

Hertsmere Local Plan

Development Plan Document

Site Allocations and Development Management Policies Plan

Statement of Compliance with the Duty to co-operate

October 2015



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Annexes

1. Introduction

- 1.1 The Council acknowledges and embraces its duty to co-operate with other local authorities and bodies in addressing the strategic (planning) issues which are relevant to this area. The duty was formally introduced by the Localism Act 2011, and while the duty is important because the Act has resulted in the removal of regional or county-wide strategic planning advice, the Council sees co-operation and collaboration as good practice.
- 1.2 The duty itself requires ongoing, constructive and active engagement on the preparation of planning documents and related activities concerned with sustainable development and the use of land. This is normally most important in considering the location of development and availability of strategic infrastructure.
- 1.3 The National Planning Policy Framework (March 2012) says that plans should be based on joint working and co-operation to address larger than local issues (paragraph 17), and in particular co-operation with neighbouring authorities, public, voluntary and private sector organisations (paragraph 157). Further advice is provided in the Planning Practice Guide (PPG), first published in March 2014.
- 1.4 The purpose of this statement is to explain how Hertsmere Borough Council has co-operated on strategic (planning) issues with other public bodies in the preparation of its Site Allocations and Development Management Policies DPD (SADM).
- 1.5 This statement covers the period up to submission of the published version of the Site Allocations DPD to the Planning Inspectorate. It takes into account representations and responses to key issues raised by duty to co-operate (DTC) bodies.

2. National and Legal Context

Co-operation and Collaboration

- 2.1 Section 110 of the Localism Act inserted section 33A (duty to co-operate in relation to planning of sustainable development) into the Planning and Compulsory Purchase Act 2004. The responsibility it introduced applies to all local planning authorities, county councils and other bodies. These other bodies are prescribed in Regulation 4 of the Town and Country (Local Planning) (England) Regulations 2012.
- 2.2 The duty to co-operate:
- relates to sustainable development and use of land that would have a significant impact on:
 - a) at least two local planning areas; or
 - b) a planning matter that falls within the remit of a county council;
 - requires that councils set out planning policies to address these issues;
 - requires councils and other bodies to “engage constructively, actively and on an ongoing basis” to develop strategic policies; and
 - requires councils to consider joint approaches to plan making.
- 2.3 The National Planning Policy Framework describes the duty to co-operate and sustainable development, sets out strategic issues on which co-operation may be appropriate and stresses the importance of co-ordination across local boundaries.
- 2.4 It says that local plans (including the Core Strategy) should be prepared with the objective of contributing to sustainable development. Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development (and net gains in all three) (paragraphs 151 and 152).
- 2.5 Paragraph 156 identifies strategic priorities, such as homes and jobs, transport infrastructure, health and community facilities, and conservation and enhancement of the environment, where it may be appropriate for co-operation to occur.
- 2.6 Paragraphs 178-181 say, inter alia, that:
- public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly the strategic priorities;
 - strategic priorities should be co-ordinated across boundaries and reflected in individual local plans;
 - local planning authorities should work together to meet development requirements which cannot be wholly met within their own areas;
 - local planning authorities should take account of different geographic areas;
 - local planning authorities should collaborate with the bodies prescribed *and* local enterprise partnerships, local nature partnerships, private sector bodies, utility and infrastructure providers;

- co-operation is a continuous process of engagement (from initial thinking to implementation) to ensure plans are in place to provide the infrastructure necessary to support the development proposed.

2.7 Planning Practice Guidance (PPG) elaborates how Councils should interpret and action the duty to co-operate. It provides further clarification on a number of key points:

- the bodies to which the DTC applies (see Table 1 below);
- the importance of focussing on the outcome of discussions, not solely on whether such discussions have taken place;
- the need for co-operation to occur throughout the plan making process, rather than at any one point in the process;
- the need for close co-operation in shire authorities to ensure appropriate planning of strategic matters;
- that Local Enterprise Councils (LEPs) and Local Nature Partnerships (LNPs) are not subject to the requirements of the duty. However, local planning authorities should engage with them when preparing their Local Plans.

Table 1: Duty to Co-operate Bodies

Relevant local authorities ¹	Other, Named Bodies
<ul style="list-style-type: none"> ▪ London Borough of Barnet ▪ London Borough of Enfield ▪ London Borough of Harrow ▪ St Albans City & District Council ▪ Three Rivers District Council ▪ Watford Borough Council ▪ Welwyn-Hatfield District Council ▪ Hertfordshire County Council 	<ul style="list-style-type: none"> ▪ Mayor of London ▪ Environment Agency ▪ Natural England ▪ Civil Aviation Authority ▪ Homes and Communities Agency ▪ National Health Service Commissioning Board ▪ Office for Rail Regulation ▪ Transport for London ▪ The relevant Integrated Transport Authority ▪ The Local Highway Authority ▪ Marine Management Organisation ▪ Historic Buildings and Monuments Commission for England (English Heritage – now Historic England) ▪ Clinical Commissioning Groups established via the National Health Service Act 2006

Note: 1 Determined by Hertsmere Borough Council in the local context

Examination

2.8 Paragraph 182 of the National Planning Policy Framework states the basis on which SADM will be examined:

“The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

Conclusions

2.9 There are two aspects of the Council’s responsibilities:

1) Preparing SADM

The legal test introduced as Section 33A, Planning and Compulsory Act 2004 is concerned with the process of preparing a local plan: i.e. constructive engagement, involving adjoining planning authorities and statutory consultees, and maximising the effectiveness of preparation: the potential for joint agreements and even joint plans should be considered. The examination into SADM cannot proceed if this legal test is not satisfied.

This Statement of Compliance is primarily concerned with the legal test, which is a prerequisite for proceeding with the examination.

2) Testing the soundness of SADM

The examination into SADM will assess its soundness: the key tests relating to co-operation are the “positively prepared” and “effective” tests described above (see paragraph 2.8). Both tests consider the policies in SADM: i.e. whether they are positively prepared and effective.

The Council acknowledges that confirmation of the soundness of SADM can only be given as an outcome of the examination.

3. Local Planning Context

A New Local Plan

3.1 The Council has been working towards the replacement of Hertsmere Local Plan 2003. Its replacement will consist of three documents:

- Core Strategy;
- Site Allocations and Development Management Policies (SADM); and
- Elstree Way Corridor Area Action Plan (AAP).

3.2 The Core Strategy was adopted on 16 January 2013. It is a very important strategic planning document, setting a balance between the Borough's housing and economic development needs, social welfare and protection of the environment for the period from 2012/13 to 2026/27. It sets the framework for more detailed planning policies and provides the foundation for decisions on planning applications and development proposals. The Council worked collaboratively with a wide range of organisations and interests and actively engaged the local community in the preparation of the Core Strategy. This was evidenced in a Statement of Collaboration (extract attached as Annex B) and a Positive Preparation Statement (Annex C). The Inspector conducting the examination into the Core Strategy reported that:

"...in the light of all of the evidence I conclude that the Plan has been prepared in accordance with the duty to co-operate." (See the extract from her report in Annex A, paragraph 10).

In terms of the most significant strategic issue the Core Strategy deals with, the supply of housing, each adjoining local authority¹ confirmed that it was not seeking to meet any of its housing requirement within Hertsmere (ref Appendix 1 in Annex C).

3.3 The Action Area Plan was adopted on 8 July 2015. It provides a co-ordinated framework for residential-led regeneration of an employment area in the Elstree Way Corridor, Borehamwood. It represents the most significant land use allocation arising from the Core Strategy. The scale of new housing is expected to be around 1,000-1,500 units overall in the Corridor. At 1 April 2015 it was calculated that future supply within the plan period would amount to 1,174 units (less a discount – ref. Table 1 page 14 SADM): this is around 30% of the total housing supply. The Council explained its collaboration in a Duty to Co-operate Statement (Annex E), including its view that the AAP did not raise any significant strategic or cross-border issues, the principle of the development having been tested through the adopted Core Strategy. The Inspector examining the AAP reported:

"I agree with this view. Therefore, in this case the DtC is not engaged. Nevertheless, the Council has engaged constructively, actively and on an on-going basis with the relevant bodies to which the DtC requirements relate in the preparation of the Plan." (See the extract from her report in Annex D, paragraph 7).

3.4 The Site Allocations and Development Management Policies (SADM) document has been under preparation for around three years: a specific call for sites and topics was launched in

¹ i.e. Barnet, Dacorum, Enfield, Harrow, St Albans, Three Rivers, Watford and Welwyn-Hatfield Councils

April 2013, followed by a draft in March 2014 and culminating in the publication of the Council's Plan in July 2015. The policies in SADM are primarily intended to help deliver the aspirations, targets and intentions of the Core Strategy. This is particularly significant because, although during the course of preparing SADM comments have been received seeking a higher housing target, this is not at issue now: it will however be a matter to consider as part of the Core Strategy review. SADM policies have two main purposes:

- a) to provide environmental and other criteria, against which all development proposals and planning applications can be judged; and
- b) to define sites and areas - these are shown on a Policies Map. They include the Green Belt, towns and villages, town centres, employment areas and housing sites and open spaces. For site proposals, the plan lists specific planning criteria or constraints which should be adhered to.

The Council is submitting SADM to the Planning Inspectorate in November 2015 and hopes to adopt it by mid-2016, depending on progress with the examination.

- 3.5 The Council adopted a community infrastructure levy (CIL) to support the planning policy framework and provision of infrastructure in 2014: the CIL charging schedule came into effect on 1 December 2014. The background work involved joint commissioning of evidence across the county and extensive and on-going consultation with Hertfordshire County Council (in their capacity as the local education and highway authority) and other infrastructure providers.

Continuing Co-operation

- 3.6 In Hertsmere, while the replacement of the Hertsmere Local Plan is still to be completed (through adoption of SADM), the Core Strategy Review has started and other (external) strategic documents have been prepared or are in the course of preparation. Government advice says that co-operation is appropriate at evidence gathering, development of strategy and delivery (implementation) stages. It is therefore a continuous process relating to a range of strategic issues, and not confined to one particular planning document or to Hertsmere's planning on its own.

- 3.7 The main strategic issues, which have been considered, where appropriate, through the preparation of the (existing) Core Strategy, are:

- i. The homes needed: i.e. the level of housing that should be provided and its balance with the level of jobs; the diversion of housing requirements outside of the borough; provision for travellers;
- ii. The jobs needed: i.e. the level appropriate in relation to the housing level; the role of film and creative industries in the economy;
- iii. Retail and leisure demands: i.e. the management of the countryside and maintenance of the Green Belt; the role of town centres; the accommodation of strategic recreational facilities, including the retention of a private aerodrome;

- iv. Health and education facilities: maintaining access for residents to the Watford Health Campus (with its Accident & Emergency and other specialist health services); new primary schools;
 - v. Managing the water environment: i.e. achieving a co-ordinated approach to water supply, and the management of waste water, run-off/flood risk and the river environment;
 - vi. Transport: i.e. capacity and planning for movement on some routes, including M1/A41, M25, and A1(M)/A1M and some localised cross-boundary issues; ensuring the appropriate links to and consistency with the local transport plan;
 - vii. Climate change and energy: i.e. achieving a common understanding and approach to low and zero carbon development and renewable energy opportunities (within the limits of Government policy);
 - viii. Waste and minerals planning: i.e. ensuring consistency with minerals and waste planning; and
 - ix. Conservation and enhancement of the natural and historic environment: i.e. continuity of habitat and landscape management, including the improvement of green infrastructure; management of heritage assets. Landscape management may also apply to the historic landscape.
- 3.8 The level of development, particularly housing and its implications, is the key strategic issue. The present Core Strategy follows previous Regional Plan policy in diverting a significant amount of growth away from this part of Hertfordshire.
- 3.9 Looking ahead to the Review of the Core Strategy, the Council accepts it:
- a) will need to consider whether to accommodate all of its objectively assessed development needs (or more than at present);
 - b) may be required to consider requests from neighbouring authorities in London or Hertfordshire to accommodate some of their development needs within the borough; and/or
 - c) may request that neighbouring authorities accommodate some of Hertsmere's development needs
- 3.10 The Council is working with Dacorum, Three Rivers and Watford Councils on a new Strategic Housing Market Assessment (SHMA) and Economy Study for south west Hertfordshire to inform new local plans/core strategy reviews: these are due for completion late in 2015. After this, Hertsmere, Three Rivers and Watford Councils are also due to start a Green Belt assessment.
- 3.11 While the approximate scale of development pressure arising from within the borough can be judged from recent household forecasts, it is difficult to be precise about the severity of the potential impact without completing a Green Belt assessment as part of the Review evidence base. The need to provide a green edge and recreational (and other) facilities for London suggest that the Green Belt in Hertsmere is as strategically as important as other Green Belt in Hertfordshire and probably more so given its immediate proximity to London.
- 3.12 London has an important influence across south east England (e.g. in terms of work, leisure and travel movements). Its growth, which comes from natural population increase

and international migration and property demands, fuels outward migration. The Council, with colleagues from other authorities outside London, contributed to the preparation and examination of the Further Alterations to the London Plan (to 2036). There is a question mark whether the London authorities can meet the current annual dwelling requirement, whether using any Green Belt land within London or not. In meetings with the adjoining London Boroughs (Barnet, Enfield and Harrow) there was no indication that any would seek to divert unmet needs into Hertsmere for the current London Plan period, and none since. The Greater London Authority is committed to a fundamental review of the London Plan taking a much longer term look at the issue of growth. It is, with the co-operation of authorities in the Greater South East area, establishing a forum, with executive steering committee and administrative framework to progress discussion of the growth issues. A summit of representatives from all authorities was held in March to begin the process; there was series of smaller roundtable meetings in July and September to raise issues planning and governance issues; these will be reported to a second summit on 11 December 2015. Hertsmere Council will continue to contribute to the ongoing work of this forum.

- 3.13 In Hertfordshire, there are well-established county-wide networking links at officer and political levels. Strategic planning, infrastructure and investment issues are discussed. A Strategic Planning Framework is being drawn up by the eleven local planning authorities in the county through the Hertfordshire Infrastructure and Planning Partnership and the Hertfordshire Planning Group. A draft Spatial Plan for Hertfordshire was initially prepared, based on the key provisions of existing core strategies/local plans. The intention now is that this is updated and elaborated on to provide a 'Local Strategic Statement' for the county, which can look in greater detail at both pressures and opportunities relating to growth and infrastructure.
- 3.14 The County Council and district authorities liaise over waste and minerals planning. A Waste Site Allocations document was adopted by the County Council in July 2014, completing the Waste Local Plan, and preparation of a new Minerals Plan began this year.
- 3.15 There is a continual process of engagement and dialogue with the County Council (in its various roles) and other councils on common matters of concern. Within the context of this liaison, there has also been a series of bilateral meetings with neighbouring authorities – HCC (local highway authority); HCC (minerals and waste); and Enfield; Barnet, Harrow, Welwyn-Hatfield, St Albans, Three Rivers and Watford Councils – to raise and discuss strategic planning issues, most after the adoption of the Core Strategy in January 2013. Welwyn-Hatfield has also separately organised two round table meetings in respect of its Local Plan. See Table 2. The upshot of all these meetings was that there were no substantive DTC/strategic planning issues for Hertsmere Council's SADM – notwithstanding Welwyn-Hatfield Council's representations on the Proposed Submission SADM and some minor issues (which are covered in Chapter 4).

Table 2: Duty to Co-operate Meetings with Other Local Authorities

Authority	Date of Meeting	Notes – key points ¹
Hertfordshire County Council²		
<ul style="list-style-type: none"> Highway Authority 	4/8/2014	Followed by meetings on the following dates to agree the Transport and Parking Chapter in SADM – 1/10 and 9/10/14, and 19/1, 29/1 and 11/2/15.
<ul style="list-style-type: none"> Minerals & Waste 	22/4/2013	Relevant aspects of minerals and waste policies and planning are included or cross-referred in SADM.
	25/2/2014	
	20/11/2014	
	18/5/2015	
London Borough Councils		
<ul style="list-style-type: none"> Barnet 	23/1/2014	Notwithstanding concerns about the delivery of housing within London (to 2036), there was no intention indicated of diverting growth to the authorities immediately adjoining. The authorities generally did not expect to release any significant amount of Green Belt land.
<ul style="list-style-type: none"> Enfield 	5/2/2014	
<ul style="list-style-type: none"> Harrow 	28/1/2015	
St Albans City & District Council		
	6/2/2014	Each authority accepted that due to similar Green Belt constraints it was unlikely that either could accommodate unmet need from the other.
	13/2/2015	
Three Rivers & Watford Councils		
<ul style="list-style-type: none"> Both 	27/9/2014	With Dacorum to progress SHMA and Economy Study in S W Herts. Following this a series of meetings were held by the four authorities to commission and progress the studies. On 13/8/2014 the authorities agreed leads for the following work: <ul style="list-style-type: none"> DBC - SHMA / population study HBC - Economy Study TRDC - Green Belt Study (covering TRDC, WBC and HBC only)
	10/7/2014	
	13/11/2014	The future use of Watford Council's former nursery site at Oxhey (in Hertsmere) was discussed at this and other meetings.
	5/12/2014	
<ul style="list-style-type: none"> Three Rivers 	15/1/2014	
<ul style="list-style-type: none"> Watford 	4/12/2013	
	8/5/2014	
Welwyn-Hatfield District Council		
	21/11/2013	
	21/5/2014	

	20/10/2014	With others, to consider development issues in connection with W-H Local Plan. W-H suggested they may need to approach others to ask whether they could accommodate any of their housing need.
	26/1/2015	
	7/10/2015	Concerns with SADM were in particular discussed – see Chapter 4

Note: 1 Notes of each meeting are in Annex G.

2 Engagement with HCC as a provider is referred to in paragraphs 3.19, 3.20 and 4.10 and Table 3 and 4.

- 3.16 The issue of cross-boundary housing growth has been raised in meetings with St Albans and Welwyn-Hatfield Council because of the difficulty of meeting objectively assessed housing needs in the absence of regional planning (see Table 2). However only Broxbourne Council has formally asked whether Hertsmere could accommodate any of its housing needs in the current plan-making process – see letter dated 4 August 2015 in Annex H. Hertsmere felt unable to assist for three reasons. Broxbourne is not in the same housing market area, and Hertsmere has its own housing development pressures and substantial Green Belt constraints.
- 3.17 Strategic planning for economic development and nature conservation is informed by liaison with the Local Economic Partnership (LEP) and Local Nature Partnership (LNP), in the main through the county-wide networks described in paragraph 3.13 above. The Herts and Middlesex Wildlife Trust is the lead organisation for the LNP and has provided general advice on wildlife mapping and policies for plan-making. The LEP has produced a Strategic Economic Plan (SEP) - ‘Perfectly Placed for Business’² - in March 2014 as a basis for future investment and long term planning. Future economic investment will involve support for the Creative Sector (including film and TV) around the M25 corridor and specific infrastructure support around Rowley Lane and Elstree Way Corridor along with further works to Elstree Studios. The Council and LEP also met to discuss planning and economic development matters, including links between the SEP and future planning, on 20 May 2015. The LEP is also invited to meetings of the advisory group supporting preparation of the south west Hertfordshire SHMA and Economy Study.
- 3.18 A number of bodies, including the Council, the LEP and the highway authority, are collaborating with Highways England to improve traffic flows on the A1(M)/A1 and adjoining roads. This is to support economic development and growth in Welwyn-Hatfield and Stevenage in particular.
- 3.19 The implementation of CIL and management of development through planning applications involve liaison with infrastructure stakeholders, including the highway bodies, health groups, Environment Agency and education authority (HCC). Consultation arrangements for planning applications are standardised, and there are working groups advising on the use of CIL.
- 3.20 Special arrangements are being put in place to help deliver housing development in the Elstree Way Corridor. The central core of the area has been designated as a Housing Zone bby the Government. The Council is setting up a development partnership (to include itself, the County Council, Herts Constabulary, NHS England and a private developer) in collaboration with the

² <http://mediafiles.thedms.co.uk/Publication/BH-Herts/cms/pdf/Herts%20-%20SEP%20FINAL.pdf>

Homes and Communities Agency (HCA) to build homes within the Zone. The HCA will be able to provide loans to support infrastructure and site preparation and grants to facilitate administrative processes.

3.21 The Authority's Annual Monitoring Reports outline actual and prospective co-operation with key organisations and neighbouring authorities in 2012/13 and 2013/14 (see Annex E). They continue from the statements of co-operation published with the submission of the Core Strategy (ref. paragraph 3.2 above).

3.22 The main (selected) areas of co-operation for the next few years are outlined in Table 3.

Table 3: Future Co-operation – Key Issues

Organisation	Prospective Nature of Co-operation relates to
GLA (Mayor of London)	<ul style="list-style-type: none"> • Protection and use of the Green Belt in the context of the Greater London Plan (2014) • Long term infrastructure needs (i.e. to 2050) via sub-regional and regional groups • Similarly long term development (i.e. post 2036)
London Borough of Barnet	<ul style="list-style-type: none"> • S W Herts Green Belt assessment • Possible consideration of development needs arising from Greater London Plan (2014)
London Borough of Enfield	<ul style="list-style-type: none"> • S W Herts Green Belt assessment • Possible longer term growth at Potters Bar (to 2036)
London Borough of Harrow	<ul style="list-style-type: none"> • S W Herts Green Belt assessment
Hertfordshire County Council	<ul style="list-style-type: none"> • Co-ordination of local plan with minerals and waste planning • County-wide water cycle study and liaison as Lead Local Flood Authority
Dacorum Borough Council	<ul style="list-style-type: none"> • Market area housing and employment needs (to 2036)
St Albans Council	<ul style="list-style-type: none"> • Market area housing and employment needs (to 2036) • S W Herts Green Belt assessment • The effect of the strategic rail freight depot at Radlett Aerodrome (if implemented)
Three Rivers District Council	<ul style="list-style-type: none"> • Market area housing and employment needs (to 2036) • S W Herts Green Belt assessment
Watford Borough Council	<ul style="list-style-type: none"> • Market area housing and employment needs (to 2036) • Possible outward expansion of Watford • S W Herts Green Belt assessment
Welwyn-Hatfield District Council	<ul style="list-style-type: none"> • Neighbouring market area housing and employment needs (to 2031/6) • S W Herts Green Belt assessment
Environment Agency	<ul style="list-style-type: none"> • Implementation of development management policies • Updated strategic flood risk assessment • County-wide water cycle study (underway)
Natural England	<ul style="list-style-type: none"> • Implementation of development management policies
Civil Aviation Authority	<ul style="list-style-type: none"> • Implementation of development management (Heathrow)

	safeguarding)
Homes and Communities Agency	<ul style="list-style-type: none"> • Delivery of Area Action Plan (Elstree Way Corridor)
Office for Rail Regulation	- ³
Transport for London	<ul style="list-style-type: none"> • Potential support of infrastructure
Passenger Transport (HCC)	<ul style="list-style-type: none"> • Implementation of development management policies
Local Highway Authority (HCC)	<ul style="list-style-type: none"> • Future traffic modelling and planning, depending on growth issues • Movement and growth along the A1(M)/A1 (with Highways England)
HCC as a provider	<ul style="list-style-type: none"> • Potential support of new infrastructure (via CIL) • Implementation of development management policies • Delivery of Area Action Plan (Elstree Way Corridor)
Marine Management Org.	- ⁴
Historic England	<ul style="list-style-type: none"> • Implementation of development management policies
National Health Service	<ul style="list-style-type: none"> • Potential support of new infrastructure (via CIL)
Clinical Commissioning Group	<ul style="list-style-type: none"> • Potential support of new infrastructure (via CIL)

³ Not required by the Office: Network Rail are consulted.

⁴ Not required – no coastal area nearby.

4. Co-operation in the Preparation of SADM

Strategic Matters

- 4.1 Co-operation in the preparation of SADM is part of a wider context of past and continuing co-operation. The Core Strategy sets out the planning framework for delivering growth and development within the Borough, and the infrastructure which supports it. Preparing and consulting on the Core Strategy, working on other borough-wide strategies and initiatives (such as developing the Community Infrastructure Levy) and commissioning and managing numerous technical studies, has involved a close working relationship with other local planning authorities, the County Council and other key agencies and stakeholders.
- 4.2 SADM provides locally specific proposals and policies which implement the Core Strategy and seek to further its objectives. It is considered that the majority of the evidence required to show compliance with the Duty to Co-operate will of necessity be about collaborative working on strategic level issues, which has already taken place through the Core Strategy process. This in turn has directly informed the preparation of SADM (and the Elstree Way Corridor Area Action Plan).
- 4.3 It is considered that the approach that needs to be taken by the current SADM is as follows:
 - SADM should accord with the Core Strategy, allowing for the delivery of the development indicated and conservation of important resources: this will be in terms of policy areas and sites identified and criteria-based policies.
 - SADM should support infrastructure providers by ensuring a consistent development management approach and policies on matters of strategic importance: this is particularly evident where networks, such as roads, watercourses and wildlife corridors, are concerned but it also applies where assets or features of more than local importance are involved. Again consistency with the Core Strategy is important.
- 4.4 There are no external growth pressures which need to be addressed at the present time.
- 4.5 As the Council has prepared SADM to be in accord with the Core Strategy, the elaboration of policy in SADM is part of a logical and expected continuum. Table 4 shows links between the strategic matters identified earlier (ref. paragraph 3.7) and how, as required, they are referred to in SADM.

Table 4: Links from Core Strategy Strategic Matters to SADM

Strategic Matter		Coverage in SADM
1	The homes needed	These are delivered through Policy SADM1 and related policies in Chapter 2: Housing. Table 1 explains the housing supply in relation to specific proposals in SADM and the Area Action Plan (for Elstree Way Corridor): it also explains how the Core Strategy housing target will at least be delivered. A separately published background paper elaborates. Policy SADM5 provides pitches for travellers in accordance with the Core Strategy.

2	The jobs needed	These are delivered in large part through policies in Chapter 3: Employment and Economy. Key areas listed in the Core Strategy are delineated, and land is safeguarded for the long term. Policies which support shopping areas and other uses also contribute to the supply of jobs.
3	Retail demands	Policies in Chapter 7: Town Centres and Shopping support and elaborate the shopping hierarchy and delineate the centres listed in the Core Strategy. Local and neighbourhood areas are added to the shopping hierarchy.
4	Leisure demands	The protection and development of key community facilities (Core Strategy Policy CS19) is elaborated in Policy SADM33. Policies in the Core Strategy relating to Watling Chase and development in the Green Belt are elaborated. The use of Elstree Aerodrome (as one of two private airfields on the northern side of London) is protected and promoted through Policies SADM25 and 42.
5	Health and education	The protection and development of key community facilities is elaborated in Policy SADM33. The consolidation of Hertswood Academy onto one site is proposed, as part of the approach to enhance school places in Borehamwood.
6	Managing the water environment	Key principles, particularly in Policy CS16: Environmental Impact of Development are developed into suite of policies under the heading of Water – i.e. supply, waste water, run-off/flood risk and the river environment.
7	Transport	Chapter 6: Transport and Parking elaborates Chapter 7 in the Core Strategy. Transport Development Areas are delineated as part of a development management strategy encouraging modes of transport other than the private car.
8	Climate change and energy	-
9	Waste and Minerals	The principle of waste minimisation in Core Strategy Policy CS16 is extended in policy SADM20: Waste Storage in New Development. A subsection on minerals is introduced. The overall aim has been to show the links between land use planning and the separate minerals and waste plans in Hertsmere.
10	Conservation	A subsection of the Core Strategy covers 'Protection and Enhancement of the Natural and Historic Environment', and includes Policies CS12- CS14. Policy CS15 refers to access to the countryside. These policies are amplified in SADM in subsections on the natural environment, water environment, watercourses and historic environment. Wildlife and heritage designations are shown on the Policies Map

4.6 While new strategic matters have not generally been introduced by SADM, consultation with duty to co-operate bodies has helped the process of developing and delivering the Core Strategy, identifying areas and features, and creating development management policies.

Consultation with Duty to Co-operate Bodies

4.7 Within the context of co-operation over the Core Strategy and ongoing co-operation explained in Chapter 3, issues pertinent to SADM have been considered and/or resolved. In addition, specific consultation about SADM has followed three stages – the call for sites and topics in

April 2013, the publication of a Consultation Draft SADM in March 2014 and publication of the Proposed Submission document in July 2015. An overview of the key issues raised by duty to co-operate bodies is given in Table 5. Subsequent tables report comments and summarise the Council's response:

- Table 6: Call for Sites and Topics
- Table 7: Consultation Draft
- Table 8: Proposed Submission Draft.

- 4.8 The Council has taken a positive approach to the comments that have been submitted.
- 4.9 All those comments suggesting principles at Call for Sites stage (ref Table 6), which should be included in development management policies, have been followed through – albeit in the case of the Environment Agency there seems to have been a 'delay'. As the Core Strategy did not require the release of Green Belt land for development, the Council has not supported landowner calls for building on greenfield Green Belt land (whether or not they are a duty to co-operate body).
- 4.10 The same positive line has been taken in respect of comments at Consultation Draft stage (ref Table 7). Significant changes have been made to policies and text relating to nature conservation, water and drainage in response to comments from the Local Nature Partnership (HCC Ecology, HMWT and Natural England), the County Council and Environment Agency. Essentially this has been done to reflect the breadth and coverage of the principles the bodies felt should be incorporated. A significant editing of the chapter on Transport and Parking followed discussions with the local highway authority. New policies on Waste Storage in New Development, Aviation (consultation in safeguarded zones) and Landscape Character have been inserted in response to comments from the County Council, Heathrow Safeguarding and Natural England. Specific proposals in the Consultation Draft have been the subject of further discussion with Transport for London (TfL) and Watford Council leading to the deletion of proposals which would have involved the demolition of Potters Bar Bus garage for housing and the reuse of Watford Council's former nursery as a cemetery. It has been agreed that any closure of Potters Bar bus garage would have a major impact on the bus company, Metrolink's, ability to operate its service contracts for TfL, and probably result in a loss of jobs in the Potters Bar area. Watford Council are expected to use its cemeteries for residents' only burials and reconsider the use of the nursery site so as to avoid nuisance to local residents and occupiers due to the very difficult access. Discussions were held with the County Council to understand the education issues better, particularly in Borehamwood, and help ensure the delivery of school facilities: they have continued through Proposed Submission stage.
- 4.11 Of thirteen responses from DTC bodies, seven had no negative comment about SADM (ref Table 8). The GLA has been invited to participate in the preparation of the SHMA and Economy Study for south west Hertfordshire (including Hertsmere). Of the other six responses, two will be the subject of Statements of Common Ground – i.e. with Welwyn-Hatfield Borough Council and with Hertfordshire County Council as landowner/service provider. It is understood that with the further clarification provided Welwyn-Hatfield are satisfied [continued on page 24]

Table 5: Summary of Consultation, Representations and Responses with Duty to Co-operate Bodies

The Council **consulted** the organisation which **responded** with a **key** (or strategic) comment.

Stage	Call for Sites and Topics			Consultation Draft SADM			Proposed Submission Draft SADM		
	Consulted ¹	Responded	Key	Consulted	Responded	Key	Consulted	Responded	Key
Environment Agency	✓	✓	✓	✓	✓	✓	✓	✓	✓
Historic England				✓	✓	✓	✓	✓	✗
Natural England	✓	✓	✓	✓	✓	✓	✓	✓	✗
Mayor of London				✓	✗	✗	✓	✓	✗
Civil Aviation Authority	✓	Heathrow Safeguarding	✓	✓ (NATS, Heathrow Safeguarding, DfT Airports Policy Division), MOD Defence Infrastructure Organisation	✓ Heathrow Safeguarding	✓	✓ Plus NATS, Heathrow Safeguarding, DfT Airports Policy Division, MOD Defence Infrastructure Organisation	MOD Defence Infrastructure Organisation ✓	✗
Homes and Communities Agency				✓	✗	✗	✓	✗	✗
Clinical Commissioning Groups established via the National Health Service Act 2006				✓	✗	✗	✓	✓	✓
National Health Service (NHS) Commissioning Board				✓	✓ (NHS England)	✓	✓ (NHS England)	✗	✗
Office for Rail Regulation				✓	✗	✗	✓	✓	✗
Transport for London				✓	✓	✓	✓	✓	✓
The relevant Integrated Transport Authority				✓ (Passenger Transport Unit)	✗	✗	✓ (Passenger Transport Unit)	✗	✗
The Local Highway Authority				✓	✓	✓	✓	✗	✗

Marine Management Organisation				X	X	X	X	X	X
Relevant local planning authorities	St Albans✓	✓	X	St Albans✓	X	X	St Albans✓	X	X
	Three Rivers✓	✓	X	Three Rivers✓	X	X	Three Rivers✓	✓	X
				Watford✓	✓	X	Watford✓	X	X
				Welwyn Hatfield✓	✓	✓	Welwyn Hatfield✓	✓	✓
				Broxbourne✓	X	X	Broxbourne✓	X	X
				Dacorum✓	X	X	Dacorum✓	X	X
				East Herts✓	X	X	East Herts✓	X	X
				North Herts✓	X	X	North Herts✓	X	X
				Stevenage✓	X	X	Stevenage✓	X	X
				C Beds✓	X	X	C Beds✓	X	X
				Luton✓	X	X	Luton✓	X	X
Adjoining London Boroughs				Barnet✓	X	X	Barnet✓	X	X
	Enfield✓	✓	✓	Enfield✓	✓	✓	Enfield✓	X	X
				Harrow✓	X	X	Harrow✓	X	X
Hertfordshire County Council	✓	✓	✓	✓	✓	✓	✓	✓	
Local Enterprise Partnership				✓	X	✓	X	X	
Local Nature Partnership				HMWT✓	HMWT ✓	✓	HMWT✓	✓	

Note: 1 The records listing the organisations consulted at this stage are given from the replies received. Correspondence with St Albans and Three Rivers Councils, and the HBRC at HCC did not amount to representations.

