

## Christine Whyte

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**From:** Matthew Wilson <Matthew.Wilson@hertfordshire.gov.uk>  
**Sent:** 14 September 2015 07:10  
**To:** Local Plan  
**Cc:** Matthew Wilson  
**Subject:** Hertfordshire County Council (Development Services) email 2 of 3  
**Attachments:** Response form 5 - SADM24 Village Envelopes (Elstree).pdf; Response form 3 - SADM33 Key Community Facilities (C1).pdf; Response form 4 - Paragraph 4.76(b).pdf; Response form 6 - SADM24 Village Envelopes (South Mimms).pdf

Please find attached representations made on the Hertsmere SADM plan on behalf of Hertfordshire County Council (Development Services). In total there are 10 response forms and a main response document (a total of 11 files). Due to the files sizes involved I have broken the response into a series of emails as follows:

### Email 1

- Main Response Document
- Response form 1: SADM1 Housing Allocations (H6)
- Response form 2: SADM1 Housing Allocations (H9)

### Email 2 (this email)

- Response form 3: SADM33 Key Community Facilities (C1)
- Response form 4: Paragraph 4.76(b)
- Response form 5: SADM24 Village Envelopes (Elstree)
- Response form 6: SADM24 Village Envelopes (South Mimms)

### Email 3

- Response form 7: SADM25 Key Green Belt Sites
- Response form 8: Paragraph 5.22
- Response form 9: SADM33 Key Community Facilities (v)
- Response form 10: SADM43 Town and District Centres (TC2)

I would be grateful if you would acknowledge safe receipt of all 11 documents

Matthew Wilson  
Senior Planning Officer, Development Services  
Hertfordshire Property  
Postal Point CHO313  
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN  
**Tel: 01992 556638 Comnet/Internal: 26638**

\*\*\*\*Disclaimer\*\*\*\*

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**Site Allocations and Development Management Policies Plan (SADM)**

**Publication Stage Representation Form**

For office use only

Reference No:

Date received:

**Please use this form to make Representations**

**Please return to Hertsmere Borough Council by 5pm on Monday 14 September 2015**

**By post:** Policy and Transport Team, Planning and Building Control, Hertsmere Borough Council, Civic Offices, Elstree Way, Borehamwood, Herts, WD6 1WA.

**By email:** local.plan@hertsmere.gov.uk

This form has three parts:

**Part A** – Personal details (only needed once).

**Part B** – Your representation(s). Please complete a separate sheet (Part B) for **every** representation you wish to make, remembering to insert your or your organisation’s name at the top of the page.

**Part C** – What information you want the Council to provide you with about future progress of SADM (only needed once).

**Please read the guidance notes at the end before completing this form. They explain the terms used and will help you make your representation(s).**

Part A	1. Personal details*	2. Agent details (if applicable)
Title		Mr
First name		Matthew
Last name		Wilson
Job title (where relevant)		Senior Planning Officer
Organisation (where relevant)		Hertfordshire County Council, Development Services
Address		Postal Point CHO313 Hertfordshire County Council County Hall Pegs Lane Hertford
Post Code		SG13 8DN
Telephone number		01992 556638
Email address		<a href="mailto:matthew.wilson@hertsmere.gov.uk">matthew.wilson@hertsmere.gov.uk</a>

\*If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2.



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**Part B**

Name or organisation:

For office use only  
 Ref No:  
 support:  
 object:  
 change:

**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph  Policy  Policies Map  Other part of Plan (specify)

**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant Yes  No  no comment to make

4(b) Compliant with the Duty to Co-operate Yes  No  no comment to make

4(c) Sound Yes  No  no comment to make

*If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.*

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared  Please tick which box(es) apply

5(b) Justified

5(c) Effective

5(d) Consistent with national policy

**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible. If you wish to comment in support of the Plan's legal compliance, compliance with the Duty to Co-operate or soundness or wish to make any other comment, please also use this box.**

(continue on a separate sheet/expand box if necessary)

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You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

As stated in response form 2 the removal of the site from the Green Belt and allocation for residential development is welcomed, however County Council objects to the requirement for 1.4ha of the site to be designated as public open space.

(continue on a separate sheet/expand box if necessary)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity for further submissions based on the representation you are currently making. **After this current publication stage, further submissions will only be able to be made at the Inspector's request, based on the matters and issues he/she identifies for Examination.**

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Yes  No

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No, I do not wish to participate at the oral Examination

Yes, I wish to participate at the oral Examination

10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:

To hear discussions on the matter, to represent HCC's property and service evidence and to participate in any debate.

(continue on a separate sheet/expand box if necessary)

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Signature:



Date: \_\_\_10<sup>th</sup> September 2015 \_\_\_

Part C

(Only needed once)

Name (Print): Matthew Wilson

**Completed as part of Response form 1**

If you wish to be informed of the date of the submission of the Plan to the Secretary of State, please tick this box.

If you wish to be informed of the recommendations of the Inspector appointed by the Secretary of State to carry out the independent Examination of the Plan, please tick this box.

