

## Christine Whyte

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**From:** SPHatfield <SPHatfield@environment-agency.gov.uk>  
**Sent:** 14 September 2015 10:35  
**To:** Local Plan  
**Subject:** RE: EA reply to Consultation - Site Allocations and Development Management Policies Plan  
**Attachments:** SADM18-v2.pdf

Hi Grace

Thank you for submitting the 'Duty to Co-operate: The Water Environment' document dated September 2015 which outlines how you have considered water quality and waste water infrastructure issues and Thames Water's advice in developing the Site Allocations and Development management Policies Plan. On this basis, please see attached our revised representation on Policy SADM18 'Water Supply and Wastewater.'

In response to the proposed submission consultation, Thames Water will make comments on the individual site allocations as to potential capacity issues with the wastewater network and if upgrades are likely to be required. We are sure you will check these comments against the site allocation text to ensure the text does take account (if necessary) the need to ensure capacity is assessed and adequate capacity is made available before development is occupied.

The Environment Agency's role and remit in this is with regard to meeting the objectives of the Thames River Basin Management Plan (2009) and Water Framework Directive to prevent deterioration of water bodies and improve water quality wherever possible. Water Cycle Studies are a way of investigating the current capacity of the waste water and water supply infrastructure across a catchment and identifying solutions to overcome any potential problems linked to planned growth and development so it's positive that you intend to participate in the Herts County Council Water Project.

If you require anything further please do not hesitate to contact me.

Kind regards

**Keira Murphy MRTPI**  
Planning Specialist  
Sustainable Places Team

Environment Agency | Hertfordshire & North London  
☎ 0203 263 8057 | ✉ [keira.murphy@environment-agency.gov.uk](mailto:keira.murphy@environment-agency.gov.uk)  
📍 Ergon House, Horseferry Road, London, SW1P 2AL

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**From:** Local Plan [mailto:Local.Plan@hertsmere.gov.uk]  
**Sent:** 11 September 2015 13:11  
**To:** SPHatfield  
**Cc:** Mark Silverman  
**Subject:** RE: EA reply to Consultation - Site Allocations and Development Management Policies Plan

Hi Keira,

Thanks for confirming this, I have added a paragraph after the conclusion to reference our participation in the Water Project and note that this will inform the Core Strategy review and future DPDs as you advise.

Kind regards,  
Grace

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**From:** SPHatfield [<mailto:SPHatfield@environment-agency.gov.uk>]  
**Sent:** 11 September 2015 11:57  
**To:** Local Plan  
**Subject:** RE: EA reply to Consultation - Site Allocations and Development Management Policies Plan

Hi Grace

Thanks for sending that over. I'm happy to revise our representation on that basis but could I make one minor request? Could a brief paragraph be added in terms of a 'forward look' i.e. your intentions to participate with the Hertfordshire County Council Water Project to look at waste water and water resource infrastructure issues strategically and that the outputs from that project will inform your review of the Core Strategy and future DPDs?

Kind regards

Keira

**Keira Murphy MRTPI**  
Planning Specialist  
Sustainable Places Team

Environment Agency | Hertfordshire & North London  
☎ 0203 263 8057 | ✉ [keira.murphy@environment-agency.gov.uk](mailto:keira.murphy@environment-agency.gov.uk)  
📍 Ergon House, Horseferry Road, London, SW1P 2AL

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**From:** Local Plan [<mailto:Local.Plan@hertsmere.gov.uk>]  
**Sent:** 10 September 2015 17:53  
**To:** SPHatfield  
**Subject:** RE: EA reply to Consultation - Site Allocations and Development Management Policies Plan

Hi Keira, Clark and Tricia,

Please see the attached note on the Duty to Co-operate relating to Thames Water, which follows our meeting on Tuesday. I hope that this gives you sufficient time to take a look and, if you consider it appropriate, revise your representation to the pre-submission SADM consultation before 5pm on Monday 14<sup>th</sup> September.

