Christine Whyte

From: CPRE Hertfordshire <office@cpreherts.org.uk>

Sent: 11 September 2015 13:50

To: Local Plan

Cc: 'Steve Baker'; Kevin FitzGerald

Subject: Hertsmere Site Allocations & DMP Plan Consultation

Attachments: Hertsmere SADM Pre-sub 2015 CPRE Comments Affordable Homes.doc; Hertsmere

SADM Pre-sub 2015 CPRE Comments Change of Use to Res.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Employment Site Allocns.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Employment to Res.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Green Belt SADM 25.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Hsg Supply.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Hsg Table 1.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Monitoring Table 4.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Redevelopment for Flats SADM 3.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments SADM 10.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments SADM 28.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments SADM Pre-sub

2015 CPRE Comments Safeguarding Policy SADM 2.doc

To: Policy and Transport Team, Hertsmere Borough Council

Please find attached CPRE Hertfordshire's comments on 13 separate forms.

Please acknowledge safe receipt of all 13 forms, thank you.

Steve Baker Planning Manager





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Publication Stage Representation Form

For office use only

Reference No:

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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

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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).

Part A	1. Personal details*	2. Agent details (if applicable)
Title	Mr	
First name	Steve	
Last name	Baker	
Job title (where relevant)	Planning Manager	
Organisation (where relevant)	CPRE Hertfordshire	
Address	31a Church Street Welwyn Herts	
Post Code	AL6 9LW	
Telephone number	01438 717587	
Email address	office@cpreherts.org.uk	



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Part B		For office use only
CPRE He	rtfordshire	Ref No:
Name or organisation:		support:
		object:
		change:
IMPORTANT: Please use a separate	Part B form for each rep	presentation
3. To which part of SADM ('the Plan	') does this representation	
Paragraph Policy SAD	Policies Map	Other part of Plan (specify)
4. In relation to the part of the Plan	you identified in 3, do yo	ou 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 Yes Duty to Co-operate	No	no comment to make
4(c) Sound Yes	No	no comment to make
If you have entered 'No' to 4(c), please o	continue to Q5. In all other o	circumstances, please go to Q6.
5. If you consider the Plan to be un	sound is this because it is	s 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 Cooperate 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.



The wording of Draft Policy SADM 10 does not provide sufficient clarity in terms of the meaning of development that would be 'inappropriate' pending a decision on their long term future. CPRE Hertfordshire suggests that the final sentence be edited to provide such clarification, as set out below, to avoid misinterpretation.
(continue on a separate sheet/expand box if necessary)
 7. Please set out as precisely as possibly 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.
CPRE Hertfordshire suggests that the wording of the final sentence of the second main paragraph of draft Policy SADM 10 be amended to state 'there will be a presumption against development that would be treated as inappropriate under the terms of the policies set out in part 9 of the NPPF' for the reason set out above.
(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?



-	to participate at the oral part of the Examination?
	ot wish to participate at xamination Yes, I wish to participate at the oral Examination
	wish to participate at the oral part of the Examination, please outline why you his to be necessary:
	(continue on a separate sheet/expand box if necessary)
	te: the Inspector will determine the most appropriate procedure to hear those who ated that they wish to participate at the oral part of the Examination.
Signature	Steve Baker, Planning Manager
_	
Date: 11 ^{tt}	September 2015
Part C	(Only needed once)
Name (Pri	nt): Steve Baker, CPRE Hertfordshire.
	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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Last name	Baker	
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Part B	For office use only
CPRE Hertford	
Name or organisation:	support:
	object:
	change:
IMPORTANT: Please use a separate Part E	3 form for each representation
	·
3. To which part of SADM ('the Plan') doe	s this representation relate?
	Other part
Paragraph 3.2 Policy	Policies Map of Plan (specify)
	(specify)
4. In relation to the part of the Plan you id	lentified 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 Yes	No no comment to make
Duty to Co-operate	
4(c) Sound Yes	No no comment to make
If you have entered 'No' to 4(c), please continu	e 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	

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Paragraph 3.2 states that current policy to encourage change of use of various categories of land use to residential is temporary, and that its consequences should not be allowed for in the Plan. The effect of this policy will also need to be considered by the review of the Core Strategy, but its consequences need to influence decisions on planning applications.
(continue on a separate sheet/expand box if necessary)
7. Please set out as precisely as possibly 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 phrase on the change of use provisions being temporary in comparison with the timescale of the Plan should be amended to reflect the changes to Planning Regulations, including those that are permanent, and their intention to facilitate changes of use to residential.
(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.
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Yes

