

HERTSMERE BOROUGH COUNCIL

REVISED CORE STRATEGY DPD

**Further statement: Representations on Matters arising from the publication of the
National Planning Policy Framework.
Representations of CPRE Hertfordshire**

1. This statement is submitted by CPRE Hertfordshire (CPRE) in response to the Inspector's invitation to comment on matters relevant to her examination of the Hertsmere Revised Core Strategy Examination as a result of publication of the National Planning Policy Framework (NPPF) and Planning Policy on Travellers Sites. The statement refers to CPRE's comments as a participant at the Examination and the consequences of the content of the NPPF only; CPRE has no comments on the Planning Policy on Travellers Sites.
2. With regard to policy CS5 Affordable Housing in rural areas on "Exception" sites, we do not consider that a change to the text of the policy is necessary. This is contrary to Hertsmere Borough Council's (HBC) view. Although paragraph 54 of the NPPF refers to considering "whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs", this does not override policy to protect the Green Belt in paragraph 88. NPPF paragraph 89 refers only to "limited affordable housing" as an exception in the Green Belt. Therefore, it could not, in our view, have been the government's intention that facilitating "the provision of significant affordable housing", by allowing even more (market) housing in the Green Belt would be acceptable. To include the additional text suggested by HBC would weaken protection of the Green Belt.
3. CPRE were a participant at the examination (Representor 1491), on policy CS8. We consider that CS8 is not consistent with the NPPF on the issue of safeguarding land the Green Belt boundary and the built-up area of Borehamwood. However, contrary to the HBC NPPF Statement, we understand from comments made at the Examination, HBC will be proposing changes to the Revised Core Strategy for consultation and we will comment on those proposals.
4. It is understood that a similar situation exists with HBC's proposed changes to the wording of policy CS12, and that as a result of the Examination; they will consult on the proposed changes. We consider that the current wording of the policy is generally consistent with the NPPF, but that minor changes of wording are anticipated and we reserve comment until these proposal have been published.

CPRE Hertfordshire 11 May 2012