

Hertsmere Local Development Framework

Development Plan Document

# Revised Core Strategy

Matter 2 Statement

Distribution of Housing and Approach to the  
Green Belt

(Policies CS2, CS12, CS14)

**Hearing: 2<sup>nd</sup> May 2012**

April 2012



## Issues

- 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?**
- 1.1 The Council considers that the approach to housing provision is intended to encourage new residential development in sustainable and accessible areas of the Borough whilst recognising the significant proportion of the Borough designated as Green Belt. Policy CS2 sets out the proportion to be allocated to each settlement, having regard to the Settlement Hierarchy in Table 6. The settlements in the order presented are considered to be the most sustainable locations in the Borough.
- 1.2 Borehamwood is the primary settlement in the hierarchy, this relates to the economic importance of the town in Hertsmere, its retail and leisure offer, the size of its population, its rail, bus and road links, and the contribution of the film and television industry. Further growth within the town will require continued infrastructure and other investment, which will build on existing Section 106 funds, New Homes Bonus and other funds such as the current Growing Places Fund bids for Borehamwood or the Big Lottery funding already awarded to the town. On this basis, Borehamwood is considered to be an appropriate location to focus growth. The Infrastructure Topic Paper (CD/77) concluded that there is sufficient existing capacity, for example for health care provision, and scope for additional education infrastructure.
- 1.3 All the other main towns are on good public transport routes. The main rail and road links are identified on the key diagram. When the SHLAA (CD/94-95) was completed in 2010, it was demonstrated that the housing requirement could be accommodated through completions on allocated sites and commitments; development on sites identified through the SHLAA and the Elstree Way Corridor; development on unidentified sites within main settlements; and a limited amount of development on unidentified sites within rural settlements.
- 1.4 Alternative strategic options were considered through the Sustainability Appraisal process in Table 4.1 of the 2011 Appraisal (CD/17). These strategic options were also explained in more detail in paragraphs 2.41 to 2.46 of the RCS, which sets out why they were not chosen for the RCS. The chosen strategic option was noted to have greater positive effects compared to other options, which would have seen more environmental and social negative effects.

- 1.5 Limited growth within existing villages is considered appropriate. Through the Site Allocations DPD, 'development boundaries' will be defined and drawn around each of the villages mentioned in CS2. Those villages, in comparison to other smaller rural villages on the key diagram are acknowledged to contain a number of services, particularly essential facilities and convenience retail. It was considered too prescriptive to allocate a number of dwellings to each area type, so an anticipated range was included in Policy CS2. For the areas such as Service Villages, which are outside the more accessible and preferred housing locations, a small number of dwellings are expected to come forward to contribute to the overall housing target.
- 1.6 This approach has been tested in 2010 and 2011 through the Sustainability Appraisal process (CD/16; CD/17), which recognised the significant beneficial impact compared to the other options. These included: maintaining the current policy position; the removal of the hierarchy; 'market led/no nothing' approach; rural expansion; and substantial urban intensification. The options are reflected in the alternative options commentary in paragraphs 2.41 to 2.46 of the RCS.
- 1.7 It is considered then that CS2 is justified, as it provides the most sustainable option for housing distribution. The Elstree Way Corridor has been identified as a location for the delivery of a significant proportion of the dwellings in Borehamwood (see CD/90; CD/91). The Council's Annual Monitoring Reports continue to demonstrate a pattern of development which reflects the hierarchy of settlements presented in Table 6.
- 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?**
- 2.1 Hertsmere Local Plan Policy H4 will be replaced by Policy CS2 of the RCS, which sets out the Council's housing distribution priorities across urban and rural areas. Unlike Policy H4, CS2 does not make provision for safeguarded Green Belt housing land.
- 2.2 The Council considers that there is no longer a need to safeguard land for residential use. This is set out at RCS paragraphs 3.3-3.14. The Council's evidence base for when and where housing supply will be delivered can be found in the SHLAA (CD/94), and the SHLAA Update Report (CD/95). Although an allowance for windfall from urban and rural broad areas has been factored into the final 5 years of the plan period, this document demonstrates that the Council has been able to identify sufficient land within existing urban areas to meet future housing need, including specific sites in years 1 to 10. The Council's approach to windfall housing supply

is deliberately conservative and does not reflect the scope which exists in the NPPF to include windfall sites within the early part of the Plan period.