Thank you for meeting with us on Tuesday, we are also working on the other concerns that we discussed, which relate to the housing allocations, which we hope we can address through a Statement of Common Ground once we have carried out the required work.

Kind regards,  
Grace

**Grace Middleton (Mrs)**  
**Planning Officer (Planning Policy and Transport)**  
**Hertsmere Borough Council** | Civic Offices | Elstree Way | Borehamwood | Herts | WD6 1WA  
e: [grace.middleton@hertsmere.gov.uk](mailto:grace.middleton@hertsmere.gov.uk)  
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**From:** SPHatfield [<mailto:SPHatfield@environment-agency.gov.uk>]  
**Sent:** 01 September 2015 16:40  
**To:** Local Plan  
**Cc:** Gordon, Clark P  
**Subject:** RE: EA reply to Consultation - Site Allocations and Development Management Policies Plan

Hi Grace

Yes we have a slight preference for the morning – so could do a 10:30 am start.

Many thanks  
Keira

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**From:** Local Plan [<mailto:Local.Plan@hertsmere.gov.uk>]  
**Sent:** 01 September 2015 15:16  
**To:** SPHatfield  
**Subject:** RE: EA reply to Consultation - Site Allocations and Development Management Policies Plan

Hi Kiera,

Yes that would be suit us. Myself and the Policy Team Manager Mark can do between 10:30am and 3:00pm so anywhere between those times would be OK, whenever would suit you best.

Many thanks,  
Grace

**Grace Middleton (Mrs)**  
**Planning Officer (Planning Policy and Transport)**  
**Hertsmere Borough Council** | Civic Offices | Elstree Way | Borehamwood | Herts | WD6 1WA  
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**From:** SPHatfield [<mailto:SPHatfield@environment-agency.gov.uk>]  
**Sent:** 01 September 2015 11:15  
**To:** Local Plan  
**Cc:** Gordon, Clark P  
**Subject:** RE: EA reply to Consultation - Site Allocations and Development Management Policies Plan

Hi Grace

How about Tuesday 8<sup>th</sup> September, morning or afternoon?

Kind regards

Keira

**Keira Murphy MRTPI**  
Planning Specialist  
Sustainable Places Team

Environment Agency | Hertfordshire & North London  
☎ 0203 263 8057 | ✉ [SPHatfield@environment-agency.gov.uk](mailto:SPHatfield@environment-agency.gov.uk)

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**From:** Local Plan [<mailto:Local.Plan@hertsmere.gov.uk>]  
**Sent:** 28 August 2015 10:41  
**To:** SPHatfield; Local Plan  
**Cc:** Murphy, Keira  
**Subject:** RE: EA reply to Consultation - Site Allocations and Development Management Policies Plan

Hi Tricia,

Thanks for your response. That's OK, these things happen!

Yes, we met with Kiera last year before we re-drafted the document, so that will be fine if she is available.

Kind regards,  
Grace

**Grace Middleton (Mrs)**  
Planning Officer (Planning Policy and Transport)  
Hertsmere Borough Council | Civic Offices | Elstree Way | Borehamwood | Herts | WD6 1WA  
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**From:** SPHatfield [<mailto:SPHatfield@environment-agency.gov.uk>]

**Sent:** 28 August 2015 08:50

**To:** Local Plan

**Cc:** Murphy, Keira

**Subject:** RE: EA reply to Consultation - Site Allocations and Development Management Policies Plan

Hi Grace,

Many thanks for your email and for coming back to me so quickly.

Unfortunately I am on leave after today for two weeks and won't be back in the office until Wednesday 16 September. I know you have worked with Keira Murphy in the past on these consultations and actually we worked together on this response so it might be that Keira could meet with you. Unfortunately Keira is on leave today so I am not able to check her availability for a meeting.

I have copied her into this email and hope that she can contact you when she is back next week, I hope this is ok.

