

Written Statement to the Hertsmere Revised Core Strategy Examination – Matter 2

Issue 2.1, 2.2, 2.4 and 2.5

On behalf of Barratt North London (Ref: 4675)

13 April 2012



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1 Introduction

- 1.1 The following written statement is provided in advance of Bidwells attendance, on behalf of Barratt North London, at the scheduled Examination into the Hertsmere Revised Core Strategy Development Plan Document. The statement has been prepared having regard to the guidance provided to respondents on the submission of statements and addresses only those Matters and Key Issues for Examination raised by the Inspector. Specifically, this statement supports and further elaborates upon the comments submitted by Bidwells, on behalf of Barratt North London, on the 6 January 2012.

2 Response to Issue 2.1

Is the proposed distribution of housing based on a sound assessment of the most sustainable options? Are the broad levels of growth at particular settlements appropriate?

- 2.1 Paragraph 3.12 of the RCS acknowledges that the distribution of housing identified by Policy CS2 is principally led by the availability of suitable housing land within the borough's four major settlements. It is entirely logical to direct the majority of housing development to the most sustainable locations. Borehamwood is the largest settlement in the borough and therefore accommodates the majority of the borough's population, along with the physical and social infrastructure and employment opportunities required to meet the needs of that population. Borehamwood is also geographically well placed to take advantage of existing major road and rail links providing access to north London and the sub-region. Accordingly, although the proportion of housing development directed to specific settlements by Policy CS2 is largely based upon urban capacity, it is also representative of the sustainability characteristics of the borough.
- 2.2 This is substantiated at Table 4.1 of the submitted Sustainability Appraisal, which confirms that options which seek to focus development in the most accessible locations in Hertsmere would provide the most sustainable development strategy.
- 2.3 It is perhaps also appropriate to note that paragraph 3.12 of the RCS confirms the percentage figures in Policy CS2 to be indicative guidelines and therefore, although they provide a useful indication of where development should be directed in the borough, there is ultimately an element of flexibility as to the actual location of growth. Accordingly, so long as Policy CS2 does not artificially constrain or cap the level of growth in particular settlements to the identified percentage figure, there is no reason why the policy should not continue to provide general guidance in order to direct development to the most sustainable locations.

3 Response to Issue 2.2

Is the proposed replacement of Policy H4 of the Hertsmere Local Plan, which provides safeguarded land for housing, justified and clearly explained? Is it consistent with the approach to safeguarding employment land?

- 3.1 Policy H4 of the Hertsmere Local Plan 2003 allowed for the release of five sites from the Green Belt in order that they may be available to supplement the supply of housing in the borough, should additional development land be needed. This approach was deemed necessary in order to ensure the long term protection of Green Belt boundaries.
- 3.2 Paragraph 85 of the NPPF endorses an approach of this nature, stating that LPAs should "*where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching beyond the plan period*".
- 3.3 Nonetheless, Appendix 5 of the RCS confirms that Policy CS2 is intended to supersede Policy H4 of the Hertsmere Local Plan. Policy CS2 does not seek to take a similarly cautious approach to housing land supply by also safeguarding appropriate Green Belt sites to meet the housing needs of the borough in the future. The RCS does not provide any justification for this approach, other than to assert the Council's view that there is sufficient capacity within existing urban areas to meet the housing needs of the borough.
- 3.4 The comments provided by Bidwells on behalf of Barratt North London in respect of Matter 1 have however raised significant questions over both the extent of the housing target set by Policy CS1 and the deliverability of phased development in accordance with Policy CS3. As a result it is concluded that it will be necessary to release Green Belt land in the borough in order to meet identified housing needs.
- 3.5 The fact that the Council have seen fit to safeguard land in order to meet the employment needs of the borough (Policy CS8) confirms that there is no fundamental obstacle which would prevent a similar approach being adopted for housing land, should it be considered appropriate to do so.
- 3.6 The Council's decision to renege on the policy approach taken by the Local Plan and in doing so forfeit the opportunity to direct housing growth to the most suitable Green Belt locations is therefore considered to be unjustified and it is certainly not clearly explained.
- 3.7 Nonetheless, given Bidwells response to Matter 1, we consider that there is strong evidence to suggest that Green Belt sites will be required to meet the housing needs of the borough well before the end of the plan period. The process of safeguarding Green Belt land is not intended for sites which would contribute to the supply of housing during the plan period, however it may be

appropriate to safeguard Green Belt sites now, if it considered that there is sufficient evidence to suggest that urban sites will yield a sufficient number of dwellings to satisfy the relevant targets. As noted above, it is our view that this is unlikely.