-	r representation is seeking a mo y to participate at the oral part (you consider it
	not wish to participate at Examination		Yes, I wish to participate at t oral Examination	he
=	u wish to participate at the oral this to be necessary:	part of	the Examination, please ou	ıtline why you
			(continue on a separate sheet/ex	pand box if necessary)
	ote: the Inspector will determine cated that they wish to participa			
Cian atuma		Dal	Diam'r Managar	
Signature	e: St	eve Bak	er, Planning Manager	
Date: 11 ^t	th September 2015			
Part C				
rare	(Only needed once)			
Name (Pr	rint): Steve Baker, CPRE Hertfo	rdshire.		
	If you wish to be informed of the State, please tick this box.	date of	the submission of the Plan to	the Secretary of
	If you wish to be informed of the Secretary of State to carry out th this box.			
	If you wish to be informed of the please tick this box.	e adoptio	on of the Plan by Hertsmere B	orough Council
	If you no longer wish to receive on this box.	commun	ications from the Council on	SADM please tick





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	CPRE Hertfordshi	re		Ref No:
Name or organisation:				support:
				object:
				change:
IMPORTANT: Please use	a separate Part B fo	rm for each rep	resentation	
3. To which part of SADM	I ('the Plan') does th	is representatio		
Paragraph Po	olicy SADM 2	Policies Map	Other p of Plan (specif	
4. In relation to the part of	of the Plan you iden	tified in 3, do yo	u consider the Pla	n to be:
			Please tick whic	h boxes apply
4(a) Legally Compliant	Yes	No	no comment to n	nake
4(b) Compliant with the Duty to Co-operate	Yes	No	no comment to r	nake
4(c) Sound	Yes	No	no comment to r	nake
If you have entered 'No' to 4	l(c), please continue to	Q5. In all other ci	rcumstances, please	go to Q6.
5. If you consider the Pla	n to be unsound is t	his because it is	not:	
5(a) Positively prepared			Please tick which bo	ox(es) apply
5(b) Justified				
5(c) Effective				
5(d) Consistent with natio	onal policy			

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Hertfordshire suggests that the final sentence be edited to provide such below, to avoid misinterpretation.	on claimeation, as set out
(continue on a se	eparate sheet/expand box if necessary)

- 7. Please set out as precisely as possibly what change(s) you consider necessary to make the Plan
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- sound (having regard to the criteria you ticked at 5 above relating to soundness).
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CPRE Hertfordshire suggests that the wording of the final sentence on draft Policy SADM 2 be amended to state '...there will be a presumption against development that would be treated as inappropriate under the terms of the policies set out in part 9 of the NPPF.'

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

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Yes	√ No
-	representation is seeking a modification/change to the Plan, do you consider it to participate at the oral part of the Examination?
	Yes, I wish to participate at the oral Examination
-	wish to participate at the oral part of the Examination, please outline why you this to be necessary:
	(continue on a separate sheet/expand box if necessary)
	te: the Inspector will determine the most appropriate procedure to hear those who cated that they wish to participate at the oral part of the Examination.
Signature	Steve Baker, Planning Manager
Date: 11 ^t	th September 2015
Part C	(Only needed once)
Name (Pr	int): Steve Baker, CPRE Hertfordshire, 31a Church Street, Welwyn, Herts AL6 9LW.
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	Hertfordshire	Ref No:
Name or organisation:		support:
		object:
		change:
IMPORTANT: Please use a sepa	rate Part B form for each rep	oresentation
3. To which part of SADM ('the	Plan') does this representati	on relate?
		Other part
Paragraph Policy S	SADM 3 Policies Map	of Plan (specify)
A to relation to the next of the c	Dlan : dan#:fiad :- 2 dan	
4. In relation to the part of the	Plan you identified in 3, do y	Please tick which boxes apply
4/)		
4(a) Legally Compliant Yes	No	no comment to make
4(b) Compliant with the Yes	No No	no comment to make
Duty to Co-operate		
4(c) Sound Yes	No	no comment to make
If you have entered 'No' to 4(c), ple	ase continue to Q5. In all other (circumstances, please go to Q6.
5. If you consider the Plan to be	e unsound is this because it i	s not:
5(a) Positively prepared		Please tick which box(es) apply
5(b) Justified		
5(c) Effective		
5(d) Consistent with national po	licy	

6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Cooperate 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.