Apologies I can't be of more help than this at the moment, but I will be in touch with you when I am back from leave.

kind regards

**Tricia Devonshire**  
**Sustainable Places Planning Advisor**

**Environment Agency**  
**Hertfordshire and North London - Hatfield Team**  
T: 01707 632408

Please note I work part time so am available Wednesdays to Fridays only.

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**From:** Local Plan [<mailto:Local.Plan@hertsmere.gov.uk>]

**Sent:** 27 August 2015 16:43

**To:** SPHatfield

**Subject:** RE: EA reply to Consultation - Site Allocations and Development Management Policies Plan

Dear Tricia,

Thank you for these representations.

We are keen to meet to discuss these and to try to resolve the objections as soon as possible. Are you available to meet either towards the end of next week (Thursday 3<sup>rd</sup> or Friday 4<sup>th</sup> August) or during the week commencing 7 September?

I look forward to hearing from you.

Kind regards,  
Grace

**Grace Middleton (Mrs)**  
**Planning Officer (Planning Policy and Transport)**  
**Hertsmere Borough Council** | Civic Offices | Elstree Way | Borehamwood | Herts | WD6 1WA  
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**From:** SPHatfield [<mailto:SPHatfield@environment-agency.gov.uk>]

**Sent:** 27 August 2015 11:49

**To:** Local Plan

**Subject:** EA reply to Consultation - Site Allocations and Development Management Policies Plan

Dear Mark,

Please find attached our cover note (109795) and representations in respect of the pre-submission version of the Development Management Policies and Site Allocations DPD.

To summarise and for your ease of reference we have made the following representations:

- Policy SADM1, H2 Gas Holders Site – found unsound
- Policy SADM1, H7 Land at Lincolnsfield – found unsound
- Policy SADM14 – fully support
- Policy SADM15 – fully support
- Policy SADM16 – fully support
- Policy SADM17 – minor amendment requested
- Policy SADM18 – found not compliant with the duty to co-operate
- Policy SADM21 – minor amendment requested

Please contact me if you have any queries.  
Kind regards

**Tricia Devonshire**  
**Sustainable Places Planning Advisor**

**Environment Agency**  
**Hertfordshire and North London - Hatfield Team**  
T: 01707 632408

Please note I work part time so am available Wednesdays to Fridays only.

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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	Miss	
First name	Keira	
Last name	Murphy	
Job title (where relevant)	Planning Specialist (Sustainable Places)	
Organisation (where relevant)	Environment Agency	
Address	Apollo Court, 2 Bishops Square Business Park, St Albans Road West, Hatfield, Herts	
Post Code	AL10 9EX	
Telephone number	01707 632408	
Email address	<a href="mailto:sphatfield@environment-agency.gov.uk">sphatfield@environment-agency.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.

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.

<b>Part B</b>	<b>Name or organisation:</b> <input type="text" value="Environment Agency"/>	<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="text"/>	Policy <input type="text" value="SADM18"/>	Policies Map <input type="text"/>	Other part of Plan (specify) <input 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 checked="" type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(b) Compliant with the Duty to Co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(c) Sound	Yes	<input checked="" type="checkbox"/>	No	<input 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 type="checkbox"/>	
5(c) Effective	<input type="checkbox"/>	
5(d) Consistent with national policy	<input type="checkbox"/>	

**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.**

We support the policy wording as it is clear our previous comments particularly in regard to water resources and setting a water efficiency standard have been taken on board. We also support the policy position that developers will be required to demonstrate adequate waste water capacity on and off the site to support development and that development will be supported where sufficient capacity already exists or extra capacity is provided in time to serve developments. This will help to minimise any detrimental impacts on water quality and thus contribute toward achieving Water Framework Directive objectives. We believe the duty to co-operate requirements have been met and would be keen to see this continue with the future review of the Core Strategy and participation in the Hertfordshire County Council Water Project.



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.

(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:

(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: \_\_\_\_\_

Date: 14/09/2015

**Part C** (Only needed once)

Name (Print): KEIRA MURPHY

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.