Table 6: Key Representations and Responses – Call for Sites and Topics 2013 (taken from the Statement of Consultation Vol 1)

Consultee	Summary Representation	Council's Response
Environment Agency	Proposed updating in light of current planning policy and changes in legislation. Re-structuring and addition of new policies to clarify how Core Strategy policies and Water Framework Directive to be achieved through SADM.	1
Natural England	Broad comments provided on delivering sustainable development, promoting biodiversity, identification of key ecological networks, and going beyond conserving and enhancing by identifying on-site opportunities; Identify and distinguish between status of different sites; be in accordance with Para 118 of the NPPF; with additional consideration given to the Green Infrastructure plan; open and green spaces, climate change, renewable energy, access and rights of way, landscape character assessments; allocating land with the least environmental value; and be evidence based.	Principles included in the DM policies.
Heathrow Safeguarding	Suggest wind farms are not located within the Primary Surveillance Radar for Heathrow.	Acknowledged. There is little interest to date in wind farms in Hertsmere
Enfield Council	Allocate Land south of Potters Bar for residential.	Not included. Land is green field, agricultural and Green Belt, not suitable at present for housing development.
HCC Development Services	Allocate former Sunny Bank School as a housing site.	Site included as H9 – housing and open space, green belt boundary proposed to be re-aligned. PDL in the Green Belt has scope to be allocated for housing in line with the SHLAA assessment, subject to the re-provision of community/education facilities currently provided at the school. Site included as H9 – housing and open space, green belt boundary proposed to be re-aligned.
HCC Strategic Planning and Land Use	Flood risk recommendations on a draft policy.	Policy for flood risk and SUDs management included.

Note: 1 This representation was not referred to in the 2013 Report of Consultation: it is therefore not clear how the Council may have intended the response to be. It is concluded that the representation was not fully taken into account until the next stage in the preparation of SADM.

Table 7: Key Representations and Responses – Consultation Draft 2014 (edited from the Statement of Consultation Vol 2 Appendix K)

Consultee	Summary Representation	Response
Environment Agency	Requested amendments to strengthen and clarify policies and text and to ensure compliance with national and local policies. Many of previous comments not taken into account	Redraft relevant sections in Proposed Submission Draft to take account of comments.
English Heritage	Definition of historic environment should include non-statutory assets. More detailed development criteria for proposed sites should be included, including reference to historic environment; all development sites should be scoped for archaeological potential before taking forward to next stage.	Refer to both statutory and non-statutory assets and includes reference to assets within development sites, Employment areas and Key Green Belt sites as requested. All proposed development on any of the sites is expected to comply with Policy SADM30 – Heritage Assets.
Natural England	Plan should allocate sites for development that are of least environmental value and where required specify mitigation required. Extend policy to include conserving and enhancing landscape character. SuDs should be multi-functional. Design Principles policy should further ensure development considers climate change and adaptation.	SADM11 Biodiversity and Habitats protects designated sites and sets out criteria on which planning decisions will be based – all development has to comply with this. Insert new policy SADM12 on Landscape Character. Refer in SADM16 Sustainable Drainage to SuDs having multiple uses. Core Strategy policies address climate change and other environmental issues – it is not necessary to replicate them.
Heathrow Safeguarding	Requirement to consider impact on aviation of wind turbine developments within Heathrow Airport official safeguarding area	Insert new policy on Aviation in order to consult Heathrow on wind turbine developments within Heathrow Airport official safeguarding area.
NHS England	Indication of where CIL/S106 contributions will be sought in relation to new residential development.	Noted. The Council’s approach to CIL and S106 is set out in the Developer Contributions Framework (which is referred to in the Proposed Submission Draft text).
Transport for London	Can Radlett be a TDA?	In the context of the adopted Core Strategy (para 2.39) Radlett has limited scope and capacity for significant further growth. The TDA boundaries reflect the higher accessibility in these areas (Borehamwood and Potters Bar). Radlett currently scores lower in accessibility terms than both Borehamwood and Potters Bar. It is more appropriate to consider this as part of the review of the Core Strategy.
Local Highway Authority HCC	Requested re-draft of Transport section to more closely reflect aims of achieving modal shift and improve clarity/focus.	Edit Transport Chapter re-drafted in consultation with local highway authority to ensure it reflects LHA views.

Watford Borough Council	Support	Noted. Delete reference to a proposed cemetery off Paddock Road (at Watford Council's former nursery site).
Welwyn Hatfield Council	<p>Query windfall allowance used, availability of safeguarded housing sites, arrangements to meet housing and employment needs which may arise from neighbouring authorities.</p> <p>No G+T transit provision made. Failure to meet Government Policy requirement for G+T pitch provision, G+T sites should be removed from GB.</p> <p>Query GB changes which are not signalled in Core Strategy – compliance issue?</p>	<p>Windfall assumptions have been checked: they are reasonable and consistent with Government advice. There is no evidence to suggest the safeguarded land would not come forward. The Core Strategy will be reviewed following submission of SADM. Hertsmere Borough Council will continue to work with Welwyn Hatfield Borough Council through the duty to cooperate.</p> <p>The Gypsy and Traveller assessment commissioned by the Council concluded that there is no need for additional transit provision in Hertsmere. The level of G+T provision proposed in SADM delivers the commitment made in the adopted Core Strategy 2013, i.e. for the provision of 2 pitches per year post 2011 up until 2017. The Local Development Scheme 2015 states: "A partial review of the adopted Core Strategy Local Plan (2013) has recently commenced. The partial review will focus on housing need (including gypsy and traveller pitch requirements) and employment land needs." Include a commitment to the identification of additional pitches as part of the review of the Core Strategy in the Proposed Submission Draft.</p> <p>It is not considered appropriate or necessary to re-draw the Green Belt boundary around existing (small) G+T sites.</p> <p>The proposed changes to the Green Belt in SADM that weren't signalled in Core Strategy are small in number and relate either to local realignments to reflect changed circumstances on the ground or, in the case of Bushey Hall Golf course and former Sunny Bank School Potters Bar, specific proposals contained within SADM.</p>
Enfield Council	<p>Additional land for housing should be identified for release now. Safeguard land south of Potters Bar for residential development.</p>	<p>SADM is delivering the adopted Core Strategy. Housing land supply issues will be considered in the review of Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study, work for which has already begun.</p> <p>Allocating land to the south east of Potters Bar would entail a major Green Belt release, whether as safeguarded land or not. Such an allocation is not</p>

		needed to deliver the adopted Core Strategy housing target or provide a necessary contingency now, and is therefore inappropriate.
HCC Ecology	Adjustments to text and policies to clarify intent and enhance protection	Redraft policy and text to take account of these comments and those of HMWT.
HCC Built Environment	Separation of policies in chapters 4, 5 and 6 hampers achievement of good sustainable design. Suggest expansion of definition, principles and roles of good design. Need to amend SADM to further support objective of modal shift.	Structure of SADM carries through that already established in adopted Core Strategy. NPPF, Core Strategy and range of policies in SADM adequately cover the issues raised. Give modal shift greater priority in redraft of Transport chapter.
HCC Landscape	Landscape character should be referenced. Taking account of local distinctiveness should be referenced. Strategic role of Green and Blue Infrastructure should be acknowledged and underpin wide range of policies. Policy relating to trees should adopt a broader definition of landscape and promote good landscape design.	Insert new Policy SADM12 on Landscape Character. Require development to recognise and complement the particular local character of the area in which it is located (in Policy SADM31 Design Principles). Refer more fully to the role of green and blue infrastructure in the supporting text. Include a requirement for proposals to include appropriate landscaping schemes (in Policy SADM13).
HCC Minerals & Waste	Need to ensure all development considers impact of waste generation -which will need to be appropriately managed.	Include new Policy SADM20 Waste Storage in New Development. Supporting text refers to HCC's Waste Plans and waste management.
HCC Historic Environment	Include advice relating to archaeology on relevant sites	Append information provided by HCC in relation to site allocations, Key Green Belt Sites and Employment sites (SADM30 Heritage Assets in any case applies to all development proposals).
HCC Flood Risk & SuDS	Promotion of SuDS to be more widely promoted/integrated in other policies. SFRA out of date. Need to address flood risk from sources other than fluvial. Detailed comments in relation to SuDS and flood risk.	Redraft water-related sections of SADM to address the issues raised by the Environment Agency and HCC Flood and Water Management Team. Refer to all forms of flooding. Add further references to SuDs. The Council is committed to updating the Strategic Flood Risk Assessment, and is in the early stages of commissioning this work.
HMWT	Safeguarded sites – future development must consider wildlife value, maintain and enhance biodiversity (sites currently largely undeveloped). Revisions to SADM10 Biodiversity policy requested to more effectively promote the conservation and enhancement of the natural environment.	Include reference to the significance of habitats and environment when making judgements about safeguarded land in the future. Amend SADM11 Biodiversity and Habitats in response to these comments and those received from Hertfordshire Ecology, and incorporate the principles suggested. Add criterion to SADM25 Key Green Belt Sites referring to the impacts on

	<p>Infilling in KGBS must take account of impact on wildlife and ecological network.</p> <p>Rural diversification must not be at expense of biodiversity interests.</p>	<p>wildlife and ecology.</p> <p>Revised policy SADM11 in Proposed Submission Draft applies to all development, including rural diversification.</p>
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Table 8: Key Representations and Responses – Proposed Submission Draft 2015

Consultee	Summary Representation	Council's Response
Environment Agency	Plan covers majority of environmental issues and criteria for developments EA want to see. Some concerns around evidence base in respect of the application of Sequential and Exception tests and Policy SADM18 (re waste water capacity).	The Council has provided evidence, including in relation to co-operation with Thames water in the preparation of SADM, to satisfy the EA's concerns. The relevant objections have been withdrawn.
Historic Buildings and Monuments Commission for England (English Heritage)	Welcome changes to Plan (from Consultation stage). Object to word 'design' in Proposal TC2, SADM43: it should be changed to 'development'.	No change is proposed. The principle of a mixed-use type development accords with the location and has already been established in the adopted Radlett District Centre Key Locations Planning Brief. SADM43 is therefore concerned with the design and appearance of the development, and ensuring that this respects the character and enhances the setting of the adjacent Conservation Area.
Natural England	Support relevant policies.	Noted.
Mayor of London	Wishes to focus on responding to consultations which have clear strategic planning implications for London. Please consult on draft SHMA.	Comment noted. The GLA was invited to join the Project Advisory Group (PAG) for the SHMA. GLA indicated that they would not attend meetings but wished to be kept informed: they have accordingly been advised of meetings and provided with minutes. The draft SHMA has been made available to the GLA to comment on.
MoD Infrastructure	Notification of statutory safeguarding and consultation zones for Northolt aerodrome and RAF Chenuis radar station.	Noted.
Herts Valley CCG	Welcome emphasis on promoting safe and healthy communities. Need to consider healthcare capacity when planning future residential development. Some future care services likely to move from acute hospital settings to community. Not requesting changes but wish to stress the current pressures on health services.	Comments noted. The co-ordination of infrastructure with development is an on-going issue and is continually addressed with the relevant providers. The CCG and NHS England are consulted on planning applications for Care Homes and any residential proposal for more than 10 dwellings. They are also represented on Hertsmere's CIL Reference Group. The Council's approach to CIL and S106 is set out in the

		Developer Contributions Framework referred to in Chapter 8.
Office for Rail Regulation	No comments	Noted
Transport for London	Support transport policies. Support policies that could potentially minimise additional traffic on A1, A41 and roads forming part of London's Strategic Road network	Noted
Three Rivers	No comments	Noted
Welwyn Hatfield (W-H) Council	Plan fails to identify 5 year supply of G & T pitches, supply of developable sites for 6-15 years and transit pitches. Evidence for updated G&T needs is not available. G&T sites should be removed from Green Belt and have not been. HBC should undertake Local Plan review, not separate CS and SADM reviews - concern about how HBC will address meeting of unmet development need from adjoining authorities, including W-H. HBC should set out the timetable for this. Support designation of Elstree Aerodrome as KGBS.	A draft G&T assessment has been shared on a confidential basis with Welwyn Hatfield Council. It shows no transit pitches are needed. The status of proposed site allocations and 5 year supply has been clarified to Welwyn Hatfield's satisfaction. Welwyn Hatfield has withdrawn the objection to removing sites from the Green Belt. Clarification of the Plan review process has been provided to Welwyn Hatfield's satisfaction. A Statement of Common Ground is being agreed.
Herts County Council (HCC) Development Services	Proposals for Hertswood School, SADM1 (H6) and SADM33 (C2), need to be seen in context of need for additional primary and secondary school places in Borehamwood and appropriate provision made; there are concerns over the constraining nature of Green Belt policies in relation to schools outside the urban areas; HCC objects to requirements for 1.4ha open space at Sunny Bank school (SADM1 - H9 and SADM33 - C1) and alternative community facility in SADM43 TC2.	Some editing and a more positive approach to education use and development in the Green Belt can be made. The Council remains of the view that a balanced proposal incorporating 1.4 Ha open space at Sunny Bank School is reasonable, and would fulfil previous agreement. It also considers that the principles of Policy CS19: Key Community Facilities should apply to Proposal TC2 at Radlett. Discussions are on-going, although it is expected that several issues will remain to be resolved through the Examination process. A Statement of Common Ground is being agreed.
HCC Spatial Planning	Various minor amendments and corrections relating to the services of the Environment Department – minerals, waste, flood risk and SuDS – are proposed.	It is reasonable to make minor clarifications of text and factual corrections in respect of HCC's minerals/waste planning and services and SuDs/flood responsibilities. The Strategic Flood Risk Assessment will be updated as part of the Core Strategy Review.
HMWT (for Local Nature Partnership)	Development should result in no net loss to biodiversity and where possible net gains. Plan should require this to be measured using Biodiversity Impact Assessment Calculator.	Reference to the NPPF presumption against development harming biodiversity is proposed to be included in Policy SADM11. There is no need to refer to the BIAC, though the Council will consider using it where appropriate.

with SADM. While some of the County Council's objections can be resolved (and the Council has sought to reach agreement wherever appropriate), others will remain to be considered at Examination. The Council's approach has been to seek the most appropriate outcome for the local community in the light of the particular circumstances. This involves balancing a number of factors and competing interests, some of which may be of less importance to the landowner. It may help explain why for example there is a difference of opinion over the future of the former Sunny Bank School at Potter Bar. The Council has examined the objections from Historic England, HCC Spatial Planning and HMWT positively and is willing to make minor amendments and corrections where appropriate. The change sought by HMWT that development should not result in any net loss to biodiversity and provide net gains where possible, might be considered significant, but effectively accords with paragraph 109 in the National Planning Framework. However, the change sought by Historic England may stem from a misunderstanding of the wording of the proposal and is not accepted by the Council. The Environment Agency has withdrawn its objections as a result of further information provided to it by the Council.

- 4.12 There are no duty to co-operate issues. Only two of the DTC bodies indicated in their representations that there may have been an infringement with the duty to co-operate – i.e. Environment Agency and Welwyn-Hatfield Borough Council. The Council has provided further information provided to both bodies and removed any suggestion of an infringement with the duty to co-operate. Both bodies are satisfied with the response, and it is furthermore understood that both bodies are satisfied with SADM as a sound document.

Conclusion

- 4.13 The Council engaged and co-operated with the appropriate bodies in preparing the Core Strategy. It has continued to liaise with neighbouring authorities, the County Council, the local nature and economic partnerships and infrastructure providers over a range of matters of strategic interest. This includes matters relevant to the preparation of SADM.
- 4.14 The preparation of SADM itself has entailed consideration of a limited range of strategic matters to help deliver the Core Strategy. The constructive engagement that has taken place (and where necessary the resolution of issues) ensures that the Council has met the legal test in section 33A of the Planning and Compulsory Act 2004.
- 4.15 The Council has effectively co-operated with the DTC bodies (and others). SADM can therefore be moved forward to examination and, as appropriate, its soundness tested

Annexes

Annex A: Extract from Core Strategy Inspector's Report (December 2012)

**Annex B: Extract from the Statement of Representations – Chapter 5:
Statement of Collaboration (February 2012)**

Annex C: Core Strategy Positive Preparation Statement (April 2012)

Annex D: Extract from Action Plan Inspector's Report (May 2015)

Annex E: Duty to Co-operate Statement: Elstree Way Corridor AAP

**Annex F: Co-operation with Other Authorities – Statements in Authority
Monitoring Reports (2012/13 and 2013/14)**

Annex G: Minutes of Local Authority Planning (DTC) Meetings

Annex H: Correspondence with Broxbourne Council



The Planning
Inspectorate

Report to Hertsmere Borough Council

by **Mary Travers BA (Hons) DipTP MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local
Government

Date: 5th December 2012

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
SECTION 20

REPORT ON THE EXAMINATION INTO HERTSMERE REVISED CORE STRATEGY

Document submitted for examination on 10 February
2012

Examination hearings held between 1-3 May 2012
File Ref: PINS/N1920/429/10

“Introduction

1. This report contains my assessment of the Hertsmere Revised Core Strategy (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan’s preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the other legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.

2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. As confirmed in my Preliminary Advice Note, the basis for my examination is the submitted Hertsmere Revised Core Strategy (February 2012) (RCS), which is the same as the document published for consultation in November 2011, together with the Council’s Schedule of Proposed Minor Amendments (February 2012)¹. The Schedule comprises minor corrections, updating and clarification.

3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.

4. A schedule of proposed main modifications that are necessary for soundness has been subject to public consultation and sustainability appraisal and I have taken the consultation responses into account in writing this report and making my recommendations. In this light, the detailed wording of some of the main modifications in the attached Appendix differs from those that were published, and consequential modifications that were not fully identified in the published schedule have also been included. None of these changes significantly alters the content of the proposed main modifications or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these changes in my report.

5. Reference numbers for documents in the evidence base are set out in square brackets [].

Assessment of the Duty to Co-operate

6. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A of the 2004 Act in relation to the Plan’s preparation.

7. Preparation of the Plan was well-advanced by the time the duty to co-operate came into effect. However, as paragraph 1.17 of the Plan helps to illustrate, the Council had anticipated the duty. There is substantive evidence that the Council worked collaboratively with adjoining authorities and other stakeholders throughout the preparatory stages of the Plan². This has been based on well-established arrangements for joint working on housing, employment and infrastructure requirements and discussion and collaboration on planning objectives and strategies across borough boundaries.

8. Joint evidence gathering on housing needs, requirements for traveller sites, employment land and green infrastructure has taken place. The spatial implications of other plans, policies and programmes have been considered and are set out in Table 2 of the Plan. It is also clear that the Council has evaluated how key proposals and policies in the emerging plans for neighbouring districts relate to the strategy for Hertsmere³.

9. Strategic priorities for the Hertfordshire districts are also informed by the East of England Plan (May 2008) [CD31] which is the adopted regional strategy (RS). This remains part of the statutory development plan at the time of writing, notwithstanding the Government's intention to revoke regional strategies (apart from the London Plan). The Plan has been generally guided by RS in bringing forward its contribution to meeting housing, economic and other requirements of the wider area. I am satisfied that the Plan is in general conformity with the RS. And looking to the adjoining London region, there is no substantive evidence of failure to co-operate on planning for cross-boundary needs.

10. Concerns have arisen nonetheless about the on-going effectiveness of the Plan, especially in meeting strategic priorities for housing when taken together with emerging strategies in adjacent Hertfordshire districts. This relates particularly to indications of much higher levels of need than are provided for by RS and clarity about how this will be addressed. The views expressed by Stevenage Borough Council and representatives of the development sector encapsulate the concerns. I deal with this in more detail below. However, in the light of all of the evidence I conclude that the Plan has been prepared in accordance with the duty to co-operate."

1 Hertsmere Borough Council, Core Strategy: Schedule of Proposed Minor Amendments, February 2012 [CD07].

2 Hertsmere Borough Council Statement of Collaboration (included in the Statement of Representations - Regulation 30 statement), February 2012 [CD21]; Positive Preparation Statement, April 2012 [ED05 and ED05A].

3 See Appendix 2 of the Plan.

Annex B: Extract from the Statement of Representations – Chapter 5: Statement of Collaboration (February 2012)

Core Strategy

Statement of representations received
following publication of the Hertsmere Core Strategy for submission to the Secretary of
State
pursuant to Regulation 30 (1) (e) of The Town and Country Planning (Local Development)
(England) (Amendment) Regulations 2008

10th February 2012

“5. Statement of Collaboration

5.1 Throughout the production of the Core Strategy, and wherever possible, the Council has worked collaboratively with the County Council, neighbouring authorities (both in Hertfordshire and London), and key stakeholders. The Council has well established arrangements for joint working, consultation and discussions. These are set out below.

Meetings and discussions

5.2 The Council holds regular meetings and discussions with adjoining authorities. For example through the production of the Core Strategy, the Council has met with Watford, St Albans, Welwyn Hatfield, and Hertfordshire County Council, and had discussions with Three Rivers, Dacorum and London Borough of Enfield. Within these discussions, the Council has discussed cross boundary issues, and approaches to particular problems, such as infrastructure capacity. In addition, the Council has met with key delivery agencies such as the Highways Agency and Environment Agency to agree on issues relating to the delivery and implementation of the Core Strategy. The Council is also currently working with Thames Water and Sports England to this effect.

5.3 Hertsmere sits on a number of Countywide and Sub Regional groups such as the Hertfordshire Planning Group (HPG), HPG Development Plans committee (which Hertsmere currently chairs) and HPG Landscape. These groups consider key and emerging spatial planning other work, seeking joint working and agreement within the County where possible. The implications of the Localism Act, Infrastructure requirements, Gypsy and Traveller Accommodation, CIL, SUDs, County Monitoring, have all been considered, with joint working progressed on issues such as Strategic and Green Infrastructure and CIL viability.

Production of joint evidence base

5.4 The Council has worked with a number of neighbouring authorities in the production of evidence which underpins the Core Strategy. Joint working, particularly with authorities in the South Hertfordshire on the production of the evidence has allowed the sharing of ideas, best practice and where possible cooperation on ideas and policies. The shared evidence base includes:

- The London Commuter Belt Strategic Housing Market Assessment which was produced in cooperation with Hertfordshire County Council, Dacorum Borough Council, Hertsmere Borough Council, St Albans District Council, Three Rivers District Council, Watford Borough Council and Welwyn Hatfield Borough Council. The Assessment considers housing need within the South West Hertfordshire Housing Market.
- The Gypsy Accommodation Needs Study and the Accommodation needs of Gypsies and Travellers in South and West Hertfordshire. This joint working project was initially commissioned by Hertsmere, with Hertfordshire County Council, Dacorum Borough Council, St Albans City and District Council, Three Rivers District Council and Watford Borough Council. The study considers need and possible location sites in South West Hertfordshire.
- The Central Hertfordshire Employment Land Review was a joint project between Hertsmere, St Albans, and Welwyn Hatfield, who commissioned consultants to

consider employment need in the sub-region. This study was followed by the Hertfordshire London Arc Jobs Growth and Employment Land, this project included Broxbourne, Dacorum, Hertsmere, St. Albans, Three Rivers, Watford and Welwyn-Hatfield Councils, and considered employment need within South West Hertfordshire.

- Hertsmere jointly commissioned consultants to produce a Development Economics Study, with St Albans and Welwyn Hatfield. This study considered the viability of housing development in each of the Boroughs.
- Broxbourne Borough Council; Dacorum Borough Council; East Herts District Council; Hertsmere Borough Council; North Herts District Council; St Albans District Council; Three Rivers Borough Council; Watford Borough Council; Welwyn Hatfield Borough Council; and Hertfordshire County Council have collaborated on the production of a Hertfordshire Renewable and Low Carbon Energy Technical Study for the County.
- The Hertfordshire Local Authorities comprising the ten District Council and the County Council commissioned Atkins, Roger Tym and Partners and URS to carry out an assessment of Hertfordshire's future infrastructure requirements and the identification of funding mechanisms necessary to secure its provision, in order to support the future growth in homes and jobs in Hertfordshire in the period to 2021, with consideration also given to the period to 2031.
- The Council has also commissioned consultants on behalf of nine out of the ten Hertfordshire authorities to consider CIL viability and charging schedules.

Statement of Community Involvement

- 5.5 The Hertsmere Borough Council Statement of Community Involvement (SCI) September 2006 sets out the procedures that the Council will take when producing planning documents.
- 5.6 Within the SCI, the Council have set out that it will consult, specifically with key stakeholders, infrastructure delivery agents, government departments, all local authorities in Hertfordshire and the County Council, adjoining London Boroughs, and parish councils. As demonstrated in this statement of representation and within the statement of consultation, the Council have consulted with these organisations in the production of the Core Strategy, many of whom have helped to shape the submission Core Strategy."

Annex C: Core Strategy Positive Preparation Statement (April 2012)

“Chapter 1: Introduction

- 1.1 This background report has been prepared by the Council to inform the independent examination into the Hertsmere Revised Core Strategy 2012.
- 1.2 The Inspector requested the report on 3rd April 2012, following the publication of National Planning Policy Framework (NPPF).
- 1.3 It considers specific policy areas including overall housing provision, sites for travellers (taking account of the Planning Policy for Traveller Sites), infrastructure, and provision for economic development. Its build on the Statement of Collaboration and elaborates on the way in which the RCS seeks to meet needs and requirements as summarised in paragraph 182 of the NPPF.
- 1.4 The report draws together elements of the ‘evidence base’ so that information about the policy areas can be seen in one place. Where appropriate, links are provided to source documents. In addition, the statement includes email correspondence from neighbouring authorities regarding cross boundary housing figures.

Chapter 2: Background

- 2.1 Hertsmere Borough Council has prepared the Core Strategy by working collaboratively with neighbouring Local Planning Authorities to ensure effective coordination of strategic planning issues that cross administrative boundaries. It has had full regard to the requirements on Local Planning Authorities to cooperate in the plan preparation process on such issues.
- 2.2 The Council acknowledges its duty as a Local Planning Authority (LPA) to cooperate in relation to the planning of sustainable development, as contained within the Localism Act 2011 and the preparation of development plan documents. The Act requires the Council to engage *constructively, actively and on an ongoing basis* in this work. The Act defines a “strategic matter” as: (section 110)
- (a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and*
- (b) sustainable development or use of land in a two-tier area if the development or use*
- (i) is a county matter, or*
- (ii) has or would have a significant impact on a county matter.*
- 2.3 The Core Strategy was originally produced in line with PPS12 “Creating strong safe and prosperous communities through Local Spatial Planning” (2008). This stated in Paragraph 1.5:
- “The new spatial planning system exists to deliver positive social, economic and environmental outcomes, and requires planners to collaborate actively with the wide range of stakeholders and agencies that help to shape local areas and deliver local services.”*
- 2.4 Paragraphs 4.16 to 4.18 of PPS12 made specific reference to joint working between local authorities on spatial planning: ‘Local authorities should explore and exploit opportunities for joint working on core strategies’. PPS12 noted that ‘critical discussions on infrastructure capacity and planning may be more effectively and efficiently carried out over a larger area than a single local authority area’. Hertsmere Borough Council has addressed this consideration through engagement with and joint working in evidence gathering on particular topics.
- 2.5 The government’s revised approach to strategic planning across local boundaries is set out in in the National Planning Policy Framework (NPPF), 2012.

Paragraph 17 states that:

“Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues.”

Specific guidance is set out in paragraphs 178-181.

“178. Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.

179. *Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.*

180. *Local planning authorities should take account of different geographic areas, including travel-to-work areas. In two tier areas, county and district authorities should cooperate with each other on relevant issues. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships. Local planning authorities should also work collaboratively with private sector bodies, utility and infrastructure providers.*

181. *Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.”*

2.6 The test for the examination of the RCS is Paragraph 182 of the NPPF, which states:

“The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- *Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- *Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- *Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
- *Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”*

2.7 It is the Council’s view that the requirements of paragraph 182 have been satisfied in the production of the RCS. It has been produced in accordance with the Duty to Cooperate, legal and procedural requirements, and in general conformity with the RSS.

Chapter 3: Discussion

- 3.1 Much of the plan preparation process preceded the assent of the Localism Act. However, the Council has a long history of collaboration in strategic planning.
- 3.2 The Council greatly values collaborative working and has longstanding liaison with neighbouring planning authorities to achieve this. Joint working has been undertaken to ensure that cross boundary issues on housing markets, infrastructure, employment land, gypsy and travellers, and infrastructure are considered and planned appropriately
- 3.3 Throughout the production of the RCS, and wherever possible the Council has worked collaboratively with the County Council, neighbouring authorities (both in Hertfordshire and London), and key stakeholders. The Council has well-established arrangements for joint working, consultation and discussions.
- 3.4 The Council acknowledges its duty as a LPA to cooperate in relation to the planning of sustainable development, as contained within the Localism Act 2011 with regard to the preparation of development plan documents. The Act requires the council to engage constructively, actively and on an ongoing basis in this work (Section 110). Paragraph 178 of the NPPF emphasises that public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.
- 3.5 The Council recognises that the current position at law, as a result of the series of "Cala Homes" decisions in the High Court and the Court of Appeal, is that it is unlawful for a LPA in preparing its Core Strategy to take into account as a material consideration the Government's intention to abolish Regional Strategies. Thus any Core Strategy submitted before the abolition of Regional Strategies has been prepared on the basis that it is required to be in general conformity with the relevant Regional Strategy. It is noted that no statutory definition or national policy guidance exists in relation to what the phrase "in general conformity" means. Footnote 41 of NPPF states that Regional Strategies remain part of the development plan until they are abolished.
- 3.6 The Council regularly produces joint evidence base with neighbouring authorities. The London Commuter Belt Strategic Housing Market Assessment, The Gypsy Accommodation Needs Study and the Accommodation needs of Gypsies and Travellers in South and West Hertfordshire, The Central Hertfordshire Employment Land Review Hertfordshire London Arc Jobs Growth and Employment Land, Development Economics Study and the Hertfordshire Green Infrastructure Plan were all prepared on this basis.
- 3.7 Appendix 2 of the RCS illustrates the key development proposals and policies within neighbouring authorities DPD documents. It illustrates any potential impacts that these might have on Hertsmere.
- 3.8 Chapter 5 of the Statement of Representation Regulation 30(e) (CD/21) illustrates some examples of joint working, evidence base production and regular meetings. These have helped to inform the production of the RCS, and allowed for cross boundary issues to be discussed.
- 3.9 During the production of the RCS the Council has given full consideration to strategic planning issues that have cross boundary implications and has been active in consulting and collaborating with neighbouring LPAs in developing the policies of the RCS and its associated evidence base. Spatial planning issues are limited in their extent but it is considered that the

Council has made a proper and proportionate response and the issues arising have been fully addressed in the RCS.