Paragraph 2.16 of the draft Plan states that redevelopment of sites to create flats may be acceptable in 'existing urban areas', implying that this would not be the case in other residential areas including in villages and smaller settlements in the Green Belt, but 'existing urban areas' are not defined in the laft Plan, and there is no wording included in draft Policy SADM 3 to address this matter. CPRE Hertfordshire suggests that the Policy be amended to include a caveat that redevelopment for flats will not normally be permitted outside existing urban areas as defined in the Plan.
(continue on a separate sheet/expand box if necessary)

- 7. Please set out as precisely as possibly <u>what change(s)</u> 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.

In order to address the omission of a reference to where redevelopment with flats will not normally be acceptable in principle, CPRE Hertfordshire suggests that the following sentence be included in draft Policy SADM 3, as a new first criterion after the line that states 'For any development that provides a new flats or flats, the following principles will apply', as follows: '(i) redevelopment for flats will not normally be permitted outside existing urban areas as defined in the Plan.'

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

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changes to	to not consider the Plan to be sound and the Council is prepared to make the Plan which reflect your suggested change, would you be prepared to enter tement of Common Ground' with this Council?
Yes	No .
-	representation is seeking a modification/change to the Plan, do you consider it to participate at the oral part of the Examination?
No, I do no the oral Ex	Yes, I wish to participate at the oral Examination
=	wish to participate at the oral part of the Examination, please outline why you nis to be necessary:
	(continue on a separate sheet/expand box if necessary)
	e: the Inspector will determine the most appropriate procedure to hear those who ated that they wish to participate at the oral part of the Examination.
Signature:	Steve Baker, Planning Manager
Date: 11 th	September 2015
Part C	(Only needed once)
Name (Pri	nt): Steve Baker, CPRE Hertfordshire.
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5 . 5				
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				object:
				change:
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IIVIFORTANT. Flease us	e a separate Part B	Torri for each rep	resentation	
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5. To which part of SAD	ivi (the Plan) does	Tills representation	Other I	part
Paragraph	Policy SADM 10	Policies Map	of Plan	ı
		_	(specif	y)
4. In relation to the part	t of the Plan you ide	entified in 3, do ye	ou consider the Pla	n to be:
			Please tick whic	h boxes apply
4(a) Legally Compliant	Yes	No	no comment to r	make
4(b) Compliant with the	Yes	No	no comment to r	make 🗍
Duty to Co-operate				
4(c) Sound	Yes	No	no comment to r	make
If you have entered 'No' to	o 4(c), please continue	to Q5. In all other o	ircumstances, please	go to Q6.
5. If you consider the P	lan to be unsound i	s this because it is	s not:	
5(a) Positively prepared			Please tick which be	ox(es) apply
5(b) Justified				
5(c) Effective				
5(d) Consistent with nat	ional policy			

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The final paragraph of SADM 10 would allow part of the Safeguarded Rowley Lane site to be developed earlier than the rest of the site because it is already, in part, previously-developed land. CPRE Hertfordshire does not object to it being treated as such a site, but while it is part of a safeguarded site it should still be subject to Green Belt policy, to which the remainder of the Rowley Lane site applies.
(continue on a separate sheet/expand box if necessary)
 7. Please set out as precisely as possibly 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 wording of the final paragraph of Policy SADM 10 should be amended to make it clear that permission would be granted at an earlier stage subject to the proposal having no greater impact on the openness of the Green Belt and the purpose of including land within it, than the existing hotel development.
(continue on a separate sheet/expand box if necessary)
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-	r representation is seeking a modifi y to participate at the oral part of t	ication/change to the Plan, do you on the Examination?	consider it
	not wish to participate at Examination	Yes, I wish to participate at the oral Examination	
=	u wish to participate at the oral par this to be necessary:	t of the Examination, please outline	e why you
		(continue on a separate sheet/expand t	oox if necessary)
	ote: the Inspector will determine the cated that they wish to participate c	most appropriate procedure to hear	r those who
Signature	e: Steve	e Baker, Planning Manager	
Date: 11 ^t	t th September 2015		
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Name (Pr	rint): Steve Baker, CPRE Hertfordsl	hire.	
	If you wish to be informed of the da State, please tick this box.	te of the submission of the Plan to the	Secretary of
	-	commendations of the Inspector appoindependent Examination of the Plan, p	-
	If you wish to be informed of the ad please tick this box.	option of the Plan by Hertsmere Borou	gh Council
	If you no longer wish to receive com this box.	munications from the Council on SADN	∕I please tick





