

## Christine Whyte

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**From:** Simon Warner <simon@heronslea.net>  
**Sent:** 14 September 2015 12:06  
**To:** Local Plan  
**Subject:** Hertsmere Site Allocations and Development Management (SADM) Policies Plan Consultation Response

Dear Planning Policy Team,

Thank you for the opportunity to comment on the Hertsmere Site Allocations and Development Management (SADM) Policies Plan.

The document appears to meet the requirements of the Hertsmere Core Strategy, prior to the early review. We welcome that some of the work on the early review appears to be starting with the SW Herts SHMA and Economy Study event on 15th September. Heronslea look forward to working with the Council and their consultants on the future strategy for Hertsmere.

The SADM document will replace the saved policies from the Local Plan. Many of the new policies are consistent with previous policies with the relevant updates based on national and local policies and information.

We have some notes on selected policies which need to be address for the document to be found sound.

**SADM 1:** We note the housing sites, the majority of these are well advanced in planning terms or have planning permission and as a result likely to be successful.

**SADM 4:** We welcome the opportunity to pay financial contributions on schemes between 5-10 units, however, these financial contributions must be based on viability evidences to make sure they are proportionate to the development.

**SADM 9 Bullet (iv)** - a justification is required for the inclusion of this bullet point - for the protection of B1(a) office space that exceeds 500 sq m. If such space was important to Hertsmere then it would be protected under SADM 6, SADM 7 and SADM 8. Certain office spaces such as this will also form part of the Elstree Way Corridor which is earmarked for residential development by the Council which would also conflict with this policy. Such redevelopment of office space is encouraged by the Government, for example with the permitted development rights. An announcement for the extension of this expected shortly. Evidence and a justification is required to make this policy sound and justified.

**SADM 27** - Development Standards in the Green Belt sets out the Council's approach to sites in the Green Belt. However the approach is too prescriptive and as it fails to allow the decision maker the opportunity to assess a site fully based on its design opportunities and constraints. The spread of buildings is not necessarily detrimental to the green belt, as the breaking up of mass and built form with 'sky gaps' can be beneficial to the Green Belt, landscape and other designations. Such an approach has been accepted by the Council on a number of Green Belt application within Hertsmere - such as Nicoll Farm and Rossway Drive where the built form was seen as improvement. The policy fails to consider how design and landscaping can be used to improve the openness of a site with significant benefits.

The policy should also have links to other Green Belt policies as part two of SADM 27 should be considered with other Local and National Green Belt policies such as Very Special Circumstances. This policy fails to provide clear guidance to users, and as currently wording is not consistent with local and national polices and as a result is unsound.

Please can you confirm receipt of these comments and we look forward to working with the Council on this and future planning policy documents. If we can provide any additional information or clarity on our comments please do not hesitate to contact me.

Kind Regards

Simon

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