planning policy	No	No
NMA/23	7	7	7.9	PPS3 (Housing) The NPPF has proposed the local formulation of residential car parking standards, which are in part based on <u>local</u> car ownership, <u>accessibility, type, mix and use of development, availability and opportunities for public transport, and an overall need to reduce the use of high-emission vehicles, and this is reflected in the emerging National Planning Policy Framework</u> . This has provided the Council with an opportunity to set residential parking standards which reflect local need and circumstance in the Borough.	Change to national planning policy	No	No
NMA/24	7	76	7.11	PPS3 recommends an approach that takes account <u>The Council's adopted Parking Standards SPD was formulated in part on the basis</u> of expected levels of car ownership in the future. The 2001 Census for the Borough shows a higher level of car ownership compared to the national and regional average of 1.36 vehicles per household.	Change to national planning policy	No	No
NMA/25	8	81	8.3	The main centres of Borehamwood and Darkes Lane, Potters Bar will continue to be the preferred location for any new retail, commercial or leisure development. Where significant comparison or convenience retail development is proposed, a significant adverse impact assessment will be	Change to national planning policy	No	No

				required. It should also be proven that town centre sites have been considered before edge-of-centre and out-of-town sites, as required by the NPPF PPS4 (Planning for Sustainable Growth) .			
NMA/26	8	82	8.5	The Council will ensure that proposals within Borehamwood, Potters Bar, Radlett and Bushey town centres are appropriate to the size and scale of the centre. There are a number of larger supermarkets within Borehamwood and Potters Bar, including a new supermarket which opened at Stirling Corner in January 2011, in addition to several located nearby in Watford, London Colney and Stanmore which serve communities in the h B orough. Proposals for any additional large supermarket(s) will need be demonstrated by retailers, in addition to satisfying the significant adverse impact assessment test as required by the NPPF PPS4 .	Change to national planning policy Typographical error	No	No
NMA/27	8	82	CS26	<i>Development within the designated town, district or neighbourhood centres of Borehamwood, Potters Bar, Bushey and Radlett will be permitted provided that it maintains their primary retail function and wider role as a focus for business, leisure, cultural and other appropriate town centre uses (as defined within the NPPF PPS4). Retail activity elsewhere should be focused within local centres and parades, which will be expected to retain a core of local shopping facilities and accommodate any new retail development, commensurate to their position within the town, district and neighbourhood centre hierarchy...</i>	Change to national planning policy (See NPPF Health Check on this Policy)	No	No
NMA/28	11	92	Glossary and Acronyms	The National Planning Policy Framework (NPPF) is a proposed single national planning framework, which <u>was published on 27th March 2012, and seeks to</u> replaces the PPSs and PPGs.	Change to national planning policy	No	No
NMA/29	11	92	Glossary and Acronyms 4 th row, 3 rd column	Planning Policy Guidance notes set out national planning policy, <u>which have all now been cancelled on the publication of the National Planning Policy Framework (NPPF)</u>	Change to national planning policy	No	No
NMA/30	11	92	Glossary and Acronyms 5 th row, 3 rd column	Planning Policy Statements are the new way in which national planning policy is presented. There is an on-going process to replace all Planning Policy Guidance notes with Planning Policy Statements also formed part of national planning policy, which have all now been cancelled on the publication of the National Planning Policy Framework (NPPF).	Change to national planning policy	No	No
NMA/31	Ap	100	Table	CS7 Housing Mix – (Column 3) Reliance on PPS3	Change to	No	No

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ⁱ SHLAA Practice Guidance - <http://www.communities.gov.uk/publications/planningandbuilding/landavailabilityassessment>

Appendix D: Housing Land Supply in light of the NPPF

Several adjustments have been made to national planning policy as a result of the NPPF. The Council considers that two of these are especially relevant in respect of their impact on the Council's 15-year supply of land for housing. The first change relates to the number of Green Belt sites that can now be developed within the existing policy context and the second allows the Council to include an allowance for windfall from broad locations during years 6 to 10 of the plan period.

'Other Green Belt' SHLAA sites – previously developed land

The Strategic Housing Land Availability Assessment (SHLAA) (CD/94) and SHLAA Update reports did not include supply from Green Belt sites that could not be developed under the existing policy context ('Other Green Belt' sites) within the housing trajectory. Judgements as to a site's suitability under the existing policy context were made on a case-by-case basis; however, sites whose development for housing would have been 'inappropriate' – as defined within Planning Policy Guidance 2: Green Belts (PPG2) – were not included, unless the Council was aware of a case of 'very special circumstances' that would be likely to act as a reasonable justification for development.

The NPPF changed the definition of 'inappropriate' development in the Green Belt, at paragraph 89, to exclude the following:

Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

It is noted that Annex C of PPG2 previously stated that some partial or complete redevelopment was appropriate only at designated Major Developed Sites. As such, it is considered that some previously developed Green Belt sites earlier excluded from the Council's 15-year housing land supply could be developed under the new existing policy context, as set out by the NPPF.

Table 1 below lists those sites that are included in the 2011 SHLAA Update report as 'Other Green Belt' sites and have previously been either partially or completely developed. The table lists the gross (total) and net (previously developed) site areas and the amount of housing that could be accommodated, if a density of 30 dwellings per hectare is assumed across the net area. This was the baseline used for assessing a site's capacity in the SHLAA, and it is considered appropriate to use this low figure, given that the NPPF requires a detailed, site-by-site assessment of any impact on the openness of the Green Belt in comparison to that resulting from existing development.

It can be seen that this demonstrates that, following the changes to Green Belt policy introduced through the NPPF, an estimated, additional 177 dwellings could be delivered on sites that were not previously included within the Council's housing trajectory. If the 6% lapse rate applied to other specific sites is factored, this equates to 166 dwellings.

Table 1: Housing yield from previously developed 'Other Green Belt' SHLAA sites

Site	SHLAA Site reference	Gross area (ha)	Net area (ha)	Housing yield (@ 30 dph)
<i>Potters Bar, Ridge & South Mimms</i>				
Potters Bar Golf Course	S44	41.0	0.8	24
Former Sunnybank School Site	S47	1.4	1.1	33
Land to the South of Potters Bar (Site D)	S55	17.4	2.3	69
<i>Bushey, Aldenham and Patchetts Green</i>				
Closed swimming pool and grounds, Falconer Road	S3	0.4	0.4	12
Land adjacent to Birchville Court, Heathbourne Road	S9	0.9	0.7	21
Former West Herts College Annex, William Street	S31	2.3	0.6	18
Gross total		63.4	5.9	177
Net total				166

Housing supply from Broad Locations / windfall

The Strategic Housing Land Availability Assessment (SHLAA) (CD/94) and SHLAA Update (CD/95) reports include supply from Broad Locations (windfall) within the final 5 years of the Council's 15-year housing trajectory. Based on historical completions data, the Council has forecast that 100 and 15 units will come forward each year from urban and rural windfall, respectively. Table 2 below shows that this is a conservative estimate, based on an average figure taken from unallocated sites over a 9-year period.

Table 2: Net housing completions (unplanned) from windfall between 2002/03 and 2010/11

Year	Net completions (unplanned) in urban area	Net completions (unplanned) in rural area
2002/03	70	7
2003/04	125	1
2004/05	170	4
2005/06	190	64
2006/07	78	40
2007/08	251	19
2008/09	75	33
2009/10	185	28
2010/11	147	3
Average	143	22

PPS3: Housing strongly discouraged the inclusion of an allowance for windfall sites within the first ten years of housing supply; the NPPF now provides greater scope for

the inclusion of an allowance from such a source within the first 5 years of housing supply, as well as the scope for broad locations within years 6 to 10. At paragraph 48, the NPPF states that:

Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.

Table 2 above demonstrates that unallocated housing sites have consistently come forward for development in the Borough and form a reliable source of supply. As such, it is considered that the Council should be able to reasonably include an allowance for windfall sites within the 1 to 5 and/or 6 to 10 year periods of the 15-year housing trajectory, reflecting the broad locations already identified in the SHLAA for years 11 to 15.