- 3.10 The Council believe that the duty to cooperate has been satisfied. It has worked closely with neighbouring authorities within the context of the appropriate regional frameworks. Hertsmere Borough Council (HBC) has not requested that its housing requirements are provided within other authorities and has not received requests from neighbouring authorities to accommodate their housing requirements as specified in the East of England Plan and London Plan.
- 3.11 Hertsmere is a member of the Hertfordshire Local Enterprise Partnership (LEP), which includes all the authorities within Hertfordshire. To date this LEP has not taken a major role in coordination of work to support councils' duty to cooperate on strategic planning issues but there is every intention to fully support future initiatives.
- 3.12 The Council has collaborated with neighbouring authorities within different plan preparation programmes for their LDFs. These neighbouring authorities are statutorily required to meet the requirements of their Regional Strategies, namely the East of England Plan and London Plan. While still part of the development plan, these provide the basis for strategic planning and cooperation, and perhaps limit the degree of cooperation envisaged by the NPPF and the Localism Act at current.
- 3.13 In the Council's view, at the heart of the duty to co-operate, is effective partnership working to achieve outcomes. This principle is therefore not new to good planning practice and is one that Hertsmere Borough Council has been committed to for some time.
- 3.14 Within the SCI, the Council have set out that it will consult, specifically with key stakeholders, infrastructure delivery agents, government departments, all local authorities in Hertfordshire and the County Council, neighbouring London Boroughs, and parish councils. The Council have consulted with these organisations in the production of the Core Strategy. Many of these organisations representations have helped to shape the submission Core Strategy.
- 3.15 The Council holds regular meetings and discussions with neighbouring authorities. For example, through the production of the Core Strategy, the Council has met with Watford, St Albans, London Borough of Barnet, Welwyn Hatfield, and Hertfordshire County Council, and had discussions with Three Rivers, Dacorum, and London Borough of Enfield. Within these discussions, the Council has discussed cross boundary issues, and approaches to particular problems, such as infrastructure capacity. In addition, the Council has met with key delivery agents such as the Highways Agency and Environment Agency to help further the delivery of the Core Strategy. The Council is also currently working with Thames Water and Sports England, and has agreed statements of Common Ground (CD/08) with both parties respectively.
- 3.16 The Council participates regularly in Countywide and Sub Regional Meetings such as the Hertfordshire Planning Group (HPG), HPG Development Plans (which Hertsmere currently chairs) and HPG Landscape. The duty to co-operate was introduced as a standing item on the Development Plans agenda in 2011 when the Council took responsibility for chairing the committee. The HPG groups consider key and emerging spatial planning other work, seeking joint working and agreement within the County where possible, on the implications of the Localism Act, Infrastructure requirements, Gypsy and Traveller Accommodation, CIL, SUDs, County Monitoring, have been considered with joint working progressed on issues such as Strategic and Green Infrastructure and CIL viability.

Chapter 4: Housing

Strategic Housing Market Assessment

- 4.1 The NPPF requires that the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- 4.2 The SHMA was commissioned by Hertfordshire County Council, Dacorum Borough Council, Hertsmere Borough Council, St Albans District Council, Three Rivers District Council, Watford Borough Council and Welwyn Hatfield Borough Council. The councils formed a project group responsible for the delivery of the project. A consultation event was held at the start of the project for developers, estate agents, Registered Providers of social housing and other service providers. Two community stakeholder groups were consulted at key stages of the project and participated in consultation workshops. Formal consultation on the SHMA report was managed via the ORS (the appointed consultants) extranet. A further event was held in early 2010 to present key findings to key stakeholders.
- 4.3 The SHMA brings together population, income and housing market trends to arrive at estimates of future Affordable Housing requirements across the housing sub-market area. However, because of the many uncertainties in modelling future demand, it is considered most relevant as providing an overview of key housing issues rather than target setting in development plan policy.
- 4.4 It is apparent from the SHMA study that in both affordable and market housing, overcrowding and under-occupation exists and that many households will be unable to move to more suitable housing either because of affordability or lack of suitable supply. Paragraph 12.33 of the SHMA considers that policies aimed at unblocking turnover of second hand housing might also make a contribution to the overall housing requirement. The Hertsmere Housing Strategy (2008) and Local Investment Strategy (2012), produced with the HCA, provide the basis for the delivery of affordable housing and seek to maximise additional affordable housing stock through, for example, reducing empty homes and making best use of existing stock, in addition to new build housing.
- 4.5 The NPPF includes a presumption in favour of sustainable development, which is a focus for both plan-making and decision-taking. For plan making it states that LPAs should meet their development needs within their area, unless specific policies within the NPPF restrict this. The NPPF reiterates the protection of the Green Belt and prioritises the effective use of land which has been previously developed land. Protection of the Green Belt around urban areas is one of the 12 principles that planning should achieve, which is itself consistent with the RSS in south west Hertfordshire, which did not advocate a local Green Belt review for Hertsmere.

Table 4.1: Tenure Mix of Housing Requirement 2007 to 2021 by LA based upon prices at long-term trend level for the LCB (West) Sub-region constrained to RSS build target less delivery 2001-7

Housing tenure	Local Authority					
	Dacorum	Hertsmere	St Albans	Three Rivers	Watford	Welwyn Hatfield
Market Housing	4,800	400	400	(400)	800	3,400
Intermediate	-	2,800	5,300	2,300	2,100	500

affordable housing						
Social rented housing	3,100	500	1,300	700	600	2,800
Total Housing Requirement	7,800	3,600	7,000	2,700	3,600	6,600

Source: London Commuter Belt (West) Strategic Housing Market Assessment 2008

Table 4.2: Housing Requirement by LA 2007-2021 for Household Projections using prices at long term trend level (Note: Figures may not tally due to rounding)

Housing tenure	Local Authority					
	Dacorum	Hertsmere	St Albans	Three Rivers	Watford	Welwyn Hatfield
Market Housing	3,300	500	3,200	1,900	500	300
Intermediate affordable housing	0	2,800	6,200	3,100	2,000	0
Social rented housing	2,700	500	1,800	1,200	500	1,500
Total Housing Requirement	5,900	3,700	11,100	6,200	3,000	1,800

Source: London Commuter Belt (West) Strategic Housing Market Assessment 2008

- 4.6 The SHMA concludes that although there is a relatively low requirement for additional market housing, this does not mean that none should be built. Developers will continue to bring forward proposals for new build for planning consent where they believe a market exists. It is also essential to deliver housing growth in a sustainable way by providing a mix of tenures and sizes. The growth of new build housing will attract higher earning in-migrant households to the area. It will also be necessary to allow new build market housing to proceed, if affordable housing is to be delivered through the planning system. This may also result in a supply of cheaper second hand housing being released to the market as a consequence, provided the new housing is purchased for owner occupation rather than for investment.
- 4.7 Some older people occupy housing that is unsuitable and too large for them. Ensuring that part of new housing delivery across all tenures is particularly suited to older people will both increase choice for older people and release second hand housing into the market.
- 4.8 Hertsmere is currently seeking to reduce the number of empty homes and along with Chelmsford Borough Council, East Herts District Council, Epping Forest District Council, Harlow Council, Uttlesford District Council, Watford Borough Council, Hertsmere is a member of the PLACE scheme which seeks to bring back empty homes into use. Channel 4 television recently highlighted the Council's approach as an example of best practice in the UK.
- 4.9 Paragraph 47 of the NPPF requires LPAs to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework. 80% of the borough is Green Belt, representing a clear policy constraint which shapes how and where growth can occur in the borough. The Green Belt extends across into neighbouring authorities.
- 4.10 The East and South East of England are desirable locations to live, given their close proximity to London aligned with their proximity to the countryside and overall quality of life. Table 4.3

illustrates a number of local authority areas with adopted Core Strategies, a number of which have Green Belt designations. It can be seen within such locations, with similar characteristics to Hertsmere and its neighbouring authorities, that it has not been possible to accommodate the Housing Need illustrated in their respective SHMAs.

Table 4.3: Affordable Housing Need Compared to Housing Target in adopted Core Strategies

Local Authority	Housing figure in CS	SHMA Affordable Housing Need	Housing Target expressed as a % of the SHMA
Three Rivers	180	307	59%
South Buckinghamshire	110-140	459	31%
Surrey Heath	190	794	24%
Elmbridge	225	1048	21%
Epsom and Ewell	181	559	32%
Tandridge	125	720	17%
Rushmoor	374	878	43%
Oxford	400	992	40%
Hertsmere	237	229	104%

Housing Need in neighbouring areas

4.11 Appendix 1 has been prepared to demonstrate that the Council has not asked for any of its housing need to be accommodated within neighbouring authorities and those in our housing market. In addition, the Appendix also demonstrates that Hertsmere Borough Council has not been asked to accommodate housing need by any of the neighbouring authorities and those within our housing market. The authorities are seeking to accommodate their housing requirements, in general conformity with the appropriate regional strategy, within their borough and with respect to the presumption in favour of sustainable development. The legal challenge to the East of England Plan resulted in the quashing of the housing growth figures for Dacorum Borough Council and Welwyn Hatfield District Council. It is the Council's opinion that this satisfies the requirements of the NPPF.

Development Economics Study

4.12 Hertsmere jointly commissioned consultants to produce a Development Economics Study, with St Albans and Welwyn Hatfield. This study considered the viability of housing development in each of the Boroughs. The study provides the evidence base for Policy CS4.

4.13 The NPPF, at paragraphs 173 and 174, stipulates that LPAs must not subject development to burdens that will render schemes unviable or threaten delivery.

4.14 The Council has, thus, set its percentage target and threshold for affordable housing at levels that are lower than that which would be required to meet the need identified in the SHMA. The Development Economics Study (DES) (CD/72) explains the basis for the Council setting a percentage target of 35% and a threshold of 10 (gross) residential units (or a residential site of more than 0.3 hectares in size) in RCS policy CS4. This document tests the viability of affordable housing delivery when various options for percentage targets and thresholds are applied, taking into account existing and possible future policy objectives. The rationale behind setting this target is explained further in the Council's Matter 3 Statement.

Housing Target

- 4.15 The housing target within the RCS is based on the RSS requirement for the Borough. The RCS proposes a 15 year target (2012/13 to 2026/27) of 3,550 (237 dpa) new dwellings, reflecting the requirements of the East of England Plan and seeking to focus this on previously developed sites, taking account of the Green Belt constraints which exist in the Borough. Between 2001/02 and 2026/27 this equates to 6,125 new dwellings. This is approximately a 6% reduction from the RSS.
- 4.16 The approach taken in the RCS is consistent with paragraph 182 of the NPPF, through a strategy which seeks to meet objectively assessed housing requirements, consistent with achieving sustainable development. Hertsmere Borough Council has not been requested to accommodate any housing need from adjoining authorities and the associated local housing target is in general conformity with the RSS.

Chapter 5: Employment Land

London Arc Job Growth and Employment Land Review

- 5.1 Roger Tym & Partners was commissioned to undertake this study in February 2008 by the district and borough councils of the Hertfordshire London Arc, comprising Broxbourne, Dacorum, Hertsmere, St Albans, Three Rivers, Watford and Welwyn Hatfield. Together with Brentwood and Epping Forest in Essex, these local authority areas comprise the London Arc sub-region, as defined in the current Regional Spatial Strategy, the East of England Plan.
- 5.2 The study partially updates earlier jointly prepared studies (such as the Central Hertfordshire Employment Land Review) and brings together information to provide a broad overview across the study area as a whole. It addresses the East of England Plan, which introduced the London Arc as a sub-regional entity and set a joint employment growth target of 50,000 net new jobs for its Hertfordshire section. It considered the employment land requirements holistically within the sub region. The study recommended Hertsmere's committed land supply provides modest net growth for offices and no growth for industry/warehousing.
- 5.3 The Council's first-draft targets show modest growth in both sectors and that if these targets are accepted, Hertsmere should provide a few hectares of net additional land for industrial/warehouse growth, to provide some scope for the expansion of existing firms. However, the shortfall is small and could be considered as part of the margin of error. The study includes the potential for new business parks in St Albans and Welwyn Hatfield Boroughs respectively. If these are not forthcoming, and there is a requirement for future employment, the RCS has responded by making provision for a safeguarded area of land adjacent to Elstree Way Borehamwood.

Hertfordshire Strategic Employment Sites Study

- 5.4 Regeneris Consulting together with GL Hearn, WSP Group and John Rutherford Consulting were commissioned to carry out the Hertfordshire Strategic Employment Sites study. This assignment was carried out on behalf of Hertfordshire County Council, East of England Development Agency (EEDA) and the ten districts in Hertfordshire.
- 5.5 A previous study (regional Strategic Employment Sites Study, Arup 2009) suggested that there were a lack of strategic employment sites in Hertfordshire and the Hertfordshire Works Economic Development Strategy 2009-2021 recognises the need to work with LPAs to identify and bring forward a small number of strategic sites in high profile prestigious locations served by sustainable transport. This strategy has been supported by districts in Hertfordshire and will be taken forward by the Hertfordshire Local Enterprise Partnership (LEP).
- 5.6 It concluded that there are three broad potential economic growth scenarios for Hertfordshire which are as follows:
- Status Quo Scenario – assumes the modest growth rate experienced in Hertfordshire in the last ten years continues over the next twenty years (equivalent to +4% overall, or +19,900 additional jobs created).
 - East of England Forecasting Model (EEFM) Forecast Growth Scenario – assumes a 16% growth rate for Hertfordshire over the next twenty years (base case demand forecast) resulting in 79,300 jobs.
 - Aspirational Scenario – Herts 'raising its game' to match the best performing sub regional economies, based on applying the forecast Cambridgeshire growth rate of 25% over the next twenty years resulting in a net growth of 122,900 jobs.

- 5.7 The report concludes that while Hertfordshire has been underperforming compared to its potential, the county has the assets and strengths necessary to outperform the status quo scenario. However, there are a number of weaknesses for the county identified which suggest that the aspirational scenario is likely to be unachievable.
- 5.8 The county's main existing strategic employment sites are defined as: Gunnels Wood, Maylands, Hatfield Business Park and Watford Junction. There is the opportunity to enhance the performance of all of these sites through further development and investment, including through the delivery of additional high quality floorspace at Maylands Gateway and potentially through the extension of Hatfield Business Park. In addition there are a number of sites which support strategic activities or have an important role in supporting key economic sectors or clusters. These are GSK, Leavesden and Elstree Studios, and Building Research Establishment (BRE).
- 5.9 Moving forward there are a number of wider site-based opportunities which provide the potential to further support key sectors and cluster development. These include delivery of Watford Health Campus, further investment at BRE subject to resolution of infrastructure constraints, and the potential for development of a science or innovation park at Knebworth around a major inward investment.
- 5.10 There is a however a clear gap in Hertfordshire in terms of the provision of a Premier Business Park which can support higher value uses and is of the scale and quality demonstrated in competitor areas. Hertfordshire should seek to develop this product over time. Potentially the best opportunities currently available appear to be at Park Plaza, Waltham Cross for a major new business park adjacent to the M25 and at Watford Junction for development of a major, high quality in-town office quarter.
- 5.11 The study informed the RCS, and supports the aspirations to support and promote film and television at Elstree Studios which itself is reinforced through the current Growing Places Fund bid for £2m to remediate contaminated land, which will enable the studios to be expanded. The bid, which has been favourably received and at the time of writing, shortlisted by the LEP, was cross-referenced with Policy CS11 of the Core Strategy.
- 5.12 The study also includes the potential for new business parks in Watford and Broxbourne Boroughs respectively. The Council will work with partners and the LEP if these are not forthcoming, and there is a requirement for future employment, the RCS makes the provision of a safeguarded area of land adjacent to Elstree Way Borehamwood.
- 5.13 A revised proposal maps will be produced to support this DPD informed by the Employment Site Allocations Study (2011) (CD/74) and Addendum (2012) (CD/74A), Local Significant Employment Study (2008) (CD/75) and Update (2010) (CD/76), which provide additional site specific details.
- 5.14 The approach taken in the RCS is in consistent with paragraph 182 of the NPPF, with policies which seeks to meet objectively assessed employment requirements, consistent with achieving sustainable development. The approach taken is also in general conformity with the requirements of the RSS.

Chapter 6: Infrastructure

Hertfordshire Infrastructure and Investment Strategy (HIIS)

- 6.1 The ten Hertfordshire authorities, together with the County Council commissioned Atkins, Roger Tym and Partners and URS to carry out an assessment of Hertfordshire's future infrastructure requirements and the identification of funding mechanisms necessary to secure its provision. Such infrastructure would support future growth in homes and jobs in Hertfordshire in the period to 2021, with consideration also given to the period to 2031.
- 6.2 Stakeholder workshops explored issues such as historic infrastructure deficit and appropriate funding models and were followed by face-to-face meetings with key service providers. These were crucial in developing an understanding of existing infrastructure and service provision and future growth requirements.
- 6.3 The findings of the HIIS were integrated into the RCS and Infrastructure Topic Paper and the Hertfordshire Planning Group is currently preparing a programme, which will see the HIIS refreshed and a Strategic Infrastructure Plan for the county prepared. This will also allow the county to bid for a larger share of the infrastructure funding resources that are available, alongside existing funding streams such as the Growing Places Fund or Department for Transport funding.
- 6.5 In addition, Hertsmeres has commissioned consultants on behalf of nine out of the ten Hertfordshire authorities to consider CIL viability and charging schedules.

Hertfordshire Green Infrastructure Study

- 6.6 The 2011 Hertfordshire Strategic GI Plan provides an overview of existing strategic green infrastructure assets within the GreenArc; considers opportunities for enhancement and creation of green infrastructure; and, outlines a series of potential projects to deliver multiple. The Woodland Arc project identified within the GreenArc Strategic Green Infrastructure Plan is predominantly within the Borough of Hertsmeres. The project seeks to enhance landscape links between Broxbourne Woods and Epping Forest/Hatfield Forest, and strengthen woodland links to the urban fringe, including targeted woodland creation. Funding and implementation is expected to be via joined up grant applications between strategic delivery partners at county and local level, and with landowners.
- 6.7 This Hertfordshire plan informed the production of the Hertsmeres Green Infrastructure Plan which itself has significant crossover with the Council's Greenways strategy. Greenways remain an intrinsic part of the CS, as set out in Policy CS14 and established s106 funding arrangements for supporting the delivery of the strategy provide a sound basis for including Greenways in a future CIL Regulation 123 list for the borough.

Hertfordshire Renewable and Low Carbon Energy Technical Study

- 6.8 This study was commissioned on behalf of Broxbourne Borough Council; Dacorum Borough Council; East Herts District Council; Hertsmeres Borough Council; North Herts District Council; St Albans District Council; Three Rivers Borough Council; Watford Borough Council; Welwyn Hatfield Borough Council; and Hertfordshire County Council. These authorities worked together to deliver a Hertfordshire Renewable and Low Carbon Energy Technical Study for the County. This study subsequently informed Policy CS16 of the Core Strategy.
- 6.9 Infrastructure requirements have been assessed and discussed in cooperation with the appropriate delivery agency. The approach taken in the RCS is consistent with paragraph 182

of the NPPF, to provide a strategy which seeks to meet objectively assessed infrastructure requirements, consistent with achieving sustainable development.

Chapter 7: Gypsy and Travellers

- 7.1 As set out in RCS paragraphs 3.38-3.42, the Council's strategy for the provision of Gypsy and Traveller accommodation is justified and deliverable. It is based on the target set by the RSS single-issue review (CD/32), which specifies that within Hertsmere provision should be made for a minimum of 18 additional pitches between 2006 and 2011 and a further 3% annual compound increase beyond 2011 to 2021.
- 7.2 Representations to the RSS single issue review were based on the Gypsy Accommodation Needs Study and the Accommodation needs of Gypsies and Travellers in South and West Hertfordshire. This joint working project was initially commissioned by Hertsmere, with Hertfordshire County Council, Dacorum Borough Council, St Albans City and District Council, Three Rivers District Council and Watford Borough Council. The study considers need and possible location sites in South West Hertfordshire.
- 7.3 The Council considers that 2017 would be a suitable time to review Gypsy and Traveller accommodation need in the Borough. To ensure that the Council is able to identify sufficient land to meet accommodation need, it is appropriate to set a target for the next 5 years; however, by 2017 the existing Gypsy and Traveller Accommodation Assessment (CD/88) will be over 10 years old and the Council's evidence base should be refreshed in light of the recently published Planning policy for traveller sites document. The Council has had some initial discussions with neighbouring authorities such as St Albans and London Borough of Barnet regarding joint working on the matter. The Council has also agreed a Statement of Common Ground with Three Rivers in respect of the wording in the RCS.
- 7.4 The work undertaken has resulted in a commitment in the RCS to allocate land, if an additional site is required, for one larger site or a number of smaller sites to meet the target to 2017. The Accommodation Needs of Gypsies and Travellers in South and West Hertfordshire: Stage Two report (CD/98) forms part of the Council's evidence base and demonstrates that there is sufficient appropriate land in the Borough to deliver the accommodation required.
- 7.5 In line with Policy B of the national Planning policy for traveller sites, and within the next 12 months, the Council will produce further evidence demonstrating specific deliverable sites for the next 5 years and specific developable sites or broad locations for growth over the remainder of the 15-year plan period. This will be done through an update to the SHLAA. This approach is consistent with the RSS, which states that the required levels of provision should be achieved 'through development control decision and Development Plan Documents'.
- 7.6 The approach taken in the RCS is consistent with paragraph 182 of the NPPF, and seeks to meet objectively assessed requirements, consistent with achieving sustainable development. It is also in general conformity with the requirements of the RSS.

Chapter 8: Conclusion

- 8.1 The Council has worked with a number of neighbouring authorities in the production of evidence which underpins the Core Strategy. Joint working, particularly with authorities in the south of the county on the production of the evidence, has allowed the sharing of ideas, best practice and where possible cooperation on ideas and policies.
- 8.2 The Council have positively produced the plan in line with relevant national and regional planning policy.
- 8.3 The policies of the RCS are justified and take the most appropriate strategy for Hertsmere, considered against the reasonable alternative approaches, the characteristics of the Borough, and based on a proportionate evidence base. The RCS has been produced and based on effective joint working both in meetings and on evidence as demonstrated within this statement. Cross boundary and strategic priorities have been evaluated where appropriate. The Council continue to work with neighbouring authorities to deliver national, regional and local planning policies.

Table 8.1: Core Strategy Policies and supporting evidence base

CS Policy	Evidence	Joint working
SP1	Sustainability Appraisal	
CS1	RSS, NPPF	
CS2	SHLAA	
CS3	SHLAA	
CS4	Development Economics Study	*
CS5	NPPF, SHMA	*
CS6	(1) Assessment of the Accommodation Need of Gypsies and Travellers in SW Herts (2) Identification of potential Gypsy and Traveller Sites	*
CS7	SHMA	*
CS8	CHEL, London Arc Hertfordshire Employment Land Review	*
CS9	Local Significant Employment Sites Study	
CS10		
CS11	Hertfordshire Strategic Sites Study	*
CS12	NPPF, Green Infrastructure Plan, Hertfordshire Green Infrastructure Plan	*
CS13	NPPF, Conservation Area Appraisals	
CS14	Watling Chase Community Forest, Watling Chase Community Forest Greenways Strategy	*
CS15	SFRA	
CS16	Hertfordshire Low Carbon and renewable Energy Study	
CS17	Infrastructure Topic Paper	*
CS18	Infrastructure Topic Paper	*
CS19	NPPF	
CS20	Hertfordshire Infrastructure Investment Strategy	*
CS21	Planning and Design Guide, Joseph Rowntree Foundation	

CS22	Elstree Way Corridor Feasibility Study, Elstree Way Corridor SPG	
CS23	Parking Supplementary Planning Document (and Amendment), Hertfordshire Local Transport Plan 3	*
CS24	Parking Supplementary Planning Document (and Amendment),	
CS25	Hertfordshire Local Transport Plan 3	*
CS26	NPPF, Retail Topic Paper	
CS27	Town Centre and Shopping Needs	
CS28		
CS29	Hertsmere Crime and Disorder Reduction Partnership Plan	

- 8.4 Within Matter Statement 7, the Council have proposed some amendments to monitoring and contingency planning of the RCS. The Council is of the opinion that these amendments ensure that the RCS is effective,
- 8.5 The document has been positively prepared, within the framework of the East of England Plan (which is still part of the development plan). The Council has undertaken joint working with neighbouring authorities to ensure that cross boundary issues relating to housing markets, infrastructure, employment land, gypsy and travellers, and infrastructure are planned appropriately. The Council has received confirmation from its neighbouring authorities and those within the housing market, that at no point has Hertsmere Borough Council asked other authorities to accommodate housing requirements within their Boroughs, or been asked by other Boroughs to accommodate their housing requirements within Hertsmere.
- 8.6 This Statement demonstrates that the RCS satisfies paragraph 182 of the NPPF and the associated duty to co-operate, and as a result is sound.

Appendix 1: Emails from neighbouring Authorities regarding Housing Requirements

From: Laura Wood <Laura.Wood@dacorum.gov.uk>
Sent: 11 April 2012 16:02
To: Sarah Churchard
Cc: Simon Warner
Subject: RE: Paragraph 182 of NPPF

Dear Sarah,

On behalf of Dacorum Borough Council I am happy to confirm that Hertsmere Borough Council have not requested that Dacorum Borough Council accommodate any of its housing requirement, and neither have we asked Hertsmere to accommodate any of our housing requirement.

