

Hertsmere Local Development Framework

Development Plan Document

Revised Core Strategy

Summary of Statements of Common Ground

April 2012



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1. Introduction

In addition to the previous Statements of Common Ground submitted to the Inspector, the Council has also been in correspondence with other stakeholders to reach a state of Common Ground on the Revised Core Strategy. This has primarily taken the form of proposed minor amendments to the document. It has also resulted in a couple of other types of resolution, including a commitment to a review of the Open Space Study and a commitment to the inclusion of more detailed policies in the forthcoming Site Allocations or Development Management DPDs.

The following pages of this document summarises the level of discussion between each of the stakeholders approached, as identified in the Regulation 30 (1) (e) Statement of Representations Para 4.1.

The proposed Schedule of Minor Amendments sent to stakeholders can be found in the following Appendices. The Council have agreed a Statement of Common Ground with the following:

- Three Rivers District Council (Appendix A.i)
- David Lander Consultancy (Appendix B.i)
- CPRE (Appendix C.i)
- RPS on behalf of Willows Farm Bowman's Leisure (Appendix D.i)
- Highways Agency (Appendix E.i)
- Sport England (Appendix F.i)
- Herts Gardens Trust (Appendix G.i)
- Herts and Middlesex Wildlife Trust (Appendix H.i)
- Natural England (Appendix I.i)
- Forestry Commission (Appendix J.i)
- English Heritage (Appendix K.i)
- Hertfordshire County Council (Property) (Appendix L.i)
- Hertfordshire County Council (Environment) (Appendix M.i)
- Thames Water (Appendix S.i)

The Council have been in varying levels of discussion with these stakeholders, an explanation of which can be found in greater detail in Chapter 2:

- London Travelwatch
- National Federation of Gypsy Liaison (known as ITMB & Herts GATE)
- Savills on behalf of Jupiter Hotels
- Traveller Law reform project and Friends, Families and Travellers
- PGA Design

2. Summary

2.1 London Travelwatch

A proposed Schedule of Minor Amendments (Appendix O.i) was sent to Mr Stops at London Travelwatch on 23 February 2012. The content of the table was agreed to on 6 March 2012 and a proposed Statement of Common Ground was sent to London Travelwatch on that day (Appendix O.ii).

There was an exchange of emails (Appendix O.iii) clarifying the intention of the Statement. Unfortunately London Travelwatch has not signed the Statement, although their correspondence indicates that the proposed amendments were acceptable.

2.2 National Federation of Gypsy Liaison Group (*now known as Irish Traveller Movement in Britain (ITMB) and Herts Gypsy and Traveller Empowerment (Herts GATE)*)

A proposed Schedule of Minor Amendments (Appendix N.i) was sent to this group and HBC and ITMB & HERTS GATE came to a state of agreement on the matters. However as a result of restructuring at NFGLG the agreement was not signed. The group is now known as ITMB & HERTS GATE (see Appendix N.ii). The new officer dealing with this matter has been in correspondence and the Council have prepared a Statement of Common Ground, which has been signed by HBC and we are led to believe that ITMB & Herts GATE will also sign the Statement (Appendix N.iii) shortly.

2.3 Savills on behalf of Jupiter Hotels

A proposed Schedule of Minor Amendments (Appendix P.i) was sent Savills on behalf of Jupiter Hotels in response to the representations received. No acknowledgement or response has been received in relation to these proposals (Appendix P.ii).

2.4 Traveller Law reform project and Friends, Families and Travellers

A proposed Schedule of Minor Amendment (Appendix Q.i) was sent to this group. An email was received confirming that the group had insufficient capacity to proceed with further correspondence (Appendix Q.ii).

2.5 PGA Design

Following representations received on the RCS, the Council and PGA Design met to discuss the concerns raised and about proposed development at Bushey Golf Course. A table of minor amendments was not proposed, concerns regarding the Open Space Study are considered to have been addressed in response to Sports England representations.

A meeting on 26 March 2012 took place between the Council and PGA Design. Site specific matters were discussed regarding a proposed master plan for the site put forward by PGA Design. HBC approached PGA Design with a proposed Statement of Common Ground (Appendix J) on the basis that the meeting was considered to address concerns raised.

There was a phone conversation between HBC and PGA Design on 10 April 2012 following the proposed Statement, and a further clarification email was sent that day. On 19 April 2012 PGA Design proposed a different statement of Common Ground, which did not accurately reflect the matters previously discussed. Correspondence is included in Appendix R, along with both versions of the proposed Statements.

Appendix A

Three Rivers District Council

- i. Schedule of Proposed Minor Amendments

Objector: Three Rivers District Council

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>Paragraph 3.40 refers to the East of England Plan Single Issues Review as the most recent examination of current and future need for Gypsy and Traveller sites and the needs identified in Hertsmere Borough for 18 additional pitches to 2011 and 15 further pitches between 2011-21. However the policy sets out that just 10 pitches are to be allocated to meet needs between 2011-17. It is unclear what this target of 10 pitches between 2011-17 is based on.</p>	<p>Paragraphs 3.40-3.41 / Policy CS6</p>	<p>The methodology set out in the supporting text requires clarification to make clear the justifiable reasons for the Council only setting a target to 2017. Similar text was in a previous version of the Core Strategy that was subject to a period of public consultation. This text was deleted and should be reinserted.</p> <p>Some drafting errors were made in the supporting text and the Policy in respect of the target and the date that the target would run until. These should be corrected. Amendments should be made to make clear that the Council will provide for additional pitches beyond 2011 at the rate specified in the RSS to 2017.</p> <p>The RSS requires that beyond 2011 provision should be made for a 3% compound increase in pitch provision, based on the total number of pitches required by 2011. The RSS requires that the Council provide 53 pitches by 2011. It can be seen from the table below that the Council would exceed the RSS requirement if it were to provide 2 additional pitches a year over a 6-year period.</p>	<p><u>Paragraph 3.41</u> – Given that demand for sites has been established through the Council's own joint studies and regional plan examination, there is recognised to be a need to plan for additional pitches in the district. The Council's preferred option is to retain the target of 18 pitches established in the regional plan to 2011 and for some additional growth to 2016/7. Based on the regional plan assessment, this would equate to an additional 2 pitches a year. The Council does not consider there is a robust basis to plan from beyond 2017, as at this point the needs assessment will be more than 10 years out of date and the government has signalled its intentions to review Gypsy and Traveller requirements. This approach demonstrates a commitment to meeting Gypsy and Traveller needs, whilst recognising that a further assessment of need and a review of this aspect of the Core Strategy will be needed by 2017.</p> <p>(New paragraph) – Since the regional plan was adopted...</p> <p><u>Policy CS6</u> – The Council will provide for the further needs of Gypsies and Travellers on the basis of identified need within south and</p>

west Hertfordshire, the Council will seek to identify and allocate up to 9 additional pitches to meet the East of England Plan requirements to 2011 and a further 402 pitches per annum to 2017 through the identification of land in the Site Allocations DPD...

Year	Pitches at start of year	Increase (3%)	Pitches at end of year
1	53.00	1.59	54.59
2	54.59	1.64	56.23
3	56.23	1.69	57.91
4	57.91	1.74	59.65
5	59.65	1.79	61.44
6	61.44	1.84	63.28

Paragraph 3.40 – The single-issue review represents the most recent examination of evidence of current and future need for gypsy and traveller sites. This set district pitch requirements being across the eastern region to 2011 together with a recommendation that local authorities plan for an annual 3% compound increase in pitches after 2011. While the Council and others objected to the rate of growth, which was approximately six times greater than the planned level of other housing growth in Hertsmere, this was accepted by the Planning Inspector. For Hertsmere the regional policy set a target of 18 pitches to 2011 and an additional 15 pitches to 2021. Particular issues which emerged from the examination in relation to need included:

- That gypsy and traveller families tend to have larger families and shorter generations
- That future demand tends to focus on locations where there are already gypsy and

The supporting text should be amended to reflect the fact that the Council is committed to fulfil its 'duty to cooperate' and will work with neighbouring authorities to meet the identified need for additional transit pitches.

Paragraphs 3.38-3.42 / Policy CS6

In addition, the Core Strategy does not mention needs identified in the East of England Plan Single Issue Review for transit pitches. The Single Issue review sets out that there is a need for 10 transit pitches in south and west Hertfordshire to complement the existing South Mimms site by 2011. The adopted Three Rivers Core Strategy sets out that we will work with neighbouring authorities to identify the most appropriate location(s) for these pitches. We therefore have concerns that the need for transit pitches is not referred to in the Hertsmere Core Strategy.

<p>traveller communities</p> <p>Regional policy also sets a target for two new 10-pitch transit sites in Hertfordshire, one of which should be located within the south west of the County to complement the existing transit site at South Mimms. The Council will work with neighbouring authorities to identify the most appropriate location for this new site.</p>			
<p>(New paragraph) – ...Since the regional plan was adopted, a further 9 pitches have been approved – six pitches at the Pylon Site in Potters Bar which have since been implemented and three pitches at Sandy Lane in Bushey, approved in 2011 and for which government grant funding has been received to deliver the pitches. Given that there may be scope for small extensions to or intensification of one or more of the other existing authorised sites, any further provision beyond this, if required, is likely to be limited to no more than one larger site or a limited number of very small sites to accommodate the requirements to 2017. The Council will also consider the potential for extending the existing transit site at South Mimms, which is recognised by Hertfordshire County Council to be underused for providing some permanent pitches to provide some permanent pitches in addition to the existing transit pitches.</p>	<p>HCC has advised the Council that the conversion of some existing pitches to permanent pitches would no longer be supported due to an increase in demand for transit pitches. The text should be updated to reflect these more recent discussions.</p>	<p>Paragraph 3.41</p>	<p>The Core Strategy suggests that the Council may consider the potential for extending the existing transit site at South Mimms to provide some permanent pitches. While we would not object to the extension of the site to provide permanent pitches in addition to the existing transit pitches, we would have concerns about any net loss of transit pitches on this site which could increase the requirement for transit pitches to be provided elsewhere in south west Hertfordshire.</p>

Appendix B

David Lander Consultancy

i. Schedule of Proposed Minor Amendments

Objector: David Lander Consultancy Ltd. (on behalf of RRHE LLP)

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>Table 5 sets out the Spatial Objectives for each of the principal settlements in the Borough. Para 2.26 recognizes that "Borehamwood and Potters Bar will remain the two largest centres of employment in the Borough where many homes, jobs and services are located". Table 6 identifies Borehamwood as lying at the top of the settlement hierarchy of the Borough and 'an important economic centre for South Hertfordshire'. Paragraph 4.17 states that one of the key roles of the LDF is 'to maximize economic development opportunities in the Borough' and adds that 'this is set out in the LDF Spatial Vision and Key Objective 11'. In our submission it is not however translated into the Spatial objectives for Borehamwood.</p>	<p>Table 5</p>	<p>The text should be amended to make clear that Borehamwood is the main town in the Borough's settlement hierarchy (Table 6) and recognised as 'an important economic centre for south Hertfordshire'.</p>	<p>Table 5 – ...Protect and encourage the town's employment and industry in the town...</p>
<p>This paragraph is inconsistent with the proposal in Policy CS8 to safeguard land for additional employment between the A1 and Rowley Way at Borehamwood. Specifically, the second sentence of the paragraph is unchanged from the previous Core Strategy which did not include that proposal.</p>	<p>Paragraph 2.36</p>	<p>The text should be amended to clarify that the focus for employment will include land safeguarded for employment development adjacent to two of the Borough's designated Employment Areas.</p>	<p>Paragraph 2.36 – The focus for employment will continue to be on town centres and in and adjacent to the Borough's designated Employment Areas, including land safeguarded for employment development, rather than through the development of new locations for employment generating development...</p>
<p>Para. 5.7 states that the Council will review the detailed Green Belt boundary in a subsequent Site Allocations and Development Management DPD. It</p>	<p>Paragraph 5.7 / Policy CS12</p>	<p>No amendments should be made in respect of the Green Belt status of the land that would be safeguarded</p>	<p>Paragraph 5.7 – ...It is also suggested that the Green Belt boundary around Shenley be redrawn around the major 900 home</p>

<p>also indicates particular locations where a change to the boundary is envisaged.</p> <p>We object to this on three grounds:</p> <ul style="list-style-type: none"> the omission of any reference to the proposed safeguarded employment land between the A1 and Rowley Way (Policy CS8); the omission of any reference to the removal of the Holiday Inn Hotel at Borehamwood from the Green Belt; the absence of a policy to clarify Green Belt boundary proposals. <p>These points are addressed in turn.</p> <p>Safeguarded Employment Land between A1 and Rowley Way: it is inconsistent with the safeguarding of this land for future employment purposes that it should remain in the Green Belt.</p> <p>We highlight the guidance in para 2.12 of PPG2: <i>"When local planning authorities prepare new or revised structure and local plan, any proposals affecting Green Belts should be related to a time-scale which is longer than that normally adopted for other aspects of the plan. They should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period. In order to ensure protection of Green Belts within a longer time-scale, this will in some cases mean safeguarding land between the urban area and the Green Belt which may be required to meet longer-term development needs."</i> (our underlining)</p> <p>The text underlined confirms that safeguarded land will not remain in the Green Belt. The correct</p>		<p>for employment. The Council's intended approach is that this land remains in the Green Belt unless it is required for employment use on account of as yet unknown losses of land from existing Employment Areas and any resulting unmet need. This is consistent with PPG2 paragraph B5, which makes clear that safeguarded land is not allocated to meet immediate development needs, but rather kept free to meet the purpose of fulfilling possible longer-term development needs.</p> <p>Paragraph 5.7 should be amended to support other areas of the document that refer to safeguarded employment land.</p> <p>The safeguarded employment land between the A1 and Rowley Lane was identified in an LDF supporting study (Employment Site Allocations Report, November 2011). This was undertaken before the Council was aware that the Holiday Inn would become available for development in the longer-term. As stated, the Holiday Inn site logically forms part of the parcel of land between the A1 and Rowley Lane and, given that it is</p>	<p>redevelopment of Shenley hospital, which has a largely suburban character. This was intended when the original brief for the hospital site was agreed in 1986 and would be consistent with the status of Elstree village, where the historic part of the village is situated in the Green Belt but the remainder is not. In addition, areas of land are safeguarded for employment adjoining the Elstree Way and Cranborne Road Employment Areas.</p> <p><u>Paragraph 4.21</u> – ... This is considered to represent the most appropriate location for the provision of additional employment land, given its immediate proximity to existing employment land and to the primary route network, its limited environmental quality, the extent of existing PDL and buildings and the wider importance of the Elstree Way employment area for Borehamwood, which will be accommodating the greatest proportion of new housing in the borough over the next 15 years...</p>
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<p>policy response in this case therefore is that the land between A1 and Rowley Way (subject to the following matter regarding the Holiday Inn Hotel) is removed from the Green Belt and made subject to an appropriate policy for development control purposes. The detailed wording of that policy, and the specific new boundary, is agreed to be a matter for the Site Allocations and Development Management DPD. It is however important that the principle of a Green Belt boundary change in this location is identified in the Core Strategy and not 'delegated' to the subsequent DPD.</p> <p>Holiday Inn Hotel: the hotel comprises a substantial parcel of intensively developed land at the junction of the A1 and Rowley Way. Its inclusion in the Green Belt represents an anomaly. It does not serve any Green Belt purposes (PPG2 para. 1.5), nor is it capable of fulfilling any of the intended uses of Green Belt land (PPG2 para. 1.6). In the intended review of the Green Belt boundary this land should be removed from the Green Belt and placed within the urban area.</p> <p>This is a separate matter to the proposed safeguarding of future employment land to the north of the hotel and is a change that should also be highlighted in the Core Strategy.</p> <p>The Need for a Policy: PPS12 emphasizes the critical role of the Core Strategy in determining spatial priorities. Para. 4.5 states:</p>	<p>likely to become available for development, should also be safeguarded. An addendum to the supporting study has been produced, explaining the process behind this decision and setting out a revised map of the area that the Council considers suitable for safeguarding. There is no significant need to amend Policy CS8 or its supporting text, as these only refer to a broad area of land between the A1 and Rowley Lane adjoining the Elstree Way Employment Area. The Site Allocations & Development Management Policies DPD will clarify these locations at a later date.</p> <p>Notwithstanding this, paragraph 4.21 should be amended to include some reference to the existing buildings in the proposed safeguarded area and other previously developed parts of this land. This would provide a greater level of clarity.</p>	
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<p>"it is essential that the Core Strategy makes clear spatial choices about where developments should go in broad terms. This strong direction would mean that the work involved in the preparation of any subsequent DPDs is reduced. "</p> <p>The Green Belt is a fundamental planning concept in relation to spatial strategy in Hertsmere and it is essential that, consistent with the guidance in PPS12, the Core Strategy identifies the scope for - and limitations on - changes to the Green Belt boundary, albeit the precise detail of those will be determined through the subsequent DPD.</p> <p>As well as requiring amendments to para. 5.7 to address the matters described above, we submit that an additional policy (or an extension to Policy CS12) should be included in the Core Strategy to provide the clear direction necessary for this purpose.</p>			
<p>We support the intention to identify additional employment potential by safeguarding land north of the Holiday Inn hotel between the A1 and Rowley Lane at Borehamwood. It is important that the Core Strategy makes provision for such additional development consistent with the role, stated in para. 4.17, "to maximize economic development and employment opportunities in the Borough". The suitability of this land is emphasized by:</p> <ul style="list-style-type: none"> • its co-location with existing strategic employment land in the Elstree Way Corridor; • its location at Borehamwood, the principal 	<p>Policy CS8</p>	<p>Noted. An LDF supporting study (Employment Site Allocations Report, November 2011), which is available for download from the Council's website, justifies the Policy and its supporting text. Minor amendments to the Green Belt Boundary will be considered as part of the Site Allocations DPD.</p>	<p>N/A</p>

<p>settlement in the Borough in terms of the settlement hierarchy (Table 6);</p> <ul style="list-style-type: none"> • its strategic location adjacent to the A1; • the fact that the land fulfil little Green Belt purposes at present having regard to the substantial areas of hardstanding and generally poor environmental quality. <p>Current and emerging national policy (PPS4 and Draft NPPF) emphasizes the importance of stimulating economic growth through stronger support for business and employment development. In a Borough like Hertsmere, with tightly defined urban boundaries, it is especially important that the Core Strategy takes a positive approach to identifying additional development opportunities, including facilitating necessary changes to the Green Belt boundary (see Representation relating to para 5.7).</p> <p>This is reflected in para 5.6 of the Core Strategy which refers to the importance of facilitating "business churn" in the Green Belt. Para. 4.46 of PPS12 states that a Core Strategy is "unlikely to be effective if it cannot deal with changing circumstances". The identification of the land between the A1 and Rowley Lane in Policy CS8 is consistent with this guidance,</p>			
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Appendix C

CPRE

- i. Schedule of Proposed Minor Amendments

Objector: CPRE Hertfordshire

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>As currently worded, clause (vii) of Policy CS1 misleadingly implies that only 'inappropriate development' that is harmful to the openness and appearance of the Green Belt should be avoided, whereas all development that is inappropriate in the Green Belt should be avoided, because it is contrary to national policy, as currently set out in PPG2. The misleading implication is a result of a comma being omitted after 'inappropriate development'. The policy is therefore inconsistent with the text of the Revised Core Strategy and with Policy CS12, as well as national policy.</p>	<p>Policy SP1</p>	<p>The wording of the Policy should be amended to clarify that there is a presumption against all inappropriate development in the Green Belt in accordance with PPG2.</p>	<p>Policy SP1 – ...vii) avoid inappropriate development in the which causes harm to the openness and appearance of the Green Belt;...</p>
<p>Policy CS8 proposes the allocation and safeguarding of an undefined area of Green Belt land for employment development between Borehamwood and the A1, and this is shown diagrammatically on the Key Diagram. No recognition of the Green Belt status of this land is included in the Policy, or in the relevant text in paragraph 4.21, no indication is given of the size of the area proposed for development, and no explanation is given of the Council's justification for developing this Green Belt land contrary to national, and the Council's own, Green Belt policy. The statement that the</p>	<p>Paragraph 4.21 and Policy CS8</p>	<p>An LDF supporting study (Employment Site Allocations Report, November 2011), which is available for download from the Council's website, justifies the text, the safeguarding of this land and the Policy that it supports. In particular, this study explains that a significant proportion of the area of proposed safeguarded land has been previously developed. This is not adequately reflected in the supporting text and should be clarified.</p>	<p><u>Paragraph 4.21</u> – ... This is considered to represent the most appropriate location for the provision of additional employment land, given its immediate proximity to existing employment land and to the primary route network, its limited environmental quality, the extent of existing PDL and buildings and the wider importance of the Elstree Way employment area for Borehamwood, which will be accommodating the greatest proportion of new housing in the borough over the next 15 years...</p>

