



Room 3/12
Temple Quay House
2 The Square
Bristol
BS1 6PN

Direct Line: 0117 372 8468
Customer Services: 0117 372 6372
Fax No: 0117 372 8782
e-mail: Stephen.carnaby@pins.gsi.gov.uk

Mr Mark Silverman
Policy and Transport Manager
Hertsmere Borough Council
Civic Offices
Elstree Way
Borehamwood
Herts
WD6 1WA

Our Ref: PINS/N1920/429/10

Date: 13 June 2012

Dear Mr Silverman

EXAMINATION INTO THE SOUNDNESS OF HERTSMERE REVISED CORE STRATEGY (RCS) DEVELOPMENT PLAN DOCUMENT

Thank you for your Preliminary Response note dated 8 June and for the Additional Note to the Inspector, also dated 8 June. I have given careful consideration to their contents. In order to move forward as quickly as possible, I would be grateful for clarification/further information on a number of points.

I note that the Council suggests an amendment to the housing target in the plan. Please clarify if this would be based on 250 dwellings per year or 260 dwellings per year from 2022-2027. Whether the lower or higher rate is proposed, this requires justification.

Secondly, in order to revise the plan's housing target to at least the minimum level in the East of England Plan, detailed information is required in response to paragraphs 15-19 of my Preliminary Findings which concern specific elements of the land supply. The new information regarding the Elstree Way Corridor is noted. However the implications for the number of dwellings that could reasonably be expected from the corridor over the plan period and the timescale for their delivery should be spelled out in more detail. Similarly, further, detailed clarification of the justification for and extent of reliance on small windfalls (less than 10 dwellings) should be provided in response to my preliminary findings about the adequacy of the land supply to meet the Revised Core Strategy target or an increased target.

Thirdly, the housing potential of the safeguarded land under Policy H4 of the Local Plan should be clarified. And taking this and all of the above into account, a revised, detailed table of the housing land supply for the plan period should be provided in order to identify the sources of supply upon which the Council relies.

Fourthly, I note the Council's suggestion that land should no longer be safeguarded for employment purposes. I am not clear if this relates to the land at Borehamwood only or also includes land that is already safeguarded at Potters Bar. In any event such a change does not appear to be supported by the evidence tested at the hearings and I am concerned that my preliminary findings may have been misinterpreted by the Council. Paragraphs 11 and 12 of my note should not be taken as an indication that such changes are likely to be justified for consistency or other reasons.

I look forward to receiving the above information at your earliest convenience.

Provided that I am able to draw a conclusion from that information that the plan would not be fundamentally unsound, and that the Council would in due course request that I make recommendations on any main modifications that are required to make the plan sound, the following paragraphs set out advice about the next steps.

The Council would then prepare a detailed schedule of its suggested draft re-wording of the core strategy, to make clear how the plan would be changed both in terms of its policy wording and its justification. Please keep me informed of your draft proposed changes during this process so that I can advise on any soundness implications. I expect that, amongst other things, the changes would include an explanation in the core strategy why, having regard to NPPF's advice on objective assessment of needs, any other factors and substantive underpinning evidence, it is justified and appropriate to plan for a level of housing that is based on meeting the East of England Plan's minimum requirement. It would be appropriate to clarify that this target would not be treated as a ceiling. Another aspect that is likely to be of importance in drafting the suggested changes is the nature and specificity of the commitment to revising the core strategy, when review would be commenced and its relationship with updating of the Strategic Housing Market Assessment, and I expect that the Council would wish to make this clear.

The Council has already prepared a schedule of suggested changes on other matters following the hearings and it would be sensible to incorporate these into a composite schedule.

The Council would also need to undertake sustainability appraisal of the suggested changes as appropriate.

In due course the suggested changes together with the justification for them would require public consultation and a 6-week period is likely to be appropriate for this.

In addition to the information requested above, please would you set out an indicative timetable within which you would be able to complete the above stages.

The examination website should be updated as soon as possible and I will ask the Programme Officer to arrange this in consultation with you.

Please note that this response should not be taken as an indication that the plan will ultimately be found sound, and it may be necessary to raise other matters of soundness with you should they arise, but I trust that it is of assistance in progressing the examination. As always, please contact me through the Programme Officer if you have any queries.

Yours sincerely

Mary Travers

Inspector