

## **Hertsmere Borough Council preliminary response to the preliminary findings by the Inspector on matters relating to Overall Housing Provision, Housing, Land Supply and the Green Belt**

Thank you for your preliminary findings.

The Inspectorate and Council are aware of the transition process under way following the introduction of the National Planning Policy Framework (NPPF) and the current status of Regional Plans that are soon to be revoked.

In preparing our revised Core Strategy (RCS), the Council has utilised an evidence base which has previously been acceptable to the Planning Inspectorate and is in conformity with the Regional Strategy.

It is a matter of fact that our submission was made prior to the publication of the (NPPF) on the 27<sup>th</sup> March 2012. This Council welcomes the NPPF as a planning framework alongside the opportunities afforded by the Localism Act. Together they offer the opportunity for greater local engagement and influence on the future shaping of places for local communities.

The Council also recognises that there is unmet housing demand within the region and Hertsmere. This Council wishes to ensure that any new developments offer a wide choice of quality homes as encouraged through the NPPF.

The examination of our RCS and the Inspector's comments provide an opportunity to make revisions and amendments - in essence, the Council's proposed changes are built around

- Increasing the projected number of housing units
- Maintaining current green belt land as boundaries

The former will be achieved via brownfield developments and some limited provision from windfall sites. The latter follows dialogue with elected members and does no more than sustain the current position which seeks to protect the local Green Belt close to London. It also reflects the fact that there is currently a surplus of employment land in Borehamwood some of which provide for low volumes of employment.

### **Housing**

The Council is confident that it can deliver increased housing numbers in Borehamwood due to a number of confidential discussions on commercial developments within the Elstree Way Corridor area which are now coming to a head. These were not shared during the examination as they could not be at that time.

The Police Authority agreed on 18<sup>th</sup> May to transfer their whole operation to the Civic Centre. This releases that land for development. Other land holders - the Fire Service and Affinity Sutton - have confirmed their desire to relocate. Developments in the Corridor will therefore materialise within the period of the Plan.

The Council can with confidence now increase its delivery target from 237 to the minimum requirement set out in Policy H1.

The 2008-based household projections are based on the 2008-based population projections, published in May 2010. Like the population projections from which they are derived, these household projections are trend-based, not policy-based.

The supporting documentation to the household projections emphasises that “The assumptions underlying national household and population projections are demographic trend based. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.” The population projections actually illustrate a potential increase of 480 households per annum in Hertsmere but one household does not necessarily equate to one house. Moreover, population projections do not normally take into account the availability of building land and without any wider consideration of other planning constraints, housing targets will be unduly high in heavily populated areas. The Council, does not consider therefore that provision of over 500 dwellings per annum is necessary or desirable.

As trend based projections, the impact of the national recession and, for example, changes to government policy on non-EU immigration are not taken account of yet. They also take no account of local planning constraints, such as Green Belt policy. They simply reflect unconstrained household growth.

Paragraph 47 of the NPPF cannot be cited as justification for suggesting our plans are unsound. The NPPF does not suggest meeting housing need in an unconstrained manner is desirable. This paragraph also makes reference to meeting housing needs “as far as is consistent with the policies set out in this framework”.

The Inspector is right to identify the Council’s reliance on urban areas to meet housing needs - that is where our brownfield opportunities are. However while we will protect our Green Belt boundaries, the Inspector has noted that previous land safeguarded for housing under Policy H4 of the Hertsmere Local Plan 2003 would no longer be available for housing.

The Council is prepared to maintain the current status of this land as safeguarded for housing.

The Inspector (paragraph 12) identifies what is considered a significant contradiction in the Green Belt in terms of safeguarded land for employment purposes. Any inconsistency has only arisen because the NPPF, which itself contains a series of potentially conflicting requirements, seeks flexibility and economic growth whilst avoiding the long term protection of employment sites where there is no reasonable prospect of that use continuing. There is no specific requirement on local communities to set aside Green Belt land for all types of land use activity and the Council considers that a strategy based on focusing housing development within its built up areas to be reasonable, sustainable and consistent itself with the NPPF.

However, to remove any perceived inconsistency in the RCS, the Council will retain this land's current status as Green Belt on the basis that there are no exceptional circumstances to alter this status at this time and that the growth estimates which underpinned the East of England plan were based on pre-recession government spending expectations/growth estimates. The consultants who prepared the London Arc studied have stated that the 20 year jobs growth forecasts drawn up for the former East of England Regional Assembly, to inform local plans, halved between August 2008 and August 2010<sup>1</sup>.

The Council can subsequently consider exceptional circumstances or opportunities for additional employment development should they arise.

As explained above, there has been clear movement on the development of the Elstree Way Corridor and on-going negotiations provide the Council with a high degree of confidence that we will have the flexibility and ability to secure the minimum housing target in the East of England Plan over the 15 year period.

## **Conclusion**

The Inspector has presented the Council with three options, as well as suggesting that there may be scope for an interim approach which would go some way towards meeting increased need and demand for housing. We have discussed this with the Leadership of the Council.

Our position is as follows:

- a) Given the amendments outlined above, in addition to the further suggested changes enclosed, we consider our RCS should be accepted as sound.
- b) We consider a housing target based on the minimum target set out in the East of England Plan to be an appropriate one. The Inspector's findings refer to the Strategic Housing Market Assessment (2008) and the indication of the very high level of need for affordable housing which exists in the borough. The Council considers it would be unrealistic to expect the full extent of affordable housing 'need' to be delivered, given the availability of land for new housing of any tenure in a Green Belt authority, and the fact that the main mechanism for affordable housing is as a viable percentage of market housing.

The Council are concerned that similarities with Three Rivers are not acknowledged, particularly given that the two authorities adjoin, and share many similar characteristics. The original housing targets for both authorities were formulated in the same manner, as noted in the Panel's Report. It is unclear why Three Rivers' circumstances differ from Hertsmere.

- c) The Council is not minded to withdraw the RCS, and acknowledges the possibility of an unsound decision, as per your option 2c. This would place

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<sup>1</sup>Town halls must review employment land forecasts', Planning, 1<sup>st</sup> June 2012

the matter within public domain and allow for a wider debate around such a decision given its potential implications for plan making within England and particularly those areas with significant population and Green Belt designations.

Similarly, because of the issues at stake it is unclear whether there is a realistic prospect of a suspension of the Examination producing a radically different Plan as per Option 2(a). This would require further consideration on the Council's part.

- d) However, the most expedient position for all is a sound Core Strategy and as alluded to in the hearings, the Council would wish for the Housing Requirement in CS1 to be increased to the minimum requirement of H1. In addition, the Council proposes the introduction of an additional policy to the Core Strategy which would commit the Council to an early review of the Core Strategy within the next 5 years. This review would include the production of a single local plan and would include the Site Allocations and Development Management Policies. Such a review would include thorough population projections for Hertsmere and allow for joint working with our adjoining authorities. Such an approach would go some way towards meeting increased need and demand for housing, explaining where and when it will be provided, and also make clear what the Council will do, in co-operation with other authorities as necessary, to plan to meet objectively assessed needs as soon as and as far as possible.

On detailed matters as discussed with the Inspector during the examination, the Council has prepared a separate note considering amendments to a number of policies, including changes to the Affordable Housing policy, and has enclosed a set of suggested changes.