<p>Council considers that this is 'the most appropriate location for the provision of additional employment land' does not meet the national policy requirement for justification of the release of Green Belt for development. The inclusion of this specific proposal is therefore considered to be unsound by virtue of being unjustified and inconsistent with national planning policy.</p>		<p>With regard to the quantum of development, this will be guided by employment land requirements and the extent of currently vacant designated employment land.</p>	
<p>In our representations on the Pre-submission Core Strategy we suggested that the reference to PPG2 be amended to refer to 'national planning policy' in view of the government intention to supersede existing individual guidance documents apart from PPS10. This is necessary to avoid a cross reference to an out of date document. To be effective, the second paragraph of the Policy should also appear first, to provide the proper strategic context for decision making on development in the Green Belt, that is, the presumption against inappropriate development, and as indicated in the Policy title. This change would in part overcome our concern expressed on the Pre-submission Core Strategy in 2011, about the need for a specific Green Belt policy.</p>	<p>Policy CS12</p>	<p>No changes should be made. This is because: - First, it is not considered appropriate to refer to draft government policy guidance in a policy. Reference is made to the emerging 'consolidated national planning framework' (i.e. the NPPF) and the general implications that this will have for existing PPGs/PPSs in Paragraph 1.14 of the supporting text. - Second, the Policy relates to the Green Belt and the natural environment. Its structure is logical, dealing first with broader issues and then specifically with the Green Belt. The order of the paragraphs has no impact on the effectiveness of the Policy.</p>	<p>N/A</p>

<p>The final sentence of paragraph 5.22 notes that there is a 'wish to avoid a concentration of uses on the site (a farm) which might not be considered as conventional or appropriate activity in such a location' in part reflecting its Green Belt location. This wording fails to reflect that the starting point for consideration of proposals in Green Belt locations, should be whether both the 'uses' that might be considered acceptable, and the specific development proposals, are appropriate in Green Belt terms as defined in national planning policy. The current wording is not therefore likely to be effective, and is not consistent with national planning policy.</p>	<p>Paragraph 5.22</p>	<p>The text should be amended to clarify that there is a presumption against inappropriate development at Willows Farm in the Green Belt in accordance with PPG2.</p>	<p>Paragraph 5.22 – ... Whilst it is also a working farm, the more commercial and public aspects of the site need to be managed sensitively, given its Green Belt location and the wish to avoid a concentration of uses developed on the site which might not be considered as conventional or appropriate activity in such a location.</p>
<p>Clause 'v)' of Policy CS14 rightly refers to promotion of recreational uses which are appropriate in the Green Belt, but should also ensure that the development itself is appropriate, as defined in national policy, otherwise the policy implies that any development will be encouraged, whether 'appropriate' or 'inappropriate' in Green Belt terms. This would be contrary to national planning policy and the stated intentions of the Core Strategy.</p>	<p>Policy CS14</p>	<p>No changes should be made. Criteria v) should be read in the context of the Policy text that precedes (i.e. 'the provision or enhancement of visitor and appropriate facilities in the countryside... will be encouraged where this... promotes uses which can be considered as appropriate in the Green Belt...'). The Policy therefore specifies that development should only take place where it would provide essential facilities for land uses that are appropriate in the Green Belt in accordance with paragraphs 3.4 and 3.5 of PPG2. There is no need to amend the text, as the issue of development is covered.</p>	<p>N/A</p>

Appendix D

RPS on behalf of Willows Farm

- i. Schedule of Proposed Minor Amendment

Objector: Willows Farm (representor number - 4552)

Objectors Comment	Paragraph / Policy / Table number	Reason for Change	Suggested Change
<p>It is not considered consistent with the Good Practice Guide on Tourism (DCLG May 2006). It is considered that the following additional supporting text and policy (on similar lines) should be inserted at the end of Chapter 4 on Tourism Development Paragraph - The Council recognises that tourism is a fast changing industry, and in keen to support tourism initiatives, particularly where the provision of facilities may help to provide all-year round facilities for residents and visitors. The Council will support proposals for the extension, upgrade and improvement of existing tourist attractions. Applications for new tourist attractions will require careful consideration given the need to balance potential benefits to the local economy from increased employment and visitor numbers against the need to protect the high quality landscape within which they are located.</p>	<p>Chapter 4 and 5 Paragraph 5.20-25</p>	<p>The Council recognises Willows Farm as an access gateway to the countryside, and a 'very popular visitor attraction which that Council also recognises plays both an important economic and rural access role' (RCS para 2.20). RCS Policy CS14 supports rural visitor attractions and their enhancements, and is also consistent with PPS4 Policy EC7. Willows Farm itself is identified several times in the Core Strategy as a visitor attraction of environmental interest, a rural gateway site, and with its existing economic and retail function. To ensure clarity wording to be added to paragraph 5.25.</p> <p>Paragraph 5.22 also identifies the overarching Green Belt designation, and the restrictions that come with that. It is anticipated that more specific policies will be incorporated into the Site Allocations and Development Management DPD. The Guide on Tourism is good practice, this document is still applicable, but will be superseded by the NPPF.</p>	<p>End of paragraph 5.25 – <u>'The Council is keen to support tourism initiatives, such as proposals for the extension, upgrade and improvement of existing rural visitor attractions.'</u></p>
<p>The final sentence of paragraph 8.14 and Policy CS27 (stating that further retail development at Willows Farm will not be sought given its location outside of any designated centre in the Borough) could potentially stifle the future viability and expansion of Willows Farm Village. Specifically concerning the provision of any future tourism based retail development that is ancillary to its</p>	<p>Paragraph 8.14 and Policy CS27</p>	<p>No proposed change – protecting and strengthening town centres / local centres by focusing future retail development within these areas is an approach consistent with guidance within PPS4 and other regional and national guidance.</p> <p>Further retail development at Willows Farm, which cannot be demonstrated to be ancillary to the main use</p>	<p>None</p>

<p>function as a day visitor attraction.</p> <p>The policy takes no account of the function of the retail element of activities at Willows Farm, which is primarily to serve visitors.</p> <p>The following changes are being sought: - The deletion of all after 'retail activities' in the final sentence of paragraph 8.14 and the deletion of all other policies in final sentence of Policy CS27. This additional section would make the RCS sound by bringing it in line with national planning policy regarding and economic development tourism.</p>		<p>of the site as a visitor attraction and rural gateway, will not therefore be supported.</p> <p>Policies CS27 and CS14 should also be read in context with CS12. The last sentence in CS27 also applies to other retail functions in the Green Belt, which are also 'out of centre'. This proposal to promote retail development at Willows Farm would be unsuitable on two grounds and inconsistent with national and regional policy.</p>	
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Appendix E

Highways Agency

i. Schedule of Proposed Minor Amendments

Objector: Highways Agency

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>"Any development should form of a comprehensive, integrated package of measures to improve their respective adjoining Employment Areas and associated access, with consideration of Policies CS21, CS23 and CS25."</p> <p>"The boundaries of the area adjoining the Elstree Way Employment Area and parameters for development for the land adjoining Cranborne Road and Elstree Way will be clarified in the Site Allocations DPD. The Elstree Way Employment Area and the proposed safeguarded land will be covered by the Elstree Way Corridor AAP, as specified in Policy CS22."</p>	<p>CS8</p>	<p>Amend for clarity</p> <p>However, it is envisaged that the Elstree Way Area Action Plan will only cover the area, of the existing Elstree Way Corridor SPG. However, the text in paragraph 4.21 has been amended so states that:</p> <p><i>"In line with national planning policy, the status of safeguarded land, between the urban area and the Green Belt, is required to meet long term development needs beyond the plan period. It is not allocated for development at the present time. Planning permission for development of safeguarded land will only be granted following a review of the Site Allocations DPD (or any other equivalent document) and, until such time, normal Green Belt policy will apply."</i></p>	<p>"Any development should form of a comprehensive, integrated package of measures to improve their respective adjoining Employment Areas and associated access, with consideration of Policies CS21, CS23 and CS25."</p>
<p>The Highways Agency requests clarification on several items as described above. It is recommended, given Policy CS8 deals with the scale and location of development that</p>	<p>Paragraph 4.24</p>	<p>The level of jobs growth in the safeguarded land is not known yet, this will depend on the extent of</p>	<p>"...Consequently, proposals in Employment Areas for more than 2,500 sq m (net) of new office floorspace</p>

<p>as far as possible at this stage it is indicated what proportion of the total planned additional jobs is anticipated to be located at the Elstree Way employment area and adjacent safeguarded land.</p> <p>Also, the Highways Agency recommends the following text, highlighted in green italics, is added to paragraph 4.24* in order to increase its effectiveness:</p> <p>"...Consequently, proposals in Employment Areas for more than 2,500 sq m (net) of new office floorspace (including ancillary office accommodation) will be limited to locations in the Elstree Way Employment Area, <i>including development on the adjacent proposed safeguarded land.</i>"</p>		<p>existing sites in Elstree Way are in capable of redevelopment for other uses.</p> <p>Amend 4.24 for consistency</p>	<p>(including ancillary office accommodation) will be limited to locations in the Elstree Way Employment Area, <i>including development on the adjacent proposed safeguarded land if required.</i>"</p>
<p>The Highways Agency recommends the following text, highlighted in green italics, is inserted into Policy CS22, to increase the effectiveness of this policy and its justification:</p> <p>"Any development should have regard to guidance set out in the Elstree Way Corridor Area Action Plan DPD and be brought forward in a coordinated manner. <i>The AAP will incorporate the Elstree Way employment area and the proposed safeguarded land to the east, between Rowley Lane and the A1 Barnet Bypass...</i>"</p> <p>"...and should be in compliance with other policies in the Core Strategy, with particular reference to the requirements of policies CS21, <i>CS23</i> and CS25."</p> <p><i>"The AAP will be supported by a suitable evidence base which considers, amongst other things, the potential</i></p>	<p>Policy CS22</p>	<p>Consistency.</p> <p>It is envisaged that the Elstree Way Area Action Plan will only cover the area, of the existing Elstree Way Corridor SPG.</p> <p>The AAP, will have to provide such information for examination and such meet the test of soundness. Transport work has been completed of the initial masterplanning work, and a copy is provided.</p>	<p>"...and should be in compliance with other policies in the Core Strategy, with particular reference to the requirements of policies CS21, <i>CS23</i> and CS25."</p>

<p><i>cumulative traffic effects of planned development in the area on the surrounding transport network, including the Strategic Road Network. In consultation with relevant stakeholders, this evidence will be used to determine what mitigation and improvement works may be required to facilitate development coming forward and ensure the highway network can operate efficiently and safely in the future. As part of the AAP and in consultation with stakeholders, consideration will be given to a potential tariff mechanism or CIL contribution to secure funding for infrastructure, including highway mitigation, if based on evidence it is deemed necessary, and does not compromise the viability of development."</i></p> <p><i>"Transport assessment work prepared in support of development coming forward should take account of advice set out in DfT Circular 02/2007, the Highways Agency's Protocol for Dealing with Planning Applications, and local highway authority advice, including the need to ensure the Strategic Road Network is 'no worse off than if the development did not take place'."</i></p>			
<p>The Highways Agency recommends the following text is inserted into Policy CS19, to increase its effectiveness from the Highways Agency's perspective:</p> <p>"(iii) public transport accessibility, and local and strategic road network capacity; and"</p>	CS19	Agreed for clarity	"iii) public transport accessibility, and local and strategic road network capacity; and"
<p>The Highways Agency recommends the following text, is inserted into Policy CS23:</p> <p>"(i) it is accompanied by a suitable Travel Plan (for developments over 2,500sqm or 80 residential units),</p>	CS23	Agreed for clarity	CS23: "ii) it is accompanied by a suitable Travel Plan (for developments over 2,500sqm or 80 residential units), prepared in accordance with guidance set out in the Parking Supplementary Planning Document

<p>prepared in accordance with guidance set out in the Parking Supplementary Planning Document <i>and DfT guidance on preparing travel plans.</i>"</p> <p><i>"Reference should also be made to advice set out in DfT Circular 02/2007, the Highways Agency's Protocol for Dealing with Planning Applications, and local highway authority documentation, in terms of producing transport assessment in support of development proposals.</i></p>			<p><i>and DfT guidance on preparing travel plans."</i></p> <p>Insert to the end of Paragraph 7.6: <i>"Reference should also be made to advice set out in DfT Circular 02/2007, the Highways Agency's Protocol for Dealing with Planning Applications, and local highway authority documentation, in terms of producing transport assessment in support of development proposals.</i></p>
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Appendix F

Sports England

- i. Schedule of Proposed Minor Amendments

Objector: Sport England

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>Sport England welcomes the spirit and broad content of this policy as it takes a positive approach to facilitating and promoting the building and land use requirements of local services which would include community sport. However, there is concern that the Council's evidence base on sport which would support the inclusion and implementation of this policy will not be sufficiently robust if challenged when the policy is implemented.</p> <p>While reviewing the evidence base would be preferential before the strategy is examined, as Sport England would not wish to delay the preparation of the core strategy, I would be prepared to accept a commitment being made in the core strategy.</p>	<p>Policy CS17: Access to Services</p>	<p>The Council will need to keep technical studies under review in light of these comments and given the need to maintain an evidence base for future CIL work. The Council is keen to work with Sport England where possible. Paragraph 7.21 of the Council's Infrastructure Topic Paper states that "Following representations from Sport England concerning the methodology of the Open Space Strategy and Play Pitch Strategy, the Council will review these in 2012/13. Potential changes arising from this will be published as an update or superseded in the forthcoming Hertsmere Parks and Play Strategy." An addition to the Core Strategy is not felt appropriate as any necessary revision will be completed early in the Plan period.</p>	<p>No Change</p>
<p>Sport England welcomes this policy as it supports the principle of new community facilities including sport and seeks to protect existing facilities. However, there is concern that the Council's evidence base on sport which would support the inclusion and implementation of this policy will not be sufficiently robust if challenged when the policy is implemented.</p> <p>While reviewing the evidence base would be preferential before the strategy is examined, as Sport England would not wish to delay the preparation of the core strategy, I would be prepared to accept a commitment being made in the core strategy.</p> <p>This policy is welcomed as it makes provision for new</p>	<p>Policy CS18: Key Community Facilities</p>	<p>The Council will need to keep technical studies under review in light of these comments and given the need to maintain an evidence base for future CIL work. The Council is keen to work with Sport England where possible. Paragraph 7.21 of the Council's Infrastructure Topic Paper states that "Following representations from Sport England concerning the methodology of the Open Space Strategy and Play Pitch Strategy, the Council will review these in 2012/13. Potential changes arising from this will be published as an update or superseded in the forthcoming Hertsmere Parks and Play Strategy." An addition to the Core Strategy is not felt appropriate as any necessary revision will be completed early in the Plan period.</p>	<p>No Change</p>
	<p>Policy CS20:</p>	<p>The Council will need to keep technical studies under review in light</p>	<p>No Change</p>

<p>residential and non-residential developments to make provision for on-site or off-site community facilities (which may include sport) through standard charges or individual planning obligations. However, there is concern that the Council's evidence base on sport which would support the inclusion and implementation of this policy will not be sufficiently robust if challenged when the policy is implemented. As provision will only be justified for facilities/services for which a need is known to arise from new development, the Council's evidence base will be scrutinized by developers when assessing whether such needs exist in relation to sport. If the evidence base is not considered to be robust, developers are likely to challenge the need to make provision for sport which may result in provision not being made even though needs may exist.</p> <p>While reviewing the evidence base would be preferential before the strategy is examined, as Sport England would not wish to delay the preparation of the core strategy, I would be prepared to accept a commitment being made in the core strategy</p> <p>Open Space Study:</p> <ul style="list-style-type: none"> • Undertake a revised quantitative assessment of indoor sports facility needs using the Facilities Planning Model and Active Places Power strategic planning tools in order to robustly analyse needs; • Undertaking a qualitative assessment of all indoor sports facilities using a consistent and robust methodology; • Undertaking consultation with key stakeholders that can provide a more detailed and robust 	<p>Standard Charges and other Planning Obligations</p>	<p>of these comments and given the need to maintain an evidence base for future CL work. The Council is keen to work with Sport England where possible. Paragraph 7.21 of the Council's Infrastructure Topic Paper states that "Following representations from Sport England concerning the methodology of the Open Space Strategy and Play Pitch Strategy, the Council will review these in 2012/13. Potential changes arising from this will be published as an update or superseded in the forthcoming Hertsmere Parks and Play Strategy." An addition to the Core Strategy is not felt appropriate as any necessary revision will be completed early in the Plan period.</p>	
	<p>Evidence Base</p>	<p>This chapter (indoor sport) of the Open Space Study was produced in close cooperation with the Council's Sports & Cultural Services Manager and Hertsmere Leisure (operators of Indoor Sport Facilities in the Borough). Both agreed with the conclusion of this chapter, however, it is noted that this is not articulated within the Study. Technical studies will be kept under review by the Council, who are keen to work with Sport England regarding their representations.</p> <p>Paragraph 7.21 of the Council's Infrastructure Topic Paper states that "Following representations from Sport England concerning the methodology of the Open Space Strategy and Play Pitch Strategy,</p>	<p>No Change</p>

<p>perspective of indoor sports facility needs and issues.</p> <p>Playing Pitch Study</p> <ul style="list-style-type: none"> The Council's Playing Pitch Assessment and Strategy was based on 2006 supply and demand data which will be significantly out of date by the time the core strategy is adopted. While the document was updated in 2010, it is unclear to what extent the supply and demand data was updated and whether the stakeholder consultation element was updated. Sport England considers that any playing pitch assessment which is based on data more than 3 years old would be out-of-date and in need of review unless the supply/demand data was monitored and the assessment updated on an annual basis. As it is unclear whether this has been undertaken, it is not possible to confirm that the evidence base for outdoor sports facilities is sufficiently up-to-date. 	<p>Evidence Base</p>	<p>the Council will review these in 2012/13."</p>	<p>No Change</p>
<p>The comments regarding the Playing Pitch Study are noted, and have been discussed at length between, Hertsmere Borough Council and Sport England.</p> <p>Dale Greetham of Sport England undertook a review of the playing pitch study (July 2010) he concluded "1. Clear conclusions and recommendations are presented to protect and improve playing pitch provision in the area – Fair". This would suggest that the evidence was of a fair standard for the use of planning decisions. The Council will keep technical studies under review. The Planning Department will work with the Parks Department (the Custodians of the Playing Pitch Study) to consider the representations. Given limited resources the Council is keen to work with Sport England to ensure that the evidence base is proportionate to the issues of the plan, as required by PPS12.</p> <p>Paragraph 7.21 of the Council's Infrastructure Topic Paper states that Following representations from Sport England concerning the methodology of the Open Space Strategy and Play Pitch Strategy, the Council will review these in 2012/13.</p>			