Kind regards

Laura Wood

Team Leader (Strategic Planning)
Strategic Planning and Regeneration
01442 228661

~~~~~  
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**From:** Chris Briggs <Chris.Briggs@stalbans.gov.uk>  
**Sent:** 18 April 2012 17:52  
**To:** Sarah Churchard  
**Cc:** Heather Cheesbrough; Manpreet Singh Kanda  
**Subject:** RE: Paragraph 182 of the NPPF

Sarah

Further to your conversations with Manpreet and my conversations with your colleague Simon Warner, please find a response below:

*In light of Section 110 of the Localism Act and your email request, I am writing to confirm that St Albans City and District Council has not been requested to accommodate any of Hertsmere Borough Council's housing allocation. Neither has St Albans District Council requested Hertsmere to accommodate any of its housing requirement.*

*This Council considers that there has been and continues to be great value in the longstanding bilateral and multilateral dialogue between the two local authorities which we seek to continue; including where appropriate joint working on evidence base and other studies.*

Hopefully this fulfils what you were looking for. If you need anything different, please just let me know.

KR

Christopher Briggs  
Spatial Planning Manager  
St Albans City & District Council  
[www.stalbans.gov.uk](http://www.stalbans.gov.uk)  
01727 866100 Ext 2600

**From:** Sue Tiley <S.Tiley@welhat.gov.uk>  
**Sent:** 17 April 2012 09:46  
**To:** Sarah Churchard  
**Subject:** RE: Paragraph 182 of the NPPF

Dear Sarah,

I refer to your email. I can confirm that Welwyn Hatfield Borough Council has not specifically requested Hertsmere Borough Council to meet any of its housing requirement and nor has Hertsmere Borough Council made a request to Welwyn Hatfield Council to accommodate any of its housing allocation.

Regards

*Sue*

Sue Tiley (Mrs)  
Planning Policy and Implementation Manager  
Welwyn Hatfield Borough Council, The Campus  
Welwyn Garden City  
Herts AL8 6AE  
Tel: 01707 357268  
Fax: 01707 357285  
Email: [s.tiley@welhat.gov.uk](mailto:s.tiley@welhat.gov.uk)  
[www.welhat.gov.uk](http://www.welhat.gov.uk)  
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**From:** Philip Bylo <Philip.Bylo@watford.gov.uk>  
**Sent:** 11 April 2012 16:30  
**To:** Sarah Churchard  
**Cc:** Jane Custance; Vicky Owen; Catriona Ramsay  
**Subject:** RE: Paragraph 182 of the NPPF

Sarah,

As discussed today, I can confirm that neither Watford BC or Hertsmere BC has asked the other authority to accommodate any of its housing allocations or targets.

Regards,

**Philip Bylo**  
**Planning Policy Section Head**  
**BA (Hons), B Pl., MRTPI, MBA (Real Estate)**  
Planning and Development  
Watford Borough Council  
Town Hall, Watford, Hertfordshire WD17 3EX  
Phone: (01923) 278280 Fax: (01923) 278273  
email: [philip.bylo@watford.gov.uk](mailto:philip.bylo@watford.gov.uk)  
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**Thank you.**

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**From:** Joanna Bowyer <Joanna.Bowyer@ThreeRivers.gov.uk>  
**Sent:** 12 April 2012 15:55  
**To:** Sarah Churchard  
**Subject:** RE: Paragraph 182 of the NPPF

Sarah,

I can confirm that Hertsmere Borough Council have not requested that Three Rivers District Council accommodate any of its housing allocation, and that Three Rivers District Council have not requested that Hertsmere Borough Council accommodate any of its housing allocation.

Please let me know if you need anything else,

Kind regards,

**Jo Bowyer**  
**Development Plans**

Three Rivers District Council, Three Rivers House, Northway, Rickmansworth, Hertfordshire, WD3 1RL

**Tel:** 01923 727104

**e-mail:** [joanna.bowyer@threerivers.gov.uk](mailto:joanna.bowyer@threerivers.gov.uk)

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**From:** Matthew Paterson <matthew.paterson@harrow.gov.uk>  
**Sent:** 11 April 2012 17:45  
**To:** Sarah Churchard  
**Subject:** Re: Paragraph 182 of the NPPF

Dear Sarah,

I can confirm that neither Hertsmere BC or LB Harrow has requested the other council to accommodate any of its housing allocation.

I can also confirm that the boroughs met in 2010 at an event held by Three Rivers District Council where we discussed our respective spatial strategies and the potential implications of these on neighbouring boroughs including cross boundary issues and opportunities for joint working. The conclusion of that meeting was that there were no immediate issues that arose or required addressing between our two planning authorities.

Kind regards  
Matt

Matthew Paterson  
Senior Professional - LDF Team Leader  
Planning, Development and Enterprise  
Harrow Council,  
Civic 1 - 3rd Floor East Wing,  
Civic Centre, Station Road,  
Harrow, HA1 2UY

Phone: 020 8736 6082  
Email: [matthew.paterson@harrow.gov.uk](mailto:matthew.paterson@harrow.gov.uk)

\*\*\*\*\*  
\*

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**From:** Lynch, Nick <Nick.Lynch@barnet.gov.uk>  
**Sent:** 16 April 2012 10:51  
**To:** Sarah Churchard  
**Cc:** Carless, Mike; Simon Warner; Brar, Rita  
**Subject:** RE: Paragraph 182 of the NPPF

Hi Sarah

In advance of tomorrow's meeting I can confirm that no request has been received from Hertsmere and no request has been made by Barnet with regard to housing allocations.

Regards

Nick

**Nick Lynch**  
**Planning Policy (LDF) Manager**  
**Planning, Housing and Regeneration**

London Borough of Barnet, Building 2, North London Business Park, Oakleigh Road South,

London, N11 1NP

Tel: 0208 359 4211 Mobile: 07500816745

Barnet Online: [www.barnet.gov.uk](http://www.barnet.gov.uk)

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**Mark Silverman**

**Hertsmere Borough Council**  
Civic Offices  
Elstree Way  
Borehamwood  
WD6 1WA

Please reply to : Joanne Woodward  
:  
E-mail : [Joanne.woodward@enfield.gov.uk](mailto:Joanne.woodward@enfield.gov.uk)  
Phone : 020 8379 3881  
Textphone :  
Fax : 020 8379 3887  
My Ref :  
Your Ref :  
Date : 20 April 2012

Dear Mr. Silverman,

**RE: Hertsmere Core Strategy Development Plan Document**

Please accept this letter as the London Borough of Enfield's confirmation that neither local planning authorities, Hertsmere Borough Council and London Borough of Enfield have requested each other to accommodate any of their respective housing allocations.

This confirmation is provided in accordance with Section 110 of the Localism Act, (*Duty to co-operate in relation to planning of sustainable development*), and Paragraph 182 of the National Planning Policy Framework, (*Examining Local Plans*).

The London Borough of Enfield's Core Strategy DPD was found to be sound and was adopted in November 2010. Core Policy 2 (Housing Supply and Locations for new homes) outlines Enfield's housing target for the period 2010/11 to 2024/25 and five years beyond the plan period. In addition, it identifies broad locations within the borough for the accommodation of more than 13,000 new homes.

If you require any further details regarding the content of this letter, please do not hesitate to contact me on the details given above.

Yours Faithfully,



**Joanne Woodward**  
**Head of Planning Policy**  
Regeneration, Leisure and Culture

Neil Rousell  
Director of Regeneration, Leisure and Culture  
Enfield Council  
Civic Centre, Silver Street  
Enfield EN1 3XY

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## **Report to Hertsmere Borough Council**

**by Beverley Doward BSc BTP MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 18<sup>th</sup> May 2015

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)  
SECTION 20

### **REPORT ON THE EXAMINATION INTO THE ELSTREE WAY CORRIDOR AREA ACTION PLAN**

Document submitted for examination on 23 July 2014

Examination hearings held between 21 and 23 October 2014

File Ref: PINS/N1920/429/11

## **“Introduction**

1. This report contains my assessment of the Elstree Way Corridor Area Action Plan (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan’s preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (the Framework) (paragraph 182), makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.

2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted Plan (July 2014) which is the same as the document published for consultation in February 2014.

3. The formatting error affecting two tables in the electronic version of the Plan was dealt with at the time and I am satisfied that the steps taken to remedy this omission were adequate and that no one has been disadvantaged as a result.

4. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound or not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.

5. The main modifications have been subject to public consultation and I have taken the consultation responses into account in coming to my conclusions in this report. The Council also updated the Sustainability Appraisal. I have made a few amendments to the wording of the proposed main modifications where these were necessary for clarity. None of these changes significantly alter the modifications published for consultation or undermine the participatory process and sustainability appraisal undertaken.

### **Assessment of Duty to Co-operate**

6. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan’s preparation.

7. The statement on the DtC<sup>1</sup> indicates that the Council does not believe that the EWCAAP, in itself, is a Local Plan that raises any significant strategic or cross-border issues, the principle of the development within the EWC having been tested through the adopted CS. I agree with this view. Therefore, in this case the DtC is not engaged. Nevertheless, the Council has engaged constructively, actively and on an on-going basis with the relevant bodies to which the DtC requirements relate in the preparation of the Plan.”

---

<sup>1</sup> Duty to Co-operate Statement: Elstree Way Corridor AAP [Core Document DOC7]

## Annex E: Duty to Co-operate Statement: Elstree Way Corridor AAP

### “Planning and Compulsory Purchase Act 2004 Section 20 (7) as amended by Section 110(1) of the Localism Act 2011 - the Duty to Co-operate

#### 1. Introduction

1.1 Local Councils are expected to address strategic issues relevant to their areas through the “duty to co-operate” set out in the Localism Act (2011) and described in the National Planning Policy Statement. Section 110 of the Localism Act sets out the new “duty to co-operate”:

- Relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
- Requires that councils set out planning policies to address such issues
- Requires that councils and public bodies “engage constructively, actively and on an on-going basis to develop strategic policies; and,
- Requires councils to consider joint approaches to plan making.

#### The ‘Duty to Cooperate’ Bodies

|                                   |                                             |
|-----------------------------------|---------------------------------------------|
| Neighbouring Planning Authorities | National Health Service Commissioning Board |
| The Environment Agency            | Office of Rail Regulation                   |
| English Heritage                  | Transport for London                        |
| Natural England                   | Integrated Transport Authority              |
| Mayor of London                   | Highway authorities                         |
| Civil Aviation Authority          | Marine Management Organisation.             |
| Clinical Commissioning Groups     | Homes and Communities Agency                |

1.2 Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty. But local planning authorities and the public bodies that are subject to the duty must cooperate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities when they are preparing their Local Plans, so long as those activities are relevant to local plan making. Local Enterprise Partnerships and Local Nature Partnerships are prescribed for this purpose in the Town and Country Planning (Local Planning) (England) Regulations as amended by the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 to include Local Nature Partnerships.

1.3 This statement sets out how the relevant ‘Duty to Co-operate’ bodies have been, and will continue to be, involved in the evolution and implementation of the AAP. In doing so, the Council consider that this statement demonstrates that the Duty to Co-operate requirements have been fulfilled.

#### 2. The Duty in respect of the Elstree Way Corridor Area Action Plan (EWCAAP)

2.1 The Borough Council do not believe that the EWCAAP, in itself, is a Local Plan that raises any significant strategic or cross-border issues. The principle of the development was tested through the Council’s adopted Core Strategy, which was found sound by the appointed Inspector in December 2012 (Policy CS23).

2.2 The EWCAAP acts as framework for the implementation of Policy CS23, focussing on the overall configuration and design of development along the corridor. While there are elements which relate to areas outside the corridor, they are still local in nature and focussed within the boundary of Hertsmere borough (such as secondary school provision, wider transport implications). No issues were raised by neighbouring authorities during consultation on the EWCAAP, although the County Council (Hertfordshire County Council) were actively involved in the development of the plan, and will also be a key partner in its implementation, as both the highway authority and as a major landowner within the corridor.

2.3 The Council considered the potential strategic impacts of the EWCAAP, and involved all relevant duty to cooperate bodies. However, the following were not directly involved for the following reasons;

- Civil Aviation Authority - The maximum building heights fall below the 90m advice from the CAA. The maximum height set out in the EWCAAP is only 6 stories
- Office of Rail Regulation – The EWCAAP has no direct impact on the rail network, although to ensure no operational issues were of concern, Network Rail were consulted (Regulation 18 and 19)
- Transport for London – The EWCAAP is not within the proximity of the TfL road or rail network. The relevant bus service operator which is operated on behalf of the TfL in the borough ('Metroliner') were consulted (Regulation 18 and 19)
- Integrated Transport Authority - The site does not fall under an ITA area
- Marine Management organisation – The site does not involve any issues relevant to the MMO

### **3. Co-operation on Early Scoping of the EWCAAP**

3.1 The Initial feasibility study undertaken by Colin Buchannan (DOC36) was informed through stakeholder workshops with the key delivery partners, including;

- Hertsmere Borough Council
- Hertfordshire PCT
- Hertfordshire County Council

Appendix A of the above document outlines how the above parties agreed the key parameters for the development of the EWCAAP.

3.2 The Local Enterprise Partnership (Hertfordshire LEP) has been involved in the EWCAAP by way of supporting the implementation of the plan, resulting in the LEP promoting the development of the EWC within their Strategic Economic Plan (throughout 2013, adopted March 2014; see DOC 44). This resulted in the enabling highway improvements being adopted as a LEP strategic priority - designated under 'Projects due to start in later years of the SEP period – with likely calls on later years of LGF'.

### **4. Co-operation on Draft EWCAAP (regulation 18 version)**

4.1 The relevant duty to co-operate bodies (as justified in paragraph 2.3) were consulted at regulation 18 stage. The following made representations and such views were incorporated into the plan:

Hertfordshire County Council – Hertfordshire County Council held no objection to the plan, but requested further work on the design of the highways scheme, clarity on the relationship between CIL and s106 and further reference to biodiversity and SUDS. The plan was amended to provide further detail on these matters.

Sport England – Sport England held no objection to the plan, and offered advice for any future design of replacement community facilities in the area. As per Sport England’s response, the Council agree this is a matter post adoption of the EWCAAP. The advice will be referred to as part of any development proposal.

Highways Agency – The Highways Agency held no objection to the EWCAAP, and sought assurance that any application for over 30 units would be subject to a transport assessment and travel plan (as per DfT circular 02/2007), and that pre-application discussions should be promoted. The Council require this as standard development management practice, and will engage with the HA on such matters in future.

Three Rivers District Council – Three Rivers reported that they had no comments to make.

- 4.2 The Council has prepared a consultation summary which covers the above aspects in greater detail (DOC6). Following the closure of the consultation period, a public meeting was held in October 2013, which was jointly hosted by Hertsmere Borough Council and Hertfordshire County Council.

**5. Co-operation on Draft EWCAAP (regulation 19 version)**

- 5.1 The relevant duty to co-operate bodies (as justified in paragraph 2.3) were consulted at regulation 19 stage, the following of which made representations;

Hertfordshire County Council - Hertfordshire County Council made several comments that sought to improve the clarity of the plan. A Statement of Common Ground has been agreed to incorporate these points.”



## **Annex F: Co-operation with Other Authorities – Statements in Authority Monitoring Reports (2012/13 and 2013/14)**

### **(1) 2012/13**

#### **“Co-operation with Other Local Authorities**

- 4.10 The Duty to Co-operate is set out in Section 110 of the Localism Act 2011. This applies to all local planning authorities and county councils in England. They are required to co-operate with each other to address strategic matters relevant to their areas. The duty requires constructive and active engagement in the preparation of development plan documents and other activities relating to the sustainable development and use of land.
- 4.11 Paragraph 181 of the National Planning Policy Framework (NPPF) states that “Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination”.
- 4.12 The Council has strong existing working relationships with Hertfordshire County Council and other Hertfordshire and adjoining London local authorities on a range of planning issues. This has included joint work on the development of the Community Infrastructure Levy (CIL), preparatory consultation on Hertsmere’s Site Allocations Development Management Policies (SADMP) and Elstree Way Corridor Area Action Plan (EWC AAP). Officers and members regularly meet to discuss strategic planning issues with adjoining Boroughs and the County Council.
- 4.13 The Council commits to undertaking a partial review of the Core Strategy within three years of the adoption of this Development Plan Document. That early review will be undertaken in co-operation with neighbouring authorities taking account of the progress and status of emerging Development Plan Documents in neighbouring authorities. To support the review, the Council will commission population and household projections, and review housing and employment needs. This will entail an updated Strategic Housing Market Assessment within the South West Hertfordshire Housing Market area that accords with the advice of the National Planning Policy Guidance. The Council understands the wider issues of general growth arising in Hertsmere, Hertfordshire and London and a series of meetings started in November 2012 in relation to this. Issues include the potential for the diversion of growth to/from Hertsmere and development pressure on the Green Belt.”

### **(2) 2013/14**

#### **“Co-operation with Other Authorities**

- 9.26 The Government wants local authorities and other public bodies to co-operate on planning issues which cross administrative boundaries, particularly strategic matters relevant to their areas such as the effective delivery of economic growth. Co-operation is seen as a continuous process of engagement from initial thinking through to implementation. In the Government’s

words, this should result in “a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.” While this may be seen as a common sense approach in the absence of regional planning, it is also a statutory duty introduced by the Localism Act 2011. The Council is required to demonstrate that a plan (such as SADM) has been prepared positively, taking account of relevant strategic needs, and that the Council has effectively engaged with relevant organisations.

- 9.27 Council officers and members regularly meet to discuss strategic planning issues with adjoining Boroughs and the County Council. This occurs through standing meeting arrangements and ad hoc meetings, and has helped the Council increase its understanding of the wider issues of growth arising in Hertfordshire and London. A Strategic Planning Framework is being drawn up by the eleven local planning authorities in Hertfordshire through the Hertfordshire Infrastructure and Planning Partnership.
- 9.28 The Council has particularly strong working relationships with Hertfordshire County Council and other Hertfordshire local authorities on a range of planning issues. This has included joint work on the development of the Community Infrastructure Levy (CIL), preparatory consultation on Hertsmeire’s Site Allocations Development Management Policies (SADMP) and Elstree Way Corridor Area Action Plan (EWC AAP). The input of infrastructure providers and planners has been crucial for the successful examination of the CIL charging schedule and EWC AAP. Their contributions to SADM during consultation (March/April 2014) are improving the quality of the document.
- 9.29 The early review of the Core Strategy will be undertaken in co-operation with neighbouring authorities, particularly but not exclusively in South West Hertfordshire. To support the review, the Council is jointly commissioning the Strategic Housing Market Assessment and the Economy Study with Watford, Three Rivers and Dacorum Councils. This will establish appropriate market areas within which development needs can be analysed and addressed. The Council has been consulted over similar studies in Welwyn-Hatfield and Enfield over the last year. While the Council’s joint studies have yet to be undertaken, it is thought that the particular geography of Hertsmeire is likely to generate a pattern of growth issues that will affect Bushey, Borehamwood and Potters Bar differently.
- 9.30 The Strategic Economic Plan for Hertfordshire prepared by the Local Enterprise Partnership identifies three foci of development based around key transport communications and relative economic strengths/attributes. One includes the Borehamwood area and M1/M25 axis including Watford and Hemel Hempstead. While the SEP is supported as a bid document for investment into the county and for its pattern of growth aspirations, there is also some disquiet about the particular level of housing growth suggested. This has not been tested or subject to consultation with the local authorities, as an earlier draft of the Plan had been.
- 9.31 The Council, together with many other authorities, is concerned about the growth of London and the difficulty the Greater London Authority (GLA) has in accommodating it. The Council expressed its views through consultation in February/March and examination of the Further Alterations to the London Plan in September 2014. A potential shortfall of 6,000 homes a year for 15-20 years would be a serious problem, and the position will be worse if the substantial

increase in housing delivery in London does not materialise. The GLA has indicated that it will wish to discuss the decanting of some growth from London to the wider South East with other authorities. It is not yet known how they might involve or affect Hertsmere.”



## **Annex G: Minutes of Local Authority Planning (DTC) Meetings**

**HERTFORDSHIRE COUNTY COUNCIL**

**LONDON BOROUGHs – BARNET, ENFIELD AND HARROW**

**ST ALBANS**

**THREE RIVERS AND WATFORD**

**WELWYN-HATFIELD**

## **HERTFORDSHIRE COUNTY COUNCIL**

### **MEETING BETWEEN HERTFORDSHIRE COUNTY (AS HIGHWAY AUTHORITY) AND HERTSMERE BOROUGH COUNCIL**

**VENUE:** Civic Centre, Hertsmere Council Offices, Borehamwood

**DATE:** 4 August 2014

**ATTENDING:** Lyndsey Lucas, James Dale HCC  
Richard Blackburn, Ann Darnell HBC

#### **REASON FOR MEETING**

- To share progress on plan-making, explore matters of common concern and address strategic planning issues (having regard to our obligations under the 'Duty to Co-operate');
- To discuss HCC response to SADM (Consultation Draft) and
- To establish procedures for effective on-going consultation on possible changes to policies and proposals which may arise as a result of representations made during the recent SADM consultation.

#### **AGENDA**

1. Local Transport Plan – update
2. Hertsmere Local Plan - update
3. Hertsmere Core Strategy Review
  - a. Timescale, possible scale of development
  - b. How do we ensure appropriate co-operation under our obligations to the Duty to Co-operate? What are the strategic planning/transport issues that we should address in a review of Hertsmere's Core Strategy?
  - c. Who are the key personnel / sections involved at HCC?
4. Site Allocations and Development Management Policies (SADM)
  - a. Have we got the right transport requirements for specific sites (where they need to be stated)? Policies SADM1, 29 and 36?
  - b. Are the Transport Development Areas correct? Policy SADM 34, maps in Appendix A. NB TfL have suggested Radlett be designated a TDA. What is HCC response to this?
  - c. Should we be identifying specific transport proposals in the Transport Chapter? (e.g. safeguarding land or routes, key highway/station proposals)
  - d. Are the policies in the Transport Chapter appropriate in direction and overall coverage?
  - e. SADM 35 – Highways Agency comments re development size triggering transport assessment requirement.

- f. Should there be an additional policy in respect of roads and the road hierarchy in the Transport Chapter? (see draft attached)
- g. Possible changes in policies / sites as a result of representations received: process for enabling appropriate HCC input.

5. Next steps.

## MINUTES

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| <b>6. Local Transport Plan – update</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                      |
| Will be moving from LTP3 to LTP 4 – parts of new version likely to be more interactive. LL to confirm timescales for review and advise HBC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | LL                                                                                   |
| <b>7. Hertsmere Local Plan - update</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                      |
| Core Strategy adopted.<br>Elstree Way AAP – tentative EIP date wc 20 Oct<br>Site Allocations and Development Management Policies (SADM) – consultation March 2014; programmed publication of submission draft Feb/March 2015. Document delivers adopted Core Strategy. Review of Core Strategy to follow – see below.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                      |
| <b>8. Hertsmere Core Strategy Review and Duty to Cooperate</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                      |
| <p>The Core Strategy Review will follow immediately from the production of the current cycle of Local Plan documents. Key issues will be identification of employment and housing needs and the implications for the Green Belt. Several studies are to be commissioned:</p> <ul style="list-style-type: none"> <li>• SHMA and Economic Market Area studies jointly with Watford, Three Rivers and Dacorum Councils (starting this year).</li> <li>• Green Belt review to be commissioned jointly with Three Rivers and Watford.</li> </ul> <p>RB advised that current DCLG projections indicate that Hertsmere’s housing needs are likely to be significantly above the current target of 266 pa. The Core Strategy review would have to consider provision in the region of an additional 300 pa over and above current targets. Whilst there will be a number of options for how such levels of growth can be met, green belt locations will need to be considered.</p> <p>It was agreed that this level of growth would require additional traffic modelling re impact and mitigation. It was acknowledged that a ‘chicken and egg’ situation with regard to identifying suitable sites / locations for development and modelling traffic implications exists. RB asked whether existing modelling could give an indication of where spare capacity does / does not exist – is there a way of ruling in / ruling out sites/locations for growth at an early stage?</p> <p>JD and LL agreed to discuss with Sue Jackson what modelling already exists, how up to date / updateable it is, what further work is in the pipeline and how best to approach modelling for different levels / locations of growth which may be forecast. It was noted that Sue Jackson is putting together a county wide model. JD advised that it may be possible to identify ‘easy’ highway solutions where pinch points and potential growth areas coincide, which can then be built into the modelling at an early stage so as to cut down on time and financial implications. JD advised close, continuous joint working / dialogue between HCC and HBC in order to minimise the danger of abortive (costly) modelling being undertaken.</p> <p>JD raised the possibility of Hertsmere being able to require potential developers to fund modelling work as this approach is being pursued at eg Welwyn Hatfield with some success.</p> | <p style="text-align: center;">JD/<br/>LL</p> <p style="text-align: center;">ALL</p> |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| <p>JD advised that the lead in time for setting up / running modelling was around 3-6 months. 6 months would be needed for 'from scratch' modelling.</p> <p>Existing structure for HCC/Borough on transport issues:</p> <p><u>Officer Steering Group</u> led by LL – hasn't met for a while but deals with delivery of Urban Transport Plan type schemes. Information sharing.</p> <p><u>STIBLETS</u> at Borough level – feeds into STIB led by Rob Smith – re strategic county wide issues</p> <p><u>Regular Meetings with DM Officers</u> re planning applications</p> <p><u>Strategic Highways meeting</u> – re delivery of maintenance, management of highway network.</p> <p>It was agreed that future HCC/HBC meetings (STIBLETS level) should include Sue Jackson, plus where appropriate HCC Public Transport (Neil French) and Rights of Way officers. HBC to copy minutes of this meeting to Neil French. Future meeting will identify strategic issues that the Core Strategy Review will need to address.</p> | <b>RB</b>    |
| <b>9. Site Allocations and Development Management Policies (SADM)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |              |
| <p><b>a. Transport requirements for specific sites.</b> LL agreed to provide Highways comments on all the Policies SADM1, 2, 29 and 36 proposal sites along the lines of a pre-application consultation so that any appropriate constraints can be included in the Site Specific Requirements. JD indicated that they did not need copies of representations received from third parties.</p> <p>Noted that:</p> <p>H9 – suggestions made for new access road from Baker Street or Barnet Road</p> <p>H10 – representation made by owner of County End to include rear garden area in developable area</p> <p>H11 – proposal dependent upon relocation of bus garage</p>                                                                                                                                                                                                                                                                                                                                                  | <b>LL</b>    |
| <p><b>b. Transport Development Areas.</b> JD to check and confirm TDAs correct, and to give a response on TfL's suggestion that Radlett be designated a TDA (copy of representation attached to agenda).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>JD</b>    |
| <p><b>c/d. Transport Chapter – policies and proposals.</b> JD to advise whether there are any specific transport proposals which should be identified and whether the policies in the chapter are appropriate in direction and overall coverage.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>JD</b>    |
| <p><b>e. Highways Agency comments re reference to DfT Guidance on Transport Assessments (2007)</b> (copy attached to agenda). JD to advise precise wording to be used in SADM in light of concern about references going out of date during lifetime of Plan. Noted that LTP, Roads in Hertfordshire and HCC Travel Plan are all based on the DfT guidance and therefore consistent with it.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>JD</b>    |
| <p><b>f. Roads/Road hierarchy – additional policy?</b> JD to advise whether the suggested additional policy (attached to agenda) should be included / amended and included.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>JD</b>    |
| <p><b>g. Changes to draft SADM arising from representations.</b> It was agreed that possible changes would be discussed and an HCC response given on an 'as and when' basis. JD was happy to respond quickly where changes were being considered by HBC and a Highways input was needed.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>AD/JD</b> |
| <b>5. Next Steps</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |              |
| <p>Meeting to discuss strategic issues, existing, proposed modelling and how to go forward to be arranged for mid-October when new Principal Planner would be in post at HBC. JD to speak to Sue Jackson and arrange a date. Venue TBC.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>JD</b>    |

## **MEETINGS BETWEEN HERTFORDSHIRE COUNTY (AS MINERALS AND WASTE PLANNING AUTHORITY) AND HERTSMERE BOROUGH COUNCIL**

### **Minutes of the Meeting Held at Hertsmere Borough Council Offices with HCC Minerals and Waste on 22 April 2013**

#### **1. Attendance**

The meeting was attended by:

- Simon Warner (SW): Interim Local Plans Team Leader
- Trish Carter-Lyons (TC-L): Planning Policy Officer, Hertfordshire County Council
- Martin Wells (MW): Planning Policy Officer, Hertfordshire County Council

#### **2. Progress of LDF**

Core Strategy adopted on 17 January 2013. Site Allocations and Development Management Policies are being worked up into one document with an 8 week consultation due to start on 29 July 2013. The Sustainability Appraisal is due to be completed shortly. An Area Action Plan is being prepared for Elstree Way (800 units) which is expected to have one consultation stage running in tandem with CIL consultation.

#### **3. What housing numbers are being used to plan for growth given the abolition of the RSS?**

The adopted Core Strategy makes provision for 3,990 homes, between 2012 and 2027. An early review is due to commence within 3 years. This was stipulated by the Inspector due to the overlap with the East of England Plan and the NPPF at the time of the submission of the Core Strategy and the subsequent examination of the document. The Core Strategy was submitted in February 2012 and the NPPF was published the following month. Population work is due to commence next year to be used to set the next housing target. This potentially could require a review of the Green Belt within the next 3 years.

#### **4. Are any major developments due to commence?**

A high number of housing schemes have already been permitted which leaves only 6-7 housing sites to allocate. The big development sites have already been granted planning permission or have already been completed. Currently there is planning permission for 1,200-1,400 dwellings.

#### **5. Employment land study progress**

Hertsmere may review employment land as part of the review of the document in 3 years. Numerous employment areas are coming forward for residential use where employment generating uses have ceased. In terms of the PD change, Hertsmere has applied for exemption to 15

employment sites.

The top of Rowley Lane which is an old sports ground is to be allocated for employment use. This is sited to the east of the road alongside ELAS191.

In terms of promoting employment areas as areas which are also suitable for providing waste facilities, Hertsmere Policy CS10 (Land use within employment areas) includes waste management as an alternative use which will also be permitted within employment areas.

## **6. NPPF Issues**

Hertsmere regularly meets with the London Boroughs of Harrow, Enfield and Barnet and may possibly hold a register to ensure that the authority is cooperating with all relevant authorities.

SW explained that Hertsmere had agreed part of a Statement of Common Ground for their Core Strategy examination and made great efforts to attempt to overcome any outstanding objections prior to the start of the examination. This significantly reduced any issues left unresolved.

Hertsmere is currently in the process of updating their SCI.

## **7. Proposed Submission Waste Site Allocations comments**

Changes to the document since the last meeting were discussed, being the insertion of policies including the sequential approach to sites coming forward and the inclusion of an employment land brief.

SW understands that flexibility needs to be built into the plan and a series of potential waste uses on allocated sites is an acceptable way forward to provide waste management facilities to meet the county's needs.

A potential statement of common ground was suggested in Hertsmere's Proposed Submission representation, however given the nature of the comments to date it was not felt that this was required at present, although both parties are happy to produce one if this is deemed necessary at any stage in the future.

An update was provided regarding the ELAS and there have been some changes to some ELAS which may need to be reflected in the Site Allocations document as minor changes to site boundaries at ELAS190 and ELAS191 as detailed below.

- o White House Commercial Centre (ELAS235) – there is historic interest for housing development on this site, although nothing yet come forward.

It is not a locally significant employment area and therefore it may be acceptable for the land to become residential.

- o Cantilion Haulage (ELAS230) – is a coach washing facility at present.

- o Otterspool Way (ELAS192) – contains a car sales showroom. However changes are beginning to happen on the site. Part of the site may come available and be marketed for employment, but may come forward for residential.

- o Elstree Way employment area (ELAS191) – the north west of the ELAS has now been developed for residential (120 units with 75 affordable dwellings). The Wickes site has currently been cleared.

- o Stirling Way (ELAS190) – 4-5 stores of A1 use were previously located on the site. A Morrisons supermarket is now located on the southern part of the ELAS. As for the preferred use of the site, this has not yet been

determined and therefore there is the potential that it could go for residential use.

o Cranborne Road (ELAS201) – there is currently a recycling centre abutting the northern part of the site which is to be safeguarded for employment land and is also in the Green Belt.

SW stated that the two ELAS that are most sustainable for extensions as employment land are ELAS191 and ELAS201.

Reference was made to Policy CS9 in Hertsmere's Core Strategy – Locally significant employment sites.

#### **8. Suggested additional sites:**

None.

#### **9. What can be done to overcome any objection?**

N/A.

#### **10. Can HCC make this change?**

N/A.

#### **11. Any other business:**

SW asked what HCC require from Hertsmere in terms of accommodating waste management. TC-L requested that there is acknowledgement in policy that employment land could include waste uses and acknowledgement that new development creates waste at construction stage and on occupation that needs managing. From a district perspective, waste collection is also of importance including sufficient space being accommodated in new development for recycling bins and turning areas for refuse trucks. SW stated that Hertsmere Core Strategy Policy CS10 states that employment land is suitable to accommodate waste management facilities

MW explained that the Guide to Districts is being revamped and will be reissued when complete. MW is also happy to provide assistance with writing some words for Hertsmere to add to their website to explain HCC's minerals and waste planning function as part of the Development Plan.

Following a discussion about waste site designations appearing on District proposals maps, SW confirmed that he is happy to include a signpost to the waste documents.

SW stated that Bryce Tudball should be Hertsmere's named contact set up on Objective.

MW and TC-L gave an update of the Minerals and Waste Development Framework as follows:

- Waste Core Strategy and Development Management Policies document was adopted November 2012 & expecting to submit Waste Site Allocations document in early June 2013.
- Work is due to commence on the review of the MLP after submission of WSA. This will involve an update on the saved policies and working towards a sub-regional apportionment of mineral provision as agreed by AWP members.
- LAA is drafted and being worked up at present.

- MWDS has been updated.
- SCI has been updated in light of the removal of the requirement to advertise statutory consultations – available on the internet.

**12. Follow up action:**

MW/TC-L to email previous meetings minutes in addition to these minutes to SW. Once agreed, this will then be included in the county council's duty to cooperate evidence base document.

Exchange of SCIs between MW/TC-L and SW.

SW to provide MW with an annotated map showing the sections of ELAS190 and ELAS191 that should be removed from the Site Allocations document to reflect the current status of land designations since the previous meeting.

Minutes approved by: Simon Warner, Interim Local Plans Team Leader,  
Hertsmere Borough Council.

## Minutes - Hertsmere Borough Council and HCC Minerals and Waste DTC Meeting

**Venue: County Council Offices, Hertford**

**Date: 25 February 2014, 10am**

### 1. Attendance

Richard Blackburn (RB) (Hertsmere Borough Council)  
Martin Wells (MW) (Hertfordshire County Council)  
Trish Carter-Lyons (TCL) (Hertfordshire County Council)  
Gemma Nicholson (GN) (Hertfordshire County Council)

### 2. Reason for Meeting

- To share progress on plan-making
- To explore matters of common concern
- To identify actual or potential strategic planning issues
- To fulfil each council's obligations under the 'Duty to Co-operate'(DTC) introduced by the Localism Act 2011 and expanded upon in the National Planning Policy Framework

### 3. Progress of LDF:

#### Hertsmere

Core Strategy (to 2027) adopted in January 2013 is being implemented & is to be reviewed within 3 years (review due to start in 9-12 months). Core Strategy includes safeguarded land. All safeguarded land for housing derives from the existing Local Plan, as does one area for employment. A second safeguarded area for employment is indicated in the Core Strategy.

Elstree Way Corridor Area Action Plan (EWCAAP) pre-submission was published on 17 February for six weeks to allow for representations (until 31st March). The Action Area was important in that it would provide for a significant proportion of the borough's housing target (approx. 25%). Its extent had been revised and would reduce the Elstree Way EA Employment Area of Search (in the Waste Site Allocations Main Modifications document). The EWCAAP would be submitted to the Secretary of State along with representations received, during the summer: the examination is due this year. EWCAAP is Council policy and therefore an important material planning consideration

Site Allocations and Development Management Policies DPD (SADM) Consultation Draft will be published on 3 March for six weeks (until 14th April). RB provided a copy of the text relating to Mineral Consultation Area and information to be included on the Policies Map in respect of the Sand and Gravel Area. HCC to check Barren Area – as it was drawn freehand. RB also outlined some potential areas of interest in the SADM and invited any comments by 14 April 2014. He noted that the text needed to refer to inert waste being deposited at Tyttenhanger Quarry as a part of the restoration of the area following mineral extraction. No general Green Belt releases - most development is concentrated in existing urban areas (excluding safeguarded land).

CIL charging schedule had been supported by Inspector (letter December 2013) with modifications. Likely to be adopted in the summer and brought into operation a few months after that.

SPD progress: parking standards had been tweaked. Affordable housing was being reviewed and would be incorporated into a 'Developer Contributions Framework' together with Planning Obligations (when updated) and CIL charging (when adopted).

#### **HCC**

MW provided update on Waste Site Allocation modifications consultation. Consultation closed 17<sup>th</sup> Feb, a total of 2891 Hatfield Against Incineration (HAI) and 153 'non HAI reps' received – currently preparing summary report for Inspector. The main issues are the deletion of sites (for waste management/disposal) and the perceived disproportionate impact of waste management in Hatfield. Adoption is anticipated later this year.

There is no set timetable for Mineral Local Plan review – preliminary research is being undertaken. Main part of the work will continue once the Waste Site Allocation document is adopted. HCC will look at existing preferred areas and "mineral resource blocks" (see Item 9) as a base from which to put forward proposals in the revised Minerals Local Plan. A possible planning period might be 2016/17 to 2031/32.

#### **4. Hertsmere Site Allocations:**

Site Allocations document consultation starts in 3 March (until 14 April).

4000 dwellings to be provided – 60% of development focused in Borehamwood area (with significant amount going to the Action Area at Elstree way), remainder to other settlements.

Safeguarded land sites (Part of Cranborne Road and Rowley Lane) not within GB, but are classified as greenfield. These pieces of land should be treated as if in the Green Belt for the time being: they are future areas for development, i.e. after the plan period.

#### **5. Waste Issues**

##### **Waste Site Allocations comments:**

RB referred to changes in the boundary of the EWCAAP (Pre-submission version). This affects ELAS19. TCL said the significance was dependent on the status of the EWCAAP but recognised it has weight and is a material planning consideration. The Action Area boundary is shown on the Policies Map with the Site (and in the AAP itself). RB commented that the encouragement of housing development in the AAP was particularly relevant.

Update provided on New Barnfield waste management site and incinerator application: the Inspector's decision is due on 16<sup>th</sup> May.

##### **General comments:**

Review of Waste Movements by HCC – HCC is discussing the movement of waste with other authorities (i.e. relating to all waste streams). Environment Agency data is being used to track movements.

Residual waste is the main issue for the county, and less so for inert waste. Westmill is the only remaining landfill site within county.

Tyttenhanger Quarry Site – currently an active sand and gravel quarry with inert fill for restoration purposes only (the operator's preferred waste use). Site is within GB and is restricted to inert waste

due to groundwater sensitivity. Site is safeguarded for the whole area of mineral extraction, which is covered by a temporary planning permission until December 2032. Although the site is no longer shown in the Waste Site Allocations document, Appendix 2 of the most recent Annual Monitoring Report lists the site as being safeguarded, and covered by Policy 5 of the Waste Core Strategy and Development Management Policies document. Separate planning permission would be required for waste uses (e.g. inert recycling of a temporary nature) other than the planned restoration of the site.

RB stated that the status of Tyttenhanger is confusing as the site is not listed or mapped in the Waste Core Strategy and is no longer listed in the Waste Site Allocations document as being safeguarded. [NB. Inert waste disposal is linked with the temporary planning permission noted above].

Waste Core Strategy and Development Management Policies document shows strategic sites with planning permission.

Safeguarded map is available online from WSA examination as an informative for the Inspector. This is not policy.

**6. Are any major developments due to commence?**

No update.

**7. Employment land study progress:**

No update

**8. NPPF Issues:**

RB ran through some of the strategic issues he had been discussing with adjoining local authorities which included:

**Level of growth**

This is a significant issue for most Hertfordshire authorities, who were concerned about the use of DCLG forecasts (and their underlying assumptions). Core Strategy/Local Plan reviews would be looking at employment and housing forecasts again. Hertsmere would expect to redo the SHMA and employment space study in co-operation with key neighbours.

**London Growth**

GLA view that London cannot meet its own needs (to 2036) is really a wider strategic issue (for London and the regions).

**Green Belt**

London Plan Alterations ruled out any Green Belt review in its area. Hertsmere will need to undertake a Green Belt review study as part of the Core Strategy review. Hertsmere would want to apply a consistent methodology and shared understanding to Green Belt change and possibly undertake a joint study with other authorities, following the Dacorum/St Albans/Welwyn-Hatfield study approach.

**Infrastructure**

RB mentioned highway capacity, the future of private airfields, school capacity, sewerage infrastructure and M1/A41 corridor as relevant issues that had been raised in discussions.

**There were also geographic issues such as the possible outward growth of Watford or Potters Bar.**

## **9. Mineral Issues**

Mineral Resource Block (MRB) 20 lies to the west side of the district & 18 to the north near Tyttenhanger (adjacent to MRB22 outside of the district). Development sites listed in Hertsmere's SADM are not located near to these blocks.

Local Aggregates Assessment (LAA) published November 2013 to monitor aggregate production and plan for a steady and adequate supply of aggregates in Hertfordshire. The LAA is reviewed annually as part of the AMR.

HCC has an 11.4 years land bank of permitted minerals.

Objectively assessed housing needs arising in Hertsmere are likely to show higher housing provision is needed in the longer-term. In terms of minerals, potential mineral sterilisation issues are more likely to occur during Hertsmere's review of Core Strategy, i.e. if sites outside urban areas are being considered for development.

## **10. Any other business:**

Employment Land Areas of Search SPD – this document is being prepared to provide further information and detail on the ELAS. It is likely this document will be published post adoption of the WSA.

Guide to Districts – covers what to include in Core Strategies/Local Plan in terms of minerals and waste and will replace the old version from 1999.

Site Waste Management Plans – Regulations for SWMP have been revoked. However HCC Core Strategy and Development Management Policy 12 still remains and encourages sustainable construction. Requiring SWMPs is a method for HCC to collect data. Hertsmere DM policies or Core Strategy should cover this issue – TCL to check.

## **11. Follow up action:**

- MW to send minutes of previous DtC meetings (2012 & 2013) to RB
- HCC to look at text and map ( in particular the Barren Area) provided by RB in the meeting
- TCL to check Site Waste Management Plans are referred to sufficiently in Hertsmere policies
- Circulate minutes
- GN to send PDF maps of Mineral Resource Blocks
- **Next DTC meeting to be held in 8-9 months' time**

**Minutes - Hertsmere Borough Council and HCC Minerals and Waste  
DTC Meeting**

**20 November 2014**

**1. Attendance**

The meeting was attended by:

- Richard Blackburn (RB) Hertsmere Borough Council
- Sarah Barker (SB) Hertsmere Borough Council
- Trish Carter-Lyons (TCL) Hertfordshire County Council
- Gemma Nicholson (GN) Hertfordshire County Council
- Ella Rosser (ER) Hertfordshire County Council

**2. Progress of LDF:**

Hertsmere Core Strategy is adopted. CIL has been adopted and will come into effect on 1st December.

SB and RB are currently reviewing responses received to the Site Allocations and Development Management Policies document consultation. Public consultation on the updated version of this document is likely to be Spring 2015. SB stated that there is scope to separate out minerals and waste issues in the Hertsmere Local Plan.

SB stated that the LDS needs updating. There is the need to review the Core Strategy within 3 years.

Elstree Way Corridor AAP examination has been held. 6 week modification consultation will begin this year. Adoption is anticipated in March 2015 after receipt of the Inspector's report.

**3. Housing numbers/ SHLAA progress/Site Allocations:**

SB stated that they are reviewing the housing numbers as part of the evidence base for the review of the CS. The latest official housing projections data is due to be published and will be available to feed into the review of housing numbers. The SHLAA will be updated from the 2011 version and 2012 Housing Supply update for examination. HCC are happy to provide comments on sites in relation to minerals and waste once some of the SHLAA work is complete.

Joint SHMA will be undertaken with Watford, Dacorum and Three Rivers. It is expected this work will be completed by June.

**4. Green Belt**

SB stated that following the review of the housing numbers and economic study a joint green belt review will be undertaken with Watford and Three Rivers. There is currently no timescale for this work.

**5. Are any major developments due to commence?**

Redevelopment scheme (102 flats) has been permitted at Elton Way, Bushey.

Numerous residential schemes have come forward throughout the district on housing sites listed in Table 1 of the SADM. This includes the breakers yard at Rossway Drive , Bushey, which has been granted approval.

There is a current application on Land East of Rowley Lane for a centre of excellence for sport and other development such as Hotel.

Key changes to housing are likely to follow the review of the Core Strategy.

#### **6. Employment land study progress:**

SB stated that an Economy Study will be undertaken externally. It is planned to appoint consultants in December to start in January. This work will include looking at economic viability of sites and will be undertaken jointly with Watford, Dacorum and Three Rivers.

#### **7. NPPF Issues:**

None raised by Hertsmere.

The new National Planning Policy for Waste (NPPW), which was published last month formally replaces PPS10, and places a greater responsibility on district local planning authorities to work collectively with the Waste Planning Authority and their responsibility for determining non-waste applications to consider issues of waste and how it will be dealt with. This is covered in paragraphs 8 & 9 of the NPPW.

A new section on Waste has been added to the NPPG.

The requirement for site waste management plans (SWMPs) is set out within Policy 12 of the Waste Core Strategy and Development Management Policies document. HCC is happy to continue to comment on SWMPs submitted to the district.

#### **8. Waste Local Plan:**

##### **a. Core Strategy, Waste Site Allocations and ELAS SPD**

TCL provided an update into the Waste Local Plan by stating that the Waste Site Allocations document was adopted in July and there have been no subsequent legal challenges to it. [The Waste Core Strategy and Development Management Policies document had been adopted in November 2012].

The Employment Land Areas of Search SPD is due to go to Cabinet and full County Council in Feb/March, then out for public consultation in May 2015. It is hoped that this will be adopted in November 2015. A Sustainability Appraisal is currently being undertaken on it. Comments from districts have been incorporated by Martin Wells where appropriate.

The Guide to Districts on the implementation of the relevant Waste Local Plan policies will hopefully be adopted by the County Council next year. This will not be a SPD. Hertsmere have provided comments on this document.

TCL mentioned that an update of waste sites in the county will be carried out by way of visiting sites. Of relevance is maintaining an accurate record of operational end of life vehicle sites in Rossway Drive. As stated above SB advised that redevelopment of the site at the end of the Drive has been approved.

#### **9. Minerals Local Plan**

GN stated that the Minerals and Waste Development Scheme (MWDS) and Proposed Way Ahead went to Community Safety and Planning Panel on 3 November 2014. MWDS will be taken to Cabinet and County Council later this month for adoption. Following this, the Scheme will be placed on the website. The MWDS sets out a review of the Minerals Local Plan over three years with adoption in the fourth year (2018).

Work on the review of the Minerals Local Plan has started with various background studies commencing. The Local Aggregate Assessment (LAA) is the leading document for the Minerals Local Plan review. The Proposed Way Ahead details the 15 year plan period for sand and gravel plus a 7 year buffer period. The current annual apportionment figure of 1.39 million tonnes per annum will be used for the Minerals Local Plan review.

Tyttenhanger Quarry is an active sand and gravel site in Hertsmere. RB is aware of the barren area within Hertsmere as identified in the Mineral Consultation Areas SPD which is excluded from the Mineral Consultation Area of the sand and gravel belt.

Any new sites for potential inclusion in the Minerals Local Plan will not be known prior to the site selection work being carried out by consultants and the call for sites which is scheduled for Autumn/Winter 2015.

**10. Any other business:**

Hertsmere have requested electronic copy of the sand and gravel belt shapefile. Grace Jarvis has requested the Mineral Consultation Areas shapefile for Hertsmere GIS system. Amy Malcolm will be able to help.

**11. Follow up action:**

- HCC to circulate meetings minutes for comments
- HCC to send GIS shapefile for sand and gravel belt

**Next DTC meeting to be held in July 2015**

**Minutes - Hertsmere Borough Council and HCC Minerals and Waste  
DTC Meeting**

**Date/time: Wednesday 18<sup>th</sup> May 2015, 2.00pm**

**Venue: Hertsmere Borough Council offices**

**1. Attendance**

Richard Blackburn (RB) (Hertsmere Borough Council)  
Trish Carter-Lyons (TCL) (Hertfordshire County Council)  
Gemma Nicholson (GN) (Hertfordshire County Council)

**2. Progress of LDF/Local Plan**

Local Plan

Core Strategy (to 2027) adopted in January 2013. The review of this document has started with background studies being commissioned.

Elstree Way Corridor Area Action Plan (EWCAAP) is expected to be adopted in July. Modifications have been consulted upon and Hertsmere is awaiting the final Inspectors Report.

Site Allocations and Development Management Policies DPD (SADM) proposed submission will be taken to Members in July and on deposit in late August/September. Most development is concentrated in existing urban areas (excluding safeguarded land). SADM will be a material consideration from this point. Examination expected next year.

Thames Water provided a comment for insertion in the document which RB considers is not appropriate as it is more relevant to the Minerals Local Plan. The comment is as follows: 'Public water mains and sewers may lie across land from which it is proposed to extract minerals. Thames Water encourages early consultation by the developer to establish the position of such mains and sewers, and to arrange for them to be diverted where necessary. Where public sewers or water mains cross the site the developer will be responsible for the reasonable costs of diverting the asset.' For HCC to consider.

Neighbourhood Plan

RB stated that there is one designated Neighbourhood Plan area in Radlett. In addition there is expected to be one formed on the border at Hadley Wood which Hertsmere will look out for as it could impact on the Borough. TCL & GN confirmed that HCC minerals and waste team comment on Neighbourhood Plans in the county and adjoining authorities. RB confirmed Grace Middleton as the contact for Hertsmere.

**3. Housing numbers – SHLAA progress/Site Allocations**

There are two phases being looked at, firstly that up until 2027 and secondly to 2036. The SHLAA is currently being updated to 20 April 2015 (from April 2013 data) with HCC monitoring of housing completions data being included. There will be some changes to the allocations in the SADM as a result. GN stated that she could provide comments regarding mineral reserves for SHLAA sites if required.

RB stated that there is not a large spare capacity of housing. Hertsmere is currently undergoing much regeneration in the urban areas.

Two pieces of work have been commissioned and work started at the beginning of January – SHMA and Economic Study. The SHMA focuses around the demographic projections and housing needs,

and the Economic Study focuses on the functional economic areas and job provision. Four authorities have commissioned the work jointly – Dacorum (leading on SHMA), Three Rivers, Watford and Hertsmere. It has been concluded by the commissioning authorities that St Albans is part of the housing market area and should be covered by the assessment. A workshop is due to take place on 23 June and the studies may be published in July/August.

#### **4. Green Belt Review**

The Green Belt review will be in two parts, the first about its function and the second part about land release. Three Rivers, Watford and Hertsmere will do their own stage 2.

It is too soon to know what the options might be for any significant release of Green Belt land.

#### **5. Are any major developments due to commence?**

The AMR should be referred to. It is up to date as of 1 April 2014. Elton House regeneration is underway. Land East of Rowley Lane for a centre of excellence for sport and other development such as Hotel has planning approval and is subject to S106. RB provided information on a new proposal received today for regeneration (at Windsor Close, Borehamwood). However it only provides a net increase of 5 dwellings. HCC may need to provide comments due to the creation of construction and demolition waste.

#### **6. Employment land study progress:**

See above re: economic study.

#### **7. NPPF Issues (Including NPPG):**

RB stated that there are a number of permitted development changes that Districts are working with. Changes to affordable housing policy have resulted in a reduction in affordable housing provision in the borough, which is now at 16% of commitments. Government indicates that affordable housing should not be required on developments providing under 10 units. Government is also promoting self-build (which could replace affordable housing on sites). The borough has an affordable housing SPD, which may need revising.

#### **8. Waste Local Plan**

TCL stated that the ELAS SPD is due to be consulted on at the end of May. A draft has already been seen by the districts.

The guide to Districts has been completed which covers what to include in Core Strategies/Local Plan in terms of minerals and waste and will replace the old version from 1999. TCL to get back to RB regarding the adoption of the document for use by the districts.

Site Waste Management Plans – HCC continues to comment on these whether they are part of an application or submitted in response to a condition.

#### **9. Minerals Local Plan:**

In answer to RB's query on how the work of East of England Aggregates Working Party (EEAWP) relates to London's needs, there was discussion around Herts' apportionment figure. TCL & GN provided information to RB from Herts' LAA, EEAWP's LAA, London Plan policy and London AMR, and background information to calculating the apportionment figure for each authority in the East of England 'DCLG, 2009, National and regional guidelines for aggregates provision in England 2005-2020'.

GN stated that HCC is preparing for the initial consultation on the Minerals Local Plan which is an issues and options version consultation. The issues raised at the stakeholder event will feature in the document including the vision and objectives, plan length, SA objectives and site selection methodology. The document will not feature any sites at this stage. The site selection methodology is expected to be implemented in the winter. The document will be on consultation in August/September.

RB asked about whether it is known that new extraction sites would be needed. GN & TCL stated that it is too early yet as no site selection work has commenced although discussions are taking place with landowners in areas of the county where there is the issue of sterilisation to consider with potential housing sites coming forward. The county currently has a healthy land bank but deliverability of sites and sterilisation issues are key considerations.

The Local Aggregate Assessment (LAA) which monitors aggregate production and sales is updated annually and has a process to follow in the autumn to be approved by the EEAWP. It is now separate to the AMR and will be a key evidence base document in the review of the Minerals Local Plan.

**10. Any other business:**

RB made us aware that Sarah Barker is leaving Hertsmere Borough Council. RB expects there to be a new Hertsmere contact at the next meeting.

**11. Follow up action**

- Circulate minutes
- Next DTC meeting to be held in 6 months' time

Minutes agreed by Richard Blackburn 21/5/15 via email

## **LONDON BOROUGHS**

### **NOTE OF MEETING BETWEEN BARNET AND HERTSMERE COUNCILS**

**VENUE: Council Offices (Barnet Council), North London Business Estate, East Barnet**

**DATE: 23 January 2014, 10.30am**

#### **Those attending:**

Rita Brar (Rita) - Barnet Council

Nick Holmes (NH) – Barnet Council

Richard Blackburn (RB) – Hertsmere Borough Council

#### **Reason for Meeting**

- To share progress on plan-making;
- To explore matters of common concern;
- To identify actual or potential strategic planning issues; and generally
- To fulfil each council's obligations under the 'Duty to Co-operate'(DTC) introduced by the Localism Act 2011 and expanded upon in the National Planning Policy Framework

#### **Local Plan Progress**

##### **(a) Hertsmere (H):**

Core Strategy (to 2027) adopted in January 2013 is being implemented. Site Allocations and Development Management Policies DPD (SADM) and Elstree Way Area Action Plan (EWAAP) expected to be published in March 2014. SADM – consultation draft: EWAAP – proposed submission draft. Core Strategy Review is due to start in 9-12 months. CIL charging schedule had been supported by Inspector (letter December 2013) with modifications. Likely to be adopted in the summer and brought into operation a few months after that.

##### **(b) London Borough of Barnet (B):**

The Council's functions have been outsourced as a joint venture with Capita, known as Regional Enterprise. Capita hold a 51% share of the company. Strategic Planning and Regeneration are seen as a potential source of income for Regional Enterprise (RE). RE operates south of The Wash, with an equivalent, Urban Enterprise, operating to the north.

Core Strategy (to 2025/6) and Development Management DPDs adopted in September 2012. Site Allocations DPD – call for sites expected in September 2014 (after local elections in May). Core Strategy examination alluded to the absence of Gypsy and traveller sites: there is no existing provision in the borough. Issue will be covered in Site Allocations DPD. LDS makes no reference to a review of the Core Strategy/Local Plan.

Area Action Plans have been adopted for Colindale and Mill Hill.

B's Core Strategy is aligned with the Greater London Plan (to 2026). Principle that London consumes its own smoke has been followed. Mayor has also said there will be no Green Belt review.

The current GLP Alterations Consultation Draft rolls the plan period forward to 2036. The level of growth proposed is a problem for B – they are likely to object. B has not sought to deflect its growth northwards to H, but the distribution of London’s growth beyond the Greater London area is an important issue.

### **Development and Issues in Barnet**

B was concerned at housing growth along A5 corridor in Barnet. Rita said that a study of Edgware town centre found that a lot of people in the 60+ group liked to use Radlett for shopping, partly as it was on a bus route. RB said the centre has relatively good parking and a large range of shops for a small population.

B is working on town centres across the borough e.g. how they trade, the effect of the internet. There are different teams looking at place specific issues – management of centres and the services they offer, opportunities for sponsorship, liaison with TfL over bus services, local road conditions and pedestrian issues.

Edgware Town Strategy was adopted in June 2013

B is working on a borough-wide economic strategy, due for publication in June 2014.

B has high level of vacant office space (especially 1970s buildings) and one of the highest prior approval rates in London (for conversion of offices to residential). B is generally positive about change, but wishes to see an element of employment in conversions. There is some concern over occupiers being squeezed out (replacement offices being more expensive), but also some success in creating small scale office hubs (as incubator units and for small businesses).

Major housing growth will occur at Brent Cross (7,500), Colindale (10,000) and Mill Hill.

Brent Cross is a metropolitan town centre, with c 55,000 sqm of retail space: permission exists to double the retail area, build the new housing and provide a major new office quarter around Staples Corner.

Housing targets are based on estimates of capacity from brownfield development and regeneration. But opportunities in Barnet are diminishing. There are five priority estates targeted for regeneration.

### **Development and Issues in Hertsmere**

H was currently meeting all adjoining authorities and HCC Minerals and Waste.

While current Core Strategy was being implemented through SADM, future housing provision would be an issue longer term: i.e. for H in the review of the Core Strategy. Objectively assessed housing needs (DCLG household projections) for H would be higher than past housing provision rates. Hertfordshire had accommodated its own needs historically with some diversion of growth away from the south and west (within the county).

NH asked whether there were any particular media links with London. RB referred to Elstree Film Studios and BBC Studios, both of which were expected to remain long term, but was unaware of any especially strong links. *[Post meeting note: there is presumably a pool of skills in the London area.]*

H has commissioned an assessment of future needs for Gypsies/travelling showpeople from ORS – first draft received. SADM includes pitch provision for the next 5 years or so – via regularisation of unauthorised pitches and addition to existing site.

### **Strategic Issues**

- **Level of growth**

This is a significant issue for most Hertfordshire authorities, who were concerned about the use of DCLG forecasts (and their underlying assumptions)

Core Strategy/Local Plan reviews would be looking at employment and housing forecasts again. H would expect to redo the SHMA and employment space study in co-operation with key neighbours.

- **London Growth**

NH said the London approach was to try and accommodate their own needs. GLA do school roll and population projections for London and London boroughs. Generally they are accepted, although there may be some disagreement with DCLG. NH said that the GLA view that London cannot meet its own needs (to 2036) is really a wider strategic issue (for London and the regions), not a Barnet-Hertsmere one.

- **Effect of Development Pressures on A5 Corridor**

- **Green Belt**

London Plan Alterations ruled out any Green Belt review in its area.

H will need to undertake a Green Belt review study as part of the Core Strategy review. H would want to apply a consistent methodology and shared understanding to Green Belt change, following the Dacorum/St Albans/Welwyn-Hatfield study approach. This would probably mean that a Hertsmere study would overlap into Barnet: H would advise further when appropriate.

- **Infrastructure**

B was concerned about highway capacity on the M1/A41/A1 in London, but the Highways Agency had accepted growth at Brent Cross.

HA were looking at a route strategy for A1(M): there are capacity issues on parts of this route in Hertfordshire. [NB North Circular was a TfL responsibility.]

**It was agreed to meet again in some months' time.**

## NOTE OF MEETING BETWEEN ENFIELD AND HERTSMERE COUNCILS

**VENUE: Civic Centre, Enfield**

**DATE: 5 February 2014, 10.00pm**

### **Those attending:**

Gerry Ansell (GA) - Enfield Council (Principal Planning Officer)

Anthony Wilson (AW) – Enfield Council (Strategic Planning Team Leader)

Richard Blackburn (RB) – Hertsmere Borough Council

Mark Silverman (MS) - Hertsmere Borough Council (Planning and Transport Policy Manager)

### **Reason for Meeting**

- To share progress on plan-making;
- To explore matters of common concern;
- To identify actual or potential strategic planning issues; and generally
- To fulfil each council's obligations under the 'Duty to Co-operate'(DTC) introduced by the Localism Act 2011 and expanded upon in the National Planning Policy Framework

### **Hertsmere (H) Local Plan Progress**

#### **(c) Documents**

Core Strategy (to 2027) adopted in January 2013 is being implemented.

Site Allocations and Development Management Policies DPD (SADM) Consultation Draft will be published in late February/March for six weeks.

Elstree Way Corridor Area Action Plan (EWCAAP) will be published in February for six weeks to allow for representations. The Action Area was important in that it would provide for a significant proportion of the borough's housing target. The EWCAAP would be submitted to the Secretary of State with representations received during the summer. It was Council policy and therefore an important and material planning consideration

Core Strategy Review is due to start in 9-12 months.

CIL charging schedule had been supported by Inspector (letter December 2013) with modifications. Likely to be adopted in the summer and brought into operation a few months after that.

SPD progress: parking standards had been tweaked. Affordable housing was being reviewed and would be incorporated into a 'Developer Contributions Framework' together with Planning Obligations (when updated) and CIL charging (when adopted).

#### **(d) Planning Issues**

Housing target (266pa) is based on urban capacity and former RSS target. Development is focussed at Borehamwood, which has over the years taken overspill from London. Scale of change in the central corridor is quite dramatic and there are concerns about securing investment in infrastructure.

Land at Rowley Lane Borehamwood is safeguarded for employment use and possibly others. There is also safeguarded land at Potters Bar. The Herts Local Enterprise Council is looking at potential growth in Hertfordshire, and funds are available for some local investment. Overall though, the need for B class land in the district is shrinking.

The Metroline bus garage was identified in SADM for housing, subject to a satisfactory relocation of the function. South Mimms motorway services or safeguarded employment land were possible options in Hertsmere. E is involved in a bus depot study with Transport for London (TfL). MS asked for the study to consider whether the Metroline garage in Enfield could accommodate both functions.

MS said the Wrotham Park Estate, Potters Bar had suggested land for development in the past and was generally looking for new opportunities.

Welwyn-Hatfield Council may be considering some localised development growth at Little Heath/Potters Bar.

H has traveller sites at South Mimms and Brookes Place, Potters Bar (no change proposed). H has commissioned an assessment of future needs from ORS – first draft received. MS considered it needed a lot more work. SADM includes pitch provision for the next 5 years or so – via regularisation of unauthorised pitches and addition to an existing site.

## **Enfield (E) Local Plan Progress**

### **(a) Documents**

Core Strategy (to 2026) was adopted in 2010. It is compliant with the London Plan 2011. Minor revisions have been proposed to the London Plan on affordable housing. The mayor has insisted on setting affordable rents, which is currently the subject of a judicial review.

Development Management DPD has been submitted for examination: this is expected towards the end of April. It includes affordable housing policy: 50% sought on sites with 10 or more dwellings (on site 70-30 rent v other tenure split) and financial contributions on smaller sites.

Various area action plans – generally in the more deprived areas – are being progressed:

- North Circular: driven by the need for housing renewal: Inspector's report expected.
- North East Enfield: proposed submission in May.
- Central Leaside and Enfield Town areas: consultants to be commissioned during March.

See separate map.

Edmonton is identified as a strategic growth area, for which a master plan is needed.

Following completion of all DPDs, E expects a future planning review to consolidate its development plan framework into a local plan.

The North London Alliance (project manager from Camden) aimed to prepare a new North London Waste Plan in 2015. Urban Vision had been commissioned. [The incinerator at Edmonton would remain a key waste management facility.]

Preliminary draft CIL charging schedule prepared. Consultants are looking at viability work.

## **(b) Planning Issues**

Enfield's population was growing rapidly: significant numbers were moving out from inner London.

Core Strategy housing target (to 2026) is 560 homes pa, but **E** is committed to providing more (around 780 homes p.a.). Further Alterations to the London Plan seeks a minimum of 42,000 dwellings pa (to 2036), and 798 homes p.a. in Enfield. GA considers 42,000 p.a. to be London's capacity figure although the aim is to exceed it, i.e. 49,000 homes pa. The greatest capacity is in East London. The approach is to increasingly intensify development in key areas: it includes 'high spec' housing.

Growth was being targeted at the eastern corridor, where there is a lot of industrial land, and around the North Circular. Urban renewal was being focussed at New Southgate and Ponders End before Edmonton.

**E** is generally protective of existing industrial estates. Logistics users (especially those serving retail sector, e.g. Coca Cola, Warburtons) and manufacturers were heavily reliant on access to the primary road network. Increase in capacity on M25 would help, but a particular issue on A1005 (which is parallel to it) as identified in the Core Strategy. There is pressure to extend A1005 to J26 M25.

Six authorities were meeting to consider highway issues and other matters – including **E**, HCC and Broxbourne.

**E** wants to extend CHP in Lee Valley to serve the Meridian Water housing development scheme (Central Leaside): this would link to the Edmonton heat network.

In the Lee Valley the rail strategy was to increase capacity by 1 or 2 lines. Cross Rail 2 will go through and stop in the borough: it will provide a higher capacity service to Wimbledon.

Gypsies and travellers: needs assessments points to the need for 2 pitches in the next 5 years. There are no existing sites and an unauthorised site (with 3 pitches) at Crews Hill in the Green Belt is the subject of an appeal.

Growth of free schools (demand for which is coming from Enfield and parts of Haringey) was affecting regeneration sites in the eastern part of the borough.

## **Planning Studies**

**E** is about to do its own SHMA – keen to get up-to-date household survey, e.g. growth in private rented sector, older persons' needs. Existing SHLAA and SHMA are available online (Greater London Authority website).

**E** completed an employment land study in 2013. The recommendation is to protect the better industrial areas: small scale improvements were needed. Also see traffic issue above. Because of GPDO changes (permitting office to residential conversions), the future of the office sector was looked at. There is a concentration of offices at Southbury but **E** concluded there would be no undue impacts. (**H** has received no applications for prior approval from offices to residential)

E is due to commission a retail study. Sector has changed considerably in last few years, with the economic downturn and digital sales.

RB said the review of H's Core Strategy would involve a new SHMA, an updated SHLAA, a Green Belt review and employment land study.

## **Other Matters**

### **(a) Strategic Issues**

RB had been meeting with other local authorities adjoining Hertsmere.

The following points were mentioned during the course the meeting.

- *Level of growth*

This is a significant issue for most Hertfordshire authorities, who were concerned about the use of DCLG forecasts (and their underlying assumptions).

Core Strategy/Local Plan reviews would be looking at employment and housing forecasts again. H would expect to redo the SHMA and employment space study in co-operation with key neighbours.

- *London Growth*

GLA view that London cannot meet its own needs (to 2036) is really a wider strategic issue (for London and the regions).

- *Green Belt*

London Plan Alterations ruled out any Green Belt review in its area.

