

Those seeking changes should demonstrate why the plan is not sound and why their suggested changes would make it sound.

i.e. whether the plan is justified, effective and consistent with national policy.

Representor 4029 Mr Drummond Robson. Robson Planning Consultancy

Wednesday 2 May morning (9.30am)

Matter 2 – Distribution of Housing and Approach to the Green Belt (Policies CS2, CS12, CS14)

Issues

2.1 Is the proposed distribution of new housing based on sound assessment of the most sustainable options? Are the broad levels of growth at particular settlements appropriate?

1. See East Hertsmere Town and Country Masterplan 2012-2027 attached (as appendix 1).
2. See also response to matter 1 paragraphs 16-20 of the response and Environmental Technical Report sections 1-13, notably 1 and 2. and the references referred to. The withdrawn version of the core strategy (CD03) assumed a more even balance of growth in Borehamwood and Potters Bar which would assist the economic base of each rather than increasing Potters Bar's reliance on Borehamwood and undermining its double town centre structure unsustainably. It assumed some limited green belt releases. CD03 policy stated "Unless there are exceptional circumstances, no more than 50% of new housing will be sought in Borehamwood, up to 30% in Potters Bar, up to 30% in Bushey and up to 15% in Radlett and other suitable locations, in providing at least 5,000 new homes." This would also avoid excessive densities in Borehamwood.
3. There are many uncertainties surrounding the future of the central areas of Borehamwood and should the strategy fail to resolve the tensions between residential and commercial space there is no plan B. Pressures on the highway infrastructure in the west of the District will be made more acute by the high levels of growth planned for Borehamwood. There is no evidence to show that the highway authority is willing to contribute to or support the scale of increased activity proposed on Elstree Way. It would appear that the present aims for the area may have stalled. (SHLAA 5.14)
4. The suggestions of reviewing the green belt during the lifetime of the plan as set out in paragraph 3.20 of the RCS and the last paragraph of policy CS3 are wholly inadequate since they come as an afterthought. This is reinforced in SHLAA 3.19 "The Core Strategy recognises that there is the potential that the housing target set in the revoked regional plan cannot be met without releasing Green Belt land." and in 4.50 "Approximately 40 of the sites,

considered deliverable or developable are located within Green Belt. These sites would require formal release from the Green Belt through the Local Development Framework process. The case for the release of individual sites would need to follow setting out the overall context for changing Green Belt boundaries in the Council's Core Strategy."

5. This review needs to be integral to the RCS and CS2 should be changed in the light of it.
6. The East Hertsmere Masterplan was prepared by a professional team to offer a realistic and practical way forward to assist in solving this clear RCS deficiency. The sites are far more certain than those in the possible Masterplan area for Borehamwood. The present RCS does not comply with the LDF procedure guide paragraph 5.23 and needs reconsultation before it can be found sound.
7. Ganwick Corner/ Bentley Heath should be treated as inset or excluded from the Green Belt, to make it sustainable while protecting its heritage assets, possibly giving it conservation status as an estate village, as recommended by NPPF paragraph 86. Proposals for its growth have been extensively discussed with the Council. Even allowing for development north of the M25 (site 155) there can be no prospect of coalescence between the village and Potters Bar in view of the M25 viaduct itself, aided by the common ownership pattern of both sites. (See attached supporting Appendix 2 Discussion Document).

2.2 Is the proposed replacement of Policy H4 of the Hertsmere Local Plan, which provides safeguarded land for housing, justified and clearly explained? Is it consistent with the approach to safeguarding land for employment?

8. Without a review of Green Belt boundaries it is difficult to see the basis on which green belt land is safeguarded for up to a further 15 years compared with the alternative since that have emerged since, in particular towards the east of the District where the risks of coalescence are less compared with the five sites in Bushey in particular. Byron Avenue Borehamwood does not seem to have been assessed. The one mile strategic gap of RCS paragraph 5.8 is inconsistent with this safeguarding.
9. Land safeguarded for housing and employment do not form a coherent strategy. There is no basis for paragraph 3.15 of the SHLAA September 2010 which will need redrafting, notably in the light of NPPF 22 11nd 51.

2.3 Are the proposals for insets for Elstree (the part within the Green Belt), Shenley and South Mimms justified?

2.4 Are there sufficient reasons to conclude that there is no need for the RCS to provide for limited release of sites for housing in the Green Belt?