Appendix G

Herts Gardens Trust

- i. Schedule of Proposed Minor Amendments

Objector: Herts Garden Trust

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>'Unsound' due to: The Listed Building assets do not include historic gardens, locally listed buildings, those on the English Heritage Register, or the settings of heritage assets.</p>	<p>Paragraph 2.19; and Paragraph 5.16-5.20</p>	<p>Text should be inclusive of all appropriate references to those settings and buildings of particular historic interest</p> <p>No proposed change to references to locally listed buildings. It is referenced in both paragraphs 2.19 and 5.18</p> <p>Update paragraph 5.17 and number of CAs</p>	<p>Paragraph 2.19 – '...Hertsmere has over 330 listed buildings, gardens or structures...'</p> <p>Paragraph 5.16 – 'Although 80% of the Borough is designated Green Belt, the character, and distinctiveness and settings within of its towns and villages are critical local assets.'</p> <p>Paragraph 5.17 – 'There are presently over 330 listed buildings, gardens or structures in the Borough together with 156 Conservation Areas, all of which receive additional protection through the Planning (Listed Building and Conservation Area) Act 1990... Separate consent is also required for the demolition of Listed Buildings or buildings in a Conservation Area. Both the Council and English Heritage hold a register of statutorily protected historic assets.'</p>

Appendix H

Herts and Middlesex Wildlife Trust

- i. Schedule of Proposed Minor Amendments

Objector: Herts and Middlesex Wildlife Trust

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>It is note that 'allotments and other urban open land including woodland and town or village greens' is listed as a 'key community facility'. Whilst this is welcomed, it would be preferable for this definition to be broadened to include 'other Green Infrastructure assets'.</p>	<p>Paragraph 6.4</p>	<p>To ensure that green infrastructure is recognised alongside other open or green space</p>	<p>Paragraph 6.4, 9th bullet – 'Allotments and other urban open land including woodland, <u>green infrastructure</u> and town or village greens...'</p>
<p>Habitat and green infrastructure creation and restoration should be included in the charging schedule.</p>	<p>Para 6.12, Table 11 and Policy CS20</p>	<p>No proposed change – habitat creation and green infrastructure are already listed in Table 11 as potential items to be included in a future CIL charging schedule. It should also be noted that the Greenway Strategy currently allows for S.106 contributions to be collected</p>	<p>None</p>
<p>Greater attention should be given to ecological linking features, buffer areas, support for the development and implementation of initiatives in Herts, and also any landscape-scale conservation areas, as may be defined or endorsed by the Hertfordshire LNP</p> <p>There should be reference made to the following documents to help</p>	<p>Paragraph 5.4</p>	<p>To ensure that ecological linking features/green infrastructure are recognised alongside other open or green space. Statutory designations are subject to buffer requirements and is more a subject for the forthcoming site allocations and DM policies</p>	<p>Paragraph 5.4 – add bullet point '<u>Ecological links and green infrastructure</u>'</p>
<p>There should be reference made to the following documents to help</p>	<p>Chapter 5</p>	<p>1. It is not clear what role Hertfordshire Local Nature Partnership has. The RCS recognises that HIMWT</p>	<p>Paragraph 5.13 – '...and many local environmental and voluntary organisations. The aims and objectives for the natural</p>

<p>boost the flexibility of the Core Strategy</p> <ol style="list-style-type: none"> 1. Local Nature Partnership (LNP); 2. Living Landscapes Strategy; 3. Natural Environment White Paper 2011; 4. DFRA's Biodiversity 2020 - A strategy for England's wildlife and ecosystem services (August 2011); 5. Nature Improvement Areas; 6. Ecological Restoration Zones; 7. Local BAP; 8. SHIP; and 9. Green Infrastructure Plan. 	<p>and HBRC are both consultees in the determination of matters in relation to the natural environment and its assets. The RCS does not rule out the use of such guidance where it is appropriate. (No proposed change)</p> <ol style="list-style-type: none"> 2. It is unclear what influence the 'Living Landscapes' document has, where HMWT is already a statutory consultee. The document cannot be downloaded from their website. It is also considered that the referencing of additional documents could reduce the documents flexibility. (No proposed change) 3. It is not considered necessary to reference a document that is not yet adopted as legislation (Natural Environment White Paper 2011). Again, the RCS does not rule out the use of such guidance anyway, where it is appropriate. (No proposed change) 4. DEFRA's Biodiversity 2020 to be referenced in Paragraph 5.13, where the aims and objectives are consistent 5. It is not obvious that there are any ERZs or Nature Improvement Areas in Hertsmere. (No proposed change) 6. No need to reference Local BAP, as it is cited due to repetition in paragraph 5.13. (No proposed change) 7. Additional references can be added to paragraph 5.13 for clarification where appropriate on Green Infrastructure Plan/SHIP 	<p><u>environment are consistent with those found in the Biodiversity 2020 – A strategy for England's wildlife and ecosystem services (August 2011). ...</u></p> <p>Paragraph 5.13 - Insert at the end of the paragraph <u>'Working with local partners including the County Council and adjoining authorities, the Council has recently produced a Hertsmere Green Infrastructure Plan, which forms part of the evidence base of the Core Strategy and identifies the need for delivering GI in the future. The Plan aims to: increase green access links to the countryside from main settlements; conserve and enhance historic parklands; promote WCCF; link with adjacent Authorities GI; and contribute to landscape character.'</u></p>
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<p>National Indicator 197 could be used for the progression in nature conservation: the number and area of Wildlife Sites under positive conservation management.</p>	<p>Table 17</p>	<p>Add indicator to Table 17</p>	<p>Table 17 – Nature Conservation 'Number and area of Wildlife Sites under positive conservation management'</p>
<p>There must be recognition that previously developed or 'brownfield' sites can also support biodiversity</p>	<p>Paragraph 5.14</p>	<p>No proposed change – paragraph 5.14 recognises that a natural asset is not limited to green field sites, and that consideration for biodiversity can occur in urban areas too</p>	<p>None</p>
<p>It may be useful to insert the words 'natural and heritage assets' in place of 'assets' in the sentence preceding the bulleted list</p>	<p>Paragraph 5.4</p>	<p>To make it clear that the list relates to both paragraphs 5.3 and 5.4</p>	<p>Paragraph 5.4 – The diverse range of <u>natural and historic</u> assets in the Borough includes both statutory, national designations and sites and areas of local importance:...</p>
<p>Give consideration to whether 'Green Belt' should be included as a natural/heritage asset.</p>	<p>Chapter 5; Policy CS12</p>	<p>No proposed change – the last iteration of the RCS separated the information in policy CS12 to ensure that the Green Belt is considered as a different matter next to other environmental designations</p>	<p>None</p>

Appendix I

Natural England

- i. Schedule of Proposed Minor Amendments

Objector: Natural England

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
Protection and enhancement of a multi-functional network of green space resulting in an overall net gain over the period of the Core Strategy.	Paragraph 5.15	No proposed change – this is supported and explained in paragraph 5.15	None
All development should incorporate sufficient new green space in accordance with Natural England's ANGSt standards of achieving 2ha of natural green space within 300m of every home. In addition as many existing wildlife features as possible should be retained, and new features such as green roofs created	Paragraph 5.13; Policy CS12	No proposed change – paragraph 5.13 and policy CS12 are sufficient in supporting Natural England (and the Environment Agency's) advice and guidance. The ANGSt is cited in the GI plan for Hertfordshire and Hertsmere. More specific advice on development standards will be incorporated into the site allocations and development management policies DPD	None
Disappointing that the provision of GI is not a key objective and that there is no reference to levels of GI deprivation or Natural England's ANGSt; The RCS makes no reference to the Hertsmere GI Plan or the Hertfordshire GI Plan, the objectives and aspirations of these plans should form part of the evidence base for the RCS	Paragraph 5.13	Additional references can be added to paragraph 5.13 for clarification where appropriate on Green Infrastructure Plan/SHIP The documents are also referenced in the Council's Infrastructure Topic Paper	Paragraph 5.13 - Insert at the end of the paragraph <u>'Working with local partners including the County Council and adjoining authorities, a Hertsmere Green Infrastructure Plan has been produced, which forms part of the evidence base of the Core Strategy and identifies the need for delivering GI in the future. The Plan aims to: increase green access links to the countryside from main settlements; conserve and enhance historic parklands; promote WCCF; link with adjacent Authorities GI; and contribute to landscape character.'</u>

Appendix J

Forestry Commission

- i. **Schedule of Proposed Minor Amendments**

Objector: The Forestry Commission

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>Considered that policies do not go far enough to support the increase in tree planting to meet a range of aims (drainage, habitats, recreation, and urban heat sinks).</p>	<p>Policies CS12 and SP1</p>	<p>No proposed change – policies CS12 and SP1 and supporting text are considered sufficient to protect trees. It is likely that more specific policies will be included as development standards in the forthcoming site allocations and development management DPD, similar to that of Local Plan 2003 policies E7 and E8</p>	<p>None</p>
<p>Considered that monitoring targets should be more positive by using targets to prevent the felling of trees</p>	<p>Table 17</p>	<p>Number of trees subject to a Preservation Order felled or damaged is already an indicator. The creation of new areas of woodland would be considered in Number / area of designated environmental sites. Suggest an indicator on the creation of TPOs, as this is an indicator which the Council can monitor; this is also currently monitored in the current Annual Monitoring Report. There could be a more specific one when DM policies have been defined.</p>	<p>Nature conservation: Indicator/Target (Insert) New and surveyed TPOs</p>

Appendix K

English Heritage

- i. **Schedule of Proposed Minor Amendments**

Objector: English Heritage

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>It would be helpful for clarity to include the words 'or their setting' after scheduled monument' in line 5 of the policy.</p>	<p>Policy CS13</p>	<p>To be clear on the intentions of the policy CS13</p>	<p>Policy CS13 – 'Development proposals should be sensitively designed to a high quality and not cause harm to identified, protected sites, buildings or locations of heritage or archaeological value including Conservation Areas, Listed Buildings, Historic Parks and Gardens, Scheduled Ancient Monuments <u>or</u> their setting, and identified and as yet unidentified Archaeological Remains.'</p>
<p>It may be suitable for the Council to include heritage assets as a potential area for CIL funding, e.g. if a scheme related to a heritage asset at risk.</p>	<p>Table 11</p>	<p>No proposed change – this would be a subject for a Section 106 agreement where such contributions are locally specific</p>	<p>None</p>
<p>PP5 emphasises that the historic environment can have a positive role to play in place-shaping, and would be appropriate to refer to this within the policy.</p>	<p>Paragraph 5.16</p>	<p>Proposed change accepted so that the supporting text is clear on its purpose for protecting historic assets</p>	<p>Paragraph 5.16 – 'Although 80% of the Borough is designated as Green Belt, the character and distinctiveness of its towns and villages are critical local assets. <u>Heritage assets, including individual buildings and the wider area play a significant and positive role in shaping places.'</u></p>

<p>For Built Heritage, it would be suitable to broaden the reference from listed buildings at risk, to all heritage assets at risk. English Heritage's register is updated annually and it would be helpful to monitor grade II listed buildings on any locally compiled register.</p> <p>The inclusion of working in RCS policy CS21 to be reflective of HE3.1 of PPS5 – 3rd line after conserve... 'take inspiration from'</p>	<p>Table 17 (Monitoring Framework)</p>	<p>To be clear that 'at risk' does not just refer to buildings, but any historic assets, such as structures and monuments.</p>	<p>Table 17 – Built Heritage % of listed buildings identified all Historic Assets as 'at risk'</p>
<p>Policy CS21</p>	<p>No proposed change. This wording cannot be found in PPS5. It is also not considered relevant in this general overarching policy that applies to the whole Borough, and not just historic assets. It would be unreasonable for proposed development not affected by historic assets to take inspiration from the historic environment.</p>	<p>None</p>	<p>None</p>

Appendix L

Hertfordshire County Council (Property)

- i. Schedule of Proposed Minor Amendments

Objector: Hertfordshire County Council Property

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>During previous consultations HCC Property has supplied detailed information to HBC regarding the likely need for new educational facilities proportionate to the amount of housing growth. Due to the level of housing proposed in Borehamwood a 2FE Primary School site is required.</p>	<p>Page 23 Table 5 Borehamwood</p>	<p>To ensure that the Core Strategy provides opportunities for additional school capacity in Borehamwood</p>	<p>Insert an additional bullet point:</p> <ul style="list-style-type: none"> • To provide a new 2.5 hectare primary school site
<p>The acknowledgment of the importance of other external influences and the plans and strategies of others set out at Table 2 is welcomed. However the HCC Supporting People Strategy has been updated to 2007-12.</p> <p>The Supporting People Commissioning Body endorsed a new five year strategy in July 2007, and this has been formally adopted by each partner organisation on the Commissioning Body. The implementation of the strategy is reviewed annually.</p> <p>http://www.hertsdirect.org/services/healthsoc/adult/supphcs/houssupp/SPinfoproov/supportpeoplestrat/</p>	<p>Table 2, 4th row, 1st column, Table 2, 4th row, 2nd column, Table 2, 4th row, 4rd column</p>	<p>Update the document in light of the revised strategy.</p>	<p>Table 2, 4th row, 1st column</p> <p>Hertfordshire County Council Supporting People Strategy: 2005-2010 <u>2007-2012</u></p> <p>Table 2, 4th row, 2nd column</p> <p>Identify client groups and geographic areas with a need for housing-related support <u>28 units for older people with support needs in Herts mere in 2011 and 2012 years it will prioritise people with learning difficulties and Gypsies and Travellers.</u></p> <p>Table 2, 4th row, 4rd column</p> <p>Sustainability objectives relating to quality and affordability of housing, <u>Gypsies and Travellers</u>, health improvement and reducing social exclusion.</p>

<p>Table 2, 4th row, 5th</p> <p>Housing</p> <ul style="list-style-type: none"> • <u>Policy CS4 (Affordable Housing)</u> • <u>Policy CS6 (Gypsy and Traveller sites)</u> • Policy CS7 (Housing mix) • Site Allocations DPD 			
<p>Table 2, 3rd row, 1st column</p> <p>Hertfordshire County Council <u>Meeting the rising demand for school places (2007) Updated (2010) School Organisation Plan (2003 - 2008)</u></p> <p>Table 2, 3rd row, 2nd column</p> <p>Predicted 25% surplus of primary school places in Potters Bar; Closure of Sunny Bank Primary School in 2008; Predicted 0.4% shortfall <u>up to 2013, but a 7.3% surplus</u> of primary school places in Radlett by 2014; <u>Review of primary school places required in Radlett; Required in excess of Additional 0.5 Additional 2 FE in Borehamwood up to 2026 at Cowley Hill Primary Schools (need identified since SOP)</u></p>	<p>Update the document in light of the revised strategy.</p>	<p>Table 2, 3rd row, 1st column, Table 2, 3rd row, 2nd column</p>	<p>The acknowledgment of the importance of other external influences and the plans and strategies of others set out at Table 2 is welcomed. HCC has a challenging duty to ensure that there is always sufficient and suitable education provision for all of its children and young people which was encapsulated in the document School Organisation Plan (2003 - 2008) Hertfordshire CC has a good record meeting this challenge – actively planning school places and changing the supply in line with forecast demand. The planning cycle – the process of forecasting, review and change – is a continual one. In line with national trends, Hertfordshire experienced a period of falling demand for primary school places between 2000 and 2007. The national and local situation has now changed: demand for places has increased and will increase further. In Table 2 the reference to ‘Hertfordshire County Council School Organisation Plan (2003 - 2008)’ is now therefore out of date. Hertfordshire County Council’s strategy to meet the rising demand for school places is set out in the ‘Meeting the rising demand for school places’ document. http://www.hertsdirect.org/services/edlearn/aboutstatesch/risingdemand/</p>
<p>Table 2, 4th row, 1st column</p> <p>Hertfordshire County Council Children and Young People’s</p>	<p>Update the document in light of the</p>	<p>Table 2, 4th row, 1st column, Table 2, 4th row,</p>	<p>Row 3 Table 2 The current Children and Young People’s Plan is dated 2011/12 The Hertfordshire Children’s Trust Partnership was disbanded in Summer</p>

<p>2011 and it was agreed that the CYPP would be extended for one final year until 3/12. This was to bridge the gap in strategic planning until the new Health and Wellbeing Board (and within those arrangements, the Children's Strategic Commissioning Groups) came on stream.</p>	<p>2nd column</p>	<p>revised strategy.</p>	<p>Plan 2006-2009 <u>2011-2012</u></p> <p>Table 2, 4th row, 2nd column</p> <ul style="list-style-type: none"> • <u>Promotion of healthy lifestyles and development of primary care intervention</u> • <u>Protection from dangers of drug and alcohol misuse</u> • <u>Reduce number of children with learning needs placed out of County</u> • <u>Reduce anti-social behaviour</u> • <u>Reduce road traffic accidents</u> • <u>Raise quality of early years, childcare and play provision</u> • <u>Increase number of children's centres</u> • <u>Develop training initiatives and collaborative arrangements between education and employment sectors</u> • <u>Reduce number of young people who are homeless</u> • <u>Children and young people are safe from abuse and neglect</u> • <u>Children and young people achieve their full potential whilst in and moving on from care</u> • <u>Children and young people are confident to respond to bullying</u> • <u>Children and young people's emotional wellbeing and mental health is well supported</u> • <u>Children and young people have a healthy weight</u>
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<ul style="list-style-type: none"> • <u>Under 5s from the poorest families have a positive early childhood</u> • <u>Vulnerable children achieve as well as others</u> • <u>Children and young people with special educational needs and disabilities are empowered to reach their full potential</u> • <u>Young people get a wide range of opportunities to learn</u> • <u>Children and young people thrive in spite of family poverty</u> • <u>Children and young people keep on the right track</u> 			
<p>An Infrastructure Topic Paper has been produced to bring together all the Infrastructure Information used to inform the production of the Core Strategy. A copy will be sent with this table.</p>		Evidence Base	<p>The soundness of the Core Strategy would be improved if it were supported by an Infrastructure Delivery Plan (IDP) which could form the basis of a CIL charging schedule for Hertsmere. The IDP would be able to pick up on the need to ensure mitigating CIL funding is obtained from developers for key supporting HCC infrastructure.</p> <p>The intention at 5.5 to review and clarify MDSs in Hertsmere within the Site Allocations DPD and the potential minor realignment of Green Belt boundaries outlined at section 2.37 is welcomed and HCC would also welcome the opportunity to discuss the issue in greater detail and to explore the options for HCC service sites within Hertsmere.</p>
<p>Comments welcomed and noted</p>		Paragraph 5.5	

Appendix M

Hertfordshire County Council (Environment)

i. Schedule of Proposed Minor Amendments

Objector: Hertfordshire County Council Environment / Spatial Planning and Land Use

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>In relation to the site management of waste and waste generation, there is specific mention of commercial and industrial waste. This is welcomed, however it should be recognised that construction and demolition waste is not the only waste stream that needs to be managed and every household has a part to play in the management of waste across the county in accordance with the emerging Waste Core Strategy and Development Management Policies vision and objectives.</p>		<p>HBC agrees that household waste is important, and this is included within the Core Strategy. Policies SP1 and CS15 state: <i>"make provision for waste minimisation and recycling within the development and during the construction phase and following occupation."</i> The policies consider both the construction and occupation of houses and other uses. Paragraphs 5.48-5.50 of the Core Strategy also consider waste. Recycling and waste minimisation is also one of the Sustainability Objectives in appendix 3.</p>	<p>No Change</p>
<p>In order to meet the housing target set out in Policy CS6, there is a significant reliance upon urban sites identified in the SHLAA. There does not appear to have been any discounting exercise to cater for the probability that not all SHLAA sites are likely to come forward</p>	<p>Policy CS6</p>	<p>This is not the case. A non-implementation rate was used in both the SHLAA (2010) section 4.46 and its update (2011) section 4.11. Moreover, this rate has increased in our update of this study to reflect the current state of the economy.</p>	<p>No Change</p>
<p>With regard to the location of new waste management facilities, it is encouraging to see that Para 4.25 states that whilst there is a focus for designated employment areas to remain B-Class development, waste management facilities are identified as being one of the limited range of other uses that will be considered. However, it should be clarified that this also applies to the safeguarded employment areas adjoining both the Elstree Way and Cranbourne Road employment areas.</p>	<p>4.25</p>	<p>If required, the safeguarded land would be an extension of the two existing employment areas (Cranborne Road and Elstree Way) where waste management facilities are in principle an acceptable use. Amend to ensure clarity.</p>	<p>Whilst the Council considers that the focus within designated Employment Areas and safeguarded land (if required) should remain on B-class development, a limited range of other uses will also be considered.</p>
<p>Para 5.27 outlines the modules that are included within the Hertfordshire Building Futures Guide. In addition to those modules currently set out in Para 5.27, there are a number omitted from the list which would be</p>	<p>Para 5.27</p>	<p>Agreed, amendment required for completeness.</p>	<p>Hertsmere Borough Council has worked closely with Hertfordshire County Council on the preparation of the Hertfordshire Sustainable Development Guide,</p>

