

Chelmsford

Strutt & Parker LLP

Telephone

Facsimile

struttandparker.com

STRUTT
PARKER

Carmel Edwards
Programme Officer
C/O Policy and Transport Team
Hertsmere Borough Council
Civic Offices
Elstree Way
Borehamwood
Herts
WD6 1WA

E-Mail:
Direct Dial:
your Ref:

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Dear Carmel Edwards,

RE: HERTSMERE REVISED CORE STRATEGY EXAMINATION- NATIONAL PLANNING POLICY FRAMEWORK RESPONSE

I refer to your email of the 2 April 2012 and the opportunity to provide a representation in relation to the Hertsmere Revised Core Strategy and its compliance with the National Planning Policy Framework (NPPF). This response has been written by Strutt and Parker on behalf of the Royal Masonic Trust for Girls and Boys, with specific regard to Land at Little Bushey Lane, Bushey. This response should be read in conjunction with our original response to the Revised Core Strategy, dated January 2012.

The NPPF provides a clear requirement on local planning authorities to positively plan for growth in their local areas. Paragraph 14 states that at the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision making. For plan making:

'local planning authorities should positively seek opportunities to meet the development needs of the area, with sufficient flexibility to adapt to rapid change.'

This is particularly important with regard to Hertsmere, given that the Core Strategy only makes provision for a modest quantum of growth over the plan period and that this has been tightly restricted to existing brownfield sites, which are likely to suffer from deliverability problems. The current Core Strategy does not allow for the flexibility required as part of the NPPF and will not deliver the numbers of affordable housing required in the Borough.

This matter is discussed in further detail with reference to the key Core Strategy policies below:

Policy CS1: The Supply of New Homes

Our initial consultation response put forward a clear rationale for the release of suitable Green Belt sites and set out that the Council's Annual Monitoring Report clearly identifies problems with regard to the delivery of brownfield sites. The point was also made in relation to the need for the Council to provide additional flexibility in the delivery of new sites, which should include the release of land from the Green Belt.

The Councils approach to Green Belt protection is understood and the importance of Green Belts in protecting the countryside and preventing urban sprawl is not questioned. However, paragraphs 83 and 84 of the NPPF does clearly state that Green Belt boundaries should be reviewed as part of the preparation and review of the Local Plan. Paragraph 83 states that:

'At that time (of Local Plan Review), authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.'

Paragraph 84, then provides clear guidance that the Local Plan Review should be a mechanism for reviewing Green Belt boundaries and states that following:

'When reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of challenging development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.'

As part of the evidence base to inform the Core Strategy, although a SHLAA has been undertaken, the Council have not produced evidence directly in relation to the Green Belt. To fully assess, the appropriateness of land within the Green Belt for development, the Council should undertake a Green Belt review to determine if the strategic functions of the Green Belt are still served by potential development sites.

In addition the NPPF clearly sets out that Councils should seek to provide additional flexibility and increase in the competition in the market for land. Paragraph 47 of the NPPF sets out that Councils need to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.

The SHLAA has identified 3740 dwellings to come forward over the plan period, against a Core Strategy target of 3550. Taking into consideration a 5% buffer as set out in the NPPF, this requires an increase in dwelling numbers to a minimum of 3728 over the plan period. The increase in provision to 3728 is just below the 3740 identified in the SHLAA. However, given the high quantum of brownfield sites, this target will not be reached in the likely event that one or more of the larger brownfield sites cannot be delivered due to viability problems. The Council therefore needs to release some well-located strategic greenbelt sites, to deliver the housing that the Borough requires.

In addition the Annual Monitoring Report (AMR) demonstrates that in 2010/2011 only 156 dwellings were completed against a Core Strategy target of 237 and a previous housing completion target 250. The NPPF states that where there has been a persistent under delivery of housing, local planning authorities should increase the buffer of 20%, not 5%. Whilst Hertsmere has not had a 'persistent' under-delivery of land for housing, the AMR figures for 2010/2011 provide clear evidence that previously developed sites alone are not delivering the required growth. The lack of flexibility with regard to Green Belt land release

is likely to result in housing supply becoming a problem if the current Core Strategy is adopted.

To allow for the flexibility over the plan period, and to ensure accordance with the NPPF the Council should seek to allocate a limited number of Green Belt sites for development. For reasons set out in our previous representation, Little Bushey Lane is the most appropriate Green Belt site for development. At a minimum flexibility should be provided by allocating 'safeguarded' Green Belt sites, which could come forward for development in the event that dwelling completions rate fall below the target of 237 dwellings.

Policy CS2: The Location of New Homes

This policy is generally supported, and there is no further comment to add in relation to the NPPF, other than re-iterating the need for the Council to provide flexibility in the number and locations of housing to be delivered in the key settlements.

Policy CS3: Phasing of Development

Strutt and Parker's initial consultation response made reference to the need to introduce additional flexibility to this policy and the need to clearly identify Green Belt sites to be delivered if housing completions numbers fall below Core Strategy targets. The advice in the NPPF with regard to the need for increased flexibility and competition for market land places a stronger emphasis on the need for the Council to identify and safeguard Green Belt land, such as Little Bushey Lane, Bushey in the event that Council supply falls below the Councils target.

Policy CS4: Affordable Housing

The lack of delivery of affordable housing is a key shortcoming of the Revised Core Strategy. Strutt and Parker's initial consultation response raised concern that the number of dwellings to be delivered over the plan period will not deliver the identified shortfall of 351 affordable homes per year. This is especially the case in Bushey, where many of the identified brownfield sites fall below the 10 dwelling or 0.3 hectare threshold when affordable housing is required under policy CS4.

The Revised Core Strategy is not considered to be in accordance with paragraphs 47 and 50 of the NPPF. Paragraph 47 of the NPPF states for market and affordable housing local planning authorities need to illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a **housing implementation strategy for the full range of housing** describing how they will maintain a delivery of five- year supply of housing land to meet their target.

Paragraph 3.23 of the Core Strategy identifies that there is demand for 351 affordable homes per year, yet the Core Strategy only makes provision for the delivery of 237 houses per year. In the best case scenario that 35% of the 237 dwellings built per year are affordable, this would give a provision of 83 affordable units a year, against a target of 351. It is therefore clear that the Council will only deliver a small percentage of the affordable housing that is actually required over the plan period. In accordance with the NPPF the

Council cannot deliver a 5 year supply of affordable housing to meet the identified need and the Core Strategy is therefore not considered to be 'sound' in this regard.

Policy CS7: Housing Mix

The Core Strategy sets out the need to provide a mix of housing to meet the wide range of the needs of the Borough. This policy is fully supported. It also sets out that larger sites will be important in delivering sheltered housing to meet the identified need within the Borough.

The ethos of policy CS7 is supported in the NPPF. Paragraph 52 of the NPPF also provides clear guidance that the supply of new homes is often best achieved through planning for larger scale development.

Unlike many of the brownfield sites, Land at Little Bushey Lane, Bushey is of a large enough size to provide an adequate mix of housing to meet identified local need. The RMTGB site was the only site in Bushey identified in the SHLAA that is considered to be suitable to deliver over 100 dwellings. The contribution a site of this size (which has an identified capacity of 162) could make in provision of a vast mix of housing, should not be underestimated. It would also have a significant contribution to provision of affordable housing and could include a Care Home for the elderly.

Conclusion

The NPPF provides clear guidance to local planning authorities in relation to the need to plan positively for growth. Whilst the need to protect the Green Belt is understood, it is considered that this matter has taken precedent above the need to 'promote patterns of sustainable development.' To address the NPPF it is considered that the Core Strategy is amended to give increasing flexibility to the delivery of housing. This should include the release of well located sites, such as Little Bushey Lane, Bushey for residential development. At a minimum the Council should identify larger Green Belt sites for residential development as 'safeguarded' residential sites to allow for the event that housing completions from brownfield sites fall below the identified targets.

Please take this matter into consideration prior to adoption of the Core Strategy.

Yours sincerely



David Fletcher
Senior Planner MSc MRTPI
Strutt and Parker