Table 3: Gross housing completions (unplanned) between 2008/09 and 2010/11 broken down by scheme size

Scheme size (dwellings)	Number of dwellings	Percentage of total dwellings
1 to 4	140	25.5%
5 to 9	31	5.6%
10 to 14	53	9.6%
15 to 24	115	20.9%
25 to 49	33	6.0%
50 to 99	64	11.6%
>100	114	20.7%
Total	550	

Table 3: Housing supply from specific sites to 2027 broken down by scheme size

Scheme size (dwellings)	Number of dwellings	Percentage of total dwellings
1 to 4	60	2.8%
5 to 9	95	4.5%
10 to 14	55	2.6%
15 to 24	134	6.3%
25 to 49	154	7.3%
50 to 99	273	12.9%
>100	1340	63.5%
Total	2111	

Table 4: Housing supply from commitments (at 01/04/2011) broken down by scheme size

Scheme size (dwellings)	Number of dwellings	Percentage of total dwellings
1 to 4	122	10.2%
5 to 9	89	7.5%
10 to 14	179	15.0%
15 to 24	78	6.5%
25 to 49	78	6.5%
50 to 99	63	5.3%
>100	583	48.9%
Total	1192	

Tables 3, 4 and 5 above show housing supply by scheme size from unplanned completions between 2008/09 and 2010/11, specific sites to 2027 and commitments at 01/04/2011, respectively. These tables demonstrate that, whilst housing supply from small sites is taken into account adequately by windfall (unplanned completions) and commitments, the Council is not able to easily identify specific sites that are likely to yield a small number of houses.

The housing trajectory, which is including within the RCS as Figure 2, shows that no delivery from either committed or windfall sites is allocated to years 7 to 10 (2018/19 to 2021/22) of the Council's 15-year supply. Upon further inspection of Appendix 5 of the SHLAA Update report, which sets out all specific sites and shows their phasing across the 15-year supply period, it can be seen that no specific site capable of accommodating fewer than 44 residential units has been allocated to years 6 to 10 of the Council's housing supply. It is noted that the housing trajectory includes 39 committed sites to year 6 (2017/18). However, as can be seen from Appendix 4 of the SHLAA Update report, which shows committed sites and their phasing across the first 6 years of the 15-year supply period, only 2 of these units would yield from sites that are due to deliver fewer than 10 units.

It can be seen that, although the Council has a track record of delivering a large proportion of its housing on smaller sites, the SHLAA only includes provision for 2 units to be delivered on sites capable of accommodating minor housing development of between 1 and 9 units in years 6 to 10 of the housing trajectory. On account of this it is considered that there would be sufficient justification to include a modest windfall allowance for minor housing development of between 1 and 9 units in the years 6 to 10 of the Council's 15-year housing supply.

From Table 5, below, it can be seen that between 2002/03 and 2010/11 an average of 44 units per year were delivered from windfall sites as a part of schemes yielding fewer than 10 units. In years 11 to 15 of the Council's housing supply the allowance for windfall supply from both urban and rural locations has been set at approximately 70% of the annual average; if the same conservative approach is applied to windfall supply from sites yielding fewer than 10 residential units, this would equate to a supply of approximately 30 units a year.

It is considered that this shows, following adjustments to policy regarding windfall from broad locations introduced through the NPPF, an allowance could be made for

up to an additional 150 dwellings in years 6 to 10 that were not previously included within the Council's housing trajectory.

Table 5: Net housing completions (unplanned) from windfall between 2002/03 and 2010/11 on sites yielding fewer than 10 residential units

Year	Net completions (unplanned) on sites yielding fewer than 10 residential units
2002/03	49
2003/04	8
2004/05	29
2005/06	59
2006/07	21
2007/08	69
2008/09	65
2009/10	43
2010/11	52
Average	44

Conclusion

The adjustments introduced through the NPPF have provided the Council with the confidence to demonstrate that it would be capable of meeting 100% of an RSS target of 3,900. This is on the basis that over 300 additional units could be delivered through 'other Green Belt' specific sites and windfall from broad locations in years 6 to 10.