

## 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 3 of 3  
**Attachments:** Response form 7 - SADM25 Key Green Belt Sites.pdf; Response form 8 - Paragraph 5.22.pdf; Response form 9 - SADM33 Key Community Facilities (v).pdf; Response form 10 - SADM43 Town and District Centres (TC2).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

- 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 (this email)

- 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>

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**Part B**

Name or organisation:

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 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.**

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Paragraph 5.22 states that the Council recognises the need identified by the education Authority for two more forms of entry at primary school level in Borehamwood. The paragraph goes onto to state that the case for a new site is unclear given the potential capacity of existing one form entry schools in the area to expand and the possible establishment of new Free Schools. It should be noted that the Core Strategy sets out the strategic objectives and spatial strategy for the area and it is within this document that the need for a new primary site has been established. The recently adopted Elstree Way Corridor Area Action Plan (AAP) also recognises the need for a new 2fe primary school within Borehamwood.

There is an established requirement within the Core Strategy for a new primary school site. To ensure conformity with the Core Strategy the County Council considers that clarification is required within paragraph 5.22 that the recognised need for “two more forms of entry at primary school level in Borehamwood” is in the form a new primary school site.

(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

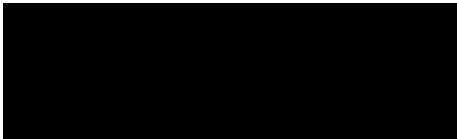
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Signature:



Date: 10th September 2015

Part C

(Only needed once)

Name (Print): Matthew Wilson

**Completed as part of Response form 1**

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**Policy SADM25 Key Green Belt Sites** identifies a series of Green Belt sites which contain a significant amount of buildings, the use of which are recognised as being important and should be maintained and supported. The County Council welcomes to recognition of the education facilities identified as being Key Green Belt sites, these being:

- The Bushey Academy, London Road, Bushey;
- Bushey Meads School, Coldharbour Lane, Bushey;
- Dame Alice Owen’s School, Sawyers Lane, Potters Bar;
- Hertswood Lower School, Cowley Hill, Borehamwood; and,
- Queen’s School, Aldenham Road, Bushey;

While the identification of the above sites as Key Green Belt Sites is welcomed the County Council considers that the Effectiveness of the policy is hindered by the current site infill boundaries. The site infill boundaries as drawn would not support the expansion potential of the schools as they do not offer any flexibility to meaningfully develop the sites. The infill boundaries appear arbitrary, for instance it is unclear why the area at the front of Bushey Mead School is not within the infill area, and development of this area would affect the openness of the Green Belt. There also appears to be an inconsistency in the approach to the drawing of the infill boundary. The infill boundary at Hertswood School includes an area of undeveloped land between the built form and the football pitch used as informal recreation while at Bushey Academy the boundary is tightly drawn around the central building. As presented the County Council consider that the Policy SADM25 Key Green Belt Sites is unsound on the grounds that it will not effectively allow development. HCC seek the redrawing of the infill boundaries of the above mentioned school and suggests that the area of hardstanding be considered as being with the site infill.

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

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Date: 10 September 2015

Part C

(Only needed once)

Name (Print): Matthew Wilson

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It is unclear why the Site Allocations plan in paragraph 5.22 and subsequently in **Policy SADM33 Key Community Facilities (v)** is seeking to introduce a requirement to demonstrate this established need. Policy SADM33 states that in the case of new schools, proposal will only be supported if there is a clear need for the provision of additional capacity which cannot be met through the expansion of existing schools. It is noted that this requirement has been introduced within this draft of the plan and did not feature in the earlier draft of the SADM (formally Policy SADM29).

The Council's intention behind the introduction of this requirement is unclear. It is considered that the requirement is in conflict with Core Strategy Policy CS19 Community Facilities and in particular supporting text paragraph 6.5 which states that the "Council is committed to promoting, providing or facilitating the provision of key community facilities and a clear presumption in favour of supporting such uses is considered to be of paramount importance". A requirement to demonstrate that the provision of additional capacity cannot be met through the expansion of existing schools is neither Effective nor Consistent with national policy. Academies and Free Schools are run by a governing body and are independent from the local council. A requirement to demonstrate provision cannot be met through the expansion of existing schools is not effective as the Local Education Authority cannot require schools independent from it to accommodate the growth.

Requirement (v) of policy SADM33 should be deleted.

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

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Yes  No

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Signature:



Date: 10th September 2015

Part C

(Only needed once)

Name (Print): Matthew Wilson

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**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;" type="text" value="SADM43"/>	Policies Map <input style="width: 50px; height: 20px;" type="text"/>	Other part of Plan (specify) <input style="width: 100px; height: 20px;" type="text" value="TC2"/>
-------------------------------------------------------------------	--------------------------------------------------------------------------------	----------------------------------------------------------------------	---------------------------------------------------------------------------------------------------

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4(c) Sound	Yes <input style="width: 50px; height: 20px;" type="text"/>	No <input style="width: 50px; height: 20px;" type="text" value="X"/>	no comment to make <input style="width: 50px; height: 20px;" type="text"/>

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Policy SADM43 Town and District Centres states that the council will support proposals to improve the facilities, functions and environments of town and district centres as identified on the Policies Map. Policy SADM43 provides specific for requirements for the Radlett Service Station/Regency house, Former Fire Station and Burrell & Co (TC2) sub area of Radlett Watling Street District Centre. The Council’s intentions behind the requirement for former community uses on the site to be provided on the site are unclear. There are not considered to be any community facilities in this location.

Should it be the Council’s intention to identify the former Radlett Fire Station as a former community use the County Council directs HBC to the recent Appeal Decision (APP/N1920/A/12/2186478) in respect of the former Radlett Fire Station where Hertsmere Borough Council required the re-provision of “community facilities” where actually there was no use by the community. By allowing the appeal the inspector was very clear in her option that the fire station was not a community facility.

The County Council requests the deletion of the following words from Policy SADM43 (TC2): “Community uses required on part of the site to replace former community use”.

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

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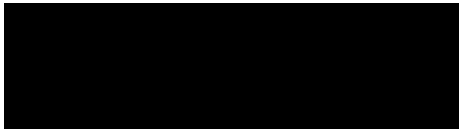


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Date: 10th September 2015

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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.

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