

Christine Whyte

From: Michael.Clare@Herts.pnn.police.uk
Sent: 20 August 2015 12:37
To: Local Plan
Subject: Consult submission - RE: Hertsmere Consultation - Site Allocations and Development Management Policies Plan
Attachments: SADM-Response- Full form A, B & C - Re SADM5.doc; SADM-Response-Part B re SADM 31.doc; SADM-Response-Part B re SADM 34.doc

Dear Sir, Madam,

I am writing in regarding the consultation on the Site Allocations and Development Management Policies Plan. I have three submissions regarding this consultation, and please find them attached. I have used the consultation form from the council web site for each submission. I tried doing separate part B sections for two of the submissions (as requested on the form), but found problems with the formatting of the form, hence unfortunately you have parts A, B & C for each submission.

I hope you find this acceptable?

Regards

Mr Michael Clare

Crime Prevention Design Advisor | Crime Prevention Design Service | Hertfordshire Constabulary
Address: Herts Constabulary, Police Headquarters, Stanborough Road, Welwyn Garden City,
Hertfordshire AL8 6XF

Direct Dial: 01707 355226

e-mail: michael.clare@herts.pnn.police.uk

CPDS: 13512015

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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).

Table with 3 columns: Part A, 1. Personal details*, 2. Agent details (if applicable). Rows include Title, First name, Last name, Job title, Organisation, Address, Post Code, Telephone number, and Email address.

*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 Constabulary**

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.

Other Comment:

Policy SADM31 says about Design Principles and high quality design. Yet no measurements are proposed.

Part 58 under section A2 (Design Quality) of the BPPF says about creating safe and accessible environments where crime and disorder and the fear of crime do not undermine quality of life or community cohesion.

Building to the physical security of Secured by Design, which is the police approved minimum security standard, has been shown consistently to reduce the potential for burglary by 50% to 75%.

I would like to see the promotion of the secured by Design award for physical security of dwellings promoted in the document.



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

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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:

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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: *Mr Michael Clare*

Date: 20th August 2015

Part C

(Only needed once)

Name (Print): _____ **Mr Michael Clare**

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

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Part A	1. Personal details*	2. Agent details (if applicable)
Title	Mr	
First name	Michael	
Last name	Clare	
Job title (where relevant)	CPDA (Crime Prevention Design Advisor)	
Organisation (where relevant)	Hertfordshire Constabulary	
Address	Police Headquarters Stanborough Road Welwyn garden City	
Post Code	AL8 6XF	
Telephone number	01707-355226	
Email address	Michael.clare@herts.pnn.police.uk	

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Other Comment:

Part 5.26 of the SADM says about Faith Groups and facilities for them, being used for other uses with that faith other than worship.
Some other uses for some faiths do involve large numbers of people attending the site and invariably in cars. Sometimes such uses mean that public transport is not used. (Weddings, etc). Such large numbers of cars can cause serious obstruction and annoyance to local residents. Therefore there has to also be a realistic transport plan and provision for extra parking on occasions, whether it be on site or another site nearby.
I would have liked to see this referred to in the document.
I am pleased to see that the Council is open to all faith groups and their needs as is expressed in part 5.25 of the document.



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Date: 20th August 2015

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Other Comment:

Para 2.31 of the SADM - Mention is made regarding about the need for up to 28 additional pitches needed. The larger sites such as Brookes Place and Sandy Lane are large enough and it is my contention that they should not have additional pitches on them.

The DCLG document "Designing Gypsy Sites 9May 2008) says at para 4.7
There is no one ideal size of site or number of pitches although experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. However, smaller sites of 3-4 pitches can also be successful, particularly where designed for one extended family.

Large traveller sites do not engage with the wider community. Also larger size sites have different groups of travellers on them, and between these different groups there are tensions. Therefore small is good for integration with the wider community as well as for the travellers themselves.

I would support newer, smaller and separate traveller sites / pitches being considered.



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Signature: *Mr Michael Clare*

Date: 21st August 2015

Part C

(Only needed once)

Name (Print): _____ Mr Michael Clare

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