<p>beneficial to include as they would help meet the objectives set out at the beginning of the chapter and the wider vision of the Core Strategy. For completeness, the following modules should be included in the list;</p> <ul style="list-style-type: none"> ▪ Climate Change Adaptation ▪ Landscape and Biodiversity ▪ Safety 			<p>Building Futures. Building Futures provides clear and detailed guidance for a range of development types, together with best practice examples, on various measures of sustainability including:</p> <ul style="list-style-type: none"> • Water • Energy • Waste • Efficient use of land, buildings and materials • Air quality • Noise • Design • Climate Change Adaptation • Landscape and Biodiversity • Safety
<p>In the March 2011 Budget Statement, the coalition Government announced changes to the definition of zero carbon. These changes now mean that by 2016, new residential development will be required to achieve a carbon reduction equivalent to their regulated emissions, not the total emissions as previously required under the definition. Subsequently, this would require all new development to meet the equivalent Code 5 of the CSH and not Code 6 as currently stated in Para 5.27 and Policy CS16. Should the council still have ambitions to achieve carbon reductions equivalent to Code Level 6 in 2016 then this will need to be supported by an appropriate evidence base.</p>	<p>Noted and agreed</p>	<p>Para 5.44</p>	<p>(Inserted to the end of Para 5.44) In the March 2011 Budget, the Chancellor stated that by 2016 new homes would not have to be fully zero carbon but built in accordance to Level 5 of the Code for Sustainable Homes. Details of such arrangements will come out in a future consultation. It is understood the consultation will also include opportunities for an Offset Fund. Following the consultation, the Council will publish additional guidance, as required.</p>
<p>The requirement for larger developments to provide at least 10% of their predicted energy requirements on site is not the most appropriate approach. The <i>Hertfordshire RLC Technical Study</i> (Para 9.28) identifies that such an approach is not the most cost effective in achieving carbon savings and it would be more appropriate to express onsite requirements in terms of carbon reductions rather than onsite energy generation. This approach would support the remainder of the Paragraph that supports carbon reduction. Furthermore, any requirement for onsite requirements should be included within Policy CS16.</p>	<p>Noted and agreed. No change to Policy CS16 is considered necessary as it already addresses on site provision.</p>	<p>Para 5.46</p>	<p>In addition to supporting the broader infrastructure requirements of electricity and gas companies, the promotion of renewable energy technology, subject to adequate mitigation of any adverse impacts, is supported by the Council. The Council requires that larger developments (above 1,000 sq m or 10 new homes) provide at least 10% of their predicted energy requirements on site. The Council considers that it is preferable for carbon omissions to be reduced through sustainable design and construction, before</p>

	requirements for on-site renewable energy generation are considered.		
<p>Provided that utilising waste as an energy source to provide heat and power as part of a decentralised energy scheme is acknowledged, the county council is supportive of the promotion of all new development and major refurbishment to use energy efficiently, such as from decentralised and renewable or low carbon energy sources as stated in Policy CS16.</p>	<p>Para 5.51</p> <p>Noted. Energy from waste itself is a County Matter and would have to be addressed in the Waste Core Strategy and associated documents.</p>		
<p>In order to meet the higher Code Levels as set out in Policy CS16, it is likely that not all carbon reductions can be achieved onsite and there will be a need (particularly at the higher carbon reduction targets) for an allowable solution fund to help developers meet the Policy requirements. It is not yet clear on what will/will not constitute allowable solutions and these should be included in a Government consultation expected later this year. However, consideration should be given to including within Policy CS16 wording that would allow developers to pay into a local allowable solutions fund. This would allow any contributions to be spent locally and would follow the advice set out in the Zero Carbon Hubs publication <i>Allowable Solutions for Tomorrow's New Homes: Towards a workable Framework (2011)</i> which is being used to inform the forthcoming Government consultation. This approach would reflect that being undertaken by other local authorities in Hertfordshire.</p>	<p>5.44</p> <p>Noted. The text in paragraph 5.44 will be amended to reflect this. It is not considered necessary to change the policy given that the fund proposed has not yet been through a consultation and subsequently agreed by the government.</p>		<p>(inserted to the end of Para 5.44) In the March 2011 Budget, the Chancellor stated that by 2016 new homes would not have to be fully zero carbon but built in accordance to Level 5 of the Code for Sustainable Homes. Details of such arrangements will come out in a future consultation. It is understood the consultation will also include opportunities for an Offset Fund. Following the consultation, the Council will publish additional guidance, as required.</p>
<p>Paragraph 6.11 does not accurately reflect the current state of play in terms of progressing CIL charging schedules. It seems highly unlikely there will be a countywide CIL and the per dwelling costings produced by HHS now seem somewhat out-of-date and not particularly relevant given where the authorities now are in terms of progressing CIL. Whilst evidence within HHS will no doubt be drawn upon, it will be local authorities' Infrastructure Delivery Plans and appropriate viability assessments which will be key to producing CIL charging schedules.</p> <p>In addition to the Borough' standard charge already identified in Para 6.11, reference should also be made to the <i>Planning Obligations Guidance - Toolkit for Hertfordshire</i> produced by the County Council which sets out what obligations the County Council will seek in relation to</p>	<p>Para 6.11</p> <p>The paragraph summarises the finding of the HHS, and does not state that there will be a countywide CIL. Hertsmere has commissioned consultants on behalf of nine out of the ten Hertfordshire authorities to consider CIL viability and charging schedules. The Herts Planning Group is to preparing a programme which will see the updating of the Hertfordshire Infrastructure Investment Strategy (HHS). It is envisaged that the HHS review will not be a comprehensive 'root and branch' revisit (given a significant proportion of its</p>		<p>Paragraph 6.11</p> <p>In order to achieve this, the Council has adopted a Planning Obligations SPD with a local standard charge or facilities and infrastructure delivered by the Council, focused on smaller housebuilding schemes, typically of 1 to 15 units, to be secured through a planning obligation under Section 106 of the Town and Country Planning Act. Hertfordshire County Council's approach, methodology and calculations contributions in respect of the planning obligations sought towards these services is set out in Planning Obligations Guidance – Toolkit for Hertfordshire</p>

<p>new development. Should reference to the toolkit be included within Para 6.11, its implementation would be adequately covered by the existing wording of Policy CS20.</p>	<p>original findings remain valid) but instead a selective reappraisal of the key elements as a precursor to the preparation of a Strategic Infrastructure Plan for the county. Which will allow the county to bid for a larger share of the infrastructure funding resources that are available. The County Toolkit is referenced in Hertsmere Planning Obligations SPD and this has been cross referenced with additional proposed text in paragraph 6.11.</p>	<p>(2008).</p>
<p>Affordable Housing should be removed from Table 11. Although there has been a recent government consultation on whether or not affordable housing should be included within CIL, the outcome of this is not yet known and as such its inclusion within Table 11 is not compliant with the published CIL regulations 2011 (as amended).</p>	<p>The title of the table is 'Potential Items' as a result this is not definitive.</p>	<p>No Change</p>
<p>The AAP should include provision for/recognition of public realm improvements, links to Shenley Road and Elstree Way as a key sustainable transport (bus) corridor.</p>	<p>Noted and agreed.</p>	<p>No Change</p>
<p>Following confirmation of DfT funding contribution to the construction of the Croxley Rail Link it might be prudent for the Core Strategy to consider potential implications of the scheme – for example in relation to major congestion issues at Hartspring roundabout (and Bushey Arches, in Watford Borough).</p>	<p>This is included within the Infrastructure Topic Paper, in addition the Council working with Watford on potential modelling in this area.</p>	<p>No Change</p>
<p>Paragraphs 1.19, 1.22, 7.1, table 5 and policy CS14 are inconsistent in the degree to which congestion is to be managed/reduced. The position of the County Council is as set out in the LTP – the growth in traffic and congestion will be reduced.</p>	<p>The issue of congestion reduction in 1.21 and 1.22 relates to issues raised by the public in our issues and options consultation. The Hertsmere Community Strategy Environment Action Plan in the box above 7.1 specifically refers to reducing traffic growthCS14 about</p>	<p>No Change</p>

	tourism facilities within the Green Belt and seeks to avoid new congestion/exacerbate existing congestion.			<p>{Amend Paragraph 7.5} In considering the location of major new development proposals, the Council will also have regard to proposals in an approved or emerging Transportation Plan for an area or other related statutory documents, in particular the Hertfordshire Local Transport Plan (April 2011) and the Watling Chase Greenways Strategy. A number of urban transportation plans Three Urban Transport Plans have been produced for different parts of the Borough, the Borehamwood and Elstree and UTP, the Potters Bar UTP and the South West Hertfordshire Transport Plan. are also currently under preparation. The Council recognises that the Borehamwood and Elstree Transport Study, prepared by Colin Buchanan in conjunction with Hertfordshire County Council, will be an important consideration in determining how further growth can be accommodated in Borehamwood, including along the Elstree Way Corridor.</p> <p>No Change.</p>
	Noted and agreed.	Urban Transport Plans		<p>The Potters Bar diversion is included within the Urban Transport Plan.</p>
	Noted and agreed	Para 1.18 and Policy CS23	Table 5	<p>Reference to the 'associated Accessibility Strategy' should be removed. There are several associated documents with this strategy and they are likely to change over the period of the Plan. The 'strategy' is adequately covered by the inclusion of the Local Transport Plan.</p> <p>The Local Transport Plan is 2011 – 2031 is based on 5 key goals and not the 8 priorities listed in Para 1.18. The 5 goals are available at the following website http://www.hertsdirect.org/docs/pdf/1/LTP3vol1.pdf</p>

<p>Policy CS23 Development and accessibility to services and employment</p> <p>The Council will work towards Hertfordshire County Council's vision of providing a safe, efficient and affordable transport system that allows access for all to everyday facilities.</p> <p>To obtain the best use of the existing highway network, major trip generating development should be focused principally on Transport Development Areas, Transport Corridors and town centres, as indicated on the Key Map. Major non-residential developments over 2,500 sq m or schemes of 25 residential units will only be permitted where:</p> <p>i) it does not conflict with the Transport Objectives of the Hertfordshire Local Transport Plan (April 2011) and associated Accessibility Strategy;</p>			<p>The transport section should be extended to include Intelligent Transport Systems as well as 'softer' measures such as Travelwise.</p>
<p>Highways and Transportation</p> <ul style="list-style-type: none"> • Public Transport improvements • On- and off-site highway improvements • Community Transport (including both Dial-a-Ride and voluntary car scheme) • Greenways (generally shared routes for cycling, equestrian and pedestrian use) • Parking improvements in the vicinity of the site • Intelligent Transport Systems • Travelwise 	<p>Whilst the list is no definitive and as stated it includes 'potential items', the Highways and Transportation section of table can be amended to include the respondents text.</p>	<p>Table 11</p>	<p>The South Mimms Service Station is not recognised by the County Council as a source of congestion. This issue may merit a discussion between the authorities.</p>
<p>There are several areas that have been recognised across the Borough that continue to cause concerns about congestion, including: the Hartspring roundabout on the A41; Elstree High Street crossroads; the Stirling Corner roundabout; and the South Mimms services (Bignell's Corner) junction.</p>	<p>The text states "There are several areas that have been recognised across the Borough that continue to cause concerns about congestion, including: the South Mimms services junction." The text states does not state that the services is a cause of congestion, it states that junction of the services/M25/A1(M)/A1081 is a</p>	<p>Para 7.1</p>	<p>The South Mimms Service Station is not recognised by the County Council as a source of congestion. This issue may merit a discussion between the authorities.</p>

	<p>cause of concern with respect to congestion, as it is for the Highways Agency who are looking to review the junction. The Junction is currently being amended as part of the M1 widening programme. However the text will be amended to avoid confusion.</p>		
<p>The LDF has an important role to play in shaping transport patterns, both in terms of the location of new development and the attractiveness of alternative modes of travel. The application of car parking standards and parking management can also influence car usage and behaviour.</p> <p>In considering the location of major new development proposals, the Council will also have regard to proposals in an approved or emerging Transportation Plan for an area or other related statutory documents, in particular the Hertfordshire Local Transport Plan (April 2011) and the Watling Chase Greenways Strategy. A number of urban transportation plans Three Urban Transport Plans have been produced for different parts of the Borough, the Borehamwood and Elstree and UTP, the Potters Bar UTP and the South West Hertfordshire Transport Plan. are also currently under preparation. The Council recognises that the Borehamwood and Elstree Transport Study, prepared by Colin Buchanan in conjunction with Hertfordshire Highways, will be an important consideration in determining how further growth can be accommodated in Borehamwood, including along the Elstree Way Corridor.</p>	<p>Noted and agreed</p>	<p>Para 7.2</p>	<p>Para 7.2 should be extended to acknowledge that the Borough Council can influence car usage through its car parking management and standards. This would support the Core Strategy Objectives and Policy CS24.</p>
<p>Three Urban Transport Plans have been produced for different parts of the Borough, the Borehamwood and Elstree and UTP, the Potters Bar UTP and the South West Hertfordshire Transport Plan. are also currently under preparation. The Council recognises that the Borehamwood and Elstree Transport Study, prepared by Colin Buchanan in conjunction with Hertfordshire Highways, will be an important consideration in determining how further growth can be accommodated in Borehamwood, including along the Elstree Way Corridor.</p> <p>Travel Plans will be required for major trip generating commercial, education, healthcare, residential and other developments through the use of Section 106 legal agreements or planning conditions. Additional details on requirements for Travel Plans are set out in</p>	<p>Noted and agreed</p>	<p>Para 7.5</p>	<p>Para 7.5 incorrectly states that 'A number of Urban Transport Plans for different parts of the Borough are also currently under preparation'. A number of Urban Transport Plans already exist, the Potters Bar UTP is at the final stages of consultation and a review of the Elstree and Borehamwood UTP is to be undertaken next.</p>
	<p>Noted and agreed</p>	<p>Para 7.7</p>	<p>Roads in Hertfordshire has recently been updated and the 2011 rather than the 2001 version should be referenced.</p>

<p>The wording of Policy CS23 could be strengthened by the inclusion of an additional bullet point that reads;</p> <p><i>'the cumulative impact on the highway network can be adequately mitigated'.</i></p>	<p>Policy CS23</p>	<p>Noted and agreed</p>	<p>the new Parking Supplementary Planning Document, which has been prepared with regard to separate guidance published by Hertfordshire County Council on both Travel Plans and the wider transport aspects of new development (Roads in Hertfordshire, 2011).</p> <p>i) it does not conflict with the Transport Objectives of the Hertfordshire Local Transport Plan (April 2011) and associated Accessibility Strategy;</p> <p>ii) it is accompanied by a suitable Travel Plan (for developments over 2,500 sq m or 80 residential units), prepared in accordance with guidance set out in the Parking Supplementary Planning Document;</p> <p>iii) it is in accordance with Hertfordshire County Council guidance and relevant Local Plan /Development Plan Document policies relating to the operation of the Highways network and the achievement of vehicular, pedestrian and equestrian safety; and</p> <p>iv) it contributes, where required, to the provision or funding of new infrastructure or improved public transport services and non-motorised routes.</p> <p>v) the cumulative impact on the highway network can be adequately mitigated.</p>
<p>Reference should be made to the inclusion of electric vehicle charging points and consideration given to including this in Policy CS34 to support the objectives of the Core Strategy.</p>	<p>Parking Standards and Policy CS24</p>	<p>The installation of parking points will be considered within the Planning and design SPD Part D review. However, this should be included within the Core Strategy.</p> <p>Policy CS24 is concerned with the overarching criteria for assessing car parking rather than specific infrastructure for electric vehicles.</p>	<p>7.14 Parking levels can also be influenced by the availability of measures, which encourage reduced dependency on the car such as the availability of car clubs or high quality cycle lanes and pedestrian links. It is only likely to be appropriate and practical to seek a lower average number of spaces per unit where the location of the site can support such parking levels, particularly through the provision of communal parking. The installation of electric vehicle charging points can help those who are car-dependant to reduce their emissions and in turn their contribution to climate change, these will be supported in all new developments.</p>

<p>A useful addition to the section on Greenways would be on how they are likely to be delivered and this would help inform / be informed by the preparation of an Infrastructure Delivery Plan. For clarity and consistency it would also be helpful to reference 'Greenways' within Policy CS25.</p>	<p>Greenways</p>	<p>The implementation of Greenways is undertaken in line with the WCCF Greenway Strategy, which is a key document and informs the infrastructure topic paper.</p> <p>The Council has been working with HCC on the implementation of the greenways strategy, which continues to be funded from s106 (and in the future CIL). Reference is CS25 would be prudent.</p>	<p>Policy CS25 Promoting alternatives to the car The Council will support a wide range of measures to provide safer and more reliable alternatives to the car for accessing new development and existing development and other destinations across the Borough including: i) improved public transport facilities; ii) additional public transport routes and stops; iii) enhanced and new non-motorised links (including Greenways) within and between urban and rural areas, along or additional to the existing rights of way and highways network, which increase walking, cycling or riding opportunities;</p>
<p>There are a number of references to bus/rail issues within the Core Strategy Policies. It is therefore considered that a relevant target/indicator should be included within the monitoring framework to reflect this.</p>	<p>Monitoring Framework</p>	<p>Noted and agreed</p>	<p>Number of new or enhanced Greenway or cycle routes % of approved major commercial developments with a Green Travel Plan and cycling measures Increasing use of cycling, walking, public transport and reduction in travel by car mode desired</p>
<p>All references to 'public transport' should read 'passenger transport'</p>	<p>Noted</p>	<p>The term public transport has been used to meet the Councils approach to Plain English. However, to ensure consistency with HCC, reference to passenger transport has been added to 2.3, and a definition added to the glossary.</p>	<p>Paragraph 2.3 Hertsmere is well connected to London and the rest of the country. The M25 and M1 motorways and the A1 all run through the Borough, which is also serviced by main line rail services stopping at Potters Bar, Radlett and Borehamwood. However, some problems are caused by road links being better than access to public transport (also known as passenger transport),</p> <p>Also inserted within the glossary Public Transport: Also known as passenger transport and includes bus, coach and rail services, private coaches, school buses, taxis, and Dial-a-ride.</p>
<p>All references to Hertfordshire Highways should read Hertfordshire County Council (Hertfordshire Highways is part of HCC and may change once contracts are renewed);</p>	<p>Noted</p>	<p>Noted and agreed</p>	<p>All References updated : 7.5 The Council recognises that the Borehamwood and Elstree Transport Study, prepared by Colin Buchanan in conjunction with Hertfordshire Highways County</p>

<p>Council, will be an important consideration in determining how further growth can be accommodated in Borehamwood, including along the Elstree Way Corridor.</p> <p>Also in Table 17 Page 89 two references updated.</p>			
<p>Chapter 7 <i>“To improve road safety and obtain the best use of the existing highways network through effective design, maintenance and management.”</i> <i>Key environmental aim, Hertsmere Community Strategy, P.16</i> “To reduce the rate of traffic growth through integrated land use planning.” <i>Hertsmere Community Strategy, Environment Action Plan</i> “To raise levels of access by seeking development in locations not dependent on access by car and by requiring the provision of physically accessible transport interchanges and other buildings” <i>LDF Core Strategy Objective 8”</i></p> <p><i>“To provide a safe, efficient and resilient transport system that serves the needs of business and residents across Hertfordshire and minimises its impact on the environment.”</i> <i>Hertfordshire Vision in Hertfordshire’s Local Transport Plan 2011 - 2031</i></p> <p>Amend 7.2 Working with Hertfordshire County Council, the local Highways Authority, Hertsmere Borough Council has a major role to play in ensuring development is consistent with the key Transport Objectives of the Hertfordshire Local Transport Plan.</p> <p>Paragraph 7.24</p>	<p>Reference only quoted from Hertsmere Community Strategy, this has been updated and no longer references highways or road. Removed text and added a quote from LTP3.</p>	<p>Noted</p>	
			<p>Noted</p>
<p>‘highways authority’ should read ‘highway authority’</p>		<p>7.5</p>	<p>7.23</p>
<p>Para 7.23 -- would be clarified from changing ‘a equestrian road crossing’</p>			<p>The comments are noted, and whilst the</p>