10. See also original submission, response to matter 1 in paragraphs 16-20 and Environmental Technical Report sections 1-13. For this representation matters 2.1 and 2.3 are the key questions to address. CD03, the core strategy submission version considered that green belt releases were necessary and proposed areas of search outside Borehamwood and Potters Bar (see original representor submission). Since then growth has been predicted to increase, not decrease, adding to the pressures on Hertsmere's urban land, which cannot contain the growth while safeguarding the character or enhance the design quality of these principal towns. There is no longer a brownfield first policy, but rather a preference for it (NPPF).
11. NPPF places strong emphasis on high quality homes and good design. (Notably 58). The defining characteristics of the District appear to me to be poorly understood or planned for and would benefit strongly from more use of the many design tools available, of which effective masterplanning is clearly one, if successful placemaking is to be achieved.
12. Consultation on the Masterplan would offer proactive encouragement to this following NPPF section 7 and the Localism Act.

2.5 Overall, are the proposals for housing provision and its distribution reasonably flexible? Is there adequate regard to uncertainties and risks and are there sufficient measures for contingencies?

13. No. See matter 1. It is clearly important to avoid unconstrained and unsustainable growth which would be the result of undisciplined green belt development. This could have the effects not merely of sprawl but also eroding central parts of towns. However in the case of the Masterplan proposal the controlling land interests will ensure that green belt boundaries are clear, defensible and permanent, and the most beneficial balance is struck between town and country.

2.6 Taking account of Policies CS12, CS14 and the various references in the supporting text to the Green Belt, does the RCS provide a coherent, justified approach to the Green Belt and is it consistent with national policy?

14. See also original representor submission and See East Hertsmere Town and Country Masterplan 2012-2027 attached.
15. For this representation this is the key question to address. CD03, the core strategy submission version considered that green belt releases were necessary and proposed areas of search outside Borehamwood and Potters Bar (see original representor submission). Since then growth has been predicted to increase, not decrease, adding to the pressures on Hertsmere's urban land, which cannot contain the growth while safeguarding the character of these principal towns. There is no longer a brownfield first policy, but rather a preference for it (NPPF).

16. The RCS assumes from the Sustainability Appraisal Report that development in towns is more sustainable than in the country. This is by no means the case in an area with a polycentric network of settlements which are not self contained (RCS paragraph 2.46), and an area which already has large daily commuter flows. The strategic public transport bus network extends beyond town boundaries. (See also NPPF paragraphs 30, 34 and 37). This is misrepresented in the current Key Diagram of transport corridors. (See Matter 1 Appendix 3).
17. Energy. The Hertfordshire Renewable and Low Carbon Energy Technical Study provides a helpful assessment of differing energy saving scenarios which postdates the subjective Table 4.3 claims of pages 383- 390 of SAR_Appendices that development in towns is universally more energy efficient than the countryside. For example District heating and CHP also favour larger schemes for the economies of scale for housing units of equivalent size; SUDS is more normally found in the Countryside. Given the District's public transport pattern and smart vehicle aspirations ...sustainable urban extensions have not been properly assessed but only hinted at in CS3 final paragraph.
18. Design. Both NPPF and RCS encourage good design, but there has been no engagement with people in the District which would facilitate it to produce real design quality for both town and country. Consultation on the Masterplan would, I consider based on past masterplanning experience, offer proactive encouragement to this following NPPF section 7 and the Localism Act. (Planning and Design Guide DPD Part C: site appraisal section 7.1 criteria offer a checklist against which it may be reviewed following consultation)..
19. The plan allows for some Green Belt releases. There is no clear evidence why one part of the green belt is chosen rather than another. This absence justifies the preparation of a Masterplan based on the Environmental Technical Report professionally prepared and submitted by my practice. Hertsmere has used no other green belt studies of evidence to rely on for its current strategy. It needs to evaluate differing green belt qualities and hence the relative merits of the space to identify even broad locations for sustainable strategic development. In view of the sensitivity of Green Belt generally this is a severe deficiency of the RCS and should require more detailed scrutiny, inclusive of identifying appropriate new green belt boundaries and preparing positively for them, as required by NPPF paragraph 182.
20. If the boundaries are to be redrawn to and any of the land to have its current green belt status removed, – a question that is only asked during statutory planmaking - to take account of the widely differing environmental qualities of green belt the evaluation should have begun by assessing its intrinsic qualities (such as agricultural needs, land form and landscape, infrastructure opportunities, proximity to services, scope for recreation, scope to save energy and accommodate renewable, biodiversity etc.- see East Hertsmere Masterplan for Town and Country and Environmental Technical report) in

order to confirm or refute its need to be kept as green belt. This would ensure that policy SP1 is credible in the green belt. Instead the approach has been to assume that because it is green belt now it should not be considered.

21. Hertsmere covers 10,116 hectares. Green belt covers 8,040 hectares or just under 80%. Given the massive extent of green belt in Hertsmere the District should provide effective and justified evidence for the adopted policy of urban containment rather than other the two rejected options of urban extensions and rural expansion. As an illustration losses of about 2% of Hertsmere’s area using the least sustainable parts of the green belt would meet the housing need, facilitate major enhancements to the rest by financial contributions to its quality and infrastructure. Major land holdings, including just under 1,000 hectares of Wrotham Park Settled Estates and Hertfordshire County Council’s comparable Estate would ensure a sustainable and connected green infrastructure and recreation enhancements. These benefits would also reduce excessive pressure on Hertsmere’s town densities to enhance their current more spacious qualities. This follows the historical pattern of growth of Hertsmere’s towns. The accompanying Masterplan further illustrates this and should be consulted on with a view to becoming an Area Action Plan in order to ensure a more robust Core Strategy and enduring LDF.