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Part A	1. Personal details*	2. Agent details (if applicable)
Title	Mr	
First name	Steve	
Last name	Baker	
Job title (where relevant)	Planning Manager	
Organisation (where relevant)	CPRE Hertfordshire	
Address	31a Church Street Welwyn Herts	
Post Code	AL6 9LW	
Telephone number	01438 717587	
Email address	office@cpreherts.org.uk	



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Part B		For office use only
CPRE Herti	fordshire	Ref No:
Name or organisation:		support:
		object:
		change:
IMPORTANT: Please use a separate F	Part B form for each rep	resentation
3. To which part of SADM ('the Plan')	does this representation	n relate?
Paragraph Policy SADM	Policies Map	Other part of Plan (specify)
4. In relation to the part of the Plan y	ou identified in 3, do yo	u 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 Yes Duty to Co-operate	No	no comment to make
4(c) Sound Yes	No	no comment to make
If you have entered 'No' to 4(c), please co	ntinue to Q5. In all other c	rcumstances, please go to Q6.
5. If you consider the Plan to be unso	ound 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 Cooperate 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.



Draft Policy SADM 25 includes a short sentence standefined areas. The word 'appropriate' in relation to should not be confused with what might be considered a local plan policy.	Green Belt locations has a specific meaning, that
	(continue on a separate sheet/expand box if necessary)
 7. Please set out as precisely as possibly what the Plan legally compliant or 	t change(s) you consider necessary to make
 sound (having regard to the criteria you t You will need to say why this change will make be helpful if you are able to put forward your 	ke the Plan legally compliant or sound. It will
text.	
CPRE Hertfordshire suggests that the word 'appro 25, be replaced with the word 'acceptable', for the	opriate' in the third paragraph of draft Policy SADM reasons set out above.
	(continue on a separate sheet/expand box if necessary)
Please note your representation should cover succi information necessary to support/justify the represent not normally be a subsequent opportunity for furth are currently making. After this current publication be made at the Inspector's request, based on the Examination.	sentation and the suggested change, as there will her submissions based on the representation you on stage, further submissions will only be able to
8. If you do not consider the Plan to be soun	



-	to participate at the oral part of the Examination?
· ·	Yes, I wish to participate at the oral Examination
-	wish to participate at the oral part of the Examination, please outline why you this to be necessary:
	(continue on a separate sheet/expand box if necessary)
	te: the Inspector will determine the most appropriate procedure to hear those who cated that they wish to participate at the oral part of the Examination.
Signature	: Steve Baker, Planning Manager
Date: 11 ^t	^h September 2015
Part C	(Only needed once)
Name (Pr	int): Steve Baker, CPRE Hertfordshire.
	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.
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Part B				Fan efficiency and
1 41 (2	CPRE Hertford	dshire		For office use only Ref No:
Name or organisation:				support:
				object:
				change:
IMPORTANT: Please us	e a separate Part	B form for each re	presentation	
3. To which part of SAD	M ('the Plan') doe	es this representat		
Paragraph	Policy SADM 28	Policies Map	of Plan (specif	
4. In relation to the part	of the Plan you i	dentified in 3, do y	ou consider the Pla	n to be:
	-		Please tick whic	h boxes apply
4(a) Legally Compliant	Yes	No	no comment to r	make
4(b) Compliant with the Duty to Co-operate	Yes	No	no comment to r	make
4(c) Sound	Yes	No	no comment to r	make
If you have entered 'No' to	4(c), please continu	ue to Q5. In all other	circumstances, please	go to Q6.
5. If you consider the Pl	an to be unsound	d is this because it	is not:	
5(a) Positively prepared			Please tick which be	ox(es) apply
5(b) Justified				
5(c) Effective				
5(d) Consistent with nat	ional policy			

6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Cooperate 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.



There have recently been several planning applications for redevelopment of equestrian sites to housing in Hertsmere, taking advantage of the relaxed NPPF policy treating such development as appropriate in the Green Belt. In order to avoid facilitating otherwise inappropriate development for housing in current Greenfield Green Belt locations, Policy SADM 28 should include a specific provision that precludes subsequent redevelopment for a land use that would be considered inappropriate in the Green Belt.
(continue on a separate sheet/expand box if necessary)
7. Please set out as precisely as possibly what change(s) you consider necessary to make
the Planlegally compliant or
• sound (having regard to the criteria you ticked at 5 above relating to soundness).
You will need to say <u>why</u> 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.
SADM 28 should include a sentence that states that any permission granted for a new equestrian or rural business use in the Green Belt under the terms of the Policy would include a restriction preventing the subsequent redevelopment of the site for an otherwise inappropriate land use.
(continue on a separate sheet/expand box if necessary
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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 No