- 2.3 It is envisaged that, in the longer-term, beyond the 15-year period considered in the SHLAA, sites from within existing urban areas will continue to come forward for housing. The Council has a record of delivering housing on sites from within such areas, including former employment land and film studio sites and through the suitable intensification of existing residential sites. As such, the Council is of the view that it is not necessary to safeguard any Green Belt land for housing development and that its approach is consistent with the NPPF, which, in paragraph 17, seeks to prioritise the reuse of previously, developed land. The Council will, however, allow for the release of some existing designated employment land, on a case-by-case basis, and permit residential redevelopment on these sites where appropriate.
- 2.4 Land has been safeguarded for employment use in Policy CS8 of the RCS. This compliments Policy CS2, as the policies contribute to the Council's overall development strategy for the Borough over the next 15 years to 2027. The Council has adopted a responsive approach towards the release of vacant or surplus designated employment land in Policy CS8 and, as set out in the SHLAA Update Report, a number of such sites have been allocated to the housing trajectory. The Employment Site Allocations Report (CD/74) explains that current market trends, which indicate that there is an oversupply of designated employment land in the short-term, may continue and a proportion of the Council's housing target might be met through the redevelopment of existing designated employment sites.
- 2.5 Notwithstanding this, the Council is also aware that the Hertfordshire London Arc Jobs Growth and Employment Land Study (CD/71) indicated a likely small shortfall in the Borough's office, industrial and warehousing floorspace by 2026. Given further slowdowns in economic growth since this document's publication in 2009, it is thought possible that any increase in the uptake of land for B-class uses could be deferred. Therefore, in accordance with the NPPF, the Council has taken the view that it is appropriate to safeguard land for employment use in the longer-term whilst also reflecting government policy (paragraph 22) that policies should avoid the long term protection of sites for employment where there is no reasonable prospect of sites being used for that purpose.
- 2.6 This approach will allow the Council to respond to the market, meet housing need within existing urban areas and provide sufficient strategic employment land for any longer-term economic growth. Moreover, it is considered that it is consistent with the NPPF's core planning principles, at paragraph 17, which prioritise the reuse of previously developed land.

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

3.1 The proposals for 'development boundaries' to be drawn around areas suitable for limited infilling in Service Villages was in response to local experience in receiving planning applications for development in these villages; the requirements of PPG2, which were carried through to the NPPF (paragraph 89); and a number of representations received on previous consultation exercises.

3.2 It is not considered that the proposals for 'development boundaries' are beyond the scope of existing national planning policy in relation to infilling development in the Green Belt. There continues to be a number of planning applications where the definition of 'infill development' was not clear as the boundaries of the villages had not been defined. The use of 'development boundaries' will help to contain development and direct new housing to the most suitable locations, thereby restricting the sprawl of these villages and risk of encroachment into the Green Belt.

3.3 In addition, a number of representations received over the course of the preparation of the RCS related to the proportions of development proposed for different areas in the Borough. Elstree (that part within the Green Belt), Shenley and South Mimms are recognised as Service Villages due to their local facilities and convenience retail provision and it is considered appropriate that 'infill development' in these locations can contribute to the supply of housing in the Borough.

3.4 This proposal for 'development boundaries' was also subject to the Sustainability Appraisal process in November 2011, where there were considered to be minor positive economic effects found in relation to this proposal. The proposed approach to Service Villages in the RCS is therefore considered to be justified, and is also consistent with national planning policy.

**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?**

4.1 RCS Policy CS1 sets a housing target of 3,550 new dwellings, which will meet identified housing need over the plan period. The SHLAA Update Report (CD/95) provides evidence of where and when sites will come forward; although an allowance is made for a small number of rural sites from various sources, it is demonstrated that there is sufficient land

supply, mainly from within existing urban areas, to meet housing need. Indeed, the Council's SHLAA methodology in estimating housing supply, which was subject to stakeholder consultation, is consistent with the NPPF and government issued SHLAA Practice Guidance (2007).

- 4.2 The housing trajectory shows the make-up of projected housing supply in the Borough over the next 15-years, and the Council considers that this provides a rational basis to conclude that there is no need to Green Belt land for housing. It can be seen that a total of 1,000 and 1,984 homes will be delivered at committed and identified sites (including the Elstree Way Corridor), respectively, and that a credible allowance has been made for a windfall of 575 homes from broad locations. The windfall projection, in years 11-15 of the housing trajectory only, is based on average annual completion rates taken from historical data. It is estimated at an annual rate of 115 new homes, which is some way lower than the actual rate of delivery at windfall sites in recent years, as illustrated in the Council's response to early matters (12/03/2012) (EC/02). The total of 3,559 homes would meet the RCS housing target without requiring Green Belt releases for housing.
- 4.3 The estimated housing supply figure is deliberately conservative, so as to ensure that it is realistic. The gross projected number of homes that will be delivered at committed and identified sites has been discounted by 6% to reflect the average proportion of permissions that have lapsed prior to being implemented between 2001/02-2007/08. The estimated supply from windfall sites is given at approximately 70% of the average annual number of completions from this source between 2002/03 and 2010/11.
- 4.4 It is noted that some housing will be delivered at Green Belt sites: some of the committed sites are within rural areas; some identified rural sites were known to be acceptable in principle, despite their Green Belt status; and, there is a small windfall allowance from rural broad locations. Indeed, this source of housing supply is included within the trajectory on account of the fact that there are a few sites that come forward for development in the Green Belt each year which are either appropriate or have an acceptable case of very special circumstances. The NPPF approach to appropriate development in the Green Belt reflects this and provides additional scope (paragraph 89) to permit the complete redevelopment of sites, whether or not they are in continuing use.

**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?**

5.1 The approach to housing provision is intended to encourage new residential development in the most sustainable areas of the borough. The original justification for distributing housing in this manner was to encourage the continued sustainable growth of the borough. Having tested other reasonable alternatives for housing distribution in earlier iterations of the plan, it is considered that the approach is justified, as it provides the most sustainable option for housing distribution.

5.2 The housing policies within the RCS are considered to be sufficiently flexible to allow for changes in trends and demand. In addition, the RCS is not reliant on a small number of single ownership large sites coming forward to deliver residential development, rather it allows for a wide variety of sites of differing sizes and ownership. This will ensure supply is not dependant on individual small numbers of large sites being delivered.

5.3 The RCS is flexible and was produced within the paradigm of Plan, Monitor and Manage. Chapter 9 encourages the regular review and monitoring of the RCS. However, to provide additional clarity, the Council has proposed amendments to Chapter 9 and Table 17 of the RCS. The amendments are set out in the Council's Matter 7 Statement. The proposed contingencies section includes an approach to housing delivery, affordable housing delivery, affordable housing mix, and the location of housing development. The proposed text sets out how policies will be monitored and the triggers for contingencies and the measures these will take. These are also incorporated within proposed amendments to Table 17.

**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?**

6.1 The approach taken to the Green Belt is based on the requirements of national and regional planning policy. There are several aspects of the RCS that relate to the Green Belt, including its continued presumption against inappropriate development; the proposed 'development boundaries' for Service Villages; the proposed safeguarded employment land in Potters Bar and Borehamwood; the promotion of rural gateway sites within the context of the Watling Chase Community Forest; and the support for existing rural visitor attractions.

6.2 The NPPF states the importance of the Green Belt, with five particular purposes. The above aspects of the Green Belt are coherent and justified, and consistent with the purposes as set out in the NPPF in paragraph 80 as follows:

- The presumption against inappropriate development in the Green Belt continues to be the principal policy direction, which is consistent with the NPPF (paragraph 80). It is noted that the five purposes of including land within the Green Belt between PPG2 and the NPPF are the same and these have informed the RCS Objectives, spatial vision, settlement hierarchy and strategic spatial policy (SP1) in the RCS (CD/05);
- As discussed in Matter 2.3, the approach to proposed 'development boundaries' for Service Villages builds on the concept of limited infilling. The RCS therefore recognises and defines the ideas retained in paragraph 89 of the NPPF. The boundaries are thought to be able to give greater clarity on where these villages end in relation to the countryside and where any initial development would be most suitable;
- The NPPF paragraph 85 and PPG2 paragraphs 2.12-2.13 advocates safeguarded land only to meet longer-term development needs of the Borough, which should be located between the urban area and the Green Belt. There are two proposed safeguarded employment sites. The Cranborne Road site in Potters Bar which had been included in the previous plan, and the site at Elstree Way/Rowley Lane in Borehamwood, in the context of the continued demand to redevelop sites for housing within the Elstree Way employment area. This is support by the Employment Site Allocations Report November 2011 (CD/74; CD/74A), and more detail is set out in the Council's submission for Matter 5;
- The RCS promotes the rural Gateway Sites in the context of the Watling Chase Community Forest. This is consistent with paragraph 92 of the NPPF. The plan for the WCCF (CD/84) has been adopted for some years now. It provides an on-going strategy for the area and was the initial support for the policy. The Forest is a largely pan-borough designation, and there are four gateway sites in Hertsmere which were the same in the Hertsmere Local Plan 2003; and
- Lastly, the promotion of Gateway Sites is linked with various existing rural visitor attractions within the Borough, including a Country Park and a farm attraction for children. The Council supports such leisure activity particularly in connection with the Community Forest plan, and those facilities have been recognised. Access to the countryside and open space has also been identified in the NPPF in paragraph 73. More detailed development standards will be incorporated into the forthcoming Site Allocations and Development Management DPD. The Council