22. 6 sites in particular were studied for Gilston Investments Ltd. based on suitability, developability, deliverability, layout potentials and infrastructure capacity analysis as set out in the following table:

23. The Council’s assessment summarises these sites as follows:

Borehamwood

Site	LPA Ref	No. Units	Timeframe
Site A, NE Borehamwood	S52 (Appendix 11)	315 using a density of 30dph and gross to net site area ratio of 70%	Yrs 6-10
Site B, NE Borehamwood	S53 (Appendix 11)	NIL	NIL

Potters Bar Sites

Site	LPA Ref	No. Units	Timeframe
Site C, South of Potters Bar	S54 (Appendix 12)	151	Yrs 1 to 5
Site D, Bentley Heath	S55 (Appendix 12)	16	Yrs 6-10
Site E Baker Street	S56 (Appendix 12)	NIL	NIL
Site F Bridgefoot	S161 (Appendix 12)	123	Yrs 1 to 5

24. The Council’s draft SHLAA recognises three of the 6 sites as suitable for development in years 1-5 or 6-10. The investigations on behalf of the landowner considered the utility infrastructure implications of development of

these sites as part of a Masterplan and was satisfied that these could be met from existing main services. Local service can deficiencies such as any highway improvements and public transport enhancements can be met as part of site development in line with CS policies 24 and 25.

25. Based on these assessments in January 2010 I would modify the Council's assessment and would consider that all 6 sites are deliverable and developable within five years with capacities for up to the numbers of dwellings set out below dependent on dwelling mix:

Borehamwood

Site	LPA Ref	No. Units (Approx.)	Timeframe
Site A, NE Borehamwood	S52 (Appendix 11)	650	Yrs 1 to 5
Site B, NE Borehamwood	S53 (Appendix 11)	600	Yrs 1 to 5

Potters Bar Sites

Site	LPA Ref	No. Units	Timeframe
Site C, South of Potters Bar	S54 (Appendix 12)	250	Yrs 1 to 5
Site D, Bentley Heath	S55 (Appendix 12)	50	Yrs 1 to 5
Site E Baker Street	S56 (Appendix 12)	300	Yrs 1 to 5
Site F Bridgefoot	S161 (Appendix 12)	230	Yrs 1 to 5

26. S56 is some 800 metres from Potters Bar Station and Town Centre on three bus routes and closer to these than many parts of the existing town. It adjoins a primary school and is close to a secondary school. It could be developed in association with the Former Sunnybank School site S47 to assist that site's constrained access.

27. This view is not altered by recent policy changes but should form part of the Council's public consultation inclusive of the Masterplan and supporting material which the findings of the Inspector should give rise to.

28. Consultation. The present CRS urban containment strategy relies on public opinion from questionnaire replies in 2005 to ranking of residents' priorities. (CD18). The first two questions and the response rates (930 from some 40,000 households or around 2%) are set out below from which it may be seen that urban open space was almost of equal importance to protecting the green belt. If the question were a choice between green belt or urban open space the results would have more meaning.

1. Look at the list below and tell us whether or not you think this is a priority. Tick one box for each statement where 1 = high priority and 5 = low priority.

	High Priority				Low Priority		Not relevant to me
	1	2	3	4	5		
Providing as much housing as possible within existing towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Providing more affordable housing (housing association, key worker, part rent / buy)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Providing more 1 and 2 bedroom houses / flats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Providing more 3 and 4 bedroom houses / flats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Providing sites for gypsies and travellers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Protection of the Green Belt	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Encouraging renewable energy and energy saving measures (eg solar panels and wind turbines)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Protection of wildlife and habitats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Protection of listed buildings, conservation areas, areas of archeological importance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Protecting existing Employment Land for industrial, warehousing and office use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Providing additional Employment Land	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Restricting the number of non-retail units permitted in our town centres (cafes, estates agents, offices)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Protecting local shopping facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Providing land for additional community facilities (e.g. Doctors surgeries)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Providing land for additional recreational facilities (e.g. Cinemas, Leisure Centres)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Protecting existing open space within our towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Ensuring new development has good access to bus, road and rail links	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Encouraging measures to reduce the need to travel to work by car "Green Travel Plans" eg cycling, working from home	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Reducing traffic congestion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Q2 If we cannot build all our new houses within existing towns, what type of land do you think should be considered for development? (Please tick all that apply)