-	representation is seeki to participate at the o	_	tion/change to the Plan, do you Examination?	consider it
No, I do r	ot wish to participate at xamination		Yes, I wish to participate at the oral Examination	
-	wish to participate at this to be necessary:	the oral part o	of the Examination, please outli	ne why you
			kt and wider implications for the Green Belt of sions to prevent subsequent in appropriate of	
			(continue on a separate sheet/expand	d box if necessary)
	•		ost appropriate procedure to he he oral part of the Examination.	ar those who
Signature Date: 11 ^t	: ^h September 2015	Steve B	aker, Planning Manager	
Part C	(Only needed onc	e)		
Name (Pr	int): Steve Baker, CPRI	E Hertfordshir	e.	
	If you wish to be inform State, please tick this bo		of the submission of the Plan to th	e Secretary of
	•		nmendations of the Inspector appo pendent Examination of the Plan,	•
	If you wish to be inform please tick this box.	ed of the adop	tion of the Plan by Hertsmere Bord	ough Council
	If you no longer wish to this box.	receive comm	unications from the Council on SAL	OM please tick





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Part B	F (C)
CPRE Hertfordshire	For office use only Ref No:
Name or organisation:	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?	r part
Paragraph 2.4 Policy Policies Map of Placeton (spec	an
4. In relation to the part of the Plan you identified in 3, do you consider the P	lan to be:
	nich boxes apply
4(a) Legally Compliant Yes No no comment to	o make 🔝
4(b) Compliant with the Yes No no comment to Duty to Co-operate	o make 🔝
4(c) Sound Yes No √ no comment to	o make
If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, plea	se 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 √	

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The figure of 4,465 for dwelling supply is an underestimate of likely completions between 2012 and 2027. Our criticisms of this figure are set out in our comments on Table 1, but the matter of principle is relevant to paragraph 2.4 which indicates that the Plan's Housing Target would be exceeded by 475 dwellings, or 12 percent of the Housing Target. There is no reference however to this oversupply being used to meet the needs of the wider Housing Market Area or other local planning authorities which may not be able to meet their own needs without removing land from the Green Belt.
(continue on a separate sheet/expand box if necessary)
 7. Please set out as precisely as possibly 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.
Paragraph 2.4 should be amended to include a higher revised figure to reflect a revised Table1, and include a short sentence to indicate that the Plan would contribute to meeting the housing needs of adjacent areas as a result of the excess of Housing Supply over Housing Target.
(continue on a congrate checkleypand boy 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.
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-	representation is seeking a modification/change to the Plan, do you consider it to participate at the oral part of the Examination?
	ot wish to participate at xamination Yes, I wish to participate at the oral Examination
-	wish to participate at the oral part of the Examination, please outline why you his to be necessary:
	Housing Supply is of fundamental importance in decision making on planning applications and site allocations for velopment, and CPRE Hertfordshire wishes to be able to fully explain its views on this matter to the Inspector.
	(continue on a separate sheet/expand box if necessary)
	te: the Inspector will determine the most appropriate procedure to hear those who rated that they wish to participate at the oral part of the Examination.
Signature	: Steve Baker, Planning Manager
Date: 11 ^t	h September 2015
Part C	(Only needed once)
Name (Pri	int): Steve Baker, CPRE Hertfordshire.
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·	
4. In relation to the part of the Plan you identified in 3, do you consider the Please tick w	Plan to be: hich boxes apply
4(a) Legally Compliant Yes No no comment t 4(b) Compliant with the Yes No no comment t	
Duty to Co-operate 4(c) Sound Yes No no comment to	o make
If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please. 5. If you consider the Plan to be unsound is this because it is not:	ase go to Q6.
5(a) Positively prepared Please tick which	n box(es) apply
5(b) Justified	
5(c) Effective	
5(d) Consistent with national policy	

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Table 1 does not correctly reflect the scale of new residential development that is likely to take place in Hertsmere under current Planning Policy, in particular under the various categories of 'Windfall' development. The information used to calculate windfalls is out of date and fails to take into account current Government Planning Policy and recent changes to Regulations that facilitate significant increases in housing supply in both Urban and Green Belt areas of Hertsmere. The increased supply from windfalls includes the redevelopment of large previously-developed sites in the Green Belt, the change of use of sites and buildings in other land uses to residential, including offices, not reflected in the Council's calculations. For example paragraