



26th April 2012
Our Ref: P-11-373

Carmel Edwards, Programme Officer
Hertsmere Revised Core Strategy
c/o Policy & Transport Team
Hertsmere Borough Council
Civic Offices, Elstree Way
Borehamwood
Herts WD6 1WA

By email to: Programme.Officer@hertsmere.gov.uk

Dear Ms Edwards

HERTSMERE REVISED CORE STRATEGY EXAMINATION
Further representations in the light of the National Planning Policy Framework

We refer to your email of 2nd April offering an opportunity to make further representations on the Hertsmere Revised Core Strategy in the context of the National Planning Policy Framework (NPPF). Please will you pass these brief comments to the Inspector for his consideration together with our representations (dated 5th January 2011) on the Submission version of the Core Strategy.

National Planning Policy

Our representations made in January 2012 inevitably refer to the then PPG and PPS documents but, other than now needing to refer to the relevant parts of the NPPF, those representations continue to be relevant. Indeed, in the context of the emphasis on Sustainable Development, we believe that the NPPF adds further emphasis to our criticism of the way in which the Council has approached the process of preparing the Revised Core Strategy. The NPPF re-emphasises the requirement for a Development Plan to be 'sound' when submitted for Examination and that in order to be so it must be *"Positively prepared, Justified, Effective and Consistent with National Policy"*. The Government expects the local plan process to consider alternative strategies before deciding upon the most appropriate, that decision being based on evidence to support the choice (paragraph 182). The NPPF is clear that each LPA should *"ensure that the Local Plan is based upon adequate, up-to-date and relevant evidence"* and that their assessments and strategies *"take full account of relevant market and economic signals"* (paragraph 158). As our representations explain, the Council has not done so, resulting in a plan that is unsound.

On the matter of policy formulation the NPPF states that for plan-making:

- *"local planning authorities should positively seek opportunities to meet the development needs of their area"; and*
- *"Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change"*(paragraph 14).

The Government is clear that there should be a positive attitude to *"proactively drive and support sustainable economic development"* and to *"respond positively to wider opportunities for growth"*. Plans should *"take account of market signals"* and the needs of business communities (NPPF paragraph 17). *"Planning should operate to encourage and not act as an impediment to sustainable growth"* and *"significant weight should be placed on the need to support economic growth through the planning system"* (paragraph 19). Local Planning Authorities *"should plan proactively to meet the development needs of business"* (paragraph 20) and *"Investment in business should not be over-burdened by the combined requirements of planning policy expectations"* (paragraph 21). In drawing up Local Plans, local planning authorities should set out a clear economic vision and strategy which *"positively and proactively"* encourages sustainable economic growth; and should *"support existing business sectors, taking account of whether they are expanding or contracting"*. The NPPF confirms that *"Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances"* (paragraph 21). In his Foreword to the NPPF the Minister for Planning is very clear that *"Development means growth"* and that *"Sustainable development is about positive growth"*, emphasising that *"Planning must be a creative exercise in finding ways to improve the places in which we live our lives"*. This reflects HM Treasury's commitment that *"the default answer to development is yes"* in its ongoing 'Plan for Growth', which was launched at the time of the Budget in 2011, reinforced in the 2012 Budget and now underpins the NPPF. Rather than being positive and proactive towards development, Hertsmere's Core Strategy is resolutely negative in tone.

Housing Land Requirement and Supply

In respect of Housing, other than the minor change to windfall allowances which the Inspector has already raised, the emphasis in the NPPF strengthens the previous advice in PPS3, making it clear that a LPA must ensure that the plan *"meets household and population projections, taking account of migration and demographic change"* and that it *"caters for housing demand and the scale of housing supply necessary to meet this demand"* (paragraph 159). The submitted Core Strategy does none of these.

Employment

Our comments at Paragraph 28 of our Submission stage representations are reinforced by the NPPF requirement to support business sectors and for policies to be flexible enough to respond rapidly to changes in economic circumstances. Our comments also clearly illustrate that the Hertsmere Core Strategy has not been *"based on co-operation with neighbouring authorities"* (paragraph 157) and that the LPA has not demonstrated *"evidence of having effectively cooperated to plan for issues with cross-boundary impacts"* (paragraph 181).

Green Belt Policy

Our representations on Green Belt policy continue to be relevant in respect of the NPPF, particularly in the light of the need to promote sustainable patterns of development and the advice on defining boundaries (paragraphs 83, 84 & 85).

Conclusion

The contents of the NPPF do not detract from any of the points we made in our representations on the Submission Core Strategy. Indeed the NPPF reinforces our conclusions (and those of the previous Inspector) on the inadequacy of the Hertsmere Core Strategy as it fails the crucial test that it should *"plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework"* (paragraph 157). The Core Strategy is therefore unsound.

Yours faithfully

Paul Bloomfield

PAUL BLOOMFIELD DipTP MRTPI
For Shire Consulting