

PINS LDF Advisory Visit – St Albans Core Strategy

Inspector's Advice Note: David Vickery – 16 to 20 November 2009

The purpose of this Advisory Visit was to consider what has been done so far in preparation of the Core Strategy (CS) and to identify those matters and questions that at this stage appear potentially problematic in terms of soundness. It did not seek to test material, confirm the adequacy of the CS or endorse any part of it as sound. This Note should therefore not be taken as pre-judging the outcome of the examination of the submitted CS in any way. The Note sets out specific advice for this authority based on the particular circumstances and questions raised. Although the Note contains some general guidance and good practice, it should not be assumed that this specific advice is necessarily applicable to all other authorities and other circumstances. The main sources of advice as to the appropriate content are: PPS12; the PAS Plan Making Manual; and the PINS Soundness Guidance (July 2008).

Key Positives

- There is a high degree of commitment, good co-ordination and project management at both officer and member level to the production of a timely Core Strategy (CS), all aiming for adoption in the summer of 2011.
- The Emerging CS of July 2009 is succinct and very well designed, in a logical order and with good graphics. This bodes well for the submission CS.

Key Concerns

- The Council will be close to the limits of its 5 year rolling land supply by the time of the anticipated adoption of the CS. If the timetable slips then planning by appeal could result.
- Major issues and problems need to be faced up to (e.g. Green Belt, Strategic Rail Freight Interchange), by showing in the CS how alternatives or possibilities would be handled (the "what if" scenarios).
- Infrastructure issues, particularly highways matters, need to be as fully resolved as possible in order to show that the proposals can realistically be delivered.

Please aim to keep the evidence base **concise**, just the minimum necessary to justify the policies, and the Core Strategy **short** – no more than 50 to 80 pages.

A CS should avoid policies or proposals which are just assertions. One of the main changes to the planning system introduced by the 2004 Act is that policies must be justified – that is, they should be backed up by robust, convincing evidence. Otherwise they are unsound and will be struck out or (if major) the whole Plan might fail.

The most helpful advice I can give you at this stage is to continually ask yourselves the following questions:

▪ **Are the Vision and Objectives focussed?**

Are the Vision and Objectives sufficiently (a) spatial in planning terms and (b) locally specific and distinctive? Are they clear, easy to read and to understand? Do they (and the Plan overall) provide everyone with a sense of purpose and direction? A CS should give a clear message about the ways in which the area will change by its end date. A CS must be very clearly focussed on the locality and how it will change.

- **Does it deal with the basic questions?**

The basic questions (¶ 4.1 PPS12) to be answered by every part of every policy are:

- **what** will be delivered;
- **where** will it be delivered;
- **when** will it be delivered; and
- **how** will it be delivered through the Core Strategy?

- **Is it Spatial Planning?**

Are the various parts of the CS (policies and text) relevant to spatial planning? That is, are they contributing to "place shaping and delivery"? If it does not shape a place and/or cannot be delivered, it should not be in a CS. (¶s 2.1 to 2.7 of PPS12)

- **Does the CS deal with the critical questions?**

The critical questions cannot be left in a CS to be answered by a subsequent DPD or SPD (Associated British Ports judgement). The CS is the place where the hard and key decisions have to be made. The principle guiding components must be in a CS before a lower level Document can deal with the detail of implementation.

Background to the Advisory Visit

- 1) The Local Plan was adopted in 1994. There is a 5-year rolling housing land supply at present, but its continuance is in doubt. These factors are all pushing forward the CS, so that the programme for the production of the CS is very tight: the Pre-submission version is to be issued in February 2010, with submission in July 2010.
- 2) The approved East of England Plan (the RSS) runs to 2021 and is being reviewed to run to 2031 – the consultation period closes this month. The draft Plan is due to be published in March 2010. In the meantime, the approved RSS has been the subject of a successful High Court challenge which has deleted parts of the policies concerning substantial greenfield (Green Belt) extensions to Hemel Hempstead and Welwyn Garden City and Hatfield. A "repair process" is being undertaken to the RSS, but the initial report on this will not be available until March 2010.