- 3.8 In order for Policy CS2 to be sound, it must therefore make provision for either the allocation of specific sites within the Green Belt or the identification of broad directions for growth in order that specific sites can be allocated via a subsequent DPD.
- 3.9 Land at North Barnet Lane in Borehamwood (SHLAA Site S2) provides an opportunity to allocate a medium sized Green Belt site for development in order to supplement any shortfall in supply, as and when it is required. The site is discussed in greater detail in Bidwells response to Response to Issues 2.4 and 2.5, along with suggested amendments to Policy CS2.

4 **Response to Issues 2.4 and 2.5**

Are there sufficient reasons to conclude that there is no need for the RCS to provide for the limited release of sites for housing in the Green Belt.

Overall, are the proposals for housing provision and its distribution reasonably flexible? Is there adequate regard to uncertainties and risks and are there sufficient measures for contingencies?

- 4.1 The comments submitted by Bidwells of behalf of Barratt North London in respect of Matter 1 demonstrate that the Council have not provided a sufficiently robust evidence base to justify the housing target set by Policy CS1 of the RCS and that there is compelling evidence to suggest that the target should be increased, if the housing needs of the borough are to be satisfied.
- 4.2 An increase in the borough's overall housing target would have a significant bearing on the strategy adopted by Policy CS2 of the RCS for the location of new homes. There is no doubt that the supply of potential urban housing sites in the borough is constrained, indeed the margin between the capacity of urban sites identified by the SHLAA and the targets set by the Policy CS1 amounts to 9 dwellings. Any increase in housing targets will therefore result in the need to identify and allocate appropriate Green Belt land to supplement any deficit in supply.
- 4.3 By way of example, it has been demonstrated that in order to remain in general conformity with the East of England Plan, the target set by Policy CS1 would need to be increased to 266 dwellings per annum (see Bidwells in respect of Matter 1, Issue 1.1). An increase of this extent would result in a requirement to deliver a further 444 dwellings across the plan period. The SHLAA has confirmed that there is not capacity to accommodate these dwellings within existing urban areas and therefore it would be necessary to allow for the limited release of Green Belt land to meet the housing needs of the borough. Any further increase in targets would of course require additional Green Belt release.
- 4.4 Even if the target set by Policy CS1 remains unchanged, it would only take one or more of the sites identified by the SHLAA to fail to come forward or to yield fewer dwellings than anticipated, and the overall housing target set by Policy CS1 would not be deliverable. Although the SHLAA provides a broad assessment of the capacity of potential housing sites in the borough, the document is ultimately based on a number of assumptions which may not materialise in reality. The comments provided by Bidwells in respect of Matter 1, Issue 1.4 identify a number of limitations in the methodology used by the SHLAA to assess housing capacity in the district. This strongly suggests

that the delivery of housing on urban sites will not be sufficient to satisfy the targets set by Policy CS1.

- 4.5 The RCS therefore fails to recognise the limitations of the SHLAA in predicting housing land capacity and perhaps more worryingly also fails to incorporate a contingency plan which would redress any shortfall in delivery if urban sites do not come forward as anticipated.
- 4.6 The SHLAA identifies a number of sites within the Green Belt which are assessed to be suitable to accommodate housing development. This includes SHLAA Site S2 (Land North of Barnet Lane). The SHLAA confirms the site to be within walking distance of a primary school, food store and GP Surgery, as well as being adjacent to frequent bus services along Furzehill Road and Barnet Lane. In light of this, the SHLAA considers the site to be suitable for housing development, provided that it is limited to those areas which are not occupied by TPO trees.
- 4.7 The site is bounded to the north and east by existing residential development and is contained by Barnet Lane to the south. On the opposite side of Barnet Lane there are a row of residential properties which lie within the Green Belt. The site boundaries are therefore well defined by existing physical features that are readily recognisable and permanent. The geographical characteristics of the site would therefore allow for a natural extension to the settlement boundary of Borehamwood in a manner which does not leave surrounding land vulnerable to development pressure in the future. The release of the site for development at this stage would fully comply with paragraph 83 of the NPPF, which requires LPAs to *"establish Green Belt boundaries in their Local Plans which set the Framework for Green Belt and Settlement Policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt having regard to their intended performance in the long term, so that they should be capable of enduring beyond the plan period"*. This confirms that if Green Belt land is required to meet the growth needs of the borough, any amendment to the Green Belt boundary should be considered now.
- 4.8 The Council has not undertaken a strategic assessment of the existing Green Belt boundaries in the borough in order to identify the most appropriate locations for growth, however an independent assessment of SHLAA Site S2 has been undertaken by David Williams Landscape Consultancy (submitted by Bidwells on behalf of Barratt North London at pre-submission stage). This assessment considers the landscape characteristics of the site, its value to achieving the objectives of the Green Belt and the appropriateness of its release for development. This document confirms that the site in question could be excluded from the Green Belt without harm to its purpose or functions and that the release of the site would relieve pressure to develop less appropriate Green Belt sites elsewhere in the borough. These conclusions are supported by the

