

Hertsmere Core Strategy Examination in Public

Representor 4029 Mr Drummond Robson. Robson Planning Consultancy

1. Revised Core Strategy Additional Note following Matter 1 1st May 2012 by Hertsmere.

- 1.1 There is clearly a misunderstanding and confusion in paragraph 14. I was speaking about the original Urban Capacity Study of November 2006 and comments on that. The Council is referring to the much later Stakeholder workshop of 3rd September 2009 when the Council's representation was with different Council officers following earlier staff resignations. The later agenda related to an assessment and review of SHLAA sites themselves. My amendments in relation to that were broadly accepted.
- 1.2 The fact remains that I queried the methodology following the original UCS which led to the amended approach to accessibility put forward by Scott Wilson and I continue to query this methodology in relation to density multipliers and accessibility as set out in my response to matter 1 and at the hearing. This was not early and meaningful engagement and collaboration (NPPF 155) any more than has happened since the preparation of the Environmental Technical Report or Masterplan which the Council have had since 2010.

2. Area Action Plan

- 2.1 I attach a plan with a suggested boundary to the area action plan boundary for the East Hertsmere Town and Country Masterplan 2012-2027 developed by my practice and that principally of Higgs Young from skills developed and since further improved from many major Masterplans both designed and realised by as while we were at (Sir) Terry Farrells as Planning and Design Directors respectively, supported by extensive technical evidence by a wider team of infrastructure and transport engineers and environmentalists largely from Scott Wilson (now part of URS) and also benefitting from Hertsmere's and County Council's own evidence and many detailed site visits. I believe this would not constitute a full green belt review covering some 3,010 hectares while ensuring that only that a very small area of green belt (less than 2%) was developed and town cramming avoided.
- 2.2 It should be added that the AAP proposal, (as well as other green belt enhancements subject to reasonable negotiation) seeks integration in particular of footpaths and used connections between town and country through the Hertsmere landscape. This differs from the Council's Watling Chase Community Forest greenways network which is I believe wholly reliant on existing highways also used by cars as opposed to dedicated paths and new rights of way offering true public access to the countryside. The proposals would also enable real connections for walkers and cyclists finally to be made between the London network and the wider area of Hertfordshire.

2.3 Incorporation after consultation by the Council of the realistic choices available to it including urban extensions and the principles and ideas offered by the Masterplan would contribute, I believe significantly, to turning an unsound development plan document into a sound one in much shorter time than if the Council had to justify areas of search from scratch. (NPPF 150). This in turn would enable earlier starts on much needed and suitably placed and sustainable development and green belt enhancement as well as closer integration of town and country.

3. Further supporting NPPF representations

3.1 You will note that the main thrust of the representations has been to demonstrate that the plan is unsound but not why representors “suggested changes would make it sound”.

3.2 The NPPF also offers scope to integrate core strategies and site allocation investigations to shorten timescales and to me more importantly reduce the high risk of design not being properly and seamlessly integrated by being split into separate stages of feasibility in spite of being in the highly sensitive green belt where very special circumstances need to be justified.

3.3 It is to be hoped that the recent NPPF offers the scope for LDF Frameworks to be improved by positive and creative contributions from informed and experienced professional stakeholders as proper participants (rather than largely ignored consultees*) to make an unsound development plan document sound.

3.4 In spite of much evidence from commissioned reports the plan as does not pass the tests of soundness, including that it is positively prepared, justified, effective or consistent with National policy. It does not “make every effort to meet the area’s objectively identified development needs”.

3.5 Notwithstanding the Council’s discussions with other Councils there is no evidence that the Council has followed the duty to co-operate of section 110 of the Localism Act either.

3.6 My purpose in making these unpaid and I hope impartial representations has consistently been to offer ways of improving the approach to make Hertsmere realistically a better place for its citizens over the next 15 years, based on extensive professional and local knowledge and experience.

*Chris Shepley from Planning 20th April 2012 wrote
“Alf reckoned there was no skill so well developed, no ingenuity so consistently demonstrated, no virtuosity so impressively flourished as that of councils appearing to cooperate while actually failing comprehensively to do so.”*