H will need to undertake a Green Belt review study as part of the Core Strategy review. H would want to apply a consistent methodology and shared understanding to Green Belt change, following the Dacorum/St Albans/Welwyn-Hatfield study approach.

- *Infrastructure*

RB mentioned highway capacity, school capacity and sewerage infrastructure as relevant issues that had been raised in discussions. The construction of the Croxley Rail link (from Three Rivers district) will alter (and improve) access to Watford. MS felt that the future of the Potters Bar bus depot was best linked to the wider TfL and Enfield bus depot study.

There were also geographic issues such as the possible outward growth of Watford or Potters Bar. Possible expansion of Potters Bar could involve Enfield Council land.

### **(b) Future Liaison**

**It was agreed to meet again in a few months' time.**

## NOTE OF MEETING BETWEEN **HARROW** AND HERTSMERE COUNCILS

**VENUE:** Civic Centre, Harrow

**DATE:** 28 January 2014, 10.00pm

### **Those attending:**

Matt Paterson (MP) - Harrow Council

Philip Crowther (PC) – Harrow Council

Richard Blackburn (RB) – Hertsmere Borough Council

### **Reason for Meeting**

- To share progress on plan-making;
- To explore matters of common concern;
- To identify actual or potential strategic planning issues; and generally
- To fulfil each council's obligations under the 'Duty to Co-operate'(DTC) introduced by the Localism Act 2011 and expanded upon in the National Planning Policy Framework

### **Local Plan Progress**

#### **(e) Hertsmere (H):**

Core Strategy (to 2027) adopted in January 2013 is being implemented.

Site Allocations and Development Management Policies DPD (SADM) Consultation Draft will be published in late February/March for six weeks.

Elstree Way Corridor Area Action Plan (EWCAAP) will be published in February for six weeks to allow for representations. The Action Area was important in that it would provide for a significant proportion of the borough's housing target. Its extent had been revised and would reduce the Elstree Way EA Employment Area of Search (in the Waste Site Allocations Main Modifications document). The EWCAAP would be submitted to the Secretary of State with representations received during the summer. It was Council policy and therefore an important and material planning consideration

Core Strategy Review is due to start in 9-12 months.

CIL charging schedule had been supported by Inspector (letter December 2013) with modifications. Likely to be adopted in the summer and brought into operation a few months after that.

SPD progress: parking standards had been tweaked. Affordable housing was being reviewed and would be incorporated into a 'Developer Contributions Framework' together with Planning Obligations (when updated) and CIL charging (when adopted).

#### **(f) London Borough of Harrow (LBH):**

Core Strategy (to 2026) adopted in February 2012.

Site Allocations DPD, Development Management DPD and Area Action Plan (separate documents) were adopted in July 2013.

Site Allocations contains a number of strategic sites based on site availability. The housing provision rate is 350 dwellings pa (6,050 to 2026). This is consistent with the current Greater London Plan. There is a good pipeline, c 11 years with a 5 year supply in planning permissions (including Sec 106 agreements). The Action Area covers a central area (comprising Harrow Town Centre, Wealdstone Town Centre and the area between): it will take around 50% of the housing requirement.

CIL charging schedule had been adopted on 1 October 2013. MP said a Mayoral CIL had been concluded in 2012: it had been generated by a joint working party organised by Transport for London (TfL). This had been a good learning experience and informed the structure for LBH. LBH has own governance arrangements. MP said that CIL monies were slow to come in (i.e. time lags between permissions and development commencement). MP was looking at how spending of CIL could be related to the capital programme and how that is determined. The Infrastructure Delivery Plan (2010/11) needed a refresh e.g. to take account of population increases (c240,000 to 258,000 in 2026).

### **Strategic Issues**

RB ran through some of the strategic issues he had been discussing with adjoining local authorities:

- **Level of growth**

This is a significant issue for most Hertfordshire authorities, who were concerned about the use of DCLG forecasts (and their underlying assumptions).

Core Strategy/Local Plan reviews would be looking at employment and housing forecasts again. **H** would expect to redo the SHMA and employment space study in co-operation with key neighbours.

- **London Growth**

GLA view that London cannot meet its own needs (to 2036) is really a wider strategic issue (for London and the regions).

- **Green Belt**

London Plan Alterations ruled out any Green Belt review in its area.

**H** will need to undertake a Green Belt review study as part of the Core Strategy review. **H** would want to apply a consistent methodology and shared understanding to Green Belt change, following the Dacorum/St Albans/Welwyn-Hatfield study approach.

- **Infrastructure**

RB mentioned highway capacity, school capacity and sewerage infrastructure as relevant issues that had been raised in discussions. The construction of the Croxley Rail link will alter (and improve) access to Watford (especially west Watford where the football ground and hospital is): the overall effect is uncertain.

There were also geographic issues such as the possible outward growth of Watford or Potters Bar.

## **Development and Issues affecting Harrow**

### **(i) West London Waste Local Plan (for West London Alliance (WLA) boroughs – LBH, Hillingdon, Hounslow, Ealing Brent and Richmond) – to 2031**

Pre-submission is programmed for March 2014. While there is a Steering Committee guiding preparation each authority must approve the document. WLA has consulted HCC and other county authorities. MP said there was a good supply of waste management (transfer and disposal) sites and a contingency (2 sites). The route of HSR2 had been safeguarded. WLA was aiming for self-sufficiency

### **(ii) London Plan Alterations – to 2036**

London Plan is predicated on a population change of 8.2m (now) to about 9.5m in 2013. Population is expected to increase further, to 10.1m in 2031.

London will not meet its objectively assessed housing needs. The Alterations propose 43,000 new homes pa compared with a need of 48-62,000 homes pa (according to the particular forecast). Fully compliant SHLAA points to 43,000pa being deliverable. This is compared to a fairly consistent delivery in London over a long time of c 28,000 homes pa. MP thought there was a genuine market cap to London's growth.

Strategic framework reconciles need with capacity. Need in East London is small relative to its potential – in particular at Thameside, the Thames Gateway and Lower Lea Valley. There is to be no Green Belt review.

Housing demand is strong in West London and delivery uses employment land to a significant degree. The level of completions in west London points to the need for infrastructure investment from the Mayor of London.

MP expects GLA to deal with the Secretary of State on London's overall target and agree a level of housing that is lower than full objectively assessed needs.

Examination into the London Plan Alterations is programmed for September/October 2014 before approval of Secretary of State in 2015 (before the next general election).

### **(iii) Housing**

LBH target is 593 homes pa in the London Plan Alterations. LBH expect to support it, because it is deliverable. Objectively assessed need for LBH would suggest a need for 1200-1400 homes pa.

There had been a London Strategic Housing Market Assessment (SHMA) followed by one for West London in 2011 (the WLA with Hammersmith & Fulham instead of Richmond). For affordable housing rent caps were being set centrally by The Mayor.

### **(iv) Employment**

There is a surplus of employment land. Neither offices nor industry have attracted CIL. MP said that LBH is not competing well across the region, with Park Royal and Watford being strong, successful regional competitors.

There is interest in converting offices to residential use (through permitted development). LBH had sought an exemption but had failed. The concern (as for **H** in the Elstree Way Corridor) is that by avoiding the need to secure planning permission there would be little or no contribution to infrastructure provision. There have been discussions about some redevelopment schemes. Typically changes affect 1960s/70s blocks, 50% of which are occupied. There was not a market for refurbishment of offices (for office use). The Council preferred to see mixed use redevelopment. MP commented that the conversion of offices to residential could affect demand and stall other schemes.

The reuse of industrial land would enable small industrial sheds to be provided, as well as opportunities for schools and community uses (in addition to the normal residential demand).

MP referred to two significant schemes redeveloping industrial land:

- Collard (former Winsor and Newton) for a mix of housing and employment
- Kodak – 1,000 homes, retail, school and smaller premises for Kodak, with open space link from Wealdstone to Headstone recreation ground.

#### **(v) Gypsies and Travellers**

LBH had taken a steer from London Plan. The West London Study, linked to the SHMA, had concluded that 3 extra pitches were needed up till 2026. Watling Farm (off A41 and next to M1) contains 3 pitches. Though not ideally located, the site will be fully authorised and at least expanded to 6 pitches. LBH is also providing additional social support for Gypsies living in houses.

LBH likely to provide more than 3 additional pitches at Watling Farm. It will be more cost effective to extend the site to 12 pitches. This will more than meet LBH's needs.

[**H** has commissioned an assessment of future needs from ORS – first draft received. SADM includes pitch provision for the next 5 years or so – via regularisation of unauthorised pitches and addition to existing site.]

#### **(vi) Railways**

Tube capacity is an issue in inner London, though it is OK in the outer area. Rolling stock on the Jubilee and Metropolitan Lines has been upgraded: an upgrade is planned on the Bakerloo Line. The construction of Cross Rail 1 should release extra tube capacity.

Transport for London (TfL) is undertaking a series of station enhancements to make them step free. There is also a commercialisation project, identifying station car parks for redevelopment. The station car park at Stanmore will be decked to enable the release of part of the site for housing.

The west coast main line has some capacity on suburban links to Euston and Clapham. HSR2 would help free up more. HSR2 terminus would be at Old Oak Common where it would link to Cross Rail 1. WLA support HSR2. They also support a spur from Old Oak Common to Wembley (to serve the stadium) and Watford (LB Brent is leading on this).

#### **(vii) Other Matters**

Traffic calming and bus priority measures will help manage available road space. In general, there will be no increase in road capacity.

Mitigation of run-off (affecting flood risk of flooding) is an issue for significant parts of the Green Belt. Other issues stem from the "concreting" of front gardens and capacity of culverts. There is a long term plan to replace the dual sewer network (i.e. which takes foul and surface water).

Stanmore Country Park is due to be extended.

Redevelopment of the Royal National Orthopaedic Hospital, together with residential enabling development (of 360 homes) has been agreed.

More cemetery capacity is needed within 7 years. Additional land has been purchased in Three Rivers district. LBH may consider setting up its own crematorium, though the shared facility in Hillingdon is sufficient capacity-wise.

There is a substantial primary school expansion programme towards 24 additional forms of entry (9 FE in the first phase). A new secondary school will be delivered in Wealdstone in 2015. Salvatorian College (also in Wealdstone) has plans for expansion. A free school has recently moved into a site in Harrow Weald (Avanti House).

LBH anticipate commencing a retail study by the end of the year (last one in 2009). There is a 6% shop vacancy rate at present, with a 55,000sqm target in the Core Strategy. The target was most unlikely to be met, and MP envisages a shrinking retail sector.

### **Past and Future Liaison**

**LBH** would wish to be involved in Hertsmere's future Green Belt review.

**LBH** suggested **H** consider whether co-operation/liaison with the West London Alliance (including LBH) or the North London Alliance (including Barnet and Enfield) would be beneficial. MP would extend an invitation for H to meet the West London Alliance at their next quarterly meeting.

Ian Nichol is the Director for the West London Alliance based in Ealing, but we can always approach MP. Alliance comprises LBH, Hillingdon, Hounslow, Ealing Brent and Richmond (Barnet also attend). Hillingdon and LBH have met Three Rivers on a DTC basis on behalf of the Alliance.

**It was agreed to meet again in a few months' time.** MP was willing for that to happen on a 1-1 basis or with Barnet as well.

## **ST ALBANS**

### **NOTE OF MEETING BETWEEN ST ALBANS AND HERTSMERE COUNCILS**

**VENUE: Civic Centre, St Albans**

**DATE: 10.00am, 6 February 2014**

#### **Those attending:**

Manpreet Kanda (MK) - St Albans Council

Chris Briggs (CB) – Spatial Planning Manager, St Albans Council

Mark Silverman (MS) – Hertsmere Borough Council

Richard Blackburn (RB) – Hertsmere Borough Council

#### **Reason for Meeting**

- To share progress on plan-making;
- To explore matters of common concern;
- To identify actual or potential strategic planning issues; and generally
- To fulfil each council's obligations under the 'Duty to Co-operate' introduced by the Localism Act 2011 and expanded upon in the National Planning Policy Framework

#### **St Albans (St A) Local Plan Progress**

##### **(c) Team Structure**

**St A** had a big reorganisation in 2011. There is a Chief Executive with Heads of Service. Head of Planning is being recruited [*Later confirmed as Tracy Harvey (Welwyn-Hatfield)*]

CB is Spatial Planning Manager under the Head of Planning.

##### **(d) Documents**

Consultation on the Core Strategy (2011-2031) is likely around July-September 2014. It may include a housing target of 436 dwellings p.a. – also see below under Planning Issues. The Core Strategy document would likely largely follow the draft prepared in 2012 with the exception of housing and broad locations.

Informal draft CIL charging schedule will be published for consultation at the end of February. The schedule is based on the Stage 1 Lambert Smith Hampton work for Hertfordshire. MS commented that at Hertsmere's examination the Inspector was interested in viability and detailed spread sheets: Stage 2 work was essential for the Examination.

##### **(e) Planning Issues**

SHMA was completed in December 2013 and has been published. It points to a housing need of 584 dwellings p.a. on 5 year migration-lead figures and 436 on 10 year, whereas DCLG forecast is for 532 dwellings p.a. The DCLG forecast is being used as the de facto basis for estimating 5-year housing land supply need in planning decisions (giving a 3.9 year supply).

There may be an update to the SHMA. St A's Planning Policy Committee (PPC) concluded that housing need should be taken as 436 dwellings p.a.

GB review had been undertaken by consultants, SKM. Part 1 (with Dacorum and Welwyn-Hatfield) had been published. It shows 8 areas contributing least to GB purposes: these include areas around Napsbury and London Colney. The methodology is being commended to the Hertfordshire Planning Group (and to Hertfordshire Infrastructure Planning and Policy (HIPP)).

Part 2 is due to be published soon. Officers had concluded an evaluation methodology for environmental, social and economic considerations. SKM has suggested some potential residential sites within this framework. CB said there are still updates to be done. CB also said that some of the area at London Colney was waste landfill and unsuitable for development.

The PPC had agreed to initiate discussions with Dacorum Council, HIPP and LEP to consider growth east of Hemel Hempstead – i.e. co-operation and infrastructure funding, new housing and (sub-regional) employment development.

G & T needs assessment brief is being prepared. Study report is likely by the end of the year. Current provision is around 70 pitches, including temporary and tolerated sites: there is little or no scope to extend sites. RB said there were 74 pitches in Hertsmere on a similar basis.

The rail freight depot proposal for Radlett Aerodrome was with the Secretary of State (who had previously said he was minded to approve the application). All St A's legal challenges were at an end for now. Planning obligations agreement had been reached among the parties. CB expects HCC to sell their land to the developer (Helioslough) if the Secretary of State issues permission. A counter suggestion of 6,000 homes was likely to fail – CB considered there was no evidence to support such a proposal.

Harperbury Hospital is being disposed of by the Health Authority. Site was not covered by the Green Belt Review. Future development and change would be concentrated on the 'brownfield' in St Albans. The proposed Free School is apparently not going onto the site. It would comprise around 225 dwellings and mental health facilities (including clinics). The Free School may set up in the former Marconi Industrial Estate on a temporary basis. CB said he thought there may be a knock on effect on Hertsmere's Green Belt. MS mentioned the former Shenley Hospital (Porters Park residential area) which was being removed from the Green Belt in SADM.

## **Hertsmere (H) Local Plan Progress**

### **(a) Team Structure**

There is no Head of Planning: this will be reviewed later this year.

MS currently takes part of the role. MS heads the Planning Policy and Transport team. MS would like to appoint a full-time deputy manager (this is subject to an internal review). Two replacement planners are due to start in March. A conservation officer will be employed jointly with Welwyn-Hatfield. A full complement of planning staff (excluding conservation, parking management and trees) would comprise MS and 5 officers.

## **(b) Documents**

Core Strategy (to 2027) adopted in January 2013 is being implemented.

Site Allocations and Development Management Policies DPD (SADM) Consultation Draft will be published in late February/March for six weeks.

Elstree Way Corridor Area Action Plan (EWCAAP) will be published in February for six weeks to allow for representations. The Action Area was important in that it would provide for a significant proportion of the borough's housing target. The EWCAAP would be submitted to the Secretary of State with representations received during the summer. It was Council policy and therefore an important and material planning consideration

Core Strategy Review is due to start in 9-12 months.

CIL charging schedule had been supported by Inspector (letter December 2013) with modifications. Likely to be adopted in the summer and brought into operation a few months after that.

SPD progress: parking standards had been tweaked. Affordable housing was being reviewed and would be incorporated into a 'Developer Contributions Framework' together with Planning Obligations (when updated) and CIL charging (when adopted).

## **(c) Planning Issues**

Housing target (266pa) is based on urban capacity and former RSS target. Development is focussed at Borehamwood: the scale of change in the central corridor is quite dramatic and there are concerns about securing investment in infrastructure. There is a 7+ year's supply of housing land.

The first draft of a G&T assessment had been received. MS expected there to be revisions. Transit provision needed to be addressed now that the Regional Plan has gone (it required 10 pitches in south and west Hertfordshire).

## **Other Matters**

### **(a) Strategic Issues**

RB had been meeting with other local authorities adjoining Hertsmere.

The following points were mentioned during the course the meeting.

- *Level of growth*  
This is a significant issue for most Hertfordshire authorities, who are concerned about the use of DCLG forecasts (and their underlying assumptions).  
  
**St A** will attend a seminar on the subject later in the month. Both authorities agreed to try and facilitate a Herts-wide response to the DCLG consultation on the 2012 subnational population projections

No decisions on scale or location of growth in St Albans, but probable housing target of 436p.a. compared with DCLG and current de facto target of 532 dwellings p.a. Housing growth unlikely in the south of the district.

**H** may face a similarly significant percentage increase in objectively assessed housing needs (DCLG household projections), when reviewing the Core Strategy.

- *London Growth*

Need to work together with other Herts authorities to address migration out of London and GLA view that London cannot meet its own needs (to 2036). London Boroughs have suggested this is really a wider strategic issue (for London and the regions).

- *Green Belt*

**H** will need to undertake a Green Belt review study as part of the Core Strategy review. **H** would want to apply a consistent methodology and shared understanding to Green Belt change, following the Dacorum/St Albans/Welwyn-Hatfield study approach.

The effect of decision from the Radlett aerodrome inquiry may merit joint discussion.

- *Infrastructure*

RB mentioned highway capacity (e.g. A1(M)), school capacity and sewerage infrastructure as relevant issues that had been raised in other discussions. The construction of the Croxley Rail link (from Three Rivers district) will alter (and improve) access to Watford.

CB referred to school issues in **St A**: the location of the Harperbury Free School could end up as an issue for **H** (see above). CB suggested the Watling Trail green infrastructure link could be improved.

- *Transit provision for travellers*

## **(b) Miscellaneous**

**H** will need to start evidence base work on the Core Strategy review later in the year – to include SHMA, SHLAA update, GB review and Employment space study.

**St A** has a planning application for about 20% more retail space at London Colney.

## **(c) Future Liaison**

**It was agreed to meet again in September 2014.**

## NOTE OF MEETING BETWEEN ST ALBANS AND HERTSMERE COUNCILS



### Duty to Co-operate - Friday 13 February 2015

#### Meeting Notes

##### Attendees

St Albans City & District Council (SADC) – Councillor Julian Daly - Executive Leader and Planning & Conservation Portfolio Holder, Chris Briggs  
Hertsmere Borough Council (HBC) – Councillor Harvey Cohen – Planning & Localism Portfolio Holder, Glen Wooldridge, Mark Silverman

##### Notes

Overall, the matters discussed were largely as set out in the draft Agenda.

There was particular discussion regarding Item 2.

#### 2. *Ministerial statement on Green Belt and PINS informal advice – possible implications*

Responding to a point raised in Hertsmere's consultation response, SADC confirmed it is waiting for an independent assessment of Gypsy & Traveller need and hence the limited information in draft Policy SLP12.

##### Agreed Outcomes

#### 3. *Options for sharing development need – ie if HBC had any capacity to provide for some of SADC's need and vice versa*

Under Item 3, both Councils considered the potential and ability of each authority to meet some of the other's need. Neither Council thought it did or likely would in the future, given their Green Belt constraints and the importance given to the Green Belt in the NPPF.

SADC will write formally to HBC after the Meeting Notes are agreed to confirm the above position.

Responding to a point raised in Hertsmere's consultation response, SADC confirmed that it will look again at the question of what is the most appropriate approach to policies' maps in its draft SLP/DLP.

Recognising the point raised by HBC, SADC confirmed it agreed that its Economic Development Policy evidence base would be strengthened.

##### Ongoing Collaboration

SADC confirmed it would continue to be involved in the Dacorum/Hertsmere/Three Rivers/Watford SHMA and FEMA work. Comments on the recent presentations would be sent to Laura Wood.

Both authorities confirmed their on-going commitment to discussions and working together.

## **THREE RIVERS AND WATFORD**

### **NOTES OF DUTY TO COOPERATE MEETING BETWEEN HERTSMERE, **THREE RIVERS AND WATFORD** COUNCILS**

**27 September 2012**

#### 1. Introductions

#### 2. Duty to Cooperate update

DTC is not a duty to agree, but to cooperate. We need to define areas of common interest, and HPG initially discussed this at the last meeting and the planning coordinator role will look at mapping this and taking it forward. For housing the main issue is the need to define the sub-market area. The discussion highlighted that there are different groupings which don't fit perfectly with the administrative boundaries. We agreed to continue cooperating and at the right time to discuss possible housing land allocation cooperation.

#### 3. Local Plan Update

Hertsmere – consultation on modifications to Core Strategy finishes on 5<sup>th</sup> October. Then they will be awaiting the Inspector's report. Hoping the end of the year to have a finalised Core Strategy.

Three Rivers – CS now 1 year old. SA and DM plans are picking up on any new evidence that is emerging.

Watford – consultation ended on the 10<sup>th</sup> September on the modifications to the CS. Submitting our responses to the representations to the Inspector this week and then we await report back from the Inspector.

#### 4. Housing evidence update

Through the DTC this will ensure LA's review housing numbers in a cooperative way. Possibly look to moving towards a mini high level "structure plan" with neighbouring authorities. Take a mini schedule to HPG for the 3 Authorities (plus Dacorum depending on the outcome of their examination) St Albans may also need to be involved.

Now the 2011 census figures are out this could be the basis for a new run of figures.

HBC suggested that there was potential to examine the possibility of authorities with constraints locating development in neighbouring boroughs. For example land to the east of Borehamwood (15ha) which is currently designated as employment land could potentially provide for development from a neighbouring borough. The issue was raised regarding should the need arise in one LA how far away would it be considered acceptable to provide the equivalent development. SHMA and DAST studies show some linkages, but no clear cut answer to this issue.

#### 5. Gypsy and Traveller issues

Three Rivers is expecting results from the ORS needs assessment very shortly. This will be passed through their Committee then distributed including to WBC and HBC. Depending on the results from

the study this will determine the need for a transit site and travelling show person site. HBC and WBC have both adopted the RSS figures in their CS for pitches and made reference to working with neighbouring authorities to provide any need for transit or travelling show people sites. The existing transit site in Hertsmere has now become busier since the Basildon site closed in Essex.

## 6. Green Belt

Three Rivers – Warner Brothers want the studios removed from the GB, members not keen initially but in the Site Allocation document this area is up for removal from the GB. Members did not wish to exclude the residential development from the Green Belt until such time that it was established on the ground.

Hertsmere – super green belt designation has now been removed from the CS around the Bushey area.

Hotel/Residential proposals for Langleybury – the Brief has been completed but no further progress to report.

All agreed to keep secondary schools in the green belt (where applicable) to help control development and address the potential sell off of these sites by HCC for development.

## 7. Leavesden / employment

Warner Brothers is a major employer in Three Rivers. Three Rivers now focussing more on economic development and this is reflected in some planning policy staff responsibility changes. Will however be seeking to do further joint working on economic development generally, and also will be looking at having a review of employment figures. Already in contact with Andrew Gibson at Watford.

## 8. Retail issues

Ascot Road - Morrisons full planning application now in. 2500 sq m net convenience and 1300 sq m net comparison. Looking at taking it to committee in November. Principle established in the Core Strategy – impact mainly on the existing Tesco and Sainsbury stores in central Watford, but acceptable. Various design issues being discussed, and proposals include a primary school next to the store.

Pre-app discussions on Gasholder/Frogmore House continuing – application due in 4 months and Waitrose looking at operating from the site. Radlett and Bushey might be impacted by the Waitrose store, but trade will be drawn quite widely given its quality offer. Main issues will be impact, parking and the transport network. Public exhibition due end of October.

South Oxhey – Morrisons and Asda both interested in the retail foodstore. This will draw trade from the possible new Waitrose and also Tesco.

## 9. Major Projects update

Health Campus – Kier chosen as preferred partner and discussions ongoing to financial close at the end of the year. Major housing delivery site (at least 500 homes over 10 years, mainly flats) and established in the CS for new housing, employment, local centre, replacement hospital and other uses. A challenging site design wise due to a number of constraints including flooding, contaminated land and level changes.

Croxley Rail Link – public inquiry on Transport Works Order starts 8<sup>th</sup> October. Hardship hearing has happened for the Met station closure. Not been too many objections to the CRL – currently working on Land Transfers. Decision is due in March next year. April 2015/16 to start.

Watford Junction – Next meeting to take place tomorrow with developers to look at feasibility of some phased development so as to avoid triggering the need for the relief road. Previously discussed issue of WJ and Hartfield objecting to the CS regarding the quantity of retail being specified in the SPA2 area. This is still awaiting a decision from the Inspector through the CS examination. Important medium to long term site for the delivery of housing, at least 1500 units, mainly flats.

Charter place – Planning application to be submitted in March 2013, and opening in 2015. 10,000 sq m of additional comparison space plus “leisure box”, restaurant and cinema uses. CSC now the delivery partner, who own the Harlequin centre.

Hertsmere – Borehamwood area has a separate mixed use DPD in an employment area. Looking at putting a lot of housing in Elstree Way. Large residential windfalls still coming forward. Bushey heath – potentially releasing land there for housing. No other major projects.

Three Rivers – mainly Oxhey mixed use scheme and Leavesden developments that are ongoing.

## 10. CIL

All three authorities have individually commissioned LSH to take forward Stage 2. Similar issues being focussed on; postcode areas, new development, major development areas, viability of a single retail rate. HBC concerned how CIL money will be spent. There is a real need for HCC to be more explicit on their needs and requirements, hence the need for a strategic infrastructure plan. All authorities currently on track for consultation and implementing CIL by April 2014 deadline.

## 12. Water Cycle study

The WCS outlined the issues each LA had to deal with. Key issue is the upgrading of Maple Cross sewage treatment plant. It was agreed that after Stage 1 to continue having update meetings. No urgent need for a review at the present time.

## 13. Schools

Three Rivers have proposed 3 secondary school sites in Site Allocations. One at Croxley near the boundary with WBC and two at Mill End area at Junction 17 of the M25. No decisions have been made which 2 sites to take forward.

South Oxhey – no suitable school sites have been found by HCC.

WBC – Three new (7 FE) primary school sites being investigated to be taken forward, Ascot Rd, Health Campus and Lanchester House as well as some school extensions.

## 14. Climate Change

C - Plan would be useful after the Allowable Solutions comes into force. Three Rivers highlighted the need for appropriate evidence if setting targets, and they must be able to be monitored. Watford

may consult a more stringent policy approach option in the Development Management Policies document.

Any other business

Note of meeting to be circulated.

All agreed that it had been a useful meeting and that cooperation would continue on a regular basis, at all levels, helped by the new planning coordinator.

## DUTY TO COOPERATE MEETING BETWEEN **WATFORD** AND HERTSMERE

4 December 2013, Town Hall Watford (2.30pm)

Present: Richard Blackburn (HBC), Philip Bylo (WBC), Sian Finney-Macdonald (WBC), Catriona Ramsay (WBC), Vicky Owen (WBC)

### Reason for Meeting

- To share progress on plan-making;
- To explore matters of common concern, reviewing the note of the meeting held in December 2011;
- To identify actual or potential strategic planning issues; and generally
- To fulfil each council's obligations under the 'Duty to Co-operate' introduced by the Localism Act 2011 and expanded upon in the National Planning Policy Framework

### 1. Burial ground at Lower Paddock Road depot site / allotments

Identified in the WBC Local Plan 2. Discussed issues including the difficult access, limited site area, and limited trees on site. Agreed that further information on the project setting out how we would like it to appear should be sent to HBC by 3 January for a potential allocation in HBC's Site Allocations DPD in February 2014. Discuss with PR whether it is a woodland cemetery or garden of remembrance in a woodland setting.

HBC would like further information on allotments in Watford, background to the status and whether additional land is required as opposed to reconsolidation.

**Action: SFM, ER (December/January)**

### 2. Green Infrastructure

There remains £500K in an HBC pot for greenway strategy improvements and the Colne Valley area might be a suitable area that would benefit from specific improvements to the GI and open space access arrangements that would be of benefit to both HBC and WBC residents.

**Action: SFM (in regard to GI progress in 2014), RB (to check on potential to spend monies in this area)**

### 3. Sports hub/Decathlon issue

Discussed the activities in the Stevenson Way corridor and the recent approach by Decathlon (French sports retailer) to operate from this area. Agreed that it was difficult from a GB policy and limited land/access perspective but nevertheless would remain open minded to what Decathlon may submit to both WBC and HBC site allocations documents, and work together on this as required in 2014.

**Action: PB/RB**

#### 4. Retail at Frogmore House site

SFM outlined the discussions taking place with potential retail operators including Waitrose, another budget supermarket operator and for residential development (on the part of the site not impacted by flooding issues). RB asked about traffic modelling and it was noted that the likely level/location of development had not significantly changed since Core Strategy for which transport modelling evidence was available (should be on web). TIA would also be required as part of any application. WBC view that whilst there would be traffic and retail impacts in the area, this should not be overly significant for the Bushey / HBC area given that the area was predominantly in retail use at the current time. HBC still have some concerns about the cumulative impact on Bushey village however, and WBC agreed that this would be looked at as part of the impact assessment.

#### 5. Gypsy and Traveller issues

WBC outlined their core strategy approach and the site in the site allocations document for 20 pitches. HBC outlined their approach of retaining existing sites, intensifying some sites and allowing tolerated sites. The transit site issue was discussed and this would be taken forward via discussions at HPG level.

#### 6. Croxley Rail Link

Discussed briefly progress on the delivery of this project. Car parking at Ascot Road Station will be used to encourage park & ride into Watford town centre.

#### 7. CIL / Whole Plan viability

HBC awaiting inspector's report on examination, adoption before April 2014. WBC making progress towards their Draft Charging Schedule consultation in Feb/March, and aiming for CIL charging schedule adoption by April 2015. HBC will update their existing Planning Obligations SPD in due course following CIL adoption. WBC currently considering how best to address the whole plan viability issue and will be undertaking a local plan health check shortly to help with this and other matters post having the RSS guidance available.

#### 8. SFRA

WBC outlined their work on their SFRA with AECOM in the Colne valley/Lower High Street area, a Stage 2 SFRA

#### 9. Neighbourhood planning

Interest in neighbourhood planning is improving since we last met. HBC have 2 neighbourhood plans progressing – at Radlett and in the rest of Aldenham Parish. WBC have none mainly because WBC is not parished.

#### 10. Traffic modelling

No modelling being undertaken at the current time. WBC interested in HCC response to site allocations in the context of the modelling work undertaken for the core strategy evidence base with TRDC.

#### 11. Plan making/strategic planning

HBC - Core Strategy (to 2027) adopted in January 2013 is being implemented. Site Allocations and Development Management Policies DPD (SADM) and Elstree Way Area Action Plan (EWAAP) expected to be published in February 2014. SADM – consultation draft: EWAAP – proposed submission draft. Core Strategy Review is due to start in 9-12 months. HBC explained the need for a core strategy review in 3 years' time given that they face a significant percentage increase in objectively assessed housing needs. The DCLG household projections housing needs were not considered fully compliant by their inspector.

WBC - Core Strategy (to 2031) adopted in January 2013 is being implemented. It does not specifically commit to an early review however, but WBC will still be involved in new strategic planning initiatives going forward. Local Plan Part 2 covering site allocations and DM policies is currently out to its first consultation (ending Dec 16).

Strategic influences for both WBC and HBC in 2014 will be the ongoing HCC / LSS work for the LEP economic plan and the London Plan / 2050 infrastructure plan cooperation work which will need to address the significant London growth / out-migration implications on Hertfordshire authorities. There will be a need for Hertfordshire to apply a consistent methodology and a shared understanding to potential Green Belt changes.

#### 12. Duty to Cooperate

Suggested that the DTC meeting should continue on a regular basis perhaps every 6 months with the next meeting to take place in April 2014. WBC cooperate with HBC, TRDC and SADC at the district level, generally on an individual basis, and with HCC mainly with regard to the regular regeneration and infrastructure discussions that take place on a quarterly basis at WBC, and also STIBLET at HCC. HBC cooperate with 9 districts and London boroughs which are located around their area, and with others.

**Action: PB/RB to organise**

## NOTE OF MEETING BETWEEN **THREE RIVERS** AND HERTSMERE COUNCILS

**VENUE: Council Offices, Three Rivers District Council, Rickmansworth**

**DATE: 15 January 2014, 2.30pm**

### **Those attending:**

Renato Messere (RM) - Three Rivers District Council

Mark Silverman (MS) – Hertsmere Borough Council

Richard Blackburn – Hertsmere Borough Council

### **Reason for Meeting**

- To share progress on plan-making;
- To explore matters of common concern;
- To identify actual or potential strategic planning issues; and generally
- To fulfil each council's obligations under the 'Duty to Co-operate'(DTC) introduced by the Localism Act 2011 and expanded upon in the National Planning Policy Framework

### **Local Plan Progress**

**(g) Hertsmere (H):** Core Strategy (to 2027) adopted in January 2013 is being implemented. Site Allocations and Development Management Policies DPD (SADM) and Elstree Way Area Action Plan (EWAAP) expected to be published in February 2014. SADM – consultation draft: EWAAP – proposed submission draft. Core Strategy Review is due to start in 9-12 months. CIL charging schedule had been supported by Inspector (letter December 2013) with modifications. Likely to be adopted in the summer and brought into operation a few months after that.

**(h) Three Rivers (TR):** Core Strategy (to 2026) and Development Management DPDs adopted. Site Allocations DPD went to Examination in October. Sites considered in a similar level of detail to former local plan inquiries. Inspector's letter with recommendations received. Modifications to be published. Likely adoption in summer 2014. Regeneration of South Oxhey Centre (3-400 homes, supermarket, etc) is a key proposal. Gypsies and Travellers DPD being progressed separately – see below. TR expects to review the LDF in 3-5 years, replacing it with a local plan. CIL charging schedule had been out to consultation, but was currently on hold.

### **Co-operation**

TR had held DTC meetings with Harrow, Hillingdon and South Bucks. There had also been a meeting with Watford and Hertsmere in September 2012.