<p>to ' a traffic-light controlled road crossing for horse-riders'</p> <p>Consideration should be given to a revised policy framework similar to that within the adopted Three Rivers Core Strategy that identifies the Green Infrastructure and investment priorities over the Plan period . Consequently, the production of an IDP to support the delivery of the Core Strategy (and ensure that the Plan is positively prepared (NPPF; Para 48)) should include the GI projects set out in the Hertsmere GI Plan and Herts / Green Arc SHIP and the Hertsmere GI Plan should be made available via the HBC website. (The SHIP is already available on HCC's website).</p>		<p>change is not arguably different, it is amended to ensure contentment.</p> <p>Reference to the studies should be included, and are included within the Hertsmere Infrastructure Topic Paper.</p>	<p>Particularly notable implementations have included the second only 'pegasus' crossing in Hertfordshire (an equestrian-road-crossing a traffic-light controlled road crossing for horse-riders)</p> <p>Paragraph 5.13 - Insert at the end of the paragraph 'Working with local partners including the County Council and adjoining authorities, a Hertsmere Green Infrastructure Plan has been produced, which forms part of the evidence base of the Core Strategy and identifies the need for delivering GI in the future. The Plan aims to: increase green access links to the countryside from main settlements; conserve and enhance historic parklands; promote WCCF; link with adjacent Authorities GI; and contribute to landscape character.'</p> <p>Policy CS12 – All development proposals must conserve and enhance the natural environment of the Borough, including biodiversity, protected trees, landscape character, and sites of ecological and geological value, in order to maintain and improve environmental quality, and contribute to the objectives of the Hertsmere Green Infrastructure Plan. Proposals should provide opportunities for habitat creation and enhancement throughout the life of a development. In the case of the highest quality agricultural land (Grades 1, 2 and 3a) and Preferred Areas of mineral extraction, proposals will only be permitted where there is no likelihood of the land being sterilised.</p>
<p>Whilst some 300 dwellings short of the housing growth requirement for the Borough identified within the East of England Plan, paragraph 2.26 states that the housing growth level proposed within the Core Strategy still remains in general conformity with the Plan. The scale of</p>	<p>CS1</p>	<p>A similar approach was taken at neighbouring Three Rivers, and found sound at examination. The Core Strategy is in general conformity with the East of</p>	<p>No Change</p>

<p>underprovision compared to East of England Plan requirements is not too dissimilar from that proposed within the Broxbourne Core Strategy which has recently been subject to examination.</p> <p>With the East of England Plan in force greater clarity on the justification for not meeting the full housing requirement for the Borough identified in the East of England Plan.</p> <p>With the East of England Plan not in force, and if the NPPF remains substantially unchanged in relation to the above matters, clear evidence of the scale of housing need and demand within the Borough within the context of a spatially wider housing market area. Where it is considered the Borough cannot meet its projected demand/need a very clearly articulated set of reasons why this is the case (presumably drawing on SEA conclusions, Infrastructure Plans, other evidence). This would probably require a clearer articulation than is currently contained in paragraph 2.27.</p> <p>Additional information required regarding the mechanisms through which the Borough has cooperated with other local authorities within its housing market area (or indeed a different sub-regional arrangement) in an attempt to find suitable alternatives for dealing with any shortfall in meeting projected demand/need within the Borough.</p>		<p>England Plan, where the housing target (as in Three Rivers) was based largely on the results of urban capacity work. The RSS did not advocate a Green Belt review in Hertsmere and the Council considers that a target which exceeds 90% of the East of England Plan constitutes general conformity. This is justified in paragraphs 2.27 to 2.29 and it is unclear what greater clarity is needed.</p>	
<p>The approach towards safeguarding land adjacent to existing employment areas in order to provide a flexible supply of employment land seems appropriate and the wording of Policy CS8 is generally supported. Although it is unclear as to when or how the safeguarded allocations are likely to come forward over the Plan period. In light of this and the locations proximity to the primary road network, it is likely that any development will result in potentially significant traffic generation which has not yet been assessed as part of existing transport studies (i.e. Elstree Way Transport Study). Should the impacts on transport infrastructure not be adequately mitigated then there is a risk that development coming forward within the safeguarded employment area may preclude the wider objectives for the EWC set out in the Plan.</p>	<p>CS8</p>	<p>The development of safeguarded land will trigger a partial review of the site allocations, prior to any planning permission being granted and, when transport modelling would be required. In addition cross-reference to CS23 would clarify this; such a change has been agreed with the Highways Agency.</p> <p>Policy CS23 clearly seeks to prevent development which does not address and mitigate transport infrastructure impacts. The change to CS8 has been suggested</p>	<p>Text inserted 4.21 <i>In line with national planning policy, the status of safeguarded land, between the urban area and the Green Belt, is required to meet long term development needs beyond the plan period. It is not allocated for development at the present time. Planning permission for development of safeguarded land will only be granted following a review of the Site Allocations DPD (or any other equivalent document) and, until such time, normal Green Belt policy will apply.</i></p> <p>Policy CS8</p>

<p>Although it is recognised that it is not possible to assess the potential transport impacts until more detailed plans come forward, it is important for Policy CS8 to acknowledge that development will only be suitable where the cumulative impact on infrastructure, (in particular transport infrastructure) can be adequately mitigated. It is therefore requested that additional wording is included within Policy CS8 that will only allow “development to come forward on the safeguarded employment sites where it can be demonstrated that the cumulative impact on transport infrastructure can be adequately mitigated”.</p>		<p>and agreed with the Highways Agency.</p>	<p>“Any development should form of a comprehensive, integrated package of measures to improve their respective adjoining Employment Areas and associated access, with consideration of Policies CS21, CS23 and CS25.”</p>
<p>PPS12 (Para 4.8) and the draft NPPF (Para 43) require Core Strategies to be supported by evidence of what infrastructure is needed to enable the amount of development proposed for the area, including (amongst other things) infrastructure needs, costs and funding sources. In relation to transport infrastructure, it is important that essential infrastructure required to deliver the Plan over the Plan period is identified; and a reasonable level of certainty about its deliverability established. The Core Strategy is focused on development along the Elstree Way Corridor (EWC), and the development proposals underpin the wider objectives of Core Strategy. Given the importance of the Elstree Way, it is necessary to identify the necessary infrastructure requirements and ensure that they are deliverable in a timely fashion. The EWC masterplan (Para 9.1) identifies the need for approximately £10million in upfront investment in transport infrastructure in order to bring forward the redevelopment of the EWC. The transport improvements identified within the Elstree Way Transport Study undertaken by Colin Buchanan and Hertfordshire County Council have not yet been identified in the Borehamwood and Elstree Way Urban Transport Plan (2007); to be reviewed shortly) therefore there is little certainty at this stage as to how the improvements are likely to be funded prior to the commencement of development.</p>	<p>SP1</p>	<p>PPS12 advises that the Core Strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area. While there remains no specific requirement within PPS12 for Local Authorities to prepare an Infrastructure Development Plan (IDP) as part of the Core Strategy, they are required to take timely, effective and conclusive discussion with key infrastructure providers. There is a substantial amount of evidence base which considers the requirements and funding of infrastructure in Hertsmere and the County. HBC has produced an infrastructure topic paper which summarises and signposts infrastructure information that has been used to inform the production of the Hertsmere Core Strategy. A copy of this is attached.</p> <p>The Elstree Way Corridor Feasibility study (carried out by Consultants Colin Buchanan) provides a viable master plan scenario for the redevelopment of the Elstree Way Corridor (EWC). The study</p>	<p>No Change</p>

		<p>proposes significant highway and public realm works, including improvements to Elstree Way for vehicular and pedestrian access and the removal the Elstree Way/Shenley Road roundabout. In conjunction with the feasibility study, transport and financial assessments were carried out. Cost estimates for the proposed works are anticipated to be £10m, this is to be funded via developer contributions and via the release of development value from site disposals. A separate transport study has been undertaken (Commissioned by HCC) and Hertsmere Borough Council is currently working with HCC so that the study is integrated into the revised Borehamwood and Elstree Transport plan. HBC will continue to work with HCC on the project particularly as HCC is a major landowner.</p>	
<p>Additional references similar to those contained within Policy CS7 of the adopted Local Plan should be included within Chapter 5 to state that; <i>“As an example of a nationally, regionally and locally important Green Infrastructure initiative, The Watling Chase Community Forest Plan and any supplementary planning guidance to develop its themes will be a material consideration in the determination of planning applications in the Forest area when the principal aims of the Forest Plan will be taken into account.”</i></p>	<p>5.23</p>	<p>C7 is a saved policy of the Core Strategy and will be reviewed as part of the Development Management DPD</p>	<p>No Change</p>

Appendix N

National Federation of Gypsy Liaison (known as ITMB & Herts GATE)

- i. Schedule of Proposed Minor Amendments
- ii. Correspondence
- iii. Proposed Statement of Common Ground

Objector: National Federation of Gypsy Liaison Groups

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>Policy CS6 and Paragraph 3.41 set out the number of pitches proposed to be delivered in Hertsmere to 2021. However there is no justification for a reduced number of pitches post 2011 compared with the East of England Regional Plan. Since the post 2011 figures do not reflect the most robust evidence, then they are not consistent with national policy and the policy will fail to be effective at delivering pitches to meet identified need.</p> <p>Should the East of England Plan figures be rejected, then if there are 56 existing pitches in the Borough, plus 3 recently approved, plus 9 additional to be delivered to 2011, that leaves a baseline figure of 68 pitches in the district at 2011. Using the 3% compound growth rate, then there is a need for 13 additional pitches from 2011-2017: $((1.03)^6 \times 68) - 68 = 13.1$</p>	<p>Paragraphs 3.40-3.41 / Policy CS6</p>	<p>The methodology set out in the supporting text requires clarification to make clear the justifiable reasons for the Council only setting a target to 2017. Similar text was in a previous version of the Core Strategy that was subject to a period of public consultation. This text was deleted and should be reinserted.</p> <p>Some drafting errors were made in the supporting text and the Policy in respect of the target and the date that the target would run until. These should be corrected. Amendments should be made to make clear that the Council will provide for additional pitches beyond 2011 at the rate specified in the RSS to 2017.</p> <p>The RSS requires that beyond 2011 provision should be made for a 3% compound increase in pitch provision, based on the total number of pitches required by 2011. The RSS requires that the Council provide 53 pitches by 2011. It can be seen from the table below that the Council would exceed the RSS requirement if it were to provide 2 additional pitches a year over a 6-year</p>	<p><u>Paragraph 3.41</u> – Given that demand for sites has been established through the Council's own joint studies and regional plan examination, there is recognised to be a need to plan for additional pitches in the district. The Council's preferred option is to retain the target of 18 pitches established in the regional plan to 2011 and for some additional growth to 20167. Based on the regional plan assessment, this would equate to an additional 2 pitches a year. The Council does not consider there is a robust basis to plan from beyond 2017, as at this point the needs assessment will be more than 10 years out of date and the government has signalled its intentions to review Gypsy and Traveller requirements. This approach demonstrates a commitment to meeting Gypsy and Traveller needs, whilst recognising that a further assessment of need and a review of this aspect of the Core Strategy will be needed by 2017.</p> <p>(New paragraph) – Since the regional plan was adopted...</p> <p>Policy CS6 – The Council will provide for the further needs of Gypsies and Travellers on</p>

	<p>period.</p> <table border="1" data-bbox="284 734 639 1198"> <thead> <tr> <th>Year</th> <th>Pitches at start of year</th> <th>Increase (3%)</th> <th>Pitches at end of year</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>53.00</td> <td>1.59</td> <td>54.59</td> </tr> <tr> <td>2</td> <td>54.59</td> <td>1.64</td> <td>56.23</td> </tr> <tr> <td>3</td> <td>56.23</td> <td>1.69</td> <td>57.91</td> </tr> <tr> <td>4</td> <td>57.91</td> <td>1.74</td> <td>59.65</td> </tr> <tr> <td>5</td> <td>59.65</td> <td>1.79</td> <td>61.44</td> </tr> <tr> <td>6</td> <td>61.44</td> <td>1.84</td> <td>63.28</td> </tr> </tbody> </table>	Year	Pitches at start of year	Increase (3%)	Pitches at end of year	1	53.00	1.59	54.59	2	54.59	1.64	56.23	3	56.23	1.69	57.91	4	57.91	1.74	59.65	5	59.65	1.79	61.44	6	61.44	1.84	63.28	<p>the basis of identified need within south and west Hertfordshire, the Council will seek to identify and allocate up to 9 additional pitches to meet the East of England Plan requirements to 2011 and a further 402 pitches per annum to by 2017 through the identification of land in the Site Allocations DPD...</p>
Year	Pitches at start of year	Increase (3%)	Pitches at end of year																											
1	53.00	1.59	54.59																											
2	54.59	1.64	56.23																											
3	56.23	1.69	57.91																											
4	57.91	1.74	59.65																											
5	59.65	1.79	61.44																											
6	61.44	1.84	63.28																											
<p>The figures must also be minimum figures to allow for appropriate development through the development control (planning application) process. This would be consistent with the policy for mainstream housing and would allow for some flexibility in provision. On this issue, the draft policy CS6 does not appear to relate to the consideration of planning applications (contrary to the provisions of Circular 01/2006) and only refers to "identifying any required potential sites".</p>	<p>Policy CS6</p>	<p>The Policy should not be amended on account of the submitted representations. It is for the identification of sites and not for the determination of planning applications. As such, although it states that the Council will 'identify and allocate up to 9 additional pitches...', the Policy would not prohibit the Council from granting planning permission for additional appropriate pitches on a case-by-case basis.</p>	<p>N/A</p>																											
<p>Not all the criteria listed are appropriate to the planning application process (for example the sequential approach to site selection is sensible for site allocations but not workable for the development control process, given that the main drivers are land affordability and availability). The criteria are also over-restrictive, which means the policy is neither justified (against current and</p>	<p>Policy CS6</p>	<p>The Policy should not be amended on account of the submitted representations. It is for the identification of sites and not for the determination of planning applications. The criteria are considered reasonable for this purpose; any planning application for new pitches would be assessed against the relevant saved</p>	<p>N/A</p>																											

<p>emerging national policy) or likely to be effective (at meeting need).</p> <p>Criteria i and ii relate only to the site allocation process, not to the development control process.</p> <p>Criterion v is unreasonable if it expects sites to be distributed equally across the Borough, just as it would not be appropriate for housing to be distributed uniformly across the Borough. It is also not appropriate to place this restriction on applicants and could prevent acceptable sites from coming forward.</p> <p>Criterion viii does not appear to be justified in that it restricts sites to those with 'local connections'.</p> <p>Criterion xi, where it reads 'any other adverse effects on the built environment and natural environment are avoided' effectively prevents ANY site coming forward, since all development can be said to have some level of effect. Reference to the additional core strategy policies is not appropriate, given that no policy should be read in isolation.</p>	<p>Hertsmere Local Plan (2003) / emerging Site Allocations & Development Management DPD policies.</p>	
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Sarah Churchard

From: Philip Bentley
Sent: 12 April 2012 14:23
To: Sarah Churchard
Subject: FW: FW: Response to the Revised Core Strategy
Attachments: NFGLG statement of common ground v5 MS signed.pdf

Importance: High

From: Philip Bentley
Sent: 10 April 2012 11:41
To: 'Michael Hargreaves'
Subject: RE: FW: Response to the Revised Core Strategy
Importance: High

Good morning,

Please find attached an up-to-date version of the SoCG signed by the Policy Manager, Mark Silverman.

I would be grateful if you could sign and return this as soon as possible. I would prefer if you could email me a scanned version of the document; if you are not able to do this please send me a copy through the post (using the contact details below).

Best regards,

Philip

Philip Bentley
Senior Planning Officer (Policy and Transport)
Hertsmere Borough Council

Telephone: (020) 8207 7527
Extension: 5800
Fax: (020) 8207 7444
Email: philip.bentley@hertsmere.gov.uk

Civic Offices, Elstree Way, Borehamwood, Herts. WD6 1WA
DX45602 Borehamwood
www.hertsmere.gov.uk

Hertsmere Borough Council is currently preparing its Local Development Framework (LDF), a suite of documents guiding development over the next 15 years and beyond. If you would like to be consulted on this or kept up to date on progress, join the LDF mailing list by sending your details to core.strategy@hertsmere.gov.uk

From: Michael Hargreaves [<mailto:michael@irishtraveller.org.uk>]
Sent: 30 March 2012 12:25
To: Philip Bentley; sarah.curchard@hertsmere.gov.uk
Cc: Norbert McCabe; Josephine O'Driscoll; Alice de la Rue
Subject: Re: FW: Response to the Revised Core Strategy

Philip, Sarah,
Sarah & I spoke. Attached are the further amendments I am suggesting to the statement of common ground on behalf of the Irish Traveller Movement in Britain working with Herts GATE.
I'm happy to discuss further.
Best wishes, Michael

On 23 February 2012 10:15, Philip Bentley <Philip.Bentley@hertsmere.gov.uk> wrote:

Dear Mr Hargreaves,

Please find attached the document mentioned below. The Planning Inspectorate encourages that LPAs and objectors to submitted DPDs agree common ground prior to an Examination in Public, where possible.

I have also attached the schedule that I mention in my email of 30 January 2012. This sets out the contents of the NFGLG's representations, the Councils response and any proposed amendments to the document.

You will note that Ms de la Rue had already basically agree the attached Statement of Common Ground. Would you be willing to sign this on behalf of the NFGLG?

Best regards,

Philip Bentley
Planning Officer (Policy)
Hertsmere Borough Council

Telephone: (020) 8207 7527
Extension: 5800
Fax: (020) 8207 7444
Email: philip.bentley@hertsmere.gov.uk

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From: Alice de la Rue [<mailto:dglgplan@hotmail.co.uk>]
Sent: 23 February 2012 09:55

To: Philip Bentley
Cc: michael@irishtraveller.org.uk
Subject: RE: Response to the Revised Core Strategy
Importance: High

Hi Philip,

I'm actually no longer working at DGLG, yesterday being my last day (but as ever I am tying up loose ends today!). I've passed the Hertsmere documentation over to a colleague at a different organisation (Michael Hargreaves at Irish Traveller Movement) so I have copied Michael in to this reply. He may or may not have time to pick it up, depending on his existing commitments.

Many thanks,

Alice

From: Philip.Bentley@hertsmere.gov.uk
To: dglgplan@hotmail.co.uk
Date: Wed, 22 Feb 2012 16:47:40 +0000
Subject: FW: Response to the Revised Core Strategy

Alice,

Further to my email below, please find attached a draft of a Statement of Common Ground. Would you please be able to let me know whether you are prepared to sign this document?

Best regards,

Philip Bentley
Planning Officer (Policy)
Hertsmere Borough Council

Telephone: (020) 8207 7527
Extension: 5800
Fax: (020) 8207 7444
Email: philip.bentley@hertsmere.gov.uk

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From: Philip Bentley
Sent: 07 February 2012 10:41
To: 'Alice de la Rue'
Subject: RE: Response to the Revised Core Strategy

Thanks for this Alice.

Is it okay if I go ahead and draft a statement of common ground, which sets out the issues that have been agreed (and the minor changes that will be made to the Core Strategy) and the areas where there is still disagreement?

