

Hertsmere Local Development Framework

Development Plan Document

Revised Core Strategy

Positive Preparation Statement

April 2012



Chapter 1: Introduction

- 1.1 This background report has been prepared by the Council to inform the independent examination into the Hertsmere Revised Core Strategy 2012.
- 1.2 The Inspector requested the report on 3rd April 2012, following the publication of National Planning Policy Framework (NPPF).
- 1.3 It considers specific policy areas including overall housing provision, sites for travellers (taking account of the Planning Policy for Traveller Sites), infrastructure, and provision for economic development. Its build on the Statement of Collaboration and elaborates on the way in which the RCS seeks to meet needs and requirements as summarised in paragraph 182 of the NPPF.
- 1.4 The report draws together elements of the 'evidence base' so that information about the policy areas can be seen in one place. Where appropriate, links are provided to source documents. In addition, the statement includes email correspondence from neighbouring authorities regarding cross boundary housing figures.

Chapter 2: Background

- 2.1 Hertsmere Borough Council has prepared the Core Strategy by working collaboratively with neighbouring Local Planning Authorities to ensure effective coordination of strategic planning issues that cross administrative boundaries. It has had full regard to the requirements on Local Planning Authorities to cooperate in the plan preparation process on such issues.
- 2.2 The Council acknowledges its duty as a Local Planning Authority (LPA) to cooperate in relation to the planning of sustainable development, as contained within the Localism Act 2011 and the preparation of development plan documents. The Act requires the Council to engage *constructively, actively and on an ongoing basis* in this work. The Act defines a “strategic matter” as: (section 110)
- (a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and*
- (b) sustainable development or use of land in a two-tier area if the development or use*
- (i) is a county matter, or*
- (ii) has or would have a significant impact on a county matter.*
- 2.3 The Core Strategy was originally produced in line with PPS12 “Creating strong safe and prosperous communities through Local Spatial Planning” (2008). This is stated in Paragraph 1.5:
- “The new spatial planning system exists to deliver positive social, economic and environmental outcomes, and requires planners to collaborate actively with the wide range of stakeholders and agencies that help to shape local areas and deliver local services.”*
- 2.4 Paragraphs 4.16 to 4.18 of PPS12 made specific reference to joint working between local authorities on spatial planning: ‘Local authorities should explore and exploit opportunities for joint working on core strategies’. PPS12 noted that ‘critical discussions on infrastructure capacity and planning may be more effectively and efficiently carried out over a larger area than a single local authority area’. Hertsmere Borough Council has addressed this consideration through engagement with and joint working in evidence gathering on particular topics.
- 2.5 The government’s revised approach to strategic planning across local boundaries is set out in the National Planning Policy Framework (NPPF), 2012.

Paragraph 17 states that:

“Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues.”

Specific guidance is set out in paragraphs 178-181.

“178. Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.

179. Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.

180. Local planning authorities should take account of different geographic areas, including travel-to-work areas. In two tier areas, county and district authorities should cooperate with each other on relevant issues. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships. Local planning authorities should also work collaboratively with private sector bodies, utility and infrastructure providers.

181. Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.”

2.6 The test for the examination of the RCS is Paragraph 182 of the NPPF, which states:

“The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- *Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- *Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- *Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
- *Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”*

2.7 It is the Council's view that the requirements of paragraph 182 have been satisfied in the production of the RCS. It has been produced in accordance with the Duty to Cooperate, legal and procedural requirements, and in general conformity with the RSS.

Chapter 3: Discussion

- 3.1 Much of the plan preparation process preceded the assent of the Localism Act. However, the Council has a long history of collaboration in strategic planning.
- 3.2 The Council greatly values collaborative working and has longstanding liaison with neighbouring planning authorities to achieve this. Joint working has been undertaken to ensure that cross boundary issues on housing markets, infrastructure, employment land, gypsy and travellers, and infrastructure are considered and planned appropriately
- 3.3 Throughout the production of the RCS, and wherever possible the Council has worked collaboratively with the County Council, neighbouring authorities (both in Hertfordshire and London), and key stakeholders. The Council has well-established arrangements for joint working, consultation and discussions.
- 3.4 The Council acknowledges its duty as a LPA to cooperate in relation to the planning of sustainable development, as contained within the Localism Act 2011 with regard to the preparation of development plan documents. The Act requires the council to engage constructively, actively and on an ongoing basis in this work (Section 110). Paragraph 178 of the NPPF emphasises that public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.
- 3.5 The Council recognises that the current position at law, as a result of the series of "Cala Homes" decisions in the High Court and the Court of Appeal, is that it is unlawful for a LPA in preparing its Core Strategy to take into account as a material consideration the Government's intention to abolish Regional Strategies. Thus any Core Strategy submitted before the abolition of Regional Strategies has been prepared on the basis that it is required to be in general conformity with the relevant Regional Strategy. It is noted that no statutory definition or national policy guidance exists in relation to what the phrase "in general conformity" means. Footnote 41 of NPPF states that Regional Strategies remain part of the development plan until they are abolished.
- 3.6 The Council regularly produces joint evidence base with neighbouring authorities. The London Commuter Belt Strategic Housing Market Assessment, The Gypsy Accommodation Needs Study and the Accommodation needs of Gypsies and Travellers in South and West Hertfordshire, The Central Hertfordshire Employment Land Review Hertfordshire London Arc Jobs Growth and Employment Land, Development Economics Study and the Hertfordshire Green Infrastructure Plan were all prepared on this basis.
- 3.7 Appendix 2 of the RCS illustrates the key development proposals and policies within neighbouring authorities DPD documents. It illustrates any potential impacts that these might have on Hertsmere.
- 3.8 Chapter 5 of the Statement of Representation Regulation 30(e) (CD/21) illustrates some examples of joint working, evidence base production and

regular meetings. These have helped to inform the production of the RCS, and allowed for cross boundary issues to be discussed.

- 3.9 During the production of the RCS the Council has given full consideration to strategic planning issues that have cross boundary implications and has been active in consulting and collaborating with neighbouring LPAs in developing the policies of the RCS and its associated evidence base. Spatial planning issues are limited in their extent but it is considered that the Council has made a proper and proportionate response and the issues arising have been fully addressed in the RCS.
- 3.10 The Council believe that the duty to cooperate has been satisfied. It has worked closely with neighbouring authorities within the context of the appropriate regional frameworks. Hertsmere Borough Council (HBC) has not requested that its housing requirements are provided within other authorities and has not received requests from neighbouring authorities to accommodate their housing requirements as specified in the East of England Plan and London Plan.
- 3.11 Hertsmere is a member of the Hertfordshire Local Enterprise Partnership (LEP), which includes all the authorities within Hertfordshire. To date this LEP has not taken a major role in coordination of work to support councils' duty to cooperate on strategic planning issues but there is every intention to fully support future initiatives.
- 3.12 The Council has collaborated with neighbouring authorities within different plan preparation programmes for their LDFs. These neighbouring authorities are statutorily required to meet the requirements of their Regional Strategies, namely the East of England Plan and London Plan. While still part of the development plan, these provide the basis for strategic planning and cooperation, and perhaps limit the degree of cooperation envisaged by the NPPF and the Localism Act at current.
- 3.13 In the Council's view, at the heart of the duty to co-operate, is effective partnership working to achieve outcomes. This principle is therefore not new to good planning practice and is one that Hertsmere Borough Council has been committed to for some time.
- 3.14 Within the SCI, the Council have set out that it will consult, specifically with key stakeholders, infrastructure delivery agents, government departments, all local authorities in Hertfordshire and the County Council, neighbouring London Boroughs, and parish councils. The Council have consulted with these organisations in the production of the Core Strategy. Many of these organisations representations have helped to shape the submission Core Strategy.
- 3.15 The Council holds regular meetings and discussions with neighbouring authorities. For example, through the production of the Core Strategy, the Council has met with Watford, St Albans, London Borough of Barnet, Welwyn Hatfield, and Hertfordshire County Council, and had discussions with Three Rivers, Dacorum, and London Borough of Enfield. Within these discussions, the Council has discussed cross boundary issues, and approaches to particular problems, such as infrastructure capacity. In addition, the Council has met with

key delivery agents such as the Highways Agency and Environment Agency to help further the delivery of the Core Strategy. The Council is also currently working with Thames Water and Sports England, and has agreed statements of Common Ground (CD/08) with both parties respectively.

- 3.16 The Council participates regularly in Countywide and Sub Regional Meetings such as the Hertfordshire Planning Group (HPG), HPG Development Plans (which Hertsmere currently chairs) and HPG Landscape. The duty to co-operate was introduced as a standing item on the Development Plans agenda in 2011 when the Council took responsibility for chairing the committee. The HPG groups consider key and emerging spatial planning other work, seeking joint working and agreement within the County where possible, on the implications of the Localism Act, Infrastructure requirements, Gypsy and Traveller Accommodation, CIL, SUDs, County Monitoring, have been considered with joint working progressed on issues such as Strategic and Green Infrastructure and CIL viability.

Chapter 4: Housing

Strategic Housing Market Assessment

- 4.1 The NPPF requires that the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- 4.2 The SHMA was commissioned by Hertfordshire County Council, Dacorum Borough Council, Hertsmere Borough Council, St Albans District Council, Three Rivers District Council, Watford Borough Council and Welwyn Hatfield Borough Council. The councils formed a project group responsible for the delivery of the project. A consultation event was held at the start of the project for developers, estate agents, Registered Providers of social housing and other service providers. Two community stakeholder groups were consulted at key stages of the project and participated in consultation workshops. Formal consultation on the SHMA report was managed via the ORS (the appointed consultants) extranet. A further event was held in early 2010 to present key findings to key stakeholders.
- 4.3 The SHMA brings together population, income and housing market trends to arrive at estimates of future Affordable Housing requirements across the housing sub-market area. However, because of the many uncertainties in modelling future demand, it is considered most relevant as providing an overview of key housing issues rather than target setting in development plan policy.
- 4.4 It is apparent from the SHMA study that in both affordable and market housing, overcrowding and under-occupation exists and that many households will be unable to move to more suitable housing either because of affordability or lack of suitable supply. Paragraph 12.33 of the SHMA considers that policies aimed at unblocking turnover of second hand housing might also make a contribution to the overall housing requirement. The Hertsmere Housing Strategy (2008) and Local Investment Strategy (2012), produced with the HCA, provide the basis for the delivery of affordable housing and seek to maximise additional affordable housing stock through, for example, reducing empty homes and making best use of existing stock, in addition to new build housing.
- 4.5 The NPPF includes a presumption in favour of sustainable development, which is a focus for both plan-making and decision-taking. For plan making it states that LPAs should meet their development needs within their area, unless specific policies within the NPPF restrict this. The NPPF reiterates the protection of the Green Belt and prioritises the effective use of land which has been previously developed land. Protection of the Green Belt around urban areas is one of the 12 principles that planning should achieve, which is itself consistent with the RSS in south west Hertfordshire, which did not advocate a local Green Belt review for Hertsmere.

Table 4.1: Tenure Mix of Housing Requirement 2007 to 2021 by LA based upon prices at long-term trend level for the LCB (West) Sub-region constrained to RSS build target less delivery 2001-7

Housing tenure	Local Authority					
	Dacorum	Hertsmere	St Albans	Three Rivers	Watford	Welwyn Hatfield
Market Housing	4,800	400	400	(400)	800	3,400
Intermediate affordable housing	-	2,800	5,300	2,300	2,100	500
Social rented housing	3,100	500	1,300	700	600	2,800
Total Housing Requirement	7,800	3,600	7,000	2,700	3,600	6,600

Source: London Commuter Belt (West) Strategic Housing Market Assessment 2008

Table 4.2: Housing Requirement by LA 2007-2021 for Household Projections using prices at long term trend level (Note: Figures may not tally due to rounding)

Housing tenure	Local Authority					
	Dacorum	Hertsmere	St Albans	Three Rivers	Watford	Welwyn Hatfield
Market Housing	3,300	500	3,200	1,900	500	300
Intermediate affordable housing	0	2,800	6,200	3,100	2,000	0
Social rented housing	2,700	500	1,800	1,200	500	1,500
Total Housing Requirement	5,900	3,700	11,100	6,200	3,000	1,800

Source: London Commuter Belt (West) Strategic Housing Market Assessment 2008

- 4.6 The SHMA concludes that although there is a relatively low requirement for additional market housing, this does not mean that none should be built. Developers will continue to bring forward proposals for new build for planning consent where they believe a market exists. It is also essential to deliver housing growth in a sustainable way by providing a mix of tenures and sizes. The growth of new build housing will attract higher earning in-migrant households to the area. It will also be necessary to allow new build market housing to proceed, if affordable housing is to be delivered through the planning system. This may also result in a supply of cheaper second hand housing being released to the market as a consequence, provided the new housing is purchased for owner occupation rather than for investment.
- 4.7 Some older people occupy housing that is unsuitable and too large for them. Ensuring that part of new housing delivery across all tenures is particularly suited to older people will both increase choice for older people and release second hand housing into the market.

- 4.8 Hertsmere is currently seeking to reduce the number of empty homes and along with Chelmsford Borough Council, East Herts District Council, Epping Forest District Council, Harlow Council, Uttlesford District Council, Watford Borough Council, Hertsmere is a member of the PLACE scheme which seeks to bring back empty homes into use. Channel 4 television recently highlighted the Council's approach as an example of best practice in the UK.
- 4.9 Paragraph 47 of the NPPF requires LPAs to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework. 80% of the borough is Green Belt, representing a clear policy constraint which shapes how and where growth can occur in the borough. The Green Belt extends across into neighbouring authorities.
- 4.10 The East and South East of England are desirable locations to live, given their close proximity to London aligned with their proximity to the countryside and overall quality of life. Table 4.3 illustrates a number of local authority areas with adopted Core Strategies, a number of which have Green Belt designations. It can be seen within such locations, with similar characteristics to Hertsmere and its neighbouring authorities, that it has not been possible to accommodate the Housing Need illustrated in their respective SHMAs.

Table 4.3: Affordable Housing Need Compared to Housing Target in adopted Core Strategies

Local Authority	Housing figure in CS	SHMA Affordable Housing Need	Housing Target expressed as a % of the SHMA
Three Rivers	180	307	59%
South Buckinghamshire	110-140	459	31%
Surrey Heath	190	794	24%
Elmbridge	225	1048	21%
Epsom and Ewell	181	559	32%
Tandridge	125	720	17%
Rushmoor	374	878	43%
Oxford	400	992	40%
Hertsmere	237	229	97%

Housing Need in neighbouring areas

4.11 Appendix 1 has been prepared to demonstrate that the Council has not asked for any of its housing need to be accommodated within neighbouring authorities and those in our housing market. In addition, the Appendix also demonstrates that Hertsmere Borough Council has not been asked to accommodate housing need by any of the neighbouring authorities and those within our housing market. The authorities are seeking to accommodate their housing requirements, in general conformity with the appropriate regional strategy, within their borough and with respect to the presumption in favour of sustainable development. The legal challenge to the East of England Plan resulted in the quashing of the housing growth figures for Dacorum Borough Council and Welwyn Hatfield District Council. It is the Council's opinion that this satisfies the requirements of the NPPF.

Development Economics Study

4.12 Hertsmere jointly commissioned consultants to produce a Development Economics Study, with St Albans and Welwyn Hatfield. This study considered the viability of housing development in each of the Boroughs. The study provides the evidence base for Policy CS4.

4.13 The NPPF, at paragraphs 173 and 174, stipulates that LPAs must not subject development to burdens that will render schemes unviable or threaten delivery.

- 4.14 The Council has, thus, set its percentage target and threshold for affordable housing at levels that are lower than that which would be required to meet the need identified in the SHMA. The Development Economics Study (DES) (CD/72) explains the basis for the Council setting a percentage target of 35% and a threshold of 10 (gross) residential units (or a residential site of more than 0.3 hectares in size) in RCS policy CS4. This document tests the viability of affordable housing delivery when various options for percentage targets and thresholds are applied, taking into account existing and possible future policy objectives. The rationale behind setting this target is explained further in the Council's Matter 3 Statement.

Housing Target

- 4.15 The housing target within the RCS is based on the RSS requirement for the Borough. The RCS proposes a 15 year target (2012/13 to 2026/27) of 3,550 (237 dpa) new dwellings, reflecting the requirements of the East of England Plan and seeking to focus this on previously developed sites, taking account of the Green Belt constraints which exist in the Borough. Between 2001/02 and 2026/27 this equates to 6,125 new dwellings. This is approximately a 6% reduction from the RSS.
- 4.16 The approach taken in the RCS is consistent with paragraph 182 of the NPPF, through a strategy which seeks to meet objectively assessed housing requirements, consistent with achieving sustainable development. Hertsmere Borough Council has not been requested to accommodate any housing need from adjoining authorities and the associated local housing target is in general conformity with the RSS.

Chapter 5: Employment Land

London Arc Job Growth and Employment Land Review

- 5.1 Roger Tym & Partners was commissioned to undertake this study in February 2008 by the district and borough councils of the Hertfordshire London Arc, comprising Broxbourne, Dacorum, Hertsmere, St Albans, Three Rivers, Watford and Welwyn Hatfield. Together with Brentwood and Epping Forest in Essex, these local authority areas comprise the London Arc sub-region, as defined in the current Regional Spatial Strategy, the East of England Plan.
- 5.2 The study partially updates earlier jointly prepared studies (such as the Central Hertfordshire Employment Land Review) and brings together information to provide a broad overview across the study area as a whole. It addresses the East of England Plan, which introduced the London Arc as a sub-regional entity and set a joint employment growth target of 50,000 net new jobs for its Hertfordshire section. It considered the employment land requirements holistically within the sub region. The study recommended Hertsmere's committed land supply provides modest net growth for offices and no growth for industry/warehousing.
- 5.3 The Council's first-draft targets show modest growth in both sectors and that if these targets are accepted, Hertsmere should provide a few hectares of net additional land for industrial/warehouse growth, to provide some scope for the expansion of existing firms. However, the shortfall is small and could be considered as part of the margin of error. The study includes the potential for new business parks in St Albans and Welwyn Hatfield Boroughs respectively. If these are not forthcoming, and there is a requirement for future employment, the RCS has responded by making provision for a safeguarded area of land adjacent to Elstree Way Borehamwood.

Hertfordshire Strategic Employment Sites Study

- 5.4 Regeneris Consulting together with GL Hearn, WSP Group and John Rutherford Consulting were commissioned to carry out the Hertfordshire Strategic Employment Sites study. This assignment was carried out on behalf of Hertfordshire County Council, East of England Development Agency (EEDA) and the ten districts in Hertfordshire.
- 5.5 A previous study (regional Strategic Employment Sites Study, Arup 2009) suggested that there were a lack of strategic employment sites in Hertfordshire and the Hertfordshire Works Economic Development Strategy 2009-2021 recognises the need to work with LPAs to identify and bring forward a small number of strategic sites in high profile prestigious locations served by sustainable transport. This strategy has been supported by districts in Hertfordshire and will be taken forward by the Hertfordshire Local Enterprise Partnership (LEP).
- 5.6 It concluded that there are three broad potential economic growth scenarios for Hertfordshire which are as follows:

- Status Quo Scenario – assumes the modest growth rate experienced in Hertfordshire in the last ten years continues over the next twenty years (equivalent to +4% overall, or +19,900 additional jobs created).
 - East of England Forecasting Model (EEFM) Forecast Growth Scenario – assumes a 16% growth rate for Hertfordshire over the next twenty years (base case demand forecast) resulting in 79,300 jobs.
 - Aspirational Scenario – Herts ‘raising its game’ to match the best performing sub regional economies, based on applying the forecast Cambridgeshire growth rate of 25% over the next twenty years resulting in a net growth of 122,900 jobs.
- 5.7 The report concludes that while Hertfordshire has been underperforming compared to its potential, the county has the assets and strengths necessary to outperform the status quo scenario. However, there are a number of weaknesses for the county identified which suggest that the aspirational scenario is likely to be unachievable.
- 5.8 The county’s main existing strategic employment sites are defined as: Gunnels Wood, Maylands, Hatfield Business Park and Watford Junction. There is the opportunity to enhance the performance of all of these sites through further development and investment, including through the delivery of additional high quality floorspace at Maylands Gateway and potentially through the extension of Hatfield Business Park. In addition there are a number of sites which support strategic activities or have an important role in supporting key economic sectors or clusters. These are GSK, Leavesden and Elstree Studios, and Building Research Establishment (BRE).
- 5.9 Moving forward there are a number of wider site-based opportunities which provide the potential to further support key sectors and cluster development. These include delivery of Watford Health Campus, further investment at BRE subject to resolution of infrastructure constraints, and the potential for development of a science or innovation park at Knebworth around a major inward investment.
- 5.10 There is however a clear gap in Hertfordshire in terms of the provision of a Premier Business Park which can support higher value uses and is of the scale and quality demonstrated in competitor areas. Hertfordshire should seek to develop this product over time. Potentially the best opportunities currently available appear to be at Park Plaza, Waltham Cross for a major new business park adjacent to the M25 and at Watford Junction for development of a major, high quality in-town office quarter.
- 5.11 The study informed the RCS, and supports the aspirations to support and promote film and television at Elstree Studios which itself is reinforced through the current Growing Places Fund bid for £2m to remediate contaminated land, which will enable the studios to be expanded. The bid, which has been favourably received and at the time of writing, shortlisted by the LEP, was cross-referenced with Policy CS11 of the Core Strategy.
- 5.12 The study also includes the potential for new business parks in Watford and Broxbourne Boroughs respectively. The Council will work with partners and the LEP if these are not forthcoming, and there is a requirement for future

employment, the RCS makes the provision of a safeguarded area of land adjacent to Elstree Way Borehamwood.

- 5.13 A revised proposal maps will be produced to support this DPD informed by the Employment Site Allocations Study (2011) (CD/74) and Addendum (2012) (CD/74A), Local Significant Employment Study (2008) (CD/75) and Update (2010) (CD/76), which provide additional site specific details.
- 5.14 The approach taken in the RCS is in consistent with paragraph 182 of the NPPF, with policies which seeks to meet objectively assessed employment requirements, consistent with achieving sustainable development. The approach taken is also in general conformity with the requirements of the RSS.

Chapter 6: Infrastructure

Hertfordshire Infrastructure and Investment Strategy (HIIS)

- 6.1 The ten Hertfordshire authorities, together with the County Council commissioned Atkins, Roger Tym and Partners and URS to carry out an assessment of Hertfordshire's future infrastructure requirements and the identification of funding mechanisms necessary to secure its provision. Such infrastructure would support future growth in homes and jobs in Hertfordshire in the period to 2021, with consideration also given to the period to 2031.
- 6.2 Stakeholder workshops explored issues such as historic infrastructure deficit and appropriate funding models and were followed by face-to-face meetings with key service providers. These were crucial in developing an understanding of existing infrastructure and service provision and future growth requirements.
- 6.3 The findings of the HIIS were integrated into the RCS and Infrastructure Topic Paper and the Hertfordshire Planning Group is currently preparing a programme, which will see the HIIS refreshed and a Strategic Infrastructure Plan for the county prepared. This will also allow the county to bid for a larger share of the infrastructure funding resources that are available, alongside existing funding streams such as the Growing Places Fund or Department for Transport funding.
- 6.5 In addition, Hertsmere has commissioned consultants on behalf of nine out of the ten Hertfordshire authorities to consider CIL viability and charging schedules.

Hertfordshire Green Infrastructure Study

- 6.6 The 2011 Hertfordshire Strategic GI Plan provides an overview of existing strategic green infrastructure assets within the GreenArc; considers opportunities for enhancement and creation of green infrastructure; and, outlines a series of potential projects to deliver multiple. The Woodland Arc project identified within the GreenArc Strategic Green Infrastructure Plan is predominantly within the Borough of Hertsmere. The project seeks to enhance landscape links between Broxbourne Woods and Epping Forest/Hatfield Forest, and strengthen woodland links to the urban fringe, including targeted woodland creation. Funding and implementation is expected to be via joined up grant applications between strategic delivery partners at county and local level, and with landowners.
- 6.7 This Hertfordshire plan informed the production of the Hertsmere Green Infrastructure Plan which itself has significant crossover with the Council's Greenways strategy. Greenways remain an intrinsic part of the CS, as set out in Policy CS14 and established s106 funding arrangements for supporting the delivery of the strategy provide a sound basis for including Greenways in a future CIL Regulation 123 list for the borough.

Hertfordshire Renewable and Low Carbon Energy Technical Study

- 6.8 This study was commissioned on behalf of Broxbourne Borough Council; Dacorum Borough Council; East Herts District Council; Hertsmere Borough

Council; North Herts District Council; St Albans District Council; Three Rivers Borough Council; Watford Borough Council; Welwyn Hatfield Borough Council; and Hertfordshire County Council. These authorities worked together to deliver a Hertfordshire Renewable and Low Carbon Energy Technical Study for the County. This study subsequently informed Policy CS16 of the Core Strategy.

- 6.9 Infrastructure requirements have been assessed and discussed in cooperation with the appropriate delivery agency. The approach taken in the RCS is consistent with paragraph 182 of the NPPF, to provide a strategy which seeks to meet objectively assessed infrastructure requirements, consistent with achieving sustainable development.

Chapter 7: Gypsy and Travellers

- 7.1 As set out in RCS paragraphs 3.38-3.42, the Council's strategy for the provision of Gypsy and Traveller accommodation is justified and deliverable. It is based on the target set by the RSS single-issue review (CD/32), which specifies that within Hertsmere provision should be made for a minimum of 18 additional pitches between 2006 and 2011 and a further 3% annual compound increase beyond 2011 to 2021.
- 7.2 Representations to the RSS single issue review were based on the Gypsy Accommodation Needs Study and the Accommodation needs of Gypsies and Travellers in South and West Hertfordshire. This joint working project was initially commissioned by Hertsmere, with Hertfordshire County Council, Dacorum Borough Council, St Albans City and District Council, Three Rivers District Council and Watford Borough Council. The study considers need and possible location sites in South West Hertfordshire.
- 7.3 The Council considers that 2017 would be a suitable time to review Gypsy and Traveller accommodation need in the Borough. To ensure that the Council is able to identify sufficient land to meet accommodation need, it is appropriate to set a target for the next 5 years; however, by 2017 the existing Gypsy and Traveller Accommodation Assessment (CD/88) will be over 10 years old and the Council's evidence base should be refreshed in light of the recently published Planning policy for traveller sites document. The Council has had some initial discussions with neighbouring authorities such as St Albans and London Borough of Barnet regarding joint working on the matter. The Council has also agreed a Statement of Common Ground with Three Rivers in respect of the wording in the RCS.
- 7.4 The work undertaken has resulted in a commitment in the RCS to allocate land, if an additional site is required, for one larger site or a number of smaller sites to meet the target to 2017. The Accommodation Needs of Gypsies and Travellers in South and West Hertfordshire: Stage Two report (CD/98) forms part of the Council's evidence base and demonstrates that there is sufficient appropriate land in the Borough to deliver the accommodation required.
- 7.5 In line with Policy B of the national Planning policy for traveller sites, and within the next 12 months, the Council will produce further evidence demonstrating specific deliverable sites for the next 5 years and specific developable sites or broad locations for growth over the remainder of the 15-year plan period. This will be done through an update to the SHLAA. This approach is consistent with the RSS, which states that the required levels of provision should be achieved 'through development control decision and Development Plan Documents'.
- 7.6 The approach taken in the RCS is consistent with paragraph 182 of the NPPF, and seeks to meet objectively assessed requirements, consistent with achieving sustainable development. It is also in general conformity with the requirements of the RSS.

Chapter 8: Conclusion

- 8.1 The Council has worked with a number of neighbouring authorities in the production of evidence which underpins the Core Strategy. Joint working, particularly with authorities in the south of the county on the production of the evidence, has allowed the sharing of ideas, best practice and where possible cooperation on ideas and policies.
- 8.2 The Council have positively produced the plan in line with relevant national and regional planning policy.
- 8.3 The policies of the RCS are justified and take the most appropriate strategy for Hertsmere, considered against the reasonable alternative approaches, the characteristics of the Borough, and based on a proportionate evidence base. The RCS has been produced and based on effective joint working both in meetings and on evidence as demonstrated within this statement. Cross boundary and strategic priorities have been evaluated where appropriate. The Council continue to work with neighbouring authorities to deliver national, regional and local planning policies.

Table 8.1: Core Strategy Policies and supporting evidence base

CS Policy	Evidence	Joint working
SP1	Sustainability Appraisal	
CS1	RSS, NPPF	
CS2	SHLAA	
CS3	SHLAA	
CS4	Development Economics Study	*
CS5	NPPF, SHMA	*
CS6	(1) Assessment of the Accommodation Need of Gypsies and Travellers in SW Herts (2) Identification of potential Gypsy and Traveller Sites	*
CS7	SHMA	*
CS8	CHELR, London Arc Hertfordshire Employment Land Review	*
CS9	Local Significant Employment Sites Study	
CS10		
CS11	Hertfordshire Strategic Sites Study	*
CS12	NPPF, Green Infrastructure Plan,	*

	Hertfordshire Green Infrastructure Plan	
CS13	NPPF, Conservation Area Appraisals	
CS14	Watling Chase Community Forest, Watling Chase Community Forest Greenways Strategy	*
CS15	SFRA	
CS16	Hertfordshire Low Carbon and renewable Energy Study	
CS17	Infrastructure Topic Paper	*
CS18	Infrastructure Topic Paper	*
CS19	NPPF	
CS20	Hertfordshire Infrastructure Investment Strategy	*
CS21	Planning and Design Guide, Joseph Rowntree Foundation	
CS22	Elstree Way Corridor Feasibility Study, Elstree Way Corridor SPG	
CS23	Parking Supplementary Planning Document (and Amendment), Hertfordshire Local Transport Plan 3	*
CS24	Parking Supplementary Planning Document (and Amendment),	
CS25	Hertfordshire Local Transport Plan 3	*
CS26	NPPF, Retail Topic Paper	
CS27	Town Centre and Shopping Needs	
CS28		
CS29	Hertsmere Crime and Disorder Reduction Partnership Plan	

8.4 Within Matter Statement 7, the Council have proposed some amendments to monitoring and contingency planning of the RCS. The Council is of the opinion that these amendments ensure that the RCS is effective,

8.5 The document has been positively prepared, within the framework of the East of England Plan (which is still part of the development plan). The Council has undertaken joint working with neighbouring authorities to ensure that cross

boundary issues relating to housing markets, infrastructure, employment land, gypsy and travellers, and infrastructure are planned appropriately. The Council has received confirmation from its neighbouring authorities and those within the housing market, that at no point has Hertsmere Borough Council asked other authorities to accommodate housing requirements within their Boroughs, or been asked by other Boroughs to accommodate their housing requirements within Hertsmere.

- 8.6 This Statement demonstrates that the RCS satisfies paragraph 182 of the NPPF and the associated duty to co-operate, and as a result is sound.

Appendix 1: Emails from neighbouring Authorities regarding Housing Requirements

From: Laura Wood <Laura.Wood@dacorum.gov.uk>
Sent: 11 April 2012 16:02
To: Sarah Churchard
Cc: Simon Warner
Subject: RE: Paragraph 182 of NPPF

Dear Sarah,

On behalf of Dacorum Borough Council I am happy to confirm that Hertsmere Borough Council have not requested that Dacorum Borough Council accommodate any of its housing requirement, and neither have we asked Hertsmere to accommodate any of our housing requirement.

Kind regards

Laura Wood

Team Leader (Strategic Planning)
Strategic Planning and Regeneration
01442 228661

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**From:** Chris Briggs <Chris.Briggs@stalbans.gov.uk>  
**Sent:** 18 April 2012 17:52  
**To:** Sarah Churchard  
**Cc:** Heather Cheesbrough; Manpreet Singh Kanda  
**Subject:** RE: Paragraph 182 of the NPPF

Sarah

Further to your conversations with Manpreet and my conversations with your colleague Simon Warner, please find a response below:

*In light of Section 110 of the Localism Act and your email request, I am writing to confirm that St Albans City and District Council has not been requested to accommodate any of Hertsmere Borough Council's housing allocation. Neither has St Albans District Council requested Hertsmere to accommodate any of its housing requirement.*

*This Council considers that there has been and continues to be great value in the longstanding bilateral and multilateral dialogue between the two local authorities which we seek to continue; including where appropriate joint working on evidence base and other studies.*

Hopefully this fulfils what you were looking for. If you need anything different, please just let me know.

KR

Christopher Briggs  
Spatial Planning Manager  
St Albans City & District Council  
[www.stalbans.gov.uk](http://www.stalbans.gov.uk)  
01727 866100 Ext 2600

**From:** Sue Tiley <S.Tiley@welhat.gov.uk>  
**Sent:** 17 April 2012 09:46  
**To:** Sarah Churchard  
**Subject:** RE: Paragraph 182 of the NPPF

Dear Sarah,

I refer to your email. I can confirm that Welwyn Hatfield Borough Council has not specifically requested Hertsmere Borough Council to meet any of its housing requirement and nor has Hertsmere Borough Council made a request to Welwyn Hatfield Council to accommodate any of its housing allocation.

Regards

*Sue*

Sue Tiley (Mrs)  
Planning Policy and Implementation Manager  
Welwyn Hatfield Borough Council, The Campus  
Welwyn Garden City  
Herts AL8 6AE  
Tel: 01707 357268  
Fax: 01707 357285  
Email: [s.tiley@welhat.gov.uk](mailto:s.tiley@welhat.gov.uk)  
[www.welhat.gov.uk](http://www.welhat.gov.uk)  
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**From:** Philip Bylo <Philip.Bylo@watford.gov.uk>  
**Sent:** 11 April 2012 16:30  
**To:** Sarah Churchard  
**Cc:** Jane Custance; Vicky Owen; Catriona Ramsay  
**Subject:** RE: Paragraph 182 of the NPPF

Sarah,

As discussed today, I can confirm that neither Watford BC or Hertsmere BC has asked the other authority to accommodate any of its housing allocations or targets.

Regards,

**Philip Bylo**  
**Planning Policy Section Head**  
**BA (Hons), B Pl., MRTPI, MBA (Real Estate)**  
Planning and Development  
Watford Borough Council  
Town Hall, Watford, Hertfordshire WD17 3EX  
Phone: (01923) 278280 Fax: (01923) 278273  
email: [philip.bylo@watford.gov.uk](mailto:philip.bylo@watford.gov.uk)  
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**Thank you.**

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**From:** Joanna Bowyer <Joanna.Bowyer@ThreeRivers.gov.uk>  
**Sent:** 12 April 2012 15:55  
**To:** Sarah Churchard  
**Subject:** RE: Paragraph 182 of the NPPF

Sarah,

I can confirm that Hertsmere Borough Council have not requested that Three Rivers District Council accommodate any of its housing allocation, and that Three Rivers District Council have not requested that Hertsmere Borough Council accommodate any of its housing allocation.

Please let me know if you need anything else,

Kind regards,

**Jo Bowyer**  
**Development Plans**

Three Rivers District Council, Three Rivers House, Northway, Rickmansworth, Hertfordshire, WD3 1RL

**Tel:** 01923 727104

**e-mail:** [joanna.bowyer@threerivers.gov.uk](mailto:joanna.bowyer@threerivers.gov.uk)

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**From:** Matthew Paterson <matthew.paterson@harrow.gov.uk>  
**Sent:** 11 April 2012 17:45  
**To:** Sarah Churchard  
**Subject:** Re: Paragraph 182 of the NPPF

Dear Sarah,

I can confirm that neither Hertsmere BC or LB Harrow has requested the other council to accommodate any of its housing allocation.

I can also confirm that the boroughs met in 2010 at an event held by Three Rivers District Council where we discussed our respective spatial strategies and the potential implications of these on neighbouring boroughs including cross boundary issues and opportunities for joint working. The conclusion of that meeting was that there were no immediate issues that arose or required addressing between our two planning authorities.

Kind regards  
Matt

Matthew Paterson  
Senior Professional - LDF Team Leader  
Planning, Development and Enterprise  
Harrow Council,  
Civic 1 - 3rd Floor East Wing,  
Civic Centre, Station Road,  
Harrow, HA1 2UY

Phone: 020 8736 6082  
Email: [matthew.paterson@harrow.gov.uk](mailto:matthew.paterson@harrow.gov.uk)

\*\*\*\*\*  
\*

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**From:** Lynch, Nick <Nick.Lynch@barnet.gov.uk>  
**Sent:** 16 April 2012 10:51  
**To:** Sarah Churchard  
**Cc:** Carless, Mike; Simon Warner; Brar, Rita  
**Subject:** RE: Paragraph 182 of the NPPF

Hi Sarah

In advance of tomorrow's meeting I can confirm that no request has been received from Hertsmere and no request has been made by Barnet with regard to housing allocations.

Regards

Nick

**Nick Lynch**  
**Planning Policy (LDF) Manager**  
**Planning, Housing and Regeneration**

London Borough of Barnet, Building 2, North London Business Park, Oakleigh Road South,

London, N11 1NP

Tel: 0208 359 4211 Mobile: 07500816745

Barnet Online: [www.barnet.gov.uk](http://www.barnet.gov.uk)

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**Mark Silverman**

**Hertsmere Borough Council**  
Civic Offices  
Elstree Way  
Borehamwood  
WD6 1WA

Please reply to : Joanne Woodward  
:  
E-mail : [Joanne.woodward@enfield.gov.uk](mailto:Joanne.woodward@enfield.gov.uk)  
Phone : 020 8379 3881  
Textphone :  
Fax : 020 8379 3887  
My Ref :  
Your Ref :  
Date : 20 April 2012

Dear Mr. Silverman,

**RE: Hertsmere Core Strategy Development Plan Document**

Please accept this letter as the London Borough of Enfield's confirmation that neither local planning authorities, Hertsmere Borough Council and London Borough of Enfield have requested each other to accommodate any of their respective housing allocations.

This confirmation is provided in accordance with Section 110 of the Localism Act, (*Duty to co-operate in relation to planning of sustainable development*), and Paragraph 182 of the National Planning Policy Framework, (*Examining Local Plans*).

The London Borough of Enfield's Core Strategy DPD was found to be sound and was adopted in November 2010. Core Policy 2 (Housing Supply and Locations for new homes) outlines Enfield's housing target for the period 2010/11 to 2024/25 and five years beyond the plan period. In addition, it identifies broad locations within the borough for the accommodation of more than 13,000 new homes.

If you require any further details regarding the content of this letter, please do not hesitate to contact me on the details given above.

Yours Faithfully,



**Joanne Woodward**  
**Head of Planning Policy**  
Regeneration, Leisure and Culture

Neil Rousell  
Director of Regeneration, Leisure and Culture  
Enfield Council  
Civic Centre, Silver Street  
Enfield EN1 3XY

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