H were currently arranging to meet all adjoining authorities and HCC Minerals and Waste (had met Welwyn-Hatfield and Watford to date).

The Herts Planning Group is a forum for discussion and potential co-operation. It was agreed we need to be smarter i.e.:

- what should be considered at county level (e.g. household forecasts, especially the assumptions lying behind them)

- what should be considered in a south west Herts group – a new Strategic Housing Market Assessment would be logical. It was agreed to consider the potential for joint working on this later in the year. Dacorum was also a potential partner
- how to work with London – the Greater London Plan Alterations were out in January.

### **Gypsies and Travellers**

TR's DPD – difficult progress – site consulted upon has been rejected. Council likely to propose temporary pitches becoming permanent. No existing transit pitches or plots for travelling showpeople, but no need for either picked up in the G&TA by consultants, ORS. Expecting to reconult on DPD in the spring with Publication DPD expected in the summer.

H has commissioned an assessment of future needs from ORS – first draft received. MS considered it needed a lot more work. SADM includes pitch provision for the next 5 years or so – via regularisation of unauthorised pitches and addition to existing site.

It was accepted that there are common issues to consider, including:

- Political understanding and support for provision (perhaps through an LGA seminar); and
- Transit provision (e.g. spare capacity on a site)

### **Strategic Issues**

- **Level of growth (TR generation/H generation)**

While current Core Strategies were being implemented through Site Allocations documents, this was an issue for both authorities longer term: i.e. H in the review of the Core Strategy and TR when preparing a new local plan. Objectively assessed housing needs (DCLG household projections) would be higher than past housing provision rates.

RM said that employment land and space would need to be looked at again. MS referred to high (exaggerated) estimates in H.

Locally both authorities may need to address the growth of Watford

- **London Growth**

Need to work together with other Herts authorities to address migration out of London and GLA view that London cannot meet its own needs.

- **Green Belt**

Need to apply consistent methodology and shared understanding to Green Belt change. Will need to look at the Dacorum/St Albans/Welwyn-Hatfield study.

- **Infrastructure**

1. Capacity of Maple Lodge Sewage Treatment Works could be an issue, though there is potential land available for it to be expanded.
2. Croxley Rail Link is due to be implemented soon – its effect will have to be assessed in due course.

3. Within TR sites had been identified for future primary (Mill End/Abbots Langley) and secondary (Mill End) schools. Cemetery capacity was an issue – may need to expand Carpenders Park.
4. M25 could be an issue, if further growth in the vicinity

**It was agreed to meet again later in the year to consider joint issues further and the possibility of joint working on a SHMA and/or other matters.**

## **DUTY TO COOPERATE MEETING BETWEEN WATFORD AND HERTSMERE**

**8<sup>th</sup> May 2014, Town Hall Watford (2.30pm)**

Present: Richard Blackburn (HBC), Philip Bylo (WBC), Sian Finney-Macdonald (WBC), Catriona Ramsay (WBC)

### **Reason for Meeting**

- To share progress on plan-making;
- To explore matters of common concern, reviewing the note of the meeting held in December 2013;
- To discuss strategic planning issues; and generally
- To fulfil each council's obligations under the 'Duty to Co-operate' introduced by the Localism Act 2011 and expanded upon in the National Planning Policy Framework

### **Strategic Growth issues/SHMA**

Strategic Planning – London Authorities generally have capacity for 42,000pa as set out in the London Plan Alterations document. However, this falls short of needs, which has increased to 49,000 pa. Barnet may object to the London Plan Alterations, i.e. to their share of the 42,000 pa housing target: the other 2 neighbouring authorities Enfield and Harrow appear fine with this target.

The main source of HBC residential site allocations are Green Belt (but not for the Site Allocations document (SADM)), PDL and urban redevelopment opportunities. HBC target is about halfway to an objectively assessed needs (OAN) target.

The key issue is therefore how to deal with the shift from the current Core Strategy targets to OAN targets.

Need to work together on OAN for housing and look to see how this is done across the county. Ensure appropriate coverage on HPG and HIPP agendas.

Need to start discussions on joint SHMA with 3 Rivers and possibly Dacorum

### **Site Allocations/Green Belt and Cemetery**

Internal minor Green Belt (GB) review currently being undertaken by WBC for their Site Allocations document – this can be shared with Hertsmere when completed.

A joint GB review was discussed: if a study is commissioned it is likely to cover 3 Rivers and Hertsmere and contiguous areas around Watford.

Cemetery at Paddock Road - Paul Rabbits is leading from WBC; this issue will be taken to WBC Leadership Team in a couple of months. More information is required as to what the scheme will entail. What is a Green Cemetery, does this include burials? Access is not adequate for a traditional burial-type cemetery. HBC will provide feedback to WBC as soon as it is available.

There is a general cemetery capacity issue affecting Watford, aside from the Paddock Road site.

### **Strategic Sports Sites**

Corporate project on sports review is being taken forward at WBC managed by Paul Rabbits. Sports policies are currently being reviewed within WBC LP 2 (the second part of the Local Plan intended to comprise site allocations and development management policies). Generally the NPPF GB policy has become more stringent as a result of recent case law. This affects the level of built development that may be acceptable in the GB.

Decathlon is exploring an area in the Colne Valley for their type of facility (i.e. sports use with a retail component). Buy in from the top management is what Decathlon requires to progress. Discussion on the areas available for this site took place. Potentially could investigate the site at the edge of the employment estate on Radlett Road (for the retail component). This would be included as an issue in the WBC sports strategy work. HBC wish to be involved – HBC will check comments on the recent SADM consultation

HBC was exploring the use of s106 monies in the Colne Valley. WBC will advise of any key proposals which may be relevant and feed this into discussions.

### **Frogmore House Site**

Contact in Hertsmere is Mark Silverman - consult with HBC at the appropriate time. Current proposals are for a mixed retail / residential scheme.

### **Rail Issues**

Croxley Rail Link (CRL) still going ahead. Capacity issues at Watford Junction (WJ) from CRL. The feasibility study for CRL showed that 1,380,000 car trips p.a. (3,750 per day) will be removed from the road as a result of the CRL. Andrew Gibson is main contact for CRL feasibility work.

Study and capacity work at WJ is ongoing and impact of HS2 at Euston will have a knock on effect on commuter trains.

Network Rail will be having a workshop shortly on access improvement options at the WJ station – invite HBC.

### **DTC meetings**

HBC has met with all HBC neighbouring boroughs.

WBC provided Richard Blackburn a copy of WBC/TRDC DTC minutes from Feb 14 at the meeting.

Copy of Economic Development Strategy (and project brief) to be sent to Hertsmere as this may have some impact on HBC. HBC queried whether the Economic Dev Study could consider the effect of a higher level of housing.

It was agreed to set up a meeting with TRDC to discuss broader issues.

### **CIL update from HBC**

HBC had a new officer for CIL - James Renwick. There was no advance since the Inspectors Report, other than setting up a project board.

WBC is at the examination stage now, with a hearing scheduled on July 15. Philip Staddon is the Inspector appointed.

**Next meeting**

10am Thursday November 13<sup>th</sup> at HBC.

**MEETING BETWEEN DACORUM, HERTSMERE, THREE RIVERS AND WATFORD COUNCILS TO DISCUSS STRATEGIC PLANNING AND GROWTH ISSUES AFFECTING SOUTH AND WEST HERTFORDSHIRE**

**THURSDAY, 10 JULY 2014 at CIVIC CENTRE, BOREHAMWOOD**

**MINUTES**

**Attending**

**Dacorum BC:** Laura Wood (LW), John Chapman (JC) (Planning); Sarah Pickering (SP) (Housing)

**Hertsmere BC:** Mark Silverman (MS), Richard Blackburn (RB), Ann Darnell (AD) (Planning)

**Three Rivers BC:** Claire May (CM), David Holmes (DH) (Planning)

**Watford BC:** Catriona Ramsay (CR) (Planning), Rachel Dawson (RD) (Housing)

**Welwyn-Hatfield BC:** Carol Hyland (CH) (Planning)

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| <p><b>1. Overview of Strategic Issues</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                   |
| <p><b>Objectively Assessed Needs</b><br/> <b>Dacorum:</b> Core Strategy adopted. Target 430pa to 2031 – around 11000 total (lower than objectively assessed need (OAN) of around 540 pa). Partial review to include housing numbers and Green Belt Review to be in place by 2017/18. Will look to 2031 or 2036. Technical work has started; aim for Issues and Options end 2015. Expect to be asked to make contribution to meeting needs of Aylesbury Vale and Chiltern.<br/> <b>Three Rivers:</b> Core Strategy adopted. Review by 2020 (probably to 2036). Not reviewed OANs but likely to be some way off target.<br/> <b>Watford:</b> Core Strategy adopted. Target 260pa 2031 - total 6500 units 2006 to 2031. OAN likely to be around 400pa.<br/> <b>Hertsmere:</b> Core Strategy adopted (Target 266 pa). Currently working on Site Allocations to implement adopted Core Strategy. Partial review of Core Strategy to start within 6-9 months. OAN could be up to double the current housing target.</p> |                   |
| <p><b>LEP's Strategic Economic Plan</b><br/> LEP are apparently not yet confident with district level jobs and housing targets in SEP being used in SHMAs. More work is being carried out. Likely that countywide jobs target is aspirational until district level methodology resolved. There are no District level jobs targets. LEP role has been raised at HIPP/HPG.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                   |
| <p><b>The London dimension</b><br/> Further Alterations to London Plan (FALP): noted that GLA rep attending next HPG meeting. Hertsmere have reserved a place at EIP but all agreed that there should be a broader representation from Hertfordshire (perhaps through Paul Donovan or Des Welton). This has been raised at HPG Development Plans. RB has made a further approach to Paul Donovan suggesting this would be appropriate.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p><b>RB</b></p>  |
| <p><b>Reconciling acceptable growth with the duty to cooperate</b><br/> Agreed that the SW Herts grouping of authorities forms a logical Housing Market Area and it is therefore sensible to undertake joint technical work / agree methodologies. Other relevant authorities who were not in the grouping should also be involved as appropriate – eg Welwyn Hatfield. SADC also should be invited to participate.<br/><br/> Bucks may provide useful example of authorities getting high level agreement to principles, enabling individual authorities to then undertake technical work.</p>                                                                                                                                                                                                                                                                                                                                                                                                                   | <p><b>ALL</b></p> |

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| <p><b>2. Population Forecasts</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |
| <p><b>Welwyn-Hatfield experience</b><br/> CH advised that Welwyn Hatfield have been pleased with the population modelling work done by Edge Analytics and the way in which the company works.<br/> By commissioning studies later this year SW Herts authorities will be in an excellent position to benefit from the most up to date set of stats – headship rates (updated CLG household projections), SNPP 2012 and 2011 Census. Need to be aware that this could lead to a surge in commissioning requests so start process early.</p> <p>Cost – less than £10k. Edge charge a minimum set up cost, then an additional fee for reports. Need to choose what scenarios to commission. W-H included natural change, migration – 5 and 10 year led, EEFM base, lost decade, and 2 local economy scenarios.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| <p><b>3. Strategic Housing Market Assessment</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |
| <p><b>Welwyn-Hatfield experience/advice</b><br/> CH advised that their SHMA was being undertaken by Turleys (very pleased with their work, confident that they would present a robust case at EIP if called on). Should be completed in around two weeks’ time. The work would have taken 7 months to complete if hadn’t been re-commissioned in order to take SNPP2012 into account (ONS figs over-estimated W-H population figures). Ball park cost figures: Main SHMA £20k, supplementary report to explain the implications of not meeting OAN £5k, spatial report £5k.</p> <p>In their experience cheapest was not necessarily best: important to include a ‘quality bar’ in the selection process so that companies failing on quality would not reach the point of being assessed on cost.</p> <p>Inputs to SHMA = population modelling and economic studies. Economic work should be started slightly in advance of the SHMA. Sensible to run tendering processes concurrently in case the same consultant can do everything (although there may be resource / business continuity issues with this).</p> <p>SHMA includes an analysis of housing needs.</p> <p>Keeping to time – a key issue is data exchange. Important to get clear idea of inputs required from within the LA (data list) and ensure departments and any other relevant organisations are given adequate notice and kept on target with providing information. A project management timetable should be agreed with the consultant, and penalties for missed deadlines specified. A payment schedule with stage payments tied to the achievement of outputs deemed ‘acceptable’ by the client should be agreed at the start.</p> |  |
| <p><b>Luton/Central Beds experience</b><br/> ORS undertook their SHMA. Steering group was set up – worked well. Included adjoining and nearby districts (Dacorum, St Albans, North Herts, Stevenage, Aylesbury Vale, Milton Keynes, Bedford).</p> <p>OAN was calculated based on household projections and was then increased by over</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |

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| <p>2000 to reflect market signals in the light of guidance in the NPPG. However the NPPG does not provide any guidance on how to quantify the extent that OAN should be increased because of market signals. This will be an issue for the South and West Herts SHMA.</p> <p>Tight boundaries around Luton means it is unable to meet own needs (12000 dwellings shortfall 2011-2031). Memo of Understanding with all the authorities on the Steering Group: states that authorities will work together to identify sustainable solutions to addressing this unmet need within the Luton Housing Market Area. If Luton's unmet need cannot be delivered within the Luton HMA then the authorities will work together to identify other locations outside the Luton HMA.</p>                                                                          |                                                                   |
| <p><b>How to approach a SHMA in south/west Herts</b></p> <p>LW agreed that Dacorum would coordinate tendering for population/SHMA contract(s). CR agreed to ask if Watford would be prepared to do the same for the Economic work. <i>(Post meeting note: CR said Watford were unable to take this on at present, due to staff shortage).</i></p> <p>CH agreed to share W-H's project brief, which includes scoring (could be simplified perhaps) and list of potential consultants in order to help with this process. She will also source the brief for the W-H Economic Study and share that.</p> <p>Future meeting(s) will need to identify project leaders, how other authorities are to be involved, practical issues of working together, Steering Group arrangements, project brief, getting approval to finance and how to commission.</p> | <p><b>LW</b><br/><b>CR</b></p> <p><b>CH</b></p> <p><b>ALL</b></p> |
| <p><b>4. Green Belt Review</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                   |
| <p>Dacorum/St Albans and Welwyn-Hatfield have already completed Stage 1 Green Belt reviews, using consultants SKM. It was agreed that employing consultants has benefits as they are independent – this is especially important for Stage 1. The methodology was generally accepted but it was acknowledged that choice of consultant was critical. Stage 1 and 2 don't necessarily have to be done by the same people. Local knowledge is useful, especially for Stage 2.</p> <p>Hertsmere, Three Rivers and Watford agreed to undertake joint working on a Green Belt review, most likely in 2015. LW agreed to provide the Dacorum/St Albans project brief. It was agreed that a brainstorming session would be useful.</p>                                                                                                                       | <p><b>HBC/WBC</b><br/><b>/3Rivers</b><br/><b>LW</b></p>           |
| <p><b>5. Economic Issues</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                   |
| <p>CH said that the East of England Forecasting Model (EEFM) was good at regional level but less so at local level. W-H had used Experian to produce more detailed local forecasts, including defining a Functional Economic Market Area (FEMA). The economic study should be aligned with (and started before) the SHMA, as it should inform the SHMA.</p> <p>It was agreed that it would be advantageous for the four authorities to jointly commission a high level employment study, similar to the Hertfordshire London Arc Study carried out by Roger Tym &amp; Partners in 2009. Authorities might also wish to commission more detailed work separately. The possibility of inviting St Albans to join in with the high level study was discussed (see item 7 below).</p>                                                                    | <p><b>HBC/WBC</b><br/><b>/3Rivers/DBC</b></p>                     |

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| <p><b>6. Gypsies and Travellers</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                              |
| <p><b>Three Rivers:</b> based on advice from Catriona Riddell (POS Enterprises – DTC advice re G+T) CM is mapping unauthorised G+T pitches (for last 10 years) and will circulate for checking with a view to it informing possible future joint working. Catriona’s report to be circulated.</p> <p><b>Hertsmere:</b> just received second draft of ORS Accommodation Needs report</p> <p>General approach seems to be that each LA aims to meet its own needs for pitches. With regard to transit provision, the view is that rather than any more transit sites being required, the need is actually for space on existing pitches / sites for visitors to stay temporarily.</p> <p>Agreed that the HCC transit site at South Mimms may not be being used appropriately and that a formal request to look at the management of the site be made. It was however acknowledged that part of the issue may relate to lack of permanent pitches to which families could move. Other questions related to G+T provision were also raised, including the implications of an email from HCC to Three Rivers saying that the County would not make any new provision. It was unclear whether this related just to new sites or to extensions to existing sites as well. CM to forward the email to Mark Silverman. LW agreed to draft a formal request to HCC requesting clarification on these and any other related issues on behalf of the SW Herts authorities. Welwyn Hatfield and Stevenage have also recently discussed the need to contact HCC in a similar vein. Both WHBC and SBC would welcome the opportunity to be a joint signatory to any such letter from the SW Herts authorities on this strategic matter.</p> | <p><b>CM</b><br/><b>ALL</b><br/><b>CM</b></p> <p><b>CM</b><br/><b>LW</b></p> |
| <p><b>7. Next Meeting</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                              |
| <p>Weds 13 August 10am at Dacorum to brainstorm content of SHMA and Economic Study contracts. Housing reps may wish to attend. LW to confirm details.</p> <p>Need to consider whether to invite SADC. Would be appropriate if they wish to jointly commission an Economic Study (<i>Post meeting note: or replace their SHMA</i>). All to agree whether LW should invite SADC by email</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p><b>ALL</b><br/><b>LW</b></p> <p><b>LW/EB/CM/CR</b></p>                    |

## DUTY TO COOPERATE MEETING BETWEEN **THREE RIVERS**, HERTSMERE AND **WATFORD** COUNCILS

held in two parts:

- a) 10am -11.45am on Thursday 13<sup>th</sup> November 2014 in Hemel Hempstead (at Dacorum Council Offices)
- b) 12.45pm – 13.30pm on 5 December 2014 in Borehamwood at Hertsmere BC offices

### Present

- Part a) - Richard Blackburn (RB) - Hertsmere  
Sarah Barker (SB) - Hertsmere  
Catriona Ramsay (CR) – Watford  
Claire May (CM) – Three Rivers
- Part b) - Richard Blackburn (RB) - Hertsmere  
Sarah Barker (SB) - Hertsmere  
Catriona Ramsay (CR) – Watford  
David Holmes (DH) – Three Rivers

### Agenda

1. **Welcome**
2. **Any relevant matters re our Local Plan Studies**
3. **External studies – progress and issues, in particular St Albans SHMA**
4. **Gypsies and Travellers – sites and progress updates.**
5. **CIL update/issues**
6. **Projects update**
  - **Watford: CRL, Watford Junction, Health Campus, town centre**
  - **Three Rivers: South Oxhey**
  - **Hertsmere: Paddock road/Cemetery provision**
7. **Schools planning issues/ adult care**
8. **Any other business**

### Key points to note and Actions

1. **Welcome**
  -
2. **Any relevant matters re our Local Plan Studies**
  - **TRDC Site Allocations** – additional hearing day in July re modifications: adopted 25 November 2014.
  - **WBC Site Allocations merged with Development Management Policies** – publish 15 December 2014
  - **HBC Site Allocations and Development Management Policies** – to be published in Spring 2015
3. **External studies – progress and issues, in particular St Albans SHMA**
  - WBC and TRDC could merge their Local Plan Working Parties

- Chiltern Local Plan suspended – DPD strategy did not deliver their Core Strategy target
- CM said that Harrow and Hillingdon can meet their housing number (in the Further Alterations to the London Plan). RB thought Enfield could also meet theirs. Barnet?
- Progress on commissioning of joint SHMA and Economy Study referred to. Officers were unsure whether Oxford Econometrics EEFM model was finalised (to be aware of in future consultant interviews). Authorities should brief their members as to the purpose of the studies and their limitations.
- St Albans – all agreed there had been no consultation on their housing/employment evidence base (with us). Has not checked a higher level of housing, i.e. to consider whether it would not be deliverable. **SB to speak to a colleague in SADC.**

#### 4. Gypsies and Travellers – sites and progress updates.

- **TRDC** – consultation on revised G&T DPD closes on 14 November 2014. No new sites. Existing sites will be removed from the Green Belt. Issued clear policy statement not accepting racist comments. Monitoring indicators in AMR. CM commented on research findings -travellers use A road network; St Albans has the highest number of unauthorised encampments (2014). **SB to provide CM with GIS shape files of sites in HBC.**

#### 5. CIL update/issues

- TRDC CIL Examination – 1 December 2015
- TRDC moving to CIVICA management tool.
- WBC and TRDC consider receipts will be a lot less than hitherto for planning obligations
- HBC – CIL charging operational from 1 December 2014.

#### 6. Projects

##### Watford

- Watford Junction – Site Allocations DPD identifies a special policy area: developers to prepare a master plan
- Health campus – master plan may be redone to allocate a school or housing on the allotments. **CR to advise on the future of the hospital.**
- Redevelopment of Charter Place due to start in summer 2015 – **CR to advise further about the proposals.**
- Site Allocations DPD being combined with Development Management Policies DPD – consultation document to be published on 15 December 2014 for 6 weeks. Proposes a green cemetery – preferred options are an extension of North Watford cemetery or land off Hempstead Road (by A41). Nursery off Paddock Road is the third choice option
- Frogmore House/gas holder site: progress slow, issues of viability and effect on listed building
- Article 4 Direction proposed on Clarendon Road to control loss of offices to residential

##### Three Rivers

- South Oxhey – planning application expected for 360-480 net additional dwellings. To be provided by 2021/22.
- Site Allocations DPD adopted – 25 November 2014
- CIL Examination finished on 1 December 2014
- Small delay in progress on Croxley Rail Link noted

Paddock Road Nursery (in Hertsmere owned by Watford Council)

- CR said that there were 3 options for a green cemetery - off Hempstead Road nr A41, an extension of North Watford cemetery and at Paddock road (the least preferred). RB advised this site should be removed from Watford's plan. **CR will advise further on Watford's position (planning and cemetery provision).**

## 7. Schools

Three Rivers have allocated three sites

- Mill End: primary and 4 form entry secondary (free) school, to be provided by 2016/17
- Croxley Green (Baldwins Lane): secondary school, to be provided by 2016/17
- Woodside Road, Abbots Langley, to be provided by 2017/18

All school reserve sites are delineated on the Policies Map. The built areas are excluded from the Green Belt sites. Same approach is taken to Gypsy sites.

Watford's school needs

- 2 FE primary school is opening at Ascot Road
- Probably at Junction Station (2FE)
- Lanchester House (1FE)
- Cardiff Road allotments/Health Campus

Hertsmere

- 2FE primary school needed in Borehamwood. Site reserved in Elstree Way Corridor Area Action Plan.

## 8. Any Other Business

None

[Post meeting note from CR Watford– July 2015:

- **Watford Health Campus Update:**  
*September 2014: Planning approval achieved for hybrid planning application – subject to S106 agreement. 681 homes (mix of houses and flats: 35% affordable)  
January 2015: S106 agreement signed.  
A separate outline application for the Farm Terrace allotment area for 69 houses has been submitted and will be considered by WBC DC committee at a future date.*
- **Charter Place Update:**  
*Application approved, CPO completed. Work to start in Autumn this year with completion Spring 2018.*
- **Cemetery Sites Update :**  
*Hempstead Road site is in a water protection zone – in SPZ1- so now excluded.  
North Watford - concerns about effect on groundwater being investigated: still an option but could be ruled out.  
Paddock Road, Oxhey - this may become the preferred (perhaps only) option for a cemetery site. There might be a right of way into the allotment land/potential cemetery site from Elm Avenue. Further work is awaited by Lands and Parks team at Watford as to the requirements for allotment land.]*

## **WELWYN-HATFIELD**

### **NOTE OF MEETING BETWEEN **WELWYN-HATFIELD** AND HERTSMERE COUNCILS**

**VENUE: Council Offices, Welwyn-Hatfield District Council, Welwyn Garden City**

**DATE: 21 November 2013, 2pm**

#### **Those attending:**

SueTiley (ST) - Welwyn-Hatfield District Council

Carol Hyland (CH) - Welwyn-Hatfield District Council

Bryce Tudball (BT) – Hertsmere Borough Council

Richard Blackburn (RB) – Hertsmere Borough Council

#### **Reason for Meeting**

- To share progress on plan-making;
- To explore matters of common concern;
- To identify actual or potential strategic planning issues; and generally
- To fulfil each council's obligations under the 'Duty to Co-operate' introduced by the Localism Act 2011 and expanded upon in the National Planning Policy Framework

#### **Local Plan Progress**

- (i) **Hertsmere (H):** Core Strategy (to 2027) adopted in January 2013 is being implemented. Site Allocations and Development Management Policies DPD (SADM) and Elstree Way Area Action Plan (EWAAP) expected to be published in February 2014. SADM – consultation draft: EWAAP – proposed submission draft. Core Strategy Review is due to start in 9-12 months.
- (j) **Welwyn-Hatfield (W-H):** Evidence base (to 2030) progressing well. Strategic Housing Market Assessment, Green Belt Review, Economic Study and transport modelling are all due for completion within next 2 months or so. ST/CH question the robustness of the ONS household projections for W-H (concern that international in-migration has been exaggerated, because of unattributable population change being allocated to W\_H in previous ONS mid-year estimates). Consultation on proposed submission draft of Core Strategy is expected in Autumn 2014 (with submission in 2015). A separate SADM will follow later. The option of preparing a Local Plan instead of 2 DPDs is still available (and has not been ruled out yet). W-H in process of commissioning consultants to undertake CIL viability work.

#### **Gypsies and Travellers**

W-H wishes to ensure that H (and other authorities) cover the issue of provision for Gypsies properly. Review of W-H evidence by POS has suggested the need for a county-wide overview to ensure there are no inconsistencies (e.g. to avoid double-counting of pitch demand). ST agreed to raise this at HPG Devt Plans meeting

This may affect H's SADM. ST/CH have concerns about the methodology used by consultants, ORS, in Dacorum, Three Rivers and Central Beds.

H has commissioned an assessment of future needs from ORS – due for completion in December 2013. BT passed on a technical note about the growth of Gypsy households.

It was agreed to co-operate as far as possible to secure a better understanding and an accepted evidence base across districts and the county. Key matters to resolve in this wider context were:

- Better use of HCC data (e.g. where people on the waiting list currently 'reside');
- Sharing the data we already have;
- How to achieve public provision (especially through a registered provider like Affinity Sutton);
- Political understanding and support for provision (perhaps through HIPP agreeing to host an LGA seminar); and
- Transit provision (e.g. spare capacity on a site)

### **Strategic Issues**

**It was agreed to maintain a standing agenda of issues affecting the W-H Core Strategy and H Core Strategy Review for the time being.**

- **Level of growth (W-H generation)**

1. Housing development needs could substantially increase over that indicated in the Emerging Core Strategy (380 pa)
2. No decisions on scale or location of growth.
3. However be aware there could be:
  - a. The option of some growth at villages – Little Heath (Potters Bar) and Brookmans Park (in the Potters Bar secondary school catchment area)
  - b. Potential increase in student accommodation at the Royal Veterinary College
  - c. Potential for formal request to accommodate additional housing in Hertsmere.

- **Level of Growth (H generation)**

H may face a similar percentage increase in objectively assessed housing needs (DCLG household projections).

- **London Growth**

Need to work together with other Herts authorities to address migration out of London and GLA view that London cannot meet its own needs.

- **Green Belt**

Need to apply consistent methodology and shared understanding to Green Belt change.

- **Private Aerodromes**

Panshanger, Elstree and North Weald. Sport England and Light Aircraft Association object to loss of regionally important sports facilities (for flying) due to proposed loss of Panshanger to housing development. May affect Elstree. May also mean that W-H need to find an alternative housing site.

- **Infrastructure**

5. Capacity of Sewage Treatment Works could be an issue if Hertfordshire's housing level substantially increased. Would have to go back to Thames Water.
6. A1(M) corridor. W-H modelling traffic on routes and junctions of primary network. Problems along A1(M) particularly at Junctions 3 and 4.
7. M25 could be an issue, if further growth in the vicinity

**Future Meetings**

**Agreed to meet in late January/February 2014 when various studies and H's SADM are published.**

## NOTE OF MEETING BETWEEN **WELWYN-HATFIELD** AND HERTSMERE COUNCIL

**VENUE:** Civic Centre, Hertsmere Council Offices, Borehamwood

**DATE:** 21 May 2014, 2pm

### Attendance

Sue Tiley (ST) - Welwyn-Hatfield District Council (W-H)

Carol Hyland (CH) - Welwyn-Hatfield District Council

Richard Blackburn (RB) – Hertsmere Borough Council (H)

Ann Darnell (AD) - Hertsmere Borough Council

### Reason for Meeting

- To share progress on plan-making, explore matters of common concern and address strategic planning issues (having regard to our obligations under the 'Duty to Co-operate' introduced by the Localism Act 2011); and more specifically
- To address issues raised by Welwyn-Hatfield Council in response to SADM (Consultation Draft)

### Minutes of Meeting 21 November 2013

Agreed subject to the following changes/additions:

#### **Local Plan Progress (b) W-H**

**line 3:** delete *publication*, replace with *completion*.

**line 5:** after *exaggerated* add *because of unattributable population change being allocated to W-H in previous ONS mid-year figures*.

**last line:** delete *ST/CH* and replace with *W-H*

#### **Gypsies & Travellers**

**Para 1 line 2:** after *properly*. add *The review of our evidence carried out by POS has suggested the need for a county wide overview to ensure there are no inconsistencies eg to avoid double counting of demand. ST agreed to raise this at HPG Development Plans meeting.*

#### **Strategic Issues - Level of Growth (W-H)**

**Bullet 1:** delete *nearly double* and replace with *substantially increase over*. Delete *up to 700+* and replace with *per annum*

**Bullet 3:** delete *expect* and replace with *be aware there could be*

**Bullet 3b:** insert *student* before *accommodation*

#### **Strategic Issues – Green Belt**

Title: delete **Green Belt** and replace with **Private Aerodromes**

#### **Strategic Issues – Infrastructure**

**Bullet 1:** delete *W-H* and replace with *Hertfordshire's*, delete *doubled* and replace with *substantially increased*.

### Matters Arising

H agreed to forward ORS technical note re G&T household growth and why it is not appropriate to apply a 3% compound household increase rate to CH.

### Local Planning Progress

**(k) Hertsmere (H):**

***Staffing***

Wholesale change of staff: team now up to full complement, with new shared Conservation Officer. Staff working on LDF: Mark Silverman (Team Leader), Richard Blackburn (Deputy Team Leader Tues-Thurs), plus three newly appointed team members James Renwick (Senior Planning Officer, Elstree Way Action Area Plan and CIL), Grace Jarvis and Ann Darnell (both Planning Officers).

***Development Plan***

Core Strategy (to 2027) adopted in January 2013 is being implemented. Review due to start in 9-12 months.

Elstree Way Area Action Plan (EWAAP) published in February 2014. Main thrust = regeneration through residential development (comprising roughly 25% of CS housing target). Other uses also proposed. Examination targeted for October 2014. Possible need for additional consultation but may be able to handle through Examination process.

Site Allocations and Development Management Policies DPD (SADM) consultation draft published in March 2014, currently processing responses.

***Evidence Base***

Core Strategy review – RB talking to Three Rivers and Watford re Strategic Issues/SHMA. W-H indicated that their experience of commissioning Turleys had been very positive and they had been impressed with the way in which they work and the quality of output. W-H accepted RB's invitation for CH to join the first meeting to share experience of the SHMA - 10 July at Hertsmere. Of particular interest would be experience of assessing bids and selecting consultants, briefing consultants (in particular identifying scenarios) and identifying useful outputs from the study.

ST advised that H might want to engage with Barnet re SHMA.

***Other Guidance***

Parking SPD reviewed and awaiting adoption. H to advise W-H if parking space sizes have been increased and whether there have been any appeals on the new guidelines.

Review of Affordable Housing imminent. Noted that Three Dragons Development Economics Study may inform re formula for commuted sum. Experience of and local approaches to requirements for Affordable Housing (housing site thresholds and percentage affordable provision) were shared.

CIL likely to be adopted in September 2014.

**(l) Welwyn-Hatfield (W-H):**

***Staffing***

New Head of Planning Colin Haigh and Director Trevor Saunders starting in June. Monitoring Officer Rob Webster started last month. Shared Conservation Officer.

***Development Plan***

Currently working on Local Plan: this would amalgamate the emerging Core Strategy with sites work. Consultation on preferred options for sites should take place in November 2014. Proposed submission of the Local Plan is programmed for autumn 2015.

### ***Evidence Base***

Green Belt Review – Both local authorities (LAs) agreed that the methodology adopted by the consultants had been broadly appropriate, but there were some shortcomings with consistency and clarity in its execution and the quality of the output.

Economic Study – This assesses functional economic market areas. The market area covering W-H extends into Hertsmere and largely coincides with travel to work areas. The study is close to completion.

Transport Modelling – work is on-going and will be for some time yet. Highway Authority meeting with W-H and Stevenage/Hitchin reps. One A1M scenario modelled has been a “max out” one, examining the impact of developing all possible sites and possible mitigation measures.

Minerals - W-H has had a useful session with HCC in which the County gave comments on every site. There is a timing issue re housing development on Hatfield Aerodrome: this is a preferred minerals site, but extraction has not yet started.

### ***Supplementary Guidance***

WGC and Town Centre North SPD has recently been out to consultation. Officers are currently reviewing responses.

Parking and Design SPDs will follow on from the Local Plan.

### **Issues arising from Hertsmere’s SADM (ref W-H’s comments submitted to consultation)**

**Housing: windfall and safeguarding** - It was noted that whilst the evidence on windfall figures was no longer on the H website it could be provided. With regard to the deliverability of safeguarded sites, RB confirmed that there were no particular issues; an objection from the owner of a safeguarded site was to it being safeguarded instead of being allocated for development now.

RB acknowledged that the evidence base for the Core Strategy largely pre-dates the NPPF/NPPG and would be reviewed. Once an adopted SADM document delivering the current Core Strategy is in place this review can be taken forward in earnest. It may well be appropriate to develop a Local Plan, incorporating review of CS and any resultant changes to SADM and EWAAP sites and boundaries. RB thought it unlikely that there would be significant change to DM policies from those contained within the adopted CS and (once adopted) SADM.

It was agreed that a county-wide mechanism for defining broad locations for longer term growth, within which the Districts/Boroughs could then work, was required.

RB also indicated he has already met with all adjoining authorities at least once to discuss strategic issues.

**Travellers** - H confirmed that the sites allocated in SADM consultation draft have not been included in current supply figures and therefore do count as new provision. W-H would like to see evidence

for H's statement that identified needs to 2017/18 are being met, in the form of a table showing 2011, 2013 and future supply figures in order to justify not sustaining an objection. H agreed to provide clarification.