findings of a comprehensive Landscape and Visual Impact Assessment, also prepared by David Williams Landscape Consultancy.

- 4.9 On the basis of the reports discussed above (enclosed) it is clear that SHLAA Site S2 can be released for development without harm to the objectives of the Green Belt or the reasons for including land within it. Accordingly, there is no reason in Green Belt terms why the site should not contribute to the supply of housing in the borough. Indeed, two further documents were submitted at pre-submission stage which demonstrate that there are also no technical constraints (such as highways, drainage or utilities) or ecological features which would prevent the site from coming forward for development. On the basis of this information, the submitted Landscape and Visual Impact Assessment provides a 'Landscape Strategy Plan' (Drw No. 0045/L4) which illustrates how the site may be developed in a manner which maintains, manages and enhances existing landscape and ecological features in order to create a attractive, healthy and sustainable residential environment.
- 4.10 The western part of the site has Village Green status and is therefore accessible to the general public. Nonetheless, this part of the site is poorly maintained and as a result is of little ecological or recreational value. The development of the eastern part of the site would allow for significant enhancements to the Village Green in order to create a green space which is attractive, usable and rich in ecology. At paragraph 8, the NPPF acknowledges that "*economic growth can secure higher social and environmental standards*". The release of SHLAA site S2 for housing development would certainly result in social and environmental enhancements which would benefit the existing community, as well as future residents of the wider site.
- 4.11 The eastern part of the site is large enough to make a significant contribution to the supply of housing land in the borough (approximately 150 dwellings) but it is not so large as to require significant infrastructure or service improvements and can therefore be delivered in the short term if it is necessary to do so.
- 4.12 On the basis of the above and having regard to the technical evidence submitted at pre-submission stage, it is considered that SHLAA Site S2 should be allocated for the development of circa 150 new homes. Given the strategic nature of Green Belt release, it would be entirely appropriate to formalise an allocation of this nature within the RCS. Alternatively the RCS may seek to identify the site as a broad direction for growth, with a view to securing an allocation via a subsequent DPD.
- 4.13 Although the process of safeguarding Green Belt land is not intended for sites which would contribute to the supply of housing during the plan period, it may be appropriate to safeguard SHLAA Site S2 if it considered that there is sufficient evidence to suggest that urban sites will yield

a sufficient number of dwellings to satisfy the relevant targets. As noted above, it is our view that this is unlikely.

- 4.14 SHLAA Site S2 was identified as one of the areas of search for Green Belt development within the Submission Version of Hertsmere Core Strategy 2008. Although this document was subsequently withdrawn in favour of the current Revised Core Strategy, the areas of search were properly assessed by an appropriate Sustainability Appraisal and underwent the necessary stages of public consultation. Accordingly, the site could be allocated without the need to review the submitted Sustainability Appraisal or undertake any further public consultation.
- 4.15 It is therefore suggested that the following alterations should be made to Policy CS2 in order to provide the RCS with sufficient flexibility to respond to any shortfall in housing land supply as and when it occurs.

Policy CS2 Location of New Homes

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.

Land to the North of Barnet Lane in Borehamwood (shown on the Proposals Map) will also be removed from the Green Belt in order to meet the development needs of the Borough. Residential development on the site for up to 150 dwellings will be supported if the Council is unable to demonstrate a five year rolling supply of housing land at any time between 2012 – 2027.

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.

Within rural locations and in particular, Shenley, Elstree and South Mimms limited, small scale infilling on suitable sites will be supported.

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