School Playing Fields	<input type="checkbox"/>	Open Space within towns	<input type="checkbox"/>	Allotments	<input type="checkbox"/>
Green Belt	<input type="checkbox"/>	Employment Land	<input type="checkbox"/>	None of the above	<input type="checkbox"/>

Table 1: Location of survey respondents

Town	Paper responses		Web responses		Total Responses		% of Hertsmere's population*
	No	%	No	%	No	%	
Borehamwood	274	33.7%	34	29.1%	308	33.1%	33.0%
Bushey	88	10.8%	10	8.5%	98	10.5%	18.0%
Elstree	21	2.6%	8	6.8%	29	3.1%	1.9%
Potters Bar	276	33.9%	31	26.5%	307	33.0%	23.3%
Radlett	76	9.3%	12	10.3%	88	9.5%	8.5%
Shenley	55	6.8%	11	9.4%	66	7.1%	4.3%
Other / not specified	23	2.8%	11	9.4%	34	3.7%	11.0%
Total	813	100.0%	117	100.0%	930	100.0%	100.0%

* Based on data from the 2001 Census.

Table 2: Question 1 – Average score of responses (1=High Priority, 5 = Low priority)

Average Scores	All	B'wood	Bushey	Elstree	Potters Bar	Radlett	Shenley
Protection of the Green Belt	1.30	1.38	1.31	1.31	1.28	1.11	1.24
Protecting open space in towns	1.38	1.40	1.42	1.79	1.30	1.38	1.36
Protecting local shopping facilities	1.46	1.49	1.65	1.52	1.30	1.56	1.51
Protection of wildlife and habitats	1.58	1.59	1.51	1.75	1.57	1.77	1.41
Reducing traffic congestion	1.71	1.68	1.70	1.59	1.66	1.91	1.75
Protection of listed buildings / Cons Areas	1.72	1.79	1.63	1.83	1.69	1.69	1.55
Making new development accessible	1.87	1.71	1.91	1.96	1.95	1.91	1.84
Renewable energy / energy saving	1.95	1.92	1.81	1.79	2.01	2.27	1.70
Reducing the need to travel to work by car	2.07	2.08	1.97	2.22	2.05	2.22	1.76
Restricting non-retail uses	2.15	2.07	2.47	2.19	1.95	2.12	2.60
Land for additional community facilities	2.18	1.88	2.20	2.28	2.41	2.22	2.28
More affordable housing	2.53	2.43	2.35	2.84	2.45	2.80	3.02
Protecting existing employment land	2.64	2.66	2.85	2.88	2.44	2.74	2.94
Providing housing in existing towns	2.71	2.85	2.60	2.76	2.61	2.51	2.79
More 1 and 2 bed properties	2.73	2.74	2.72	2.79	2.60	2.85	2.95
Land for additional recreational facilities	2.77	2.38	3.24	2.41	2.85	3.19	2.95
More 3 and 4 bed properties	3.35	3.08	3.33	3.61	3.54	3.28	3.64
Providing additional Employment Land	3.50	3.36	3.56	4.00	3.44	3.73	3.74
Gypsy and traveller sites	4.35	4.35	4.36	4.48	4.30	4.51	4.39

29. Policy CS12 Green Belt protection and enhancement of the natural environment needs no amendment once the green belt boundaries have been redrawn to reflect a proper assessment of any boundaries following public consultation (5.23 of the LDF Framework guidance). Policy CS14 Promoting recreational access to open spaces and the countryside would stand a much greater prospect of being deliverable if the suggested approach is adopted.

2.7 Why is it necessary to designate Strategic Gaps in the Borough?

30. There is no need for the second paragraph of CS12 particularly if there is a more balanced approach to development which takes pressure from the west of the District and increases growth towards the east where green belt coalescence is less of an issue.

Matters 1 and 2 Conclusion

31. While it is clearly important to take full account of what has become a mountain of evidence it is also important to consider whether all this will add up to a truly sustainable strategy for a good quality of built development and rural improvement to live and work in and to enjoy which will not compromise future generations. The RCS is worse than its withdrawn predecessor because it protects green belt without assessing it as an integral part of the strategy.
32. Now is a very rare opportunity, unique in Hertsmere's (and indeed before Planning by the State) history, to consider a comprehensive approach to significant and realistic green belt protection and enhancement associated with quality housing and other development with two of Hertsmere's largest landholdings: Hertfordshire and Wrotham Park Estate. This would be genuine planning for both town and country.
33. The RCS also needs proper consultation so that the public can be made aware of real choices between urban containment and other patterns of settlement, notably sustainable urban extensions and their effects on both town and country. The East Hertsmere Masterplan should form part of this public engagement.
34. The aim is beneficial revision to the RCS so that it can be found sound and end a protracted period of uncertainty.

DR/dbm 9.4.12