It was agreed that an overview of the need for new provision, especially of transit pitches, was needed in order both to ensure adequate provision and guard against double counting of demand. H is awaiting receipt of a report commissioned from ORS on G+T accommodation needs in the Borough; as part of this H has asked them to examine studies for adjoining Boroughs to reconcile figures and recommendations, and also to look at the evidence base around the need for transit provision. H's CS includes a commitment to cooperate on transit pitches. H has asked the Highway Authority whether there is a possibility of land being available at South Mimms for additional transit provision. The issue, and need for a more county-wide strategic approach has been raised at HPG Development Plans.

**Green Belt** - RB confirmed that the green belt (GB) was not reviewed as a specific issue; the proposals were limited to the main changes which had been signalled in the CS, and a few minor adjustments.

**Elstree Aerodrome**. H confirmed no reps were received from Sport England on this site. W-H will be asking Sport England why it has not been identified as a strategic sports facility (for consistency with approach taken in relation to Panshanger).

#### **How to address the strategic issues**

**Travellers**- Have agreed that this is a strategic issue (see above) and that there is a need to ensure evidence base methodology is consistent across the wider area. Where methodologies are not consistent, a means of resolving issues will need to be agreed. H will share results of the ORS study with W-H once their report has been received and checked for accuracy. CH provided a copy of HCC's monitoring information for numbers of households on the HCC transfer and waiting list (with HCC's permission).

**Green Belt Review** - It was agreed that H would liaise with W-H on methodology when the review is undertaken.

**The (Green Belt) gap between Potters Bar and Hatfield** - W-H is looking at sites possibly coming forward for housing – through SHLAA and also various smaller sites – which depending on what combination of sites may be considered suitable for development could have a significant impact on the gap between Potters Bar (PB) and Hatfield. The question of how to maximise housing supply whilst still maintaining a gap is significant for both LAs. RB raised the issue of whether there were landscape features which would contribute to maintaining the gap and render some sites more or less appropriate for development. ST indicated that the loss of some sites would be more noticeable than others; W-H is looking at local purpose to differentiate between sites, together with loss of openness. They will also be taking sustainability into account. RB confirmed H considered the gap between the two towns to be important and would wish to be consulted on prospective changes.

**The strategic statement** - Agreed this needs to pick up issues such as individual LAs' possible inability to meet their housing requirements. Retail policy should also be included (see below).

**The SEP** - RB expressed H's lack of confidence in SEP housing numbers. ST was likewise concerned about job numbers: this is in part due to figures for the county having been generated by extrapolating Watford figures. W-H's Economic Study is close to completion and hasn't taken account of these figures as their availability post-dates its start. SQW is to review the work already undertaken and indicate a distribution across the districts but it is not clear when they will be reporting. RB indicated it would be useful to have Oxford Economics at HPG. It was recognised that LAs need to work collectively and are having to develop expertise that was originally accessed through County Planning. RB indicated that H would need to look at areas on the periphery of Potters Bar in relation to possible future needs for employment land.

**London growth (Barnet)** - It was acknowledged that the highest migration from London into H and W-H was from Barnet. RB has met representatives from Barnet, who were concerned that they were being asked to meet too great a share of London's housing requirement, for which they say they do not have capacity. ST said London Boroughs (LBs) have been told to respond to capacity issues by reviewing their green belt boundaries. H and W-H agree that London should meet its own objectively assessed needs or come to an agreement with Government as to how to disperse the growth. It was agreed that there was a need to be alert to moves from the LBs to push their housing provision outwards onto adjoining boroughs.

**Location of growth** - It was agreed that there will need to be cross-county agreement on where growth will go, although the difficulties of achieving this were acknowledged.

**Housing Sites** - W-H indicated that they were assessing possible housing sites around Potters Bar. As an example, depending on final decisions on site suitability, W-H indicated that there may be the potential for 230 additional dwellings in Little Heath. RB requested a map of possible and discarded sites to understand the full picture. H would need to assess the infrastructure implications for the PB area – including for the town centre, transport links and infrastructure.

The question of how to make provision for growth in washed over settlements was discussed; W-H do not believe that Green Belt policy allows for the definition of envelopes, whereas H have defined them in the SADM consultation draft in accordance with NPPF (para 86). W-H also asked H whether they had information / advice re the issue of Rural Exception sites potentially not being legal outside of designated protected areas (DPA). The limitation on stair-casing /removal of 'right to buy' may not be permissible (and would not meet HCA funding criteria) unless properties are located within a DPA. It would seem that in W-H at least, some rural areas are not covered. RB agreed that H would investigate, and would need to check whether the situation applied to H as well.

**Infrastructure** - W-H asked whether H has had any discussions with the Health Authority or Rail Authority. RB advised there had not been discussions with the Health Authority to date; a Rail Strategy (part of the LTP suite of documents) had been received from HCC. One issue for the boroughs was that the Mayor was suggesting that TFL (Transport for London) should take on the management of transport facilities further out from London than at present.

W-H requested a list of items on which H plan to use CIL, which H agreed to forward.

**Potters Bar area infrastructure** - H agreed to check the Infrastructure background paper to see whether there is anything of which W-H should be aware when they do their Distribution Strategy.

**Retailing** - The issue of whether the regional retail hierarchy should be agreed and set out in a strategic statement was discussed. Whilst H felt that out of centre development was perhaps more

likely to be an issue between LAs, W-H expressed their concern about competition potentially prejudicing their ability to get Hatfield town centre regeneration off the ground; the ability to object to competing proposals elsewhere depended on where relevant town centres sit in the hierarchy. H has no retail proposals that would affect W-H; it was agreed that it is not an issue where there is disagreement between the 2 LAs, but that it would be useful for it to be included at high level in the Strategic Statement.

### **Future Meeting**

It was agreed to meet again on a Wednesday or Thursday following 10 July 2014. CH to suggest a specific time and date.

**Minutes**  
**Welwyn-Hatfield Borough Council Duty to Cooperate Workshop**

**Date:** 20<sup>th</sup> October 2014

**Venue:** Council Offices, Campus East, Welwyn Garden City

**Attendees:**

**Welwyn Hatfield:** Trevor Saunders (Chair), Colin Haigh, Sue Tiley

**Broxbourne:** Doug Cooper

**Dacorum:** Laura Wood

**East Herts:** Jenny Pierce, Chris Butcher

**Hertsmere:** Richard Blackburn, Sarah Barker

**North Herts:** Ian Fullstone, Richard Kelly

**St Albans:** Chris Briggs

**Stevenage:** Nigel Smith

**Herts CC:** Jon Tiley

**Enfield:** Lauren Laviniere

Apologies: Kevin Owen (Luton)

No Response: Barnet

TS opened the meeting with introductions

Outputs of the SHMA and Economy Study

CH and ST gave a presentation on the outputs of the SHMA and the Economy Study. All the authorities invited to the session had been identified in the studies as having a housing market or functional economic market relationship with Welwyn Hatfield. Both studies set out housing and jobs numbers not only for Welwyn Hatfield but also for the market areas. Consultation with relevant authorities had taken place during the preparation of these studies. **ST asked that any final comments need to be received now - action all.**

Implications - We will need to explore what the potential supply is within the housing market and functional economic market areas and any policy implications arising from that.

Strategic Approach

HCC were asked to set out their role on strategic issues – apart from their planning role on minerals and waste matters - in terms of delivering growth this is limited to education and transport matters as they are no longer a strategic planning authority. The local plan protocol has been drawn up to set out how the Highway Authority will work with districts on transport matters.

On a Hertfordshire wide basis HIPP, rather than HCC, provides a platform to agree a joint approach particularly with regards to infrastructure matters, common statements and the mechanism for producing a spatial framework for the county.

For many authorities HIPP would not be able to address all the duty to cooperate requirements as many of them have relationships with other authorities.

#### The scope of the Spatial Framework

This was discussed at the last meeting of HIPP and is to be considered at the next HPG Development Plans meeting. It was agreed that the Framework could usefully contain an analysis of the OANs and housing market areas as well as setting out the constraints and the expectation on what will be delivered.

The LEP now has a strategic role through the SEP as they are committed to delivering a housing and jobs target and consideration needs to be given in the Spatial Framework to how, if at all these targets can be delivered.

It was also agreed that there was a need for a strategic approach to the Green Belt and that this should be raised for further consideration at the next HPG Development Plans Sub Committee.

Strategic Infrastructure also needs to be covered - A1M and A414, education and green infrastructure.

#### Other strategic Groupings

Dacorum Watford Hertsmere and Three Rives have set up the south west Herts group to take forward their evidence.

Enfield works with authorities on an individual basis dependant on the topic. The strategic context is set through the London Plan and groupings of London authorities focus on specific issues.

Consideration was given as to whether this meeting formed the basis of a useful strategic grouping. There was general agreement that it was but that it would not replace the need for HIPP or other Duty to Co-operate meetings that authorities would need to engage in.

#### Supply Issues

Welwyn Hatfield is currently going through the process of assessing the suitability of its housing sites. Not yet asking adjoining authorities to meet some of our housing need but this could be the position. The majority of the growth would need to be on the Green Belt which raises issues of coalescence as well as issues for transport infrastructure in particular the A1M.

We have sufficient employment land but prior notifications mean that this is under threat and we will be exploring whether it is all still suitable to meet future needs and if so whether we should be releasing any new land which would be more suitable

#### Next Steps

Agreed a meeting in mid January would be useful to explore in more detail supply issues to coincide with our next consultation.

## MINUTES OF **WELWYN-HATFIELD** HOUSING AND ECONOMIC MARKET AREAS DUTY TO COOPERATE MEETING

**Date:** 26<sup>th</sup> January 2015

**Venue:** Council Offices, Campus East, Welwyn Garden City

### **Attendees:**

**Welwyn Hatfield:** Colin Haigh, Sue Tiley

**Dacorum:** Laura Wood

**East Herts:** Jenny Pierce, Claire Symes

**Hertsmere:** Richard Blackburn, Mark Silverman

**North Herts:** Ian Fullstone, Louise Simes

**St Albans:** Chris Briggs

**Herts CC:** Jon Tiley

**Barnet:** Apologies

**Broxbourne:** No response

**Stevenage:** No response

**Enfield:** Apologies

**Luton:** do not consider we have shared issues

ST gave a presentation attached to these minutes during which the following matters were discussed:

#### 1. Outcome from last meeting

The outcomes were set out in the minutes which had been circulated.

Subsequent to the meeting no concerns raised regarding the outputs of the SHMA and FEMA.

#### 2. Content of Local Plan Consultation Document

ST outlined the content the consultation document and the background to the 'more favourable', 'finely balanced' and 'less favourable' categorization.

Members are minded to only bring forward the 'more favourable' sites which would mean we would not meet our objective assessment. Approximately 2,400 dwelling shortfall.

In addition there are deliverability issues associated with some sites and a requirement for further transport modeling work. With regards to this CH indicated that we were having difficulties getting the Environment Agency to comment on evidence which would help to confirm whether sites are deliverable

#### 3. Housing and Jobs Numbers in Housing Market Area and Functional Economic Market Area

ST set out WHBCs understanding of supply issues for housing and jobs numbers based on latest consultation documents.

This indicates a shortfall within the housing market area of approximately 10,000 dwellings.

With regards to jobs WH had reviewed the latest Travel to work data which did not indicate a change was needed to the FEMA boundary.

In terms of identifying jobs numbers within the FEMA this was quite difficult to do because of the way information is presented and the fact that most authorities were using EEFM data whereas Welwyn Hatfield use Experian. However EEFM does not cover the London boroughs.

The evidence from consultation documents indicate that there is a predicted shortfall of jobs in comparison to the EEFM baseline projections for those authorities outside London of approximately 19,000 jobs.

Need to understand how this relates to the LEP's aspirations set out in the SEP.

ST stated that she was aware of a number of authorities commissioning work on the identifications of FEMAs and asked to be kept informed as the evidence develops.

**ACTION: All to advise Welwyn Hatfield of any implications emerging from their work on FEMAs**

**ACTION: ALL to confirm if evidence set out in presentation on jobs and housing numbers could be checked for accuracy and to advise of any discrepancies. [ref. attached tables provided by Welwyn-Hatfield]**

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The outcomes were set out in the minutes which had been circulated.

Subsequent to the meeting no concerns raised regarding the outputs of the SHMA and FEMA.

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ST outlined the content the consultation document and the background to the 'more favourable', 'finely balanced' and 'less favourable' categorization.

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**ACTION: ALL to confirm if evidence set out in presentation on jobs and housing numbers could be checked for accuracy and to advise of any discrepancies.**

### Estimates of Supply and proposed delivery across the Welwyn Hatfield HMA

| LPA             | Target/<br><i>Emerging target</i>        | Household growth in<br>Welwyn Hatfield HMA<br>(WH SHMA, 2014) | Allocations / <i>Emerging<br/>allocations</i> within the Welwyn<br>Hatfield HMA | Period    |
|-----------------|------------------------------------------|---------------------------------------------------------------|---------------------------------------------------------------------------------|-----------|
| Broxbourne      | 5,000 (SHMA 2013)                        | 419                                                           | Unknown                                                                         | 2011-2026 |
| East Herts      | 15,000 (Draft DP 2014)                   | 3360                                                          | 2,901 (Draft DP 2014)                                                           | 2011-2031 |
| Hertsmere       | 3,990 (Core Strategy 2013)               | 2,477                                                         | 113 (Draft SADM DPD)                                                            | 2012-2027 |
| North Herts     | 14,600 (Preferred Options 2014)          | 674                                                           | 653 (Preferred Options 2014)                                                    | 2011-2031 |
| St Albans       | 9,125 (Draft Strategic LP 2014)          | 2,145                                                         | 1,000 (Draft Strategic LP 2014)                                                 | 2011-2031 |
| Barnet          | 28,000 <sup>1</sup> (Core Strategy 2012) | 4,243                                                         | Unknown                                                                         | 2011-2026 |
| Welwyn Hatfield | 10,150 (LP consultation 2015)            | 12,500                                                        | 10,150 (LP consultation 2015)                                                   | 2011-2031 |
| <b>Total</b>    | 85,865                                   | 25,818                                                        | 14,817                                                                          | -         |

**Estimates of Jobs taken from job target figures for LPA rather than FEMA boundary**

| LPA             | Total jobs target/<br><i>Emerging or indicative total jobs target</i> | Period    |
|-----------------|-----------------------------------------------------------------------|-----------|
| Broxbourne      | 3,700 (Core Strategy 2010)                                            | 2011-2026 |
| East Herts      | 9,700 (Draft DP 2014)                                                 | 2011-2031 |
| Hertsmere       | 8,335 (Core Strategy 2013)                                            | 2012-2027 |
| North Herts     | 5,400 (Preferred Options 2014)                                        | 2011-2031 |
| St Albans       | 360 (Herts London Arc Study 2009)                                     | 2011-2031 |
| Welwyn Hatfield | 12,000 (Local Plan consultation 2015)                                 | 2011-2031 |
| Luton           | 18,000 (Draft Local Plan 2014)                                        | 2011-2031 |
| Dacorum         | 10,000 (Core Strategy 2013)                                           | 2006-2031 |
| Stevenage       | 1,600 (Draft Local Plan 2013)                                         | 2011-2031 |
| Total           | 69,095                                                                |           |
| Barnet          | 21,500 (Core Strategy 2012)                                           | 2011-2026 |
| <b>Total</b>    | 90,595                                                                |           |

EEFM baseline figures for authority areas excluding Barnet = 88,026

#### 4. Infrastructure Issues

There is a requirement for further transport modeling for A1M junctions 3 and 4 and also further work to consider the impact on the A414 and whether there are any solutions.

Primary and secondary provision will be required and there are cross boundary issues in particular around Cuffley and Woolmer Green for primary provision. In terms of secondary provision working with East Herts on provision for Welwyn Garden City. Potential for one site in Hatfield, no site for a third.

There is an aspiration to make green infrastructure connections to East Herts and St Albans.

**Action: specific infrastructure issues to be picked up in individual Duty to Cooperate meetings. A1M to be part of A1M consortium work**

#### 5. Impact on Green Belt

Presentation highlighted issues relating to the extent of the impact on purposes of the Green Belt. ST confirmed that it would not be possible to meet OAN without significant harm to the purposes of the Green Belt.

#### 6. Letter to DCLG

Debate around the difficulty for planning post 2031 when there is concern that we cannot meet needs to 2031.

Also need to consider the implication of the Inspector's report into the FALP and the need for an early review.

JT advised that following the receipt of the Inspector's Report into the Examination of the FALP, the GLA have issued invitations to all Leaders in the Greater South East, to a Summit meeting on the 19<sup>th</sup> March to discuss how wider than London planning issues will be taken forward in the Full Review of the London Plan.

Options for urban extensions have been fully explored. There is some pressure from the community to meet need through provision of a new settlement however no opportunities have come forward within Welwyn Hatfield.

Letter agreed by Members sent to DCLG re need for new settlements. North Herts expressed an interest in the letter.

**Action: CH agreed to circulate the letter.**

#### 7. Policy Implications

ST set out potential policy implications arising from evidence which ideally would need a joint policy approach and in some cases the production of a joint document. Viability of strategic sites would be revisited as the intent is to commence masterplanning work through PPA process.

#### 8. Next Steps

Welwyn Hatfield will look to arrange a member level Duty to Cooperate session at the end of the consultation.

## Addendum to the Minutes circulated by S Tiley on 13 February 2015

**From:** Owen, Kevin [<mailto:Kevin.Owen@luton.gov.uk>]  
**Sent:** 13 February 2015 16:38  
**To:** Sue Tiley  
**Cc:** 'c.haigh@welhat.gov.uk'; Pagdin, Chris; Hayes, Troy  
**Subject:** RE: Minutes from Duty to Cooperate Meeting 26 01 15

Hi Sue,

I noted that in the minutes of the DtC meeting 26th January 2015 at your Council offices that Luton was recorded as "do not consider we have shared issues"

I understand that Luton's non attendance may give the impression that we do not have many substantive issues to respond too however, if I can refer to my email responses both on the 10th of October 2014 and on the 12th of January 2015 which did raise the substantive point on the need for the local authorities taking part in your DtC working group to:-

- consider the strategic cross boundary implications of displaced unmet housing need arising from the consequence of ensuring (in accordance with national policy) that 'no stone is left unturned' ;
- by this I referred to the unmet housing need arising from Luton which impacts on Luton's immediate local authority neighbours within its Housing Market Area (e.g. North Hertfordshire) and the potential for displaced housing need therefore impacting beyond the Luton HMA i.e. the need for North Hertfordshire's neighbours to assist the authority in meeting any of its own displaced needs
- I also referred to Luton undertaking further research on the Functional Economic Market Area and note that while of a lower order, there is a commuting relationship between Luton and your authority area, Luton is also refreshing other aspects of its evidence base including on housing capacity.

It may be of course that you outlined some of these points during the discussions at the meeting that are not captured in the minutes - however, I would be grateful if you could please amend the minutes to refer to the receipt of x 2 emails from Luton outlining these points and to circulate the emails to officers who attended your working group.

K rgs

Kevin

## **DRAFT AT 1 NOVEMBER 2015**

### **NOTE OF DUTY TO CO-OPERATE MEETING BETWEEN WELWYN-HATFIELD AND HERTSMERE COUNCILS**

**VENUE: Civic Centre, Hertsmere Council Offices, Borehamwood**

**DATE: 7 October 2015, 2pm**

#### **Attendance**

Sue Tiley (ST) - Welwyn-Hatfield District Council (W-H)

Laura Guy (LG) - Welwyn-Hatfield District Council

Mark Silverman (MS) – Hertsmere Borough Council (HBC) (first part of meeting only)

Richard Blackburn (RB) - Hertsmere Borough Council

Tai Tsui (TT) - Hertsmere Borough Council

Ann Darnell (AD) - Hertsmere Borough Council

#### **Reason for Meeting**

- To share progress on plan-making, explore matters of common concern and address strategic planning issues (having regard to our obligations under the 'Duty to Co-operate' introduced by the Localism Act 2011); and more specifically
- To address issues raised by Welwyn-Hatfield Council in response to SADM (Submission Draft)

#### **Minutes of Meeting 21 May 2014**

Agreed

#### **4. Site Allocations and Development Management Policies Plan for Submission**

(dealt with first as MS had to leave meeting early due to other commitments)

HBC aim to submit SADM to PINS on 16 November 2015. Representations from around 63 people/bodies have been received (plus around 900 signatures 'for' and 'against' proposals for a specific site).

It was agreed that the purpose of the discussion was to try to resolve objections from W-H to SADM (for Submission) as far as possible and explore where there may be scope for a Statement of Common Ground.

#### **Objection concerning arrangements for review**

ST explained that W-H's concern is to see a commitment to the arrangements for reviewing SADM and its relationship with the Core Strategy review. They wish to have a specific commitment to working together on strategic land availability issues. The timing of HBC's work in this respect was important. As background, ST explained her concern that in order for their own Plan to be able to be found sound they will need to be able to demonstrate that they have made every effort to meet their OAN within their boundary and then failing that, with neighbouring authorities. There is a particular issue for W-H in that it is not included within an HMA with any adjoining authorities and that they and surrounding LAs will be having to provide for significantly increased housing numbers.

RB indicated that with regard to HMA geography the advice from our consultants was that although there is a relationship with W-H it is not strong enough to justify inclusion of W-H in the same HMA as the other South West Herts authorities. It was generally understood that the HMA situation in Hertfordshire and surrounding area is extremely complex, and also influenced by London. Each authority is 'doing the best we can' in terms of establishing HMA geographies and identifying OANs; the approach

of working where possible to local authority boundaries is as per PPG and PAS advice. With regard to the current SHMA, W-H are of course members of the Project Advisory Group. He confirmed that there would be a meeting of the PAG on 23 November to consider the SHMA draft final report.

The likelihood of each authority needing to ask the other whether they could make a contribution towards meeting their unmet needs was discussed. Whilst it was acknowledged that HBC's SADM is delivering the adopted Core Strategy it is likely that the Core Strategy review will need to address significantly increased housing needs; W-H are concerned to understand how and when site allocations will be reviewed in order to meet a higher housing target for HBC (and/or possibly needs arising from W-H). It was noted that the HBC Core Strategy review would need to identify how the new housing and employment land requirements would be met; this would need to be shown on the Policies Map. ST's particular concern is the timescale within which the review of sites is likely to occur. It was acknowledged that the quicker SADM can be adopted the quicker the review of the Core Strategy and sites can be progressed.

**Actions:** HBC to draft a Statement of Common Ground containing a commitment to working together on OAN and housing land supply issues as part of the early review of the Core Strategy, preparation for which will include a Green Belt study. HBC will also, as part of this, review the Monitoring section of SADM with a view to clarifying the intended arrangements for reviewing site allocations in the context of the forthcoming Core Strategy review (by w/c 19 October).

**W-H agreed** that a satisfactory resolution along these lines would enable them to withdraw this objection to SADM.

### **Objections concerning Gypsies and Travellers**

MS advised W-H that whilst ORS had prepared a GTAA study for HBC the probability had recently come to light that not all the occupants of a large privately owned site in the Borough (25 pitches), were Gypsies or Travellers under any definition. ORS had only been able to interview residents of 1 out of 25 pitches when doing the Study. This potentially raised significant implications for their assessment of total additional pitches required. ORS are to be commissioned to look again at the 'numbers' and until this has been done the Study is technically incomplete. A confidential copy was passed to W-H.

With regard to W-H's concerns about the deliverability of sites, HBC confirmed that

- the provision of new pitches at Sandy Lane (GT1) could be funded from Affordable Housing commuted payments with publicly owned/managed sites being treated as Affordable Housing in the Council's Affordable Housing SPD; and
- the two 'tolerated' but unauthorised sites (GT2 and GT3) had been included as 'need' but not 'supply' so Hertsmere's overall number of pitches had been counted at the lower level when assessing future pitch requirements. As such there should be no difficulty with treating them as new provision.

With regard to the overall 5 year supply, RB confirmed that the latest AMR showed that we were on target – any shortfall that may occur as the 5 year period rolls forward would be minimal. It was noted that (a) there may be capacity at the existing private site which is currently being investigated for occupation by non-Gypsy and Traveller households, and (b) there was a current application on another existing site for an additional pitch. Small scale proposals for additional pitches on authorised sites may also come forward, and there is a commitment in SADM to meeting additional needs identified (through the ORS study, but will be as amended) as part of the Core Strategy review. MS commented that the real

issue was not the 5 year supply, but the meeting of needs in the longer term and this would be addressed in the Core Strategy review. Given the potential numbers of pitches involved HBC felt this was the most appropriate way of achieving the required provision.

With regard to transit provision, HBC advised that ORS had found no evidence of any additional need in Hertsmere. The strategic nature of this issue was discussed but it was acknowledged that this was not being picked up County-wide. It was noted that HBC currently has the only transit site in the County, and that the provision of further 'permanent' pitches, as set out in SADM, would help to free up transit pitches to be used as was intended.

ST indicated that they would be unlikely to sustain an objection to HBC's decision not to remove GT1, GT2 and GT3 from the Green Belt. She was concerned more with issues with implications for W-H.

**Agreed** that it would be best to resolve these issues prior to submission and ST undertook to respond on her return from leave (w/c 19 October).

**Action:** ST agreed to review the evidence and W-H's representations and to advise HBC as to what issues could be covered by a Statement of Common Ground and which objection(s) withdrawn (w/c 19 October).

MS left the meeting at this point.

## **2. Matters Arising from meeting of 21 May 2014**

**List of items CIL to be spent on:** RB indicated we don't yet have a list of items – this will be for the CIL Panel to determine (officer working group and member Panel have been set up). Membership includes representatives from outside bodies. HBC to forward a link to the Developer Contributions Framework to W-H.

**Infrastructure:** ST indicated that W-H has a number of infrastructure issues.

- The CCG has raised the increasing need for community based (rather than main hospital based) healthcare as an issue. This has financial and site/premises implications.
- Possible highway network capacity issues related to strategic growth locations / proposed sites. Key concerns - J3, 4 and 6 of A1M, A414 in relation to sites around Hertford. Three strategic sites (5.5k dwellings) may be vulnerable unless highways issues are resolved. W-H will be working with East Herts to agree a position.

## **3. Local Planning Update**

### **a. Hertsmere**

#### **Staffing**

Tai Tsui has joined Policy Team as Deputy Team Leader/PPO (Sarah Barker's replacement). He will be DTC link at officer level. James Renwick has also left and the CIL and Elstree Way work is now being done by Rodney Albertyn (Senior Planning Officer). Richard Blackburn (Senior Planning Officer), Grace Middleton (Planning Officer) and Ann Darnell (Planning Officer) complete the Policy team under Mark Silverman. The team is currently fully staffed.

#### **Development Plan**

Elstree Way Corridor Area Action Plan adopted 8 July 2015.

SADM published 31 July 2015. Deposit period completed 14 September 2015. Aim to submit 16 November 2015.

LDS updated April 2015.

Core Strategy review work started (SHMA, Economy Study). Third strand will be Green Belt Study (joint with Three Rivers and Watford). Methodology will be similar to St Albans/Dacorum/Welwyn Hatfield study.

### **Evidence Base**

On the website (Local Plan (New) Evidence Base, with the exception of GTAA. SHLAA is being updated (will be SHELAA) and will be on website.

### **Other Guidance**

Affordable Housing SPD should be adopted shortly

We have appointed valuers to assist with independent review of viability assessments – BNP Paribas.

Planning and Design Guide SPD – added section on garage conversions

### **b. Welwyn-Hatfield**

#### **Staffing**

W-H to add please

#### **Development Plan**

Current Plan is 2005 District Plan. At the last consultation the emerging Core Strategy was converted to a Local Plan and the previous approach of concentrating growth on Welwyn and Hatfield changed into one looking at a 'fairer' distribution of growth around the Borough which would also be more capable of delivering the increased housing requirement indicated by the SHMA.

At the W-H Leader's request drop-ins are now being organised (Oct/Nov 2015) in order to raise awareness about possible new sites that were submitted during this previous consultation. The sites have not been assessed (although they will be) and this is purely an awareness raising, not consultation, exercise. W-H will advertise within their Borough but will not notify those outside. This is potentially an issue for the Little Heath area of Potters Bar as there are sites close to the boundary between the two Boroughs in this location.

W-H will then proceed to reg 19 Publication (aiming for July 2016).

**Action:** W-H to advise HBC of details of drop-ins so that HBC can let HBC local councillors and residents groups in the Little Heath Potters Bar area know.

**Agreed:** that in light of the potential growth in the Little Heath area of Welwyn Hatfield the establishment of a shared position should be sought. Further meetings and sharing of technical assessments will be important in terms of moving towards achieving this.

#### **Evidence Base**

Sustainability Appraisal - cumulative impact of 12.5k new dwellings has been tested. Will need to SA test all individual sites going ahead.

SHMA and Economy Study being updated. ST to consult neighbouring authorities on HMA geography but the timescale is tight.

SFRA being done - stage 1, plus stage 2 on some sites.

SHELAA being updated. GB purposes part of conclusions being separated out. Separate Site Selection paper will go through the balancing exercise, then look at cumulative impacts (Green Belt, infrastructure etc). This is being done in-house. HBC consider it important to gain an understanding of why sites have been selected. Likely to be done after Christmas.

Transport modelling for strategic sites to be discussed with HCC.

Water Study – looking at infrastructure requirements. EA and Thames Water have indicated around 90% of sites could require upgrade to facilities but there is currently a lack of evidence around deliverability.

### **Other Guidance**

HMO SPD to be updated as part of Local Plan process (Article 4 is in place).

Planning Obligations SPD will be updated once CIL and Local Plan in place. Hoping to adopt CIL 2017.

Will be updating GTAA – W-H will consult HBC.

## **5. Other Issues**

### **W-H Local Plan Consultation**

HBC made representations in response to the consultation (early 2015). With regard to the query on W-H's Affordable Housing policy ST indicated that the main thrust would remain but the policy would be tweaked. With regard to Watling Chase ST acknowledged that this could be referenced, and that some work underway could also be 'badged' accordingly.

## **6. Outcome of meeting**

ST said it was important to have agreed outcomes from the meeting. The following summary list was agreed:

- To resolve W-H's representations on SADM, preferably prior to Submission on 16 November 2015; to agree a Statement of Common Ground and identify which objections would be withdrawn;
- To work together on land availability issues;
- W-H to share their Site Selection paper with HBC;
- Further meetings to achieve a joint understanding of the position in regard to possible sites in Little Heath and any others close to the boundary between the 2 boroughs.

## **7. Future Meeting**

Tues 12 January 2016 at Welwyn-Hatfield offices. LG to send diary invitation.

## Annex H: Correspondence with Broxbourne Council

Borough Offices, Bishops' College Churchgate  
Cheshunt, Hertfordshire EN8 9XB  
Tel: 01992 785555 Minicom: 01992 785581  
Fax: 01992 350988  
E-mail: [doc.environment@broxbourne.gov.uk](mailto:doc.environment@broxbourne.gov.uk)  
Internet: [www.broxbourne.gov.uk](http://www.broxbourne.gov.uk)



### Planning and Development

Your Ref:  
My Ref:  
Extension: 5561  
Please ask for: Douglas Cooper  
Date: 04/08/2015

Mr Mark Silverman  
Policy and Transport Manager  
Hertsmere Borough Council  
Civic Offices  
Elstree Way  
Borehamwood  
Hertfordshire. WD6 1WA

Dear Mr Silverman,

### Broxbourne Local Plan

Many thanks to those Councils that attended our Duty to Cooperate meeting on 16<sup>th</sup> June. For those that did, your Council has been sent a minute of that meeting.

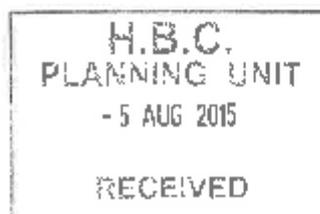
It was fairly clear from the meeting that none of the authorities present is likely to be in a position to accommodate any of Broxbourne's housing needs over the next 15 years. However, as a follow up to the meeting, we had undertaken to write to relevant councils to formalise the position.

At the time of writing, Broxbourne remains in a position whereby it is unlikely to be able to meet its full objectively assessed housing need without making substantial incursions into the Green Belt. I would therefore be most grateful if you could advise in writing if your Council is able to accommodate any of Broxbourne's housing needs within your current plan making processes.

It would be very helpful if you were able to respond by the end of August at the latest. If you wish to discuss the matter further prior to making a response you can call me direct on 01992 785561.

Yours sincerely

Douglas Cooper  
Head of Planning and Development



### Adopt-a-street volunteers wanted

You can make a difference and help keep your neighbourhood looking its best by signing up to be an adopt-a-street owner.  
For full details visit [www.broxbourne.gov.uk](http://www.broxbourne.gov.uk)  
Local email alert: [www.broxbourne.gov.uk/alerts](http://www.broxbourne.gov.uk/alerts) Twitter: [@BroxbourneBC](https://twitter.com/BroxbourneBC)



## **Planning and Building Control**

Mr Doug Cooper  
Broxbourne Borough Council  
Bishops' College  
Churchgate  
Cheshunt  
EN8 9XB

Your Reference:  
Our Reference:  
Contact: Mark Silverman  
Extension: 5850  
Date: 12 November 2015

Dear Mr Cooper

### **Broxbourne Local Plan**

Thank you for your letter of 4<sup>th</sup> August 2015 regarding your Council's housing needs and the Duty to Co-operate.

As you will be aware, the Housing Market Area(s) which includes Hertsmere does not extend to the area covered by Broxbourne. In light of this and given our own housing pressures and Green Belt constraints, I would advise that this Council would be unable to assist in accommodating any of Broxbourne's housing needs as part of our current plan making process.

Yours sincerely



Mark Silverman  
Policy and Transport Manager