

Christine Whyte

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 1 of 3
Attachments: Hertfordshire County Council (DS) response to SADM September 2015.pdf; Response form 1 - SADM1 Housing Allocations (H6).pdf; Response form 2 - SADM1 Housing Allocations (H9).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 (this email)

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

Email 2

- 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		matthew.wilson@hertsmere.gov.uk

*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.



Please note that all representations received will be made publicly available and cannot be treated as confidential. This means that the names of all those making representations will be publicly available. Other personal information relating to private individuals, including Contact details, will not however be made publicly available.

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 **SADM1** Policies Map **H6** 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)

7. Please set out as precisely as possible what change(s) you consider necessary to make the Plan

- legally compliant or
- sound (having regard to the criteria you ticked at 5 above relating to soundness).

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 latest secondary education forecasts indicate that there will be a shortage of 0.6fe in 2017/18 and that this will continue to increase to a peak in 2023/24 of 2.6fe. The SADM (July 2015) does not make provision for additional education land to mitigate the loss of land at the Upper school (southern) site.

The SADM (July 2015) also fails to identify an alternative site for a primary school will mean that the Maxwell Park site will need to be relied upon and made available for school provision. HCC considers that it would be very difficult to demonstrate the 'very special circumstances' to enable an alternative site in the Green Belt to be promoted alternatively as a primary school when there are potentially two brownfield sites that could be considered for a 2fe school within the urban area of Borehamwood. These are the Hertswood Upper School (southern) site and the proposed reserve primary school site at Maxwell Park. It is through the local plan process that new and alternative allocations are considered and the submission draft of the SADM has not sought to allocate additional land for education use.

See main response for additional details.

(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.***

8. If you do not consider the Plan to be sound and the Council is prepared to make changes to the Plan which reflect your suggested change, would you be prepared to enter into a 'Statement of Common Ground' with this Council?

Yes No

9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?

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)

Please note: the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the Examination.

Signature:

[Redacted Signature]

Date: 10th September 2015

Part C

(Only needed once)

Name (Print): Matthew Wilson

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.

If you wish to be informed of the adoption of the Plan by Hertsmere Borough Council please tick this box.

If you no longer wish to receive communications from the Council on SADM please tick this box.



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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
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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 <input style="width: 50px; height: 20px;" type="text"/>	Policy <input style="width: 100px; height: 20px; border: 1px solid black;" type="text" value="SADM1"/>	Policies Map <input style="width: 50px; height: 20px; border: 1px solid black;" type="text" value="H9"/>	Other part of Plan (specify) <input style="width: 100%; height: 40px;" type="text"/>
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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 style="width: 50px; height: 20px;" type="text"/>	No <input style="width: 50px; height: 20px;" type="text"/>	no comment to make <input style="width: 50px; height: 20px; border: 1px solid black;" type="text" value="X"/>
4(b) Compliant with the Duty to Co-operate	Yes <input style="width: 50px; height: 20px;" type="text"/>	No <input style="width: 50px; height: 20px;" type="text"/>	no comment to make <input style="width: 50px; height: 20px; border: 1px solid black;" type="text" value="X"/>
4(c) Sound	Yes <input style="width: 50px; height: 20px;" type="text"/>	No <input style="width: 50px; height: 20px; border: 1px solid black;" type="text" value="X"/>	no comment to make <input style="width: 50px; height: 20px;" type="text"/>

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 style="width: 50px; height: 20px;" type="text"/>	Please tick which box(es) apply
5(b) Justified	<input style="width: 50px; height: 20px; border: 1px solid black;" type="text" value="X"/>	
5(c) Effective	<input style="width: 50px; height: 20px; border: 1px solid black;" type="text" value="X"/>	
5(d) Consistent with national policy	<input style="width: 50px; height: 20px;" type="text"/>	

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



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- **legally compliant or**
- **sound (having regard to the criteria you ticked at 5 above relating to soundness).**

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.

See main response for additional details.

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

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Please note: the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the Examination.

Signature:



Date: ___10th 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.

If you wish to be informed of the adoption of the Plan by Hertsmere Borough Council please tick this box.

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