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Title		Mr
First name		Matthew
Last name		Wilson
Job title (where relevant)		Senior Planning Officer
Organisation (where relevant)		Hertfordshire County Council, Development Services
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Paragraph  Policy  Policies Map  Other part of Plan (specify)

**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant      Yes       No       no comment to make

4(b) Compliant with the Duty to Co-operate      Yes       No       no comment to make

4(c) Sound      Yes       No       no comment to make

*If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.*

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared  Please tick which box(es) apply

5(b) Justified

5(c) Effective

5(d) Consistent with national policy

**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible. If you wish to comment in support of the Plan's legal compliance, compliance with the Duty to Co-operate or soundness or wish to make any other comment, please also use this box.**

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**Policy SADM24 Village Envelopes** - the presence of a Green Belt designation washing over sites being used for education acts as a constraint and obstacle in being able to respond to the need to provide new, or to enhance existing facilities.

The South Mimms village envelope as defined by the policies map excludes St Giles C of E Primary School in Blanche Lane, South Mimms. The County Council considers that the school site should be included within the village envelope.

(continue on a separate sheet/expand box if necessary)

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Yes  No

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No, I do not wish to participate at the oral Examination  Yes, I wish to participate at the oral Examination

10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:

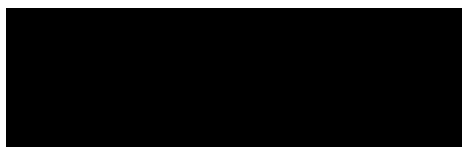
To hear discussions on the matter, to represent HCC's property and service evidence and to participate in any debate.

(continue on a separate sheet/expand box if necessary)

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Signature:



Date: 10th September 2015

Part C

(Only needed once)

Name (Print): Matthew Wilson

**Completed as part of Response form 1**

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First name		Matthew
Last name		Wilson
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**Part B**

Name or organisation: **Hertfordshire County Council**

For office use only  
 Ref No:  
 support:  
 object:  
 change:

**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph  Policy **SADM24** Policies Map  Other part of Plan (specify) **Elstree**

**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant Yes  No  no comment to make

4(b) Compliant with the Duty to Co-operate Yes  No  no comment to make

4(c) Sound Yes  No  no comment to make

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**Policy SADM24 Village Envelopes** - the presence of a Green Belt designation washing over sites being used for education acts as a constraint and obstacle in being able to respond to the need to provide new, or to enhance existing facilities.

The inclusion of the built area of St Nicholas Elstree C of E VA Primary School Elstree is welcomed however County Council considers that the envelope should also include the playing fields of the school.

(continue on a separate sheet/expand box if necessary)

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Date: 10<sup>th</sup> September 2015 \_\_

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(Only needed once)

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First name		Matthew
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Job title (where relevant)		Senior Planning Officer
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<b>Part B</b>	<b>Name or organisation:</b> Hertfordshire County Council	<b>For office use only</b> Ref No: support: object: change:
<b>IMPORTANT: Please use a separate Part B form for each representation</b>		

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph <input type="checkbox"/>	Policy <b>SADM33</b>	Policies Map <input type="checkbox"/>	Other part of Plan (specify) <b>Ref: C1</b>
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**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:** Please tick which boxes apply

4(a) Legally Compliant	Yes <input type="checkbox"/>	No <input type="checkbox"/>	no comment to make <input checked="" type="checkbox"/>
4(b) Compliant with the Duty to Co-operate	Yes <input type="checkbox"/>	No <input type="checkbox"/>	no comment to make <input checked="" type="checkbox"/>
4(c) Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	no comment to make <input type="checkbox"/>

*If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.*

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared	<input type="checkbox"/>	Please tick which box(es) apply
5(b) Justified	<input checked="" type="checkbox"/>	
5(c) Effective	<input checked="" type="checkbox"/>	
5(d) Consistent with national policy	<input type="checkbox"/>	

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**You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

The requirement for 1.4ha of the site to be public open space is disproportionate, excessive and unjustified. It is not normal practice that where a piece of land is to be removed from the Green Belt in order to allow residential development, this can only be acceptable where a disproportionate level of open space is provided on the site. It is not considered that there are any special circumstances in this case where removal of the land from the Green Belt can only be justified if it provides a disproportionate amount of open space. The Borough has so far made no compelling case as why this must be so. In the event that the Borough Council can demonstrate a robust justification for public open space in this location, the County Council is prepared to continue discussions with the Borough Council over an appropriate level of open space, ahead of the examination into the Plan.

(continue on a separate sheet/expand box if necessary)

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Yes  No

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No, I do not wish to participate at the oral Examination  Yes, I wish to participate at the oral Examination

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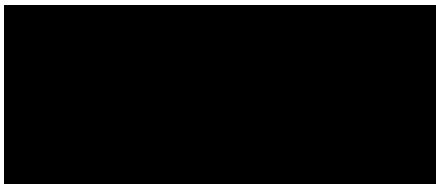
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Signature:



Date: 10<sup>th</sup> September 2015

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(Only needed once)

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