Green Belt

- 3) The CS must conform with the RSS. At present that means the RSS policies minus those parts of the policies struck out by the High Court for the expansion of Hemel Hempstead and Welwyn and Hatfield. Given the urgent need for strategic planning guidance in St Albans, I can see no reason why the CS should not go ahead on the basis of the RSS as it presently exists, especially as it is unlikely that the "repair process" would be resolved by the anticipated time of submission. This should be fully explained so that the need and the reasoning for doing this were transparent.
- 4) Clearly, it is likely that the "repair process" will introduce changes to the RSS, although these are unknown at the moment. The CS will have to be frank about this issue and set out how this particular "what if" scenario would be dealt with – probably by an early review of the CS with joint working out of the details with the adjoining Councils.
- 5) I was told that it was likely that sites would have to be found in the Green Belt to meet the RSS housing requirement. Although the numbers could be quite high, it seems that this would not be a regional strategic review, but a local adjustment. The CS must face this particular Green Belt issue and deal with it – it cannot be left alone. There has to be a clear and decisive answer in the CS.

- 6) I understand your concern about how to handle this whilst still providing permanence to Green Belt boundaries and that there is a reasonable argument for extending the CS to 2031 in order to give that permanence. But there is such an urgent need for the CS to provide strategic planning guidance and so much uncertainty about the planning situation (e.g. RSS review, RSS GB repair process, Maylands area) that I think the best course of action would be to produce the CS now for the required 15 year Plan period, to acknowledge and explain the uncertainties, and to commit to an early review of the CS once the uncertainties are resolved (around 2011?). I explain this below. The result might be that the Green Belt boundaries could be argued to have permanence in the CS in the PPG2 sense, bearing in mind that the new LDF system has changed the planning context of the advice in PPG2 ¶ 2.12, and that any more radical boundary changes would be dealt with in the CS Review. Again, this is a matter of setting out clearly and logically the case for such a course of action and providing the evidence for it. I can give no guarantees that such action would be found sound, but I think it a reasonable way forward in your circumstances.
- 7) The numbers of houses presently needed on Green Belt land and their approximate locations should be stated. The exceptional circumstances that require this course of action should be stated. Any suggested location should be sustainable, and have as little effect as possible on the Green Belt. To adequately analyse and justify this, there would need to be a study of the existing Green Belt based on a consistently applied methodology. Such a study might, for instance, assess Green Belt land against the five PPG2 Green Belt purposes; assess the strength and weaknesses of the current Green Belt boundaries, particularly with regard to their permanence; and assess the constraints and sustainable development opportunities. This could then be used not only to provide assurance that it would be possible in principle to locate housing on present Green Belt land, but also to provide the criteria in a CS policy for land that in a later DPD is to be removed from the Green Belt. Various Green Belt studies have been carried out by other councils, including Broxbourne (a required local study up to 2031 under RSS Policy SS7).
- 8) If possible, the need for Green Belt release should be phased to the end of the plan period so that the detail of the sites and their boundaries could be devolved down to a later Site Allocations DPD, using regional and national guidance for selection, together with any local criteria that may be appropriate to state in the CS. The CS would also have to say (or delegate the task to a later DPD) what would be the mechanism or circumstances that would trigger the release of Green Belt land for housing.
- 9) I am not sure why you are thinking about defining major developed sites in the Green Belt. I do not believe that such sites need to be identified. But if any are likely to be used for future new development, then they should be indicated in the CS with criteria laid out for any application, SPD or DPD. Whether such sites should be allocated when looked at in sustainability terms is a judgement for you based on the evidence.

End Date

- 10) PPS12 and PPS3 require the CS to cover at least 15 years from the date of adoption. This would take the end date of the CS to around 2026, beyond the RSS period (2021). I do not see a problem with extending the RSS housing requirement pro rata to 2026, providing this is clearly stated and the CS makes provision for dealing with the changed circumstances (see the Uncertainties section below) if the forthcoming review results in different figures.

Radlett Aerodrome Strategic Rail Freight Interchange

- 11) The possibility of this proposal cannot be left out of the CS because of its size and numbers of people employed. It may be that a decision would have been made on

the planning appeal by the time of the submission CS. Even if it has not, the CS should set out how it would deal with the proposal if – despite the Council's opposition – planning permission were to be granted for it by the Secretary of State. There would be various options open to the CS: see the Uncertainties section below for the most obvious ones.

Strategic Allocations

- 12) Paragraph 4.6 of PPS12 stresses that "strategic sites" should be those central to achievement of the strategy and that progress on a CS should not be held up by the inclusion of non strategic sites.
- 13) So a site is strategic if the delivery of the CS depends upon it. PPS12's advice on strategic sites does not make it obligatory for a CS to include strategic sites if there is another suitable timely DPD by which necessary allocations can be made. The inclusion of strategic site allocations in CSs (as opposed to the identification of broad locations for future developments) will add to the amount and detail of the work needed to support a CS. The detail is equivalent to a former Local Plan allocation. In addition, you will be aware that there will be detailed representation cases to be considered on alternative competing sites during the examination, which will increase your workload.
- 14) Thus allocations should normally only be included in a CS where there is a need to create certainty, or to enable an early start on the development, or where there is no programmed Allocations or other DPD to deliver the strategic sites. The implication of making a strategic allocation in the CS is that the development will not need to be resolved in a subsequent DPD. The CS will therefore need to be clear on how the development will be delivered, such as by a masterplan and/or SPD.
- 15) For a site anticipated in the early years of a CS there is an expectation that the detailed delivery matters such as availability and infrastructure requirements will have been resolved. Matters that impact on the rest of the Plan area (such as the scale and nature of development) will also need to have been resolved. On the other hand, matters that only impact on the site itself may not need to be detailed (see below).
- 16) The question as to the number and amount of any strategic site allocations also needs to be informed by what other DPDs are programmed in the LDS and the maintenance through that process of a 5 year housing land supply, both in PPS3 terms and in the CLG "rolling" supply requirement.
- 17) The policy in a CS for a strategic site (allocation or location) should cover the following:
 - A clear objective/aim for what is intended to be achieved in the overall development;
 - Identification of site constraints - both those that are fixed and those that need to be overcome or mitigated;
 - All the different land uses/proposals and their scale that the site is to accommodate (e.g. xx housing, yy employment, community facilities etc);
 - What infrastructure (e.g. transport, education, social and community services) is needed to make that development a viable, attractive, sustainable location;
 - What of the above needs to be provided by when (i.e. inter-related phasing of all elements) and who will fund it and deliver it.
 - *For an allocation:* whether further detail is to be worked up in a master plan and/or SPD (if so, specify timescales for delivery);
 - *For a location:* stating that the detail is to be worked up in later DPD (possibly an AAP), specifying timescales for delivery.

- *For an allocation:* milestones for progression of the development, e.g. application submission and commencement on site, phasing and consequences if missed. *For a location,* this should be left to the later DPD;
 - *For an allocation:* the boundary on the Proposals Map should encompass all the area needed for the development and related facilities, and its position can be shown on the Key Diagram. *For a location:* just a rough position on the Key Diagram shown, but if a defined search area for a later DPD is to be set, then that also would need to be shown on the Proposals Map.
- 18) It is generally helpful for the published CS to be supported by evidence which illustrates how the various elements might be accommodated within each strategic allocation. This might include an indicative or first draft of a masterplan. At Examination, the Inspector would not endorse any such material (that would be the purpose of, say, a subsequent SPD) but it would serve to demonstrate that the proposals were achievable.
- 19) Other points to bear in mind include:
- More complex sites or proposals might require more policy detail to guide a future SPD or applications than simpler sites;
 - The detail in the CS will need to be backed by evidence to demonstrate that the proposals are justified and appropriate - thus if some evidence is not available that will limit the level of prescription that can be specified.
 - Try and build in as much flexibility as possible within the overall proposals to accommodate unforeseen circumstances. This could include some reserve land, alternative access points, and making sure that the overall allocation is large enough to encompass all eventualities.
 - Matters of internal layout are likely to be less important for the CS than the linkages to the surrounding area (both physical links and demands placed on services and facilities).
- 20) For a strategic location the amount of detailed infrastructure work needed would be less and the sites could be roughly identified with stars or other non-specific notations on the Key Diagram. But there would still have to be sufficient evidence to show in principle that such sites were capable of development. The evidence could be more "broad brush", but it would have to show that the infrastructure could in all probability be provided and that there were likely to be timely solutions to any concerns.
- 21) You may find it useful to look at Horsham's CS which had both a strategic allocation and a strategic location (now the subject of an adopted AAP) within it.

Infrastructure Delivery Plan

- 22) An "Infrastructure Delivery Plan" was mentioned at our first meeting. It is imperative that infrastructure is seen to be in place at the right time to allow development to be implemented in the planned manner. The Inspectorate's recent "[Learning From Experience](#)" booklet contains useful advice on infrastructure planning and other matters.
- 23) For development in the short term (5 years) Inspectors will look for a large amount of detail and a high degree of certainty. But even in this period assumptions can be made if it is absolutely necessary. If assumptions are used you must make it clear how these will feature in the annual monitoring report and the CS must deal with "what if" alternatives if the assumptions prove to be wrong or over optimistic. I deal with this last important point below. Inspectors will not be unreasonable if all sensible efforts to obtain infrastructure certainty have been made and this is explained. For the medium or longer term sites Inspectors will accept that the level of detail and certainty will be less (see below).

- 24) Key to this is resolving what infrastructure is critical and what the infrastructure priorities are. These should then be placed into a critical “time line” or project management chart. The result is likely to determine the timing and phasing of each site, or group of sites, or area of development.
- 25) You need to get the main infrastructure partners on board and, where possible, 'signed up' to delivery mechanisms. This can mean chasing them to get answers up front and making sure that the answers are understood and acted upon before submission. The key questions to be addressed are a) what is the infrastructure required to deliver; and b) can it realistically be delivered in the timescale of the Plan’s phasing (once resolved)?
- 26) I appreciate that there may be problems exploring with some of the infrastructure providers what can be provided and when. This is where a pragmatic and realistic view will have to be taken. If the information cannot be obtained then you will have to provide the best possible information you can (perhaps from consultants or experts).
- 27) I was very concerned to hear about the lack of progress with the Highway Authority and Highway Agency on positively progressing development proposals and on providing you with the necessary information to make the critical decisions. If these bodies are unable to provide you with the information, then you must make your own assessment (possibly using consultants via the prospective developers) to justify the proposals you are promoting, to ensure that they will work in terms of access and traffic generation, and to ensure that they will provide the claimed benefits. This is particularly important for site AOS1 and the western orbital route.
- 28) Statements from developers that a site can fund the necessary infrastructure are meaningless assertions unless backed up by viability evidence. Viability assessment is even more important in today’s difficult financial climate - see ¶s 4.8 to 4.12 and 4.45 in PPS12. PPS12 says that the infrastructure planning process should identify and have evidence for, amongst other matters, cost and funding sources (¶s 4.8 to 4.12 and 4.45). The detail of such information would be less the further ahead one is looking. The PPS3 15-year period split into 3 x 5-year phases with less detailed information required on each successive phase could serve as a useful model/analogy for viability and delivery assessment in the CS (developable; deliverable; broad locations).
- 29) Viability is difficult – there is as yet no authoritative advice on how to deal with it. The HCA has produced a [Good Practice Note](#) on responding to the downturn, which gives some advice. Certainly, the house and land values of 2007 can no longer be used, but it can also be said that the very low values of the last few years should not extrapolated throughout the plan period. There is presently no “normal” market housing condition.
- 30) The strategic location in the Horsham CS previously mentioned has now been finalised in the adopted [West of Bewbush Joint AAP](#), which may be helpful in showing one way economic viability assessments can be used. This was done as follows:
- 31) The regular predictions of house price inflation produced by [Savills](#), [Knight Frank](#) and [DCLG](#) were used to derive an agreed level of house prices at the relevant date(s).
- 32) This was treated as the medium scenario. Two other scenarios were then created at agreed lower and higher house price rates. These three scenarios (low, medium and high) were then used in the [HCA economic appraisal tool](#), which are Excel spreadsheets (recently updated by the HCA).
- 33) Obviously, other appraisal tools are available, such as from Three Dragons (the London one is specific to that area) and the District Valuation Service.

- 34) If exceptional economic conditions persist the monitoring arrangements should identify the implications of this and point to what changes may need to be made to the CS. It is a feature of residual valuations that comparatively minor adjustments to the constituent figures can have a major effect on the result. Nevertheless, this methodology and this particular tool are commonly used for the valuation of development sites, which shows that it is potentially a reasonably precise valuation instrument.
- 35) The Community Infrastructure Levy is not yet resolved, and so the CS cannot deal with it in detail. Instead, it should provide a "hook" in a policy (possibly including matters to be included in S106 Obligations) for a later DPD policy.

Evidence base

- 36) Apart from the Glossary of Terms, the Appendices to the CS should not be part of the CS. They are part of the evidence base. From what I can see, they are summaries of key parts of more detailed and complex evidence elsewhere, and could be kept as part of the "audit trail" (see below).
- 37) See the [PINS article](#) on the evidence base. Evidence should be proportionate (only as much as is necessary) to the job that needs to be done. Remember that evidence gathering is a means to an end and not an end in itself. The starting point for the Inspector's Examination is the submitted CS and the evidence base will be explored only as much as is necessary to be satisfied that the CS is sound.
- 38) The evidence should inform what is in a CS. The evidence should be as up-to-date as is practical (¶ 4.47 PPS12). Be rigorous in selecting what is needed. You may need to update old studies. Give Executive Summaries to long, technical studies.
- 39) It could be a useful exercise to go through each policy and proposal in each CS asking yourselves critically what its justification is and what are the facts/analysis that backs this up. Is there a clear linkage from evidence to policy?
- 40) The CS needs to be clear what evidence is relied on. This can be achieved by very short explanations in the text and cross references (footnotes) to specific parts of supporting documents. All the evidence on which the CS is based should be published at the same time as the Pre-Submission publication. It is important that the evidence to inform the strategic choices is available in time to influence those choices, whereas evidence more concerned with aspects of delivery might come a little later, leading up to the Pre-Submission publication.
- 41) There is no need to summarise study findings in the CS itself as this can reduce clarity. Some councils (and Inspectors) have found it helpful to have a statement or "Audit Trail" that sets out the preparation process and which has clear links to the relevant evidence, including non-technical summaries, and to the policies. This is because it is often not clear to what extent the recommendations or conclusions of evidence reports have been taken forward, and why some recommendations are preferred over others.
- 42) I have looked through the list of the evidence base studies that has been sent to me and I can see no obvious gaps. Try not to over-complicate the evidence base – for instance, are all the conservation area character statements needed?

Schools

- 43) The need for more schools is a critical issue that the CS must deal with. If a school is needed early in the plan period and other proposals depend upon its provision, then it may require a strategic allocation in the CS. Otherwise, the rough location of the schools must be indicated in the CS, including alternative sites, the criteria for selecting them specified, and then the detail can be left to a later DPD.

Uncertainties

- 44) As ¶ 4.46 of PPS12 says, the CS will have to show how it will deal with contingencies – in other words with foreseeable changes. The important thing is for the implications of the uncertainty to be taken into account and the “what if” situation considered.
- 45) This is missing from the Emerging CS, and would have to be included in the submission CS for a range of topics, some of which I mention in this Note. The CS has to show what alternative strategies it has to handle the likely uncertainties, such as the late provision of needed infrastructure for the strategic sites, or the forthcoming review of the Regional Plan, or the rail freight interchange, or the Green Belt RSS repair process. In other words, the CS must be seen to be flexible and so effective, or else it is unsound. Flexibility comes through monitoring and management mechanisms and contingency planning in response to uncertainties.
- 46) The CS could set out in detail how the uncertainty would be handled; or specify monitoring targets/indicators with set limits when specified action would take place (e.g. the 10% - 20% range for housing in ¶ 65 PPS3); or devolve handling the uncertainty down to a separate DPD, setting out in the CS the parameters (broadly or in detail) for how in principle it would be dealt with; indicate that the CS would need to be wholly reviewed in order to deal with the uncertainty (the circumstances that would trigger the review and timing of it, allowing time for the review itself so that it would be adopted in time to deal with the contingency, should be stated; or indicate that a specified part only of the CS would need to be reviewed, probably as a separate DPD – again, set out the triggering circumstances and timing.

New policies or proposals

- 47) The key principle to bear in mind is that the public should have had an opportunity to contribute to and comment upon all matters before they appear in the submission version. Consultations should reflect the Statement of Community Involvement. Nothing should come as a surprise when the CS is submitted. So any new policies or proposals which are introduced in the Pre-Submission CS should be carefully considered as to whether additional consultation beyond that normally carried out at that stage is needed. Clearly the Sustainability Appraisal would also need to be altered to assess any substantial new policy or proposal. It all depends on the nature of the proposal and how controversial it is likely to be – there is no definitive answer.

Windfalls and SHLAAs

- 48) It is important to bear in mind that the identification of a site in a SHLAA would not necessarily mean that it is to be regarded as a deliverable site when calculating a 5 year supply of housing land nor does the preparation of a SHLAA absolve the Council from eventually allocating sites in a Site Allocations DPD or AAP.
- 49) You know through the SHLAA the extent of the gap in supply between sites that are now available (without the need for allocation in a DPD) and the date when the first allocated sites would come on stream (either strategic sites or those in a future Site Allocations DPD). The CS should say how that gap would be resolved. Phasing would need to be addressed in the CS.
- 50) PAS has produced a 2008 [FAQ Booklet](#) which answers some of the queries you raised about how to prepare SHLAAs. The SHLAA should sieve out sites which are patent non-runners (Stage 4 of the Practice Guidance), and also sites which the CS policies would preclude (Stage 7a and see also the FAQ Booklet above). You should in the SHLAA identify concisely the reasons for sieving out these sites, list them and record the fact that they have not been assessed further in the report.

- 51) PPS3 ¶ 59 makes it very clear that windfalls cannot be included in the first 10 years of land supply unless the authority can provide robust evidence of genuine local circumstances that prevent specific sites being identified. The fact that land has in the past come forward from windfalls, and is expected to continue to come forward, is not robust evidence of the sort required. Even in years 11 to 15 if it is not possible to identify sites, PPS3 requires the identification of broad locations for future growth. In some instances local authorities are able to rely on an element of windfalls in the 11 plus years period provided there is evidence to show that it is the only practical approach in the circumstances. See the above FAQ Booklet for more advice (Question 21).
- 52) Thus the “windfall allowance” in the table under ¶ 10.19 in the Emerging CS should either be removed and the housing found elsewhere, OR you will need to justify and explain the genuine local circumstances for including it. If the housing numbers to be provided are close to the RSS total requirement, then thought may need to be given to providing reserve sites in a later DPD in case numbers are not delivered as hoped.
- 53) Sites should have “reasonable prospects” in PPS3 ¶ 56 terms of them being considered developable, but I accept that this is difficult to assess where there is no hindrance to their developability other than the landowners’ intentions. This is because landowners’ intentions beyond the short-term (i.e. the first five years) are often unknown, even to themselves. In addition, the very identification of a site for development can trigger landowner or developer action, thus creating a ‘self-fulfilling prophecy’. Therefore, if a landowner has not said categorically that they have no intention of selling their site or that it should not be included for other reasons, then I believe it has a reasonable prospect of being available in the second or third of the five year PPS3 periods.

Proposals Map

- 54) The proposals map sets out the geographic application of all policies with specific spatial extent set out in any DPD or saved development plan. The CS has to show how the existing adopted proposals map (i.e. the adopted Local Plan map) will be changed as a consequence of its adoption. Changes include anything that is being removed (for example a protective designation) and not only what is being added. Many authorities are showing proposed changes through the use of inset plans within the submitted DPD.
- 55) The Inspectorate’s experience is that a complete “submission version” Proposals Map creates confusion between what is carried over and what is new and complicates CS examinations by side-tracking people from the main strategic issues. So this is not recommended.

Spatial Vision and Objectives

- 56) Your vision and objectives are commendably short, but they need to be more focussed and locally specific, especially the objectives. Some of vision appears to be vague, utopian and unrealistic. You should plan realistically for what might actually be achieved in a relatively short period of only 15 years. Very few of the objectives are locally distinctive or attempt to be specific – most are generic. What is needed and where is it needed? I am sure that you understand all these points and that the final CS will be much improved.

Housing Trajectory, Saved Policies and Key Diagram

- 57) As I mentioned at our first meeting, the CS needs to have a housing trajectory – probably in an appendix. It should clearly show how the sites would be phased over the plan period. The CS should also plainly set out what saved Local Plan policies it will supersede – again, probably in an appendix. And the Key Diagram should be easily found – either at the front or back of the CS.

Other Matters

- 58) Ideally you should complete the PAS self assessment toolkit. But it is not obligatory and could be left until the last moment.
- 59) The structure of the Emerging CS looks reasonable with thematic sections on housing, employment, retail etc. But, as Dacorum has commented, other Councils have placed the over-arching district-wide policies first and then those policies dealing with places, strategic sites, and other thematic areas afterwards.
- 60) Clearly with nil employment land the CS will tackle this issue as one of its priorities. My comments on the Green Belt (where some employment sites are likely to have to be located) and on Strategic Sites apply equally to employment as to housing. One of the obvious questions that will arise is what will happen with any possible expansion of the Maylands Industrial Area to the west of the district? Will non-Green Belt land be released? Will Green Belt Land be released? If so, where, how much and why and when? If not, why not?
- 61) I realise that Maylands is dependant on what happens in Dacorum through an East Hemel Hempstead AAP, the draft of which also includes a stadium and a park and ride scheme. Although I gather that this AAP is now on hold, the RSS makes reference to this area and so the CS must deal with it and say how it will be assessed and progressed. It is one of the critical decisions. If the CS is to be quickly reviewed it might be possible to explain the planning background, commit to further joint working with Dacorum on the area (explain how), and then say that the CS Review would subsequently deal with the decisions for this area. I am not saying that this would be a perfect solution, but it might be an acceptable one to the examining Inspector, dependant on how the case is explained and justified.
- 62) Obviously, the CS will need a section on the monitoring of its policies. Please follow the advice in the Government's Good Practice Guide. Targets should be SMART (Specific, Measurable, Achievable, Realistic and Time-bound). See also the Inspectorate's advice on this in its recent LDF "Learning From Experience" booklet (see above).
- 63) It has not been possible to go much further on the detail of some of the policies due to the limited time available to me, although I have covered some other points above. That is why I have given you at the beginning of this Note the questions that you must ask yourselves for any policy or text that you are considering placing in the CS. I have read GO East's letter of 28 September on the Emerging CS and agree with its comments.

Last thoughts

- 64) Please don't try to invent/re-invent the wheel. Look at other councils' websites where they have a sound Core Strategy (see the Inspectorate's list of submitted DPDs on its [LDF web page](#)); look through the documents produced for their Examination (including the Inspector's schedule of matters/issues); and discuss experiences with planning officers in other similar councils.
- 65) Please remember that the LDF system is very flexible and that there are always several possible ways of resolving a problem. Be creative. But always back up your chosen course of action with convincing evidence. And if you can see likely problems ahead with your solution, set out how you would deal with the situation if it went off course - the "what if" scenarios.
- 66) Please don't ignore a problem or concern. State it and deal with it. A CS has to deal with the tough, critical questions and not avoid the issue by pushing the problem away to a later DPD or SPD.

67) And please do not take my advice as being the last word. Circumstances change and you will probably think of better ways of doing things.