recognises the importance of such opportunities in relation to recreation and wildlife, particularly in a Borough with significant proportions of Green Belt land.

- 6.3 The Council considers that the approach taken in the RCS Policies CS12 and CS14 and the supporting text is coherent and justified and consistent with national policy.

## **7. Why is it necessary to designate Strategic Gaps in the Borough?**

- 7.1 The land designated as a Strategic Gap would be between Watford and Bushey. Two of the five purposes of the Green belt are 'to check the unrestricted sprawl of large built up areas', and 'to prevent neighbouring towns merging together'.
- 7.2 There is less than 400m at points between Bushey and Watford, and in the part identified on the Key Diagram there would be a maximum distance of about 2,000m between Watford, North Bushey and Bushey. It is noted that the Strategic Gap also extends south between the Borough boundary and Bushey, parallel to Carpenders Park in Three Rivers District. It should be noted that the other distances between settlements both in and adjacent to Hertsmere are more than 1,500m, including Stanmore, Edgware, Barnet, Brookmans Park and London Colney.
- 7.3 Another purpose of the Green Belt is 'to preserve the setting and special character of historic towns' (NPPF Paragraph 80). Part of the role of the Strategic Gap is to protect Bushey village as an area of historic interest, which contains Conservation Areas, and a number of listed buildings. At the same time the Green Belt between Stanmore, Bushey and Watford continues to come under pressure from previously developed windfall proposals, and the redevelopment of major developed sites.
- 7.4 The Sustainability Appraisal concludes that the Strategic Gap does not provide an advantage to the RCS in terms of sustainable development.
- 7.5 The Council is willing to show flexibility in the continued use of the Strategic Gap as referenced in the key diagram, paragraph 5.8 and Policy CS12 of the RCS. This is illustrated in Appendix M2.A.

## **Appendices Content Page**

**Appendix M2.A** Core Strategy Strategic Gap and CS12 Amendment

## Appendix M2.A

### Key diagram:

Remove 'Strategic Gap' from the legend and diagram (Figure 1 Page 33)

### Paragraph 5.8:

~~In addition, the Council proposes the creation of a one mile wide strategic gap designation within the Green Belt between Watford, Bushey and Stanmore. Much of Bushey remains physically separate from Watford and there is a clear break between Bushey and Stanmore. The importance of maintaining established settlement patterns and a gap between the towns, given development pressures in both Watford and Stanmore - including the Health Campus in Watford and proposals at RAF Bentley Priory, Stanmore - is considered to be particularly pressing. There are a large number of previously developed sites in the Green Belt in and around Bushey and the strategic gap will serve to control the scale of any development in these locations, should proposals emerge during the Plan period~~

### Policy CS12:

*Policy CS12* The Green Belt and protection and enhancement of the natural environment

All development proposals must conserve and enhance the natural environment of the Borough, including biodiversity, protected trees, landscape character, and sites of ecological and geological value, in order to maintain and improve environmental quality, and contribute to the objectives of the Hertsmere Green Infrastructure Plan. Proposals should provide opportunities for habitat creation and enhancement throughout the life of a development. In the case of the highest quality agricultural land (Grades 1, 2 and 3a) and Preferred Areas of mineral extraction, proposals will only be permitted where there is no likelihood of the land being sterilised.

There will also be a presumption against inappropriate development, which causes harm to the openness and appearance of the Green Belt, as defined in PPG2 (Green Belts). ~~Strategic gaps in the Green Belt between Bushey and Watford and Bushey and Stanmore will be maintained within which any limited development, deemed acceptable in the Green Belt, should serve to retain the separation between the towns.~~