Best regards,

Philip

Philip Bentley
Planning Officer (Policy)
Hertsmere Borough Council

Telephone: (020) 8207 7527
Extension: 5800
Fax: (020) 8207 7444
Email: philip.bentley@hertsmere.gov.uk

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From: Alice de la Rue [<mailto:dglgplan@hotmail.co.uk>]
Sent: 06 February 2012 10:22
To: Philip Bentley
Subject: RE: Response to the Revised Core Strategy

Dear Mr Bentley,

Thank you for your detailed response. I still do not feel that we have widely disparate views on the issues in the plan, but also I am not able to agree with the points you raise so my representations remain.

The issue of clarity relates to what the baseline figures are. It is not clear from the supporting text of CS6 whether there will be 53 pitches (as was the SiR minimum requirement) or whether there will in fact be a baseline figure of 74 (56 plus 18 - see your paragraphs 3.38 and 3.41). The compound growth rate clearly depends on the baseline figure and that is where the plan lacks clarity. I agree that the East of England SiR policy required a MINIMUM of 53 pitches at 2011, but from the supporting text to policy CS6 it suggests there may be more and the compound growth rate should be applied on which ever baseline figure is correct - I do not have the answer to that, since the plan lacks clarity. I don't really wish to keep splitting hairs on this issue, because I don't think your approach is unreasonable, and if the baseline figure is 53 I agree with the calculation of growth to be approximately 10 pitches to 2017, and your proposal of 12 pitches to 2017 clearly goes beyond this and I support that since it offers flexibility and begins to create an element of choice - IF the baseline is correct, because otherwise the plan will fall short of delivering estimated need from household growth.

In terms of policy against which planning applications will be assessed, the 2003 saved local plan policy and supporting text does not take into account Circular 01/2006 and is therefore significantly out of date. I note that you intend to replace this policy in the Site Allocations and Development Management DPD - I would argue that Circular 01/2006, since it is still in force, requires that the policy be in the Core Strategy, and I expect we will have to agree to differ on this issue.

Thanks again,

Alice

Mrs Alice de la Rue
Planning Officer, Derbyshire Gypsy Liaison Group on behalf of the National Federation of Gypsy Liaison Groups

From: Philip.Bentley@hertsmere.gov.uk
To: dglqplan@hotmail.co.uk
Date: Fri, 3 Feb 2012 15:59:06 +0000
Subject: RE: Response to the Revised Core Strategy

Dear Mrs de la Rue,

Re: Hertsmer Core Strategy – Gypsy & Traveller section

Thank you for your letter dated 1 February 2012, sent via email.

Following my previous email, which included a schedule of proposed changes to the Core Strategy DPD, I am pleased to see that you are now able to agree that the Council's proposal to review the evidence base for Gypsy & Traveller accommodation needs in 2017 is reasonable.

I note that you still consider the supporting text to Policy CS6 to be unclear. Having looked carefully at your reasoning, I would advise that your figures are not in conformity with the East of England Plan.

The Council is seeking to provide Gypsy & Traveller pitches in line with the East of England Plan. Please find attached the Single Issue Review. You will note that Policy H3 of this document states that Hertsmere should have 53 pitches by 2011; the text below the table setting out further pitch requirements states that 'beyond 2011 provision should be made for an annual 3% compound increase in residential pitch provision', and a footnote goes on to clarify that this 'should be calculated based on the total number of pitches required by 2011'.

I would refer you again to the schedule of proposed changes, which I attached to my previous email. These demonstrated that the Council, through providing an additional two pitches per annum to 2017, would be exceeding the East of England Plan requirement beyond 2011 for an annual 3% compound increase against a baseline of 53 pitches.

In respect of the delivery of the number of pitches specified as a target in policy CS6, I would advise that it is proposed that these are delivered through the identification of land in the forthcoming Site Allocations & Development Management DPD. This is made clear in Policy CS6. Please be aware the Council is currently proactively working towards the identification of land for pitches.

In respect of an up-to-date policy against which planning applications would be considered, I would advise that applications for Gypsy & Traveller pitches should be assessed in the same way and against the same policy requirements as other types of residential development. Currently saved Hertsmere Local Plan (2003) policies are relevant and up-to-date; in time, these will be replaced by policies that will be set out in the forthcoming Site Allocations & Development Management DPD.

I hope this helps to make the issues clearer and please let me know whether or not your concerns have been addressed. I would be more than happy to discuss the above matters further, if you feel that this is appropriate.

Best regards,

Philip Bentley
Planning Officer (Policy)
Hertsmere Borough Council

Telephone: (020) 8207 7527
Extension: 5800
Fax: (020) 8207 7444
Email: philip.bentley@hertsmere.gov.uk

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From: Alice de la Rue [<mailto:dglgplan@hotmail.co.uk>]
Sent: 01 February 2012 11:49
To: Core Strategy
Subject: RE: Response to the Revised Core Strategy

Dear Philip,

Please see attached brief response to the schedule of changes in connection with our previous representations. I hope the response is clear, but please let me know if anything needs clarification. I normally work on Tuesdays and Wednesdays, though next week I will be working on Monday and Wednesday, should you need to contact me.

Many thanks

Alice

From: Core.Strategy@hertsmere.gov.uk
To: dglgplan@hotmail.co.uk
Date: Mon, 30 Jan 2012 13:28:07 +0000
Subject: RE: Response to the Revised Core Strategy

Dear Alice,

Thank you for your representations. I attach a schedule showing the Council's comments and proposed minor amendments to the Core Strategy in light of these.

Please let me know whether these address the concerns raised by the National Federation of Gypsy Liaison Groups?

The Council plans to submit the Core Strategy the week commencing 6 February, so I would be grateful if you were able to respond before the close of business this Friday (3 February).

Best regards,

Philip Bentley
Planning Officer (Policy)
Hertsmere Borough Council

Telephone: (020) 8207 7527
Extension: 5800

Fax: (020) 8207 7444
Email: philip.bentley@hertsmere.gov.uk

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From: Alice de la Rue [<mailto:dglqplan@hotmail.co.uk>]
Sent: 21 December 2011 14:03
To: Core Strategy
Subject: Response to the Revised Core Strategy

Please find attached representation to the Revised Core Strategy DPD from the National Federation of Gypsy Liaison Groups.

Many thanks,

Alice

Mrs Alice de la Rue

Planning Officer, Derbyshire Gypsy Liaison Group on behalf of the National Federation of Gypsy Liaison Groups

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--
Michael Hargreaves
Planning and Accommodation Adviser

Irish Traveller Movement in Britain (ITMB)
0207 607 2002 (tel)
0775 966 6991 (mob)
The Resource Centre, 356 Holloway Road,
London, N7 6PA
michael@irishtraveller.org.uk

Campaigning Against Discrimination, Promoting Inclusion, Participation and Community Engagement

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HERTSMERE BOROUGH COUNCIL
CORE STRATEGY DPD
STATEMENT OF COMMON GROUND BETWEEN

HERTSMERE BOROUGH COUNCIL (HBC)

AND

**IRISH TRAVELLER MOVEMENT IN BRITAIN (ITMB) &
HERTS GYPSY AND TRAVELLER EMPOWERMENT (HERTS GATE)**

VERSION 5
5TH APRIL 2012

INTRODUCTION

HBC has been in correspondence with NFGLG (representor number: 4671) / ITMB & HERTS GATE in respect of objections raised in NFGLG's representations with regard to the sections of HBC's Core Strategy DPD relating to future Gypsy and Traveller pitch provision.

As part of an agreement between Traveller organisations to cover development plans across the country, ITMB, working with HERTS GATE, has taken over responsibility from NFGLG for this representation.

HBC considers that its approach to future Gypsy and Traveller pitch provision, as set out in the Core Strategy, is justified, effective and consistent with national policy. However, in order to address NFGLG's / ITMB & HERTS GATE's concerns HBC has resolved to make a number of minor changes to the Core Strategy. These are:

- Additional text added to paragraph 3.41 to reinstate wording similar to that included in a previous version of HBC's Core Strategy DPD (Consultation Draft – December 2010) and, thus, make clear the justifiable reasons for the Council only setting a target to 2017.
- Amendments to policy CS6 to correct drafting errors and clarify that HBC will provide for additional pitches beyond 2011 at the rate specified in the RS to 2017.
- Amendments to paragraph 3.41 and policy CS6 to express the pitch target to 2011 as a minimum figure, in accordance with the RS.

These minor changes satisfy one element of the concerns raised by NFGLG in respect of paragraph 3.41 and policy CS6, relating to the proposed timescale of the target for Gypsy and Traveller pitch provision prior to a review of HBC's evidence base as it relates to this type of accommodation. HBC and NFGLG / ITMB & HERTS GATE have agreed these changes (as set out in detail below) through this Statement of Common Ground. NFGLG / ITMB & HERTS GATE have confirmed that they no longer have any objections in relation to paragraphs 3.40 and 3.41, and policy CS6 of HBC's Core Strategy DPD in terms of the issue set out above, on the provision that these changes are made.

Although both parties have made efforts to negotiate and agree further appropriate minor amendments, NFGLG / ITMB & HERTS GATE still has an objection in relation to policy CS6 (criteria i to xii) of HBC's Core Strategy DPD. This objection is set out in detail in NFGLG's representations.

Notwithstanding that agreement could not be reached between both parties in respect of all areas of NFGLG's representations, HBC has made a number of other minor changes, which are set out in the submitted schedule of minor amendments. Further to this, a number of the issues raised in NFGLG's representations will be considered by HBC at a later date during the production of the forthcoming Development Management Policies DPD.

RESOLUTIONS

Minor changes to Core Strategy:

N.B.: Deletions are struck through; insertions are underlined.

Paragraph 3.41 - Given that demand for sites has been established through the Council's own joint studies and regional plan examination, there is recognised to be a need to plan for additional pitches in the district. The Council's preferred option is to retain the target of at least 18 pitches established in the regional plan to 2011 and for some additional growth to 20167. Based on the regional plan assessment, this would equate to an additional 2 pitches a year. The Council does not consider there is a robust basis to plan from beyond 2017, as at this point the needs assessment will be more than 10 years out of date. This approach demonstrates a commitment to meeting Gypsy and Traveller needs, whilst recognising that a further assessment of need and a review of this aspect of the Core Strategy will be needed by 2017. (Close paragraph)

New paragraph 3.42 (all subsequent paragraphs will be renumbered accordingly) -
Since the regional plan was adopted, a further 9 pitches have been approved – six pitches at the Pylon Site in Potters Bar which have since been implemented and three pitches at Sandy Lane in Bushey, approved in 2011 and for which government grant funding has been received to deliver the pitches...

Policy CS6 – The Council will provide for the further needs of Gypsies and Travellers on the basis of identified need within south and west Hertfordshire. †The Council will seek to identify and allocate up to at least 9 additional pitches to meet 2011 based on the evidence before the East of England Plan requirements to 2011 examination and a further 402 pitches by per annum to 2017 through the identification of land in the Site Allocations DPD...

AGREEMENT

Signed by:

Mark Flev

On behalf of Hertsmere Borough Council

Dated 10 APRIL 2012

On behalf of Irish Traveller Movement in Britain &
Herts Gypsy and Traveller Empowerment

Dated _____

Appendix O

London Travel Watch

- i. Schedule of Proposed Minor Amendments
- ii. Proposed Statement of Common Ground
- iii. Correspondence

Objector: London TravelWatch

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>There are no specific proposals in the document for decongestion measures, or for giving buses and cycles priority on congested roads, or for actively discouraging the unnecessary use of cars.</p>	<p>Paragraph 7.1</p>	<p>The Core Strategy is supported by a number of documents which set such policies, and approaches, such as the Local Transport Plan and it associated documents, the Hertfordshire Infrastructure and Investment Strategy, the three Urban Transport Plans that cover the Borough, Greenways Strategy and the Hertsmere Infrastructure Topic Paper. Many of these are referenced in paragraph 7.5 of the Core Strategy. Paragraph 7.6 and CS23 seek the use of travel plans which include measures to increase travel choice and secure a modal shift.</p>	<p>No Change</p>
<p>Laudable goals are listed but no route to their attainment is mapped. Even the simplest decongestion policies, park and ride is ruled out at paragraph 7.23, with no reasons for rejection being given.</p>	<p>Paragraph 7.23</p>	<p>The Core Strategy is supported by a number of documents which set such policies, and approaches, such as the Local Transport Plan and it associated documents, the Hertfordshire Infrastructure and Investment Strategy, the three Urban Transport Plans that cover the Borough, Greenways Strategy</p>	<p><i>"Park and Ride measures have not been actively promoted by either Hertsmere Borough Council or Hertfordshire County Council, ahead of the preparation of the Core Strategy. The South West Hertfordshire Transport Strategy (2008) does not identify any specific sites within the area, given the nature of movements and destinations within the Borough."</i></p>

<p>The bus network in Hertsmere is currently in a volatile and somewhat fragile condition, owing to the unwillingness of either the county or the district councils to continue to fund non-commercial routes (which form the vast majority of those in Hertsmere) at the level achieved over the past decade. Caution should therefore be exercised in making overly specific statements about route frequency and extent. For example, Shenley is stated to have "only three bus routes running at certain times of the day". This may have been correct at the time this paragraph was first drafted, but since March 2010 there have been only two routes serving this village.</p>	<p>Paragraph 8.14</p>	<p>and the Hertsmere Infrastructure Topic Paper.</p> <p>For clarity 7.23 will be amended.</p> <p>Noted and agreed</p>	<p>"the community has limited public transport accessibility with only <u>three a few</u> bus routes running at certain times of the day.</p>
<p>Implementation and monitoring Framework. To "promote transport choice and achieve modal shift away from private transport" is stated to be one of the two "Transport & Accessibility" outcomes sought in this strategy. Yet the only indicators of achievement listed are the number of new or enhanced greenway or cycle routes, and the percentage of approved major commercial developments with a green travel plan and cycling measures. It is noticeable and regrettable that Hertsmere council's commitment to promoting the use of public transport does not extend even to including any indicator of achievement that might demonstrate its success.</p> <p>It is stated that the "revised accessibility zones for Hertsmere identify where there is presently limited</p>	<p>Table 17 - Transport & Accessibility</p>	<p>For robustness. The Council's AMR records traffic counts at 6 key locations, and in light of the representation made, this can be included as an indicator in Table 17</p>	<p>Number of new or enhanced Greenway or cycle routes % of approved major commercial developments with a Green Travel Plan and cycling measures <u>Insert</u> <u>Increasing use of cycling, walking, public transport and reduction in travel by car mode desired</u> and: <u>Traffic counts at key locations</u></p>
<p>Hertsmere identify where there is presently limited</p>	<p>Paragraph 7.23.</p>	<p>For clarity</p>	<p>The revised Accessibility Zones for Hertsmere <u>as set out in the Parking SPD</u> identify where there is presently limited</p>

<p>public transport accessibility across the Borough,</p>		
<p>No Change.</p>	<p>The paragraphs are a matter of fact, rather than suggest that Hertsmere Borough Council was the lead authority for the station improvements. The First Impressions project which includes improvements to Elstree and Borehamwood Railway Station and Shenley Road, for example was a joint project between, Hertsmere Borough Council, Elstree and Borehamwood Town Council and First Capital Connect. The project has been funded by all the organisations and by a county grant, bid for by HBC. The link below provides further detail.</p>	<p>public transport accessibility across the Borough,</p>
	<p>Paragraphs 7.20 and 7.21</p>	<p>public transport accessibility across the Borough,</p>
<p>public transport accessibility across the Borough,</p>	<p>public transport accessibility across the Borough,</p>	<p>public transport accessibility across the Borough,</p>

<http://www.hertsmere.gov.uk/communityliving/economicdevelopment/firstimpressionsproject/latestnews.jsp>

HERTSMERE BOROUGH COUNCIL
CORE STRATEGY DPD
STATEMENT OF COMMON GROUND BETWEEN

HERTSMERE BOROUGH COUNCIL (HBC)

AND

LONDON TRAVELWATCH (LTW)

VERSION 1
7TH MARCH 2012

INTRODUCTION

HBC has been in correspondence with LTW (representor number: 1069) in respect of concerns raised in LTW's representations with regard to the sections of HBC's Core Strategy DPD relating to transport and parking

HBC considers that the approach to transport set out in Chapter 7 and 8, and the monitoring framework of the Core Strategy is justified, effective and consistent with national policy. However, in order to address LTW's concerns HBC has resolved to make a number of minor changes to the Core Strategy. These are:

- Additional wording for clarification on 'Accessibility Zones';
- Correction on the number of bus routes that go through Shenley; and
- Two additional indicators in the monitoring framework.

HBC and LTW have agreed these changes (as set out in detail below) through this statement of common ground. LTW has confirmed that they no longer have any objections in relation to HBC's Core Strategy DPD on the provision that these changes are made.

RESOLUTIONS

Minor changes to Core Strategy:

N.B.: Deletions are struck through; insertions are underlined.

- Paragraph 7.23** – The revised Accessibility Zones for Hertsmere as set out in the Parking SPD identify where there is presently limited public transport accessibility across the Borough, indicating where new routes and stops could be provided to make some development more acceptable. Park and Ride measures have not been actively promoted by either Hertsmere Borough Council or Hertfordshire County Council, ahead of the preparation of the Core Strategy. The South West Hertfordshire Transport Strategy (2008) does not identify any specific sites within the area, given the nature of movements and destinations within the Borough.
- Paragraph 8.14** – Although the population of Shenley has grown significantly and now exceeds 5,000, the community has limited public transport accessibility with only ~~three~~ a few bus routes running at certain times of the day.
- Table 17** – Transport and Accessibility

Transport and Accessibility	To promote transport choice and achieve modal shift away from private transport	Number of new or enhanced Greenway or cycle routes	CS23, CS24, CS25
		% of approved major commercial developments with a Green Travel Plan and cycle measures	
		<u>Increasing use of cycling, walking, public transport and reduction in travel by car mode desired</u>	
	<u>Traffic counts at key locations</u>		
	Parking provision	Ongoing monitoring of parking standards and implementation on new developments	

AGREEMENT

Signed by:



On behalf of Hertsmere Borough Council

Dated 07/03/2012

On behalf of London Travelwatch

Dated _____

Sarah Churchard

From: Vincent Stops <Vincent.Stops@londontravelwatch.org.uk>
Sent: 08 March 2012 08:54
To: Sarah Churchard
Subject: RE: Hertsmere Local Development Framework Notification of submission of Core Strategy to the Secretary of State

Sarah

We have accepted the alterations that are offered. We don't want that to be misinterpreted that Hertsmere has addressed our concerns.

Happy to sign a letter stating this.

Vincent

From: Sarah Churchard [mailto:Sarah.Churchard@hertsmere.gov.uk]
Sent: 07 March 2012 17:17
To: Vincent Stops
Subject: RE: Hertsmere Local Development Framework Notification of submission of Core Strategy to the Secretary of State

Hi Vincent

Thank you for your email.

I would be grateful if you would be able to sign and return the attached statement of common ground. My colleague Simon Warner (Senior Planning Officer) has also signed the statement.

We hope to be able to submit this to the Inspector by the end of this week. It would be helpful if you could return it to me by the end of Friday 9th.

Do let me know if there are any queries. I look forward to hearing from you shortly.

Kind regards

Sarah
Planning Policy Officer

Hertsmere Borough Council
0208 207 2277 (ext 5830)

From: Vincent Stops [mailto:Vincent.Stops@londontravelwatch.org.uk]
Sent: 06 March 2012 09:08
To: Sarah Churchard
Subject: RE: Hertsmere Local Development Framework Notification of submission of Core Strategy to the Secretary of State

Sarah

Thank you for this. We accept the alterations that are offered and note the clarifications you have provided in relation to our other concerns.

Vincent Stops
For London TravelWatch

From: Sarah Churchard [<mailto:Sarah.Churchard@hertsmere.gov.uk>]

Sent: 23 February 2012 15:40

To: Vincent Stops

Subject: RE: Hertsmere Local Development Framework Notification of submission of Core Strategy to the Secretary of State

Dear Mr Stops

Thank you for your representations on the Hertsmere Revised Core Strategy. The Council has reviewed the comments made on behalf of London Travelwatch, and proposed some minor amendments to the Core Strategy following the submission to the Secretary of State. Please find attached a schedule of proposed minor modifications in response to the comments.

I would be glad to hear from you on the Schedule, and whether you consider that they have addressed your comments.

We would be grateful to hear from you by 2nd March, in order to update the Planning Inspectorate as soon as possible. I look forward to hearing from you shortly. If you would like to discuss this feel free to call on the number below.

Kind regards

Sarah Churchard
Planning Policy Officer

Hertsmere Borough Council
Civic Offices | Elstree Way | Borehamwood | Herts | WD6 1WA
e: sarah.churchard@hertsmere.gov.uk
t: 020 8207 2277 ext. 5830

From: Simon Warner GCSX

Sent: 22 February 2012 17:49

To: 'Vincent Stops'

Subject: RE: Hertsmere Local Development Framework Notification of submission of Core Strategy to the Secretary of State

Dear Vincent,

Thank you for your email.

I have asked my colleague Sarah Churchard to send this to you. You should receive this tomorrow morning (Thursday)

Kind Regards

Simon Warner

Simon Warner
Senior Planning Officer (Policy and Transport)

Hertsmere Borough Council

Address: Civic Centre, Elstree Way, Borehamwood WD6 1WA
Phone: 020 8207 7567
Email: simon.warner@hertsmere.gov.uk

From: Vincent Stops [<mailto:Vincent.Stops@londontravelwatch.org.uk>]
Sent: 22 February 2012 11:32
To: Simon Warner GCSX
Subject: RE: Hertsmere Local Development Framework Notification of submission of Core Strategy to the Secretary of State

Dear Simon

I note from the report
http://www.hertsmere.gov.uk/planning/dnld_200074/CS_Statement_of_Representations_February_2012_A.pdf, part 4
that you have sought to agree minor changes with London TravelWatch.

I apologise if I missed this – It may well have gone to a general email account.

Can you please resend the letter referred to.

Can you please resend you letter direct to myself.

Thanks

Vincent Stops

From: info
Sent: 22 February 2012 10:46
To: Vincent Stops
Subject: FW: Hertsmere Local Development Framework Notification of submission of Core Strategy to the Secretary of State

From: Simon Warner GCSX [<mailto:simon.warner@hertsmere.gcsx.gov.uk>]
Sent: 21 February 2012 17:04
To: undisclosed-recipients
Subject: FW: Hertsmere Local Development Framework Notification of submission of Core Strategy to the Secretary of State

Dear Sir/Madam,

I am writing to advise you that Hertsmere Borough Council submitted its Core Strategy to the Secretary of State for Communities and Local Government on 10th February 2012 for independent examination.

The Core Strategy will guide the development of the Borough over the next 15 years and its submission follows a six week period in which representations were invited on the published document and which closed on 9th January 2012. An Inspector will now be appointed by the Planning Inspectorate to consider the representations received on the Core Strategy before carrying out the examination.

A dedicated web page for the submission and examination has been set up containing all relevant documents, including the submission documents, copies of representations made on the Core Strategy; this will also include details of the hearing sessions, once known. The web page can be viewed at

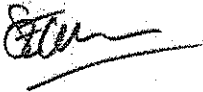
www.hertsmere.gov.uk/corestrategy and is being maintained by the Programme Officer. Documents are also available for inspection at Libraries and Deposit Points, details of this are attached.

If you sought changes to the Core Strategy between November and January and expressed a wish to be heard at the examination, you should be contacted in due course by the appointed Programme Officer for the examination, Ms Carmel Edwards. A limited number of individuals or organisations, who did not specifically ask to attend, may also be invited by the Inspector to the examination.

Following submission of the Core Strategy, I would ask that you liaise with the Programme Officer on all procedural matters relating to the examination. Her contact details are as follows:

Ms Carmel Edwards
Hertsmere Core Strategy Programme Officer
c/o Planning – Hertsmere Borough Council
Civic Centre
Elstree Way
Borehamwood
WD6 1WA
Tel: 07969 631930 Email: programme.officer@hertsmere.gov.uk

Yours faithfully,



Simon Warner
Senior Planning Officer

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Appendix P

Savills on behalf of Jupiter Hotels Limited

- i. Schedule of Proposed Minor Amendments
- ii. Correspondence

Objector: Jupiter Hotels (representor number - 4686)

Objectors Comment	Paragraph / Policy / Table number	Reason for Change	Suggested Change
<p>It is acknowledged that Hertsmere is located in a wider employment market, although there are questions relating to the reliant on neighbouring authorities employment and business markets. Does not acknowledge that there might be appropriate locations outside of Employment Areas and Employment Sites for employment generating development. It is thought that land close to the strategic road network would be ideal for commercial uses such as research and development.</p>	<p>Policy CS8</p>	<p>No proposed change - sites outside of Employment Areas, Employment Sites and settlement boundaries will be assessed against criteria set within the Site Allocations and Development Management DPD.</p> <p>It should be noted that additional land beyond existing employment sites has been identified as safeguarded employment land to allow some flexibility. However, those boundaries will be defined in the Site Allocations DPD. Furthermore, development at all sites within the Green Belt will continue to be subject to the requirements of PPG2 and RCS Policy CS12.</p>	<p>None</p>
<p>An up-to-date Community Needs Assessment / Social Infrastructure Study is required where there might be potential demand for leisure and community uses. No evidence base examining the need for leisure and community facilities.</p>	<p>Paragraph 6.5 Chapter 2</p>	<p>An Infrastructure Topic Paper and Open Space Study have been produced, which contribute to the RCS. It should also be noted that the RCS contains overarching policies, and the Site Allocations and Development Management DPD will go into greater detail on these matters.</p> <p>The policies within the Revised Core Strategy are also a result of close and continual work with departments within the Council, with Hertfordshire County Council, and other infrastructure and service providers, in addition to the Hertsmere.</p>	<p>None</p>
<p>It is important that development is not prejudiced by a fixed CIL set at a level that threatens delivery. Viability and deliverability should be emphasised in the policy wording.</p>	<p>Paragraph 6.11</p>	<p>Paragraph 6.13 recognises the importance of ensuring that a CIL standard charge is not set at a disproportionately high level leading to new sites become too costly to develop. A robust assessment of CIL viability will be carried out when preparing a CIL charging schedule, and will undergo it's statutorily consultation period at the appropriate stages.</p>	<p>None</p>

<p>Does not account for previously developed sites outside of towns which have the potential to play an important role in terms of accommodating non-residential uses to support future housing growth and the local community – areas located in poor quality Green Belt land should be considered to meet development needs. There are also a number of areas located in poor quality Green Belt land which should be considered to meet the development needs and demands of the Borough particularly in terms of additional hotel and leisure facilities and / or commercial development. Table 4 is not considered to be effective as it is not sufficiently flexible.</p> <p>Reference should be made to the importance of supporting the tourism industry, including the Nomis Labour Market Profile which identifies a high proportion of the workforce being employed in tourism related industries. It is noted that hotel accommodation encourages inward investment and meets the tourism demand, with socio-economic benefits. Section 4 should acknowledge that more detailed policies on tourism should be considered as part of the Site Allocations and Development Management DPD.</p>	<p>Table 4 Objective 3</p>	<p>The release of previously developed sites outside of towns will be determined in accordance with the Saved Policies until the adoption of the Site Allocations and Development Management DPD. Minor amendments to the Green Belt Boundary will be considered as part of the Site Allocations DPD. Development at sites within the Green Belt will continue to be subject to the requirements of PPG2 and RCS Policy CS12. The Green Belt is a designation that does not take account of the quality of the land, and policy applies to all land 'washed over' by the Green Belt. The Council supports tourism in appropriate locations as noted in PPS4.</p> <p>It should also be noted that policy CS14 allows for recreational access to open spaces and the countryside, including the Green Belt. There are a number of rural gateway sites in the Borough. In addition to this policy, the Council is proposing some wording as a minor amendment to ensure clarity in relation to rural visitor attraction and tourism initiatives.</p>	<p>End of paragraph 5.25 – '<u>The Council is keen to support tourism initiatives, such as proposals for the extension, upgrade and improvement of existing rural visitor attractions.</u>'</p>
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<p>Site by site planning obligations is supported, and it is noted that a CIL charging Schedule should not threaten delivery of development. Amendments suggested for para 6.11 - "en-larger all development schemes will provide the Council will, however, retain the option of negotiating Section 106 agreements on a site-by-site basis having regard to amongst other planning factors, the scheme's viability for both residential and non-residential development whilst affording 106 provisions which mitigate impact."</p>	<p>Chapter 4 Paragraph 6.11</p>	<p>Support noted and welcomed.</p> <p>There is a commitment for more detailed policies to be included in the Site Allocations and Development Management DPDs with particular reference to rural visitor attractions/tourism facilities and rural gateway sites as identified in policy CS14.</p> <p>The Council has adopted a Planning Obligations SPD in 2010 which sets out the reasoning behind Section 106 contributions with a standard approach that is taken. No proposed change to para 6.11 in this regard.</p> <p>Paragraph 6.13 recognises the importance of ensuring that a CIL standard charge is not set at a disproportionately high level leading to new sites become too costly to develop. A robust assessment of CIL viability will be carried out when preparing a CIL charging schedule, and will undergo it's statutory consultation period at the appropriate stages.</p>	<p>None</p>
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Sarah Churchard

From: Sarah Churchard
Sent: 27 March 2012 14:29
To: 'MBedding@savills.com'
Subject: RE: SUBMISSION CORE STRATEGY REPRESENTATIONS - SAVILLS ON BEHALF OF JUPITER HOTELS LIMITED

Dear Mr Bedding

I was wondering if you have had the chance to review the proposed minor amendments in response to your representations made on behalf of Jupiter Hotels Limited.

Thanks
Sarah

From: Sarah Churchard **On Behalf Of** Core Strategy
Sent: 14 March 2012 15:02
To: 'Mark Bedding'
Subject: RE: SUBMISSION CORE STRATEGY REPRESENTATIONS - SAVILLS ON BEHALF OF JUPITER HOTELS LIMITED

Dear Mr Bedding

Thank you for your representations on the Hertsmere Revised Core Strategy.

The Council has reviewed the comments made on behalf of Jupiter Hotels Limited, and proposed some minor amendments to the Core Strategy for consideration of the submission of the DPD to the Secretary of State. The Council has already submitted the Core Strategy, but are in the process of seeking common ground with other representors and stakeholders.

Please find attached a schedule of proposed minor modifications in response to your representations. I would be glad to hear from you on the Schedule, and whether you consider that they have addressed your comments over the next few working days

I look forward to hearing from you shortly. If you would like to discuss this feel free to call on the number below.

Regards

Sarah Churchard
Planning Policy Officer

Hertsmere Borough Council
Civic Offices | Elstree Way | Borehamwood | Herts | WD6 1WA
e: sarah.churchard@hertsmere.gov.uk
t: 020 8207 2277 ext. 5830

From: Mark Bedding [<mailto:MBedding@savills.com>]
Sent: 09 January 2012 16:42
To: Core Strategy

Cc: 'steve.hardman@jupiterhotels.co.uk'; Jane Barnett

Subject: SUBMISSION CORE STRATEGY REPRESENTATIONS - SAVILLS ON BEHALF OF JUPITER HOTELS LIMITED

Sent on Behalf of Jane Barnett

Dear Sir / Madam

REVISED SUBMISSION CORE STRATEGY CONSULTATION (NOVEMBER 2011)

Please find attached representations and a self explanatory covering letter submitted on behalf of Jupiter Hotels Limited in response to the above consultation document.

Should you require any further information or clarification on the issues raised within the submission please contact me or alternatively Mark Bedding on 0203 320 8283 / mbedding@savills.com.

Kind regards

Jane

Jane Barnett

Director

Savills Planning and Regeneration

DD: +44 (0) 203 320 8274

Mobile: 07807 999 242

DF: +44 (0) 207 016 3769

email: jabarnett@savills.com

weblink: www.savills.com



Appendix Q

Traveller Law reform project and Friends, Families and Travellers

- i. Schedule of Proposed Minor Amendments
- ii. Correspondence

Objector: Traveller Law Reform Project & Friends, Families and Travellers

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>The policy sets out needs accurately to 2011. Policy H4 stated that Hertsmere should provide 18 new pitches to 2011. However it also required councils to make provision beyond 2011 using a 3% annual compound increase. This would entail provision for a further 29 pitches to 2027. The policy only talks of seeking to make provision to 2017 of a further 10 pitches. It should also state explicitly that the policy will be used to judge windfall applications.</p>	<p>Paragraphs 3.40-3.41 / Policy CS6</p>	<p>The methodology set out in the supporting text requires clarification to make clear the justifiable reasons for the Council only setting a target to 2017. Similar text was in a previous version of the Core Strategy (December 2010) that was subject to a period of public consultation. This text was deleted and should be reinserted.</p> <p>Some drafting errors were made in the supporting text and the Policy in respect of the target and the date that the target would run until. These should be corrected. Amendments should be made to make clear that the Council will provide for additional pitches beyond 2011 at the rate specified in the RSS to 2017.</p> <p>The RSS requires that beyond 2011 provision should be made for a 3% compound increase in pitch provision, based on the total number of pitches required by 2011. The RSS requires that the Council provide 53 pitches by 2011. It can be seen from the table below that the Council would exceed the RSS requirement if it were to provide 2</p>	<p><u>Paragraph 3.41</u> – Given that demand for sites has been established through the Council's own joint studies and regional plan examination, there is recognised to be a need to plan for additional pitches in the district. The Council's preferred option is to retain the target of 18 pitches established in the regional plan to 2011 and for some additional growth to 2016/7. Based on the regional plan assessment, this would equate to an additional 2 pitches a year. The Council does not consider there is a robust basis to plan from beyond 2017, as at this point the needs assessment will be more than 10 years out of date and the government has signalled its intentions to review Gypsy and Traveller requirements. This approach demonstrates a commitment to meeting Gypsy and Traveller needs, whilst recognising that a further assessment of need and a review of this aspect of the Core Strategy will be needed by 2017.</p> <p>(New paragraph) – Since the regional plan was adopted...</p> <p><u>Policy CS6</u> – The Council will provide for the further needs of Gypsies and Travellers on</p>

<p>We also have concerns about the use of the word 'seek' in relation to future provision. Policy CS1 states that The Council will make provision for 3550 additional dwellings within the District between 2012 and 2027, a development rate of 237 dwellings per year. Policy CS6 fails to deal with provision for Gypsy and Traveller accommodation in the same positive fashion, give an annualised target or lay out the needed provision to 2027, the period for which the core strategy plans for. This opens up an element of uncertainty about future provision and only plans for the next five years. If there is uncertainty about future provision it should state how and when future needs will be assessed and how these needs will be incorporated in future planning. It fails to do this and the core strategy is internally inconsistent.</p>	<p>Policy CS6</p>	<p>additional pitches a year over a 6-year period.</p> <table border="1" data-bbox="320 719 671 1167"> <thead> <tr> <th>Year</th> <th>Pitches at start of year</th> <th>Increase (3%)</th> <th>Pitches at end of year</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>53.00</td> <td>1.59</td> <td>54.59</td> </tr> <tr> <td>2</td> <td>54.59</td> <td>1.64</td> <td>56.23</td> </tr> <tr> <td>3</td> <td>56.23</td> <td>1.69</td> <td>57.91</td> </tr> <tr> <td>4</td> <td>57.91</td> <td>1.74</td> <td>59.65</td> </tr> <tr> <td>5</td> <td>59.65</td> <td>1.79</td> <td>61.44</td> </tr> <tr> <td>6</td> <td>61.44</td> <td>1.84</td> <td>63.28</td> </tr> </tbody> </table> <p>The text should be amended to reflect the fact that the Council is committed to meeting identified need for new pitches within the Borough.</p>	Year	Pitches at start of year	Increase (3%)	Pitches at end of year	1	53.00	1.59	54.59	2	54.59	1.64	56.23	3	56.23	1.69	57.91	4	57.91	1.74	59.65	5	59.65	1.79	61.44	6	61.44	1.84	63.28	<p>the basis of identified need within south and west Hertfordshire, the Council will seek to identify and allocate up to 9 additional pitches to meet the East of England Plan requirements to 2011 and a further 102 pitches per annum to by 2017 through the identification of land in the Site Allocations DPD...</p>	<p><u>Policy CS6</u> -- The Council will provide for the further needs of Gypsies and Travellers on the basis of identified need within south and west Hertfordshire, the Council will seek to identify and allocate up to 9 additional pitches to meet the East of England Plan requirements to 2011 and a further 10 pitches by 2017 through the identification of land in the Site Allocations DPD...</p>
Year	Pitches at start of year	Increase (3%)	Pitches at end of year																													
1	53.00	1.59	54.59																													
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5	59.65	1.79	61.44																													
6	61.44	1.84	63.28																													

<p>We welcome the inclusion of a criteria based policy against which to judge allocations but are concerned about both the number of the criteria and also the content of some of them.</p> <p>Circular 1/2006, which still stands until replaced, gives advice on criteria and does state on p 21, para 3 that lists of criteria should not be overlong. In our view the list of 12 criteria is excessive and hence is more likely to lead to refusal of planning permission than a shorter list.</p> <p>We are however pleased that the policy does only require the criteria to be taken into consideration.</p> <p>We have concerns about some of the individual criteria which we believe are too tightly drawn and not realistic. C 1/2006 makes the point that all criteria need not necessarily have to be met to gain planning permission.</p> <p>Criterion iii - this requires proximity to the major road network. This would be a reasonable approach if the policy was concerned with transit accommodation with a constant toing and froing of large vehicles. However the need to be close to a major road network no more applies to a residential site as it does to conventional housing. Both generate similar amounts of traffic. To require this of all sites is unrealistic and unduly onerous and could mean the rejection of otherwise suitable sites.</p>	<p>Policy CS6</p>	<p>The Policy should not be amended on account of the submitted representations. It is for the identification of sites and not for the determination of planning applications. The criteria are considered reasonable for this purpose; any planning application for new pitches would be assessed against the relevant saved Hertsmere Local Plan (2003) / emerging Site Allocations & Development Management DPD policies.</p>	<p>N/A</p>
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<p>Criterion iv - this criterion does in our view invite NIMBY objections which may well be based on prejudice. It is an open invitation to objections. . . Hertsmere Council should be mindful that the main barrier to the construction of Traveller sites is public and official prejudice.</p> <p>Criterion v - while this does in part reflect para 54 of C 1/2006 it does in our view go much further than the intention. After all the needs in Hertsmere are very small and the likelihood of any site dominating the nearest community is extremely remote. The criterion does seem to reflect the public hysteria which often surrounds site provision and in these circumstances has no place in a planning policy. This is especially true of the latter part of the criterion which talks about undue level of pitches in any part of the district. What is an undue level? It is undefined and imprecise. It does seem that the approach taken is at odds with that taken for general housing and as such could be prejudicial.</p> <p>Criterion viii - this criterion seems to be aimed at a site which might be provided for RSL use. However it does also seem to be able to be read as restricting sites over five pitches to local Gypsies or Travellers alone. This in itself contradicts the advice contained in C 1/2006 which does state that applications have to be determined by whoever submits them. Overall this sort of criterion does not seem to have a</p>			
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place in a planning policy and is a matter much better dealt with through planning conditions at the application stage.

Sarah Churchard

From: Philip Bentley
Sent: 29 March 2012 17:00
To: Sarah Churchard
Subject: FW: Core Stratgey consultation

From: Steve Staines [mailto:Steve@ghpsy-traveller.org]
Sent: 01 March 2012 10:38
To: Philip Bentley
Subject: RE: Core Stratgey consultation

Just a response to your e mail below confirming that resources simply do not enable me to respond to your previous request.

Steve Staines
Friends, Families and Traveller and Traveller Law Reform Project
07845930065

www.ghpsy-traveller.org

From: Philip Bentley [mailto:Philip.Bentley@hertsmere.gov.uk]
Sent: Wed 29/02/2012 15:15
To: Steve Staines
Subject: FW: Core Stratgey consultation

Dear Mr Staines,

Further to our telephone conversation earlier today, I note that you have informed me verbally that you are unable to respond to my below correspondence on account of time constraints. Would you please be able to briefly confirm this in writing through a response to this email?

Best regards,

Philip Bentley
Planning Officer (Policy)
Hertsmere Borough Council
Telephone: (020) 8207 7527
Extension: 5800
Fax: (020) 8207 7444
Email: philip.bentley@hertsmere.gov.uk
Civic Offices, Elstree Way, Borehamwood, Herts. WD6 1WA
DX45602 Borehamwood
www.hertsmere.gov.uk

Hertsmere Borough Council is currently preparing its Local Development Framework (LDF), a suite of documents guiding development over the next 15 years and beyond. If you would like to be consulted on this or kept up to date on progress, join the LDF mailing list by sending your details to core.strategy@hertsmere.gov.uk

From: Philip Bentley On Behalf Of Core Strategy
Sent: 30 January 2012 13:26
To: 'Steve Staines'
Subject: RE: Core Stratgey consultation

Dear Steve,

Thank you for your representations. I attach a schedule showing the Council's comments and proposed minor amendments to the Core Strategy in light of these.

Please let me know whether these address the concerns raised by Friends, Families and Travellers and the Traveller Law Reform Project?

The Council plans to submit the Core Strategy the week commencing 6 February, so I would be grateful if you were able to respond before the close of business this Friday (3 February).

Best regards,

Philip Bentley
Planning Officer (Policy)
Hertsmere Borough Council
Telephone: (020) 8207 7527
Extension: 5800
Fax: (020) 8207 7444
Email: philip.bentley@hertsmere.gov.uk
Civic Offices, Elstree Way, Borehamwood, Herts. WD6 1WA
DX45602 Borehamwood
www.hertsmere.gov.uk

Hertsmere Borough Council is currently preparing its Local Development Framework (LDF), a suite of documents guiding development over the next 15 years and beyond. If you would like to be consulted on this or kept up to date on progress, join the LDF mailing list by sending your details to core.strategy@hertsmere.gov.uk

From: Steve Staines [<mailto:Steve@gypsy-traveller.org>]
Sent: 08 January 2012 13:09
To: Core Strategy
Subject: Core Strategy consultation

Our response is attached

Steve Staines
Friends, Families and Traveller and Traveller Law Reform Project

07845930065

www.gypsy-traveller.org

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Appendix R

PGA Design

- i. Proposed Statement of Common Ground
- ii. Correspondence

HERTSMERE BOROUGH COUNCIL

CORE STRATEGY DPD

STATEMENT OF COMMON GROUND BETWEEN

HERTSMERE BOROUGH COUNCIL (HBC)

AND

PGA DESIGN (PGAD)

VERSION 1

5th March 2012

INTRODUCTION

HBC has been in correspondence with PGAD (representor number:4764) in respect of concerns raised in PGAD's representations with regard to the sections of HBC's Core Strategy DPD relating to the evidence base and an Open Space Study. PGAD are promoting the availability of Bushey Hall Golf Course.

RESOLUTION

HBC considers that the approach to the Green Belt, access to services and community facilities in Policies CS12, CS17 and CS18 respectively of the Core Strategy is justified, effective and consistent with national policy.

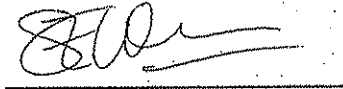
It should be noted that HBC published an Open Space Study in October 2011 and an update to the Play Pitch Strategy in March 2010, which satisfies the PGAD concerns regarding an Open Space Study.

PGAD provided HBC a potential proposed master plan of the site. Following this a meeting was held to discuss the site specific proposals for development at Bushey Hall Golf Course. The proposals related to outdoor sports facilities, a cemetery, allotments, playing pitches, caravan park, and a number of new dwelling houses. HBC and PGAD discussed when uses are appropriate or inappropriate in the Green Belt, and where evidence is needed to justify particular uses. HBC have acknowledged the status and availability of the site, and it was advised that promoting the site through Site Allocations process, and participating in formal pre-application advice was the most appropriate way forward for proposals at the site.

On signing this Statement, PGAD confirm that they do not have any objections to the RCS, and concerns about the Open Space Study are satisfied.

AGREEMENT

Signed by:



On behalf of Hertsmere Borough Council

Dated 05/04/2012

On behalf of PGA Design

Dated _____

Sarah Churchard

From: Sarah Churchard
Sent: 10 April 2012 16:53
To: andrew.craven@idgplanet.com
Subject: RE: Bushey Hall Golf Club

Dear Andrew

Further to our telephone conversation, below is the only site representation in the Green Belt report that I can see that overlaps your site. It's all out of date now in terms of references to PPG2, which will be updated when the time comes. I cannot pass you the whole document, due to the working nature of it, but I include the relevant part. You can see at the end of the table is a recommendation – that will be put onto a map, and will form the Site Allocations DPD. When we go through another call for sites, that will be the next opportunity to include other parts of the golf course to be considered for removal from the Green Belt.

I hope this helps. Please do let me know your thoughts/reasoning on the statement of common ground.

Kind regards
Sarah

Table 7.4 Bushey Hall Golf Club, Bushey Hall Drive, Bushey
<p>History and use The first nine hole golf course was first constructed in the grounds and parkland of Hall Estate Bushey in 1890. It is recognised as one of the oldest parkland golf course in Hertfordshire.</p>
<p>Planning History</p> <ul style="list-style-type: none"> ▪ In 2005 permission was granted for a new premises license in consultation with the Licensing Officer (TP 05/1173). ▪ An application for boundary fencing, walls and gates was at first refused (TP/01/0471) and then granted (TP 01/0884). ▪ An application for a new pond was approved in 2000, ▪ Rebuilding of the clubhouse and new access was declined in 1998.
<p>Future Plans There have been representations made to Council regarding the development of the site for housing.</p>
<p>PPG2 Criteria PPG2 states that up-to-date approved boundaries are essential, to provide certainty as to where Green Belt policies do and do not apply and to enable the proper consideration of future development options. Where existing local plans are being revised and updated, existing Green Belt boundaries should not be changed unless alterations to the structure plan have been approved, or other exceptional circumstances exist, which necessitate such revision.</p> <p>The Golf Course forms an important component of the strategic green gap between Bushey, North Bushey and Watford. If this area of Bushey were to be significantly developed the impact on the Green Belt in the area could potentially produce several adverse effects and would require special circumstances.</p> <ul style="list-style-type: none"> ▪ The openness of the Green Belt will be significantly affected by removing the Golf Course or even a portion of the course from the Green Belt. ▪ Three of the 5 objectives for the Green Belt will be potentially compromised by a shift to the Green Belt Boundary (sprawl, merging, and encroachment). ▪ There are no current conflicts with the land use objectives for Green Belt. ▪ The print works/ car park, to the front of the site could potentially be removed to create a logical defensible boundary to the Green Belt.
<p>Comments The site is to the south of North Bushey, it has a strong position within the landscape of the area. The site contains a number of designations which includes the identification of flood prone land, a wildlife site, TPOs, and bordering the west of the site is a nature reserve.</p>
<p>Recommendation Remove the print works from the Green Belt.</p>

From: Sarah Churchar
Sent: 05 April 2012 16:38
To: 'andrew.craven@idgplanet.com'
Subject: RE: Bushey Hall Golf Club

Dear Andrew

I write further to the meeting I attended with you and Simon at the beginning of last week. We said at the meeting that we would provide you with a few more statistics on allotment provision in Bushey. This is taken from the Open Spaces Study 2011, which can also be seen on the Council's website at [http://www.hertsmere.gov.uk/planning/hertsmere-local-development-framework/dnld_hertsmere-local-development-framework/Hertsmere Open Space Study Oct 2011.pdf](http://www.hertsmere.gov.uk/planning/hertsmere-local-development-framework/dnld_hertsmere-local-development-framework/Hertsmere%20Open%20Space%20Study%20Oct%202011.pdf)

There is an under provision of allotments in North Bushey, where more than 4,000 residents do not have access to allotments within 1200m of their house. See figure 9.3 of the study for more information. I note that the study does not include reference to the existing waiting lists for such facilities, so it might be worth liaising with the Council's Parks team to find out what that's like.

I also note that you submitted representations to the Council Revised Core Strategy in January 2012. The Examination in Public will be at the beginning of May. We have been contacting other stakeholders who made representations to reach a state of common ground on various matters prior to the hearings. As you made representations to the Core Strategy, and since we met to discuss your plans we also seek common ground with PGA Design on matters raised. I have included some of the items discussed at the meeting, to make it clear to the Inspector where we are with the proposals for the redevelopment of the Golf Course. Simon Warner, the LDF Team Leader has signed the statement, and I ask that you do as well.

I hope this is clear, let me know if there are any queries. Your earliest response would be much appreciated.

Kind regards

Sarah Churchard
Senior Planning Officer (Policy and Transport)

Hertsmere Borough Council

Civic Offices | Elstree Way | Borehamwood | Herts | WD6 1WA

e: sarah.churchard@hertsmere.gov.uk

t: 020 8207 2277 ext. 5830

From: Simon Warner
Sent: 09 March 2012 15:44
To: 'Andrew Craven'
Subject: RE: Bushey Hall Golf Club

Dear Andrew,

Following our recent discussion, please find the following comments based on your masterplan.

- As you are aware and illustrate the site is within the Green Belt. PPG2 allows agriculture and forestry and essential facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it (Residential development is only allowed with very special circumstances, or on Major Development Sites – of which this isn't and as infilling in existing villages – of which this isn't).
- Essential facilities should be genuinely required for uses of land which preserve the openness of the Green Belt and do not conflict with the purposes of including land in it.
- The need for a facility such as the cemetery would need to be demonstrated. The scale of this would also need to be proportionate, for example the scale of the facility illustrated is quite large, and given the number of parking spaces, and scale of the building there could be a number of issues to overcome. Note can be take of the Jewish Cemetery in Bushey which is close by and received planning permission for an extension in 2010. There may also be some concerns regard the level of use and access to site.
- The caravan park would also be contrary to policy and would require very special circumstances.
- The need for the playing pitches would also need to be demonstrated, the open space study does demonstrate some need in North Bushey, as a result this is welcomed. As I understand it there are also some aspirations for further allotment provision in Bushey, this is perhaps a use that could be integrated into the masterplan.
- The forthcoming MDS report considers the removal of the printworks for removal from the Green Belt, this will be published late spring/summer time to support the Site Allocations consultation. This consultation will allow you to comment on this and to propose other changes to the Green Belt, as suggested in your masterplan.
- The increase in development on the would be contrary to Green Belt policy, and would require very special circumstances if a planning application is submitted prior site allocations. Residential to replace the club house could be acceptable.

- The uses perhaps conflict with each other in places, but I appreciate the masterplan is to encourage discussion about the uses.

I hope these comments are of assistance

Kind Regards

Simon

Simon Warner
Senior Planning Officer (Policy and Transport)
Hertsmere Borough Council

Address: Civic Centre, Elstree Way, Borehamwood WD6 1WA
Phone: 020 8207 7567
Email: simon.warner@hertsmere.gov.uk

From: Andrew Craven [<mailto:andrew.craven@idgplanet.com>]
Sent: 14 February 2012 08:31
To: Mark Silverman
Cc: Simon Warner
Subject: Bushey Hall Golf Club

Dear Mark/Simon

In anticipation of next week's meeting please find attached the proposed masterplan for Bushey Hall Golf Club

Kind regards

Andrew Craven CMLI
Director
For and on Behalf of:
International Design Group Ltd.
Mob: + (0) 44 7500834681
Tel: + 44 (0) 117 316 0590
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HERTSMERE BOROUGH COUNCIL

CORE STRATEGY DPD

STATEMENT OF COMMON GROUND BETWEEN

HERTSMERE BOROUGH COUNCIL (HBC)

AND

PGA Design Consulting (PGADC)

VERSION 2

19th March 2012

AC

HBC has been in correspondence with PGADC (representor number: 4764) in respect of concerns raised in PGADC's representations with regard to the sections of HBC's Core Strategy DPD relating to the evidence base and an Open Space Study. PGADC are promoting the availability of Bushey Hall Golf Course.

RESOLUTION

With regard to the RCS, PGADC maintains that there is no reference to any assessment of need and demand for sports facilities based on the typology outlines in the Companion Guide to PPG17.

With regard to the RCS, PGADC further maintain that since there has been no PPG study of Sports Provision, it is not possible to understand whether there are sufficient facilities or even an overprovision.

With regard to the RCS, PGADC argues that the Core strategy fails to set out spatial policies in relation to large areas of derelict land whilst apparently recognizing that the problem exists.

With regard to the RCS, PGADC further argues that sport and leisure is not considered in the Core Strategy objectives.

Redundancy /dereliction is only considered in relation to industrial land whilst large redundant land areas such as golf courses are not considered

PGADC and HBC agree that it is inappropriate for PGADC to withdraw its objections to the RCS at this time.

PGADC and HBC have been considering a potential masterplan for the site. PGADC and HBC agree that the proposed masterplan for the site is an appropriate use for the site but that the proposal does require amendments to the greenbelt boundary to be viable and sustainable.

Both PGADC and HBC agree that whilst the open space elements of the masterplan may be applied for in the planning pre-application process, the masterplan would be undeliverable without revision to the current Green Belt Boundary

On signing this statement HBC confirm that they support the PGADC proposed masterplan plan through the site allocation process.

AGREEMENT

Signed by:

X

On behalf of Hertsmere Borough Council

Dated

X 

On behalf of PGA Design Consulting

19/04/12 Date

Sarah Churchard

From: Andrew Craven <Andrew.Craven@pgadc.com>
Sent: 23 April 2012 13:46
To: Sarah Churchard
Cc: Simon Warner; Mark Silverman; Bob Hunt
Subject: RE: Bushey Hall Golf Club

Dear Sarah,

Whilst we agree the statement does not reflect everything that you have told me we believe it does reflect what we have discussed by telephone and in our meeting.

We very much maintain that our objections to the core strategy are important and relevant, whilst the RCS is not a site specific we believe our site is hampered from sustainable development as a symptom of what we think is a flawed RCS.

We would welcome any points that could assist us reaching some common ground.

I hope you find the above self explanatory but if you wish to discuss please email or call.

Kind regards

Andrew Craven CMLI

Director

For and on Behalf of:

PGA Design Consulting and International Design Group

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Tel: + 44 (0) 117 316 0590

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INTERNATIONAL GOLF DESIGN LIMITED
Studio 5.17,
The Paintworks,
Bath Road,
Arnos Vale,
Bristol,
BS4 3EH

From: Sarah Churchard [mailto:Sarah.Churchard@hertsmere.gov.uk]
Sent: 23 April 2012 10:04
To: Andrew Craven
Cc: Simon Warner; Mark Silverman; Bob Hunt
Subject: RE: Bushey Hall Golf Club

Dear Andrew

I appreciate your attempt to reach Common Ground on the Revised Core Strategy. I do not believe that the RCS is an appropriate method for pursuing proposed development at the site. As stated in the proposed statement of common ground I sent you on 5 April 2012, following our meeting and telephone conversation the issues you identified in the Statement of 19 April do not accurately represent the matters we discussed.

The comments in the Statement I sent you on 5 April 2012 still stand regarding pre application advice and the Site Allocation process.

Regards

Sarah Churchard
Senior Planning Officer (Policy and Transport)

Hertsmere Borough Council
0208 207 2277 (ext 5830)

From: Sarah Churchard
Sent: 19 April 2012 10:51
To: 'Andrew Craven'
Cc: Simon Warner; Mark Silverman; Bob Hunt
Subject: RE: Bushey Hall Golf Club

Dear Andrew

I acknowledge receipt of your email this morning. We will consider your comments in due course.

Regards

Sarah
Senior Planning Officer (Policy and Transport)

Hertsmere Borough Council
0208 207 2277 (ext 5830)

From: Andrew Craven [<mailto:Andrew.Craven@pgadc.com>]
Sent: 19 April 2012 09:34
To: Sarah Churchard
Cc: Simon Warner; Mark Silverman; Bob Hunt
Subject: Bushey Hall Golf Club

Dear Sarah,

Further to your statement of common ground we have amended this to reflect what we believe is a more sustainable and progressive position.

Could you please review and if you are content please sign and return, should you have any queries or comments please do not hesitate to contact me.

Kind Regards

Andrew Craven CMLI
Director
For and on Behalf of:

PGA Design Consulting and International Design Group

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Appendix S

Thames Water

- i. Schedule of Proposed Minor Amendments

Objector: Thames Water

Objectors Comment	Paragraph number/ Policy number/ Table number	Reason for Change	Suggested Change
<p>Policy CS1 sets out that the Council will take account of local infrastructure capacity when identifying locations for new development in the Site. Allocations DPD. It is not clear whether this reference to local infrastructure capacity includes sewerage infrastructure.</p> <p>With regard to sewage treatment capacity, most of the sewage from Hertsmeire flows to Maple Lodge Sewage Treatment Works (STW) in Three Rivers District Council with the remainder being treated at Blackbirds STW located within the Hertsmeire. The Three Rivers Water Cycle Study Scoping Report highlights that upgrades will be required either at Maple Lodge or Blackbirds STWs to support growth within the study area.</p> <p>Supporting text should be provided for Policy CS1 to highlight that Hertsmeire will work with Thames Water in order to ensure that strategic wastewater infrastructure required to support growth will be delivered.</p>	<p>Policy CS1</p>	<p>The Hertsmeire LDF Infrastructure Topic Paper January 2012 states in paragraph 1.3 that water and wastewater are within the definition of infrastructure. In addition in paragraph 6.6 the Council seeks to work with Thames Water, in the provision of wastewater infrastructure.</p> <p>It is not felt appropriate to make such a change to CS1, however, such an addition would be appropriate in paragraph 5.32.</p>	<p>Insert the following into paragraph 5.32</p> <p>The Council will work with Thames Water in order to ensure that strategic wastewater infrastructure required to support growth will be delivered <u>and ahead of large scale development.</u></p>
<p>We support the requirement in Policy CS15 to improve water efficiency. However, it is also critical to ensure that there is sufficient capacity in the sewerage network and sewage treatment works to support development as set out in our comments to the draft Revised Core Strategy in January 2011.</p> <p>In order to address the above concerns and ensure that the Core Strategy is justified and effective it is considered that the second sentence of paragraph 5.32 should be deleted and replaced by a further paragraph with the following suggested wording:</p>	<p>Policy CS15</p>	<p>Noted</p>	<p>Noted - See below change</p>
	<p>Policy CS15 and Paragraph 5.32</p>	<p>The Council is willing to make the required change. To ensure that the policy is implemented appropriately a close working relationship is required</p>	<p>Insert the following into paragraph 5.32</p> <p>The Council recognises that sewer flooding can occur due to a lack of capacity within the existing sewer</p>

<p>“The Council recognises the problem of sewer flooding which can occur due to a lack of capacity within the existing sewer network. New development has the potential to cause sewer flooding by overloading the existing sewer network where there is insufficient capacity or could exacerbate existing sewer flooding problems. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users as set out in Policy CS15 (see proposed change below). In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by statutory undertaker, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.”</p> <p>Policy CS15 should also be revised to include an additional bullet point stating: “- demonstrating that capacity exists within the existing sewerage network or that capacity will be provided ahead of the occupation of development.”</p>	<p>between the Council and Thames Water, so that the Council has the appropriate data, both on capacity and future improvement works.</p>	<p>network. New development may be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead sewer flooding. Where there is a known capacity problem and no improvements are programmed by statutory undertaker, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.</p> <p>Insert the following underlined text into bullet point iii) in Policy CS15</p> <p><u>iii) demonstrating that capacity exists within the existing sewerage network and incorporating the use of Sustainable Urban Drainage Systems (SUDS) where appropriate and where required by the Flood and Water Management Act 2010 to help reduce the risk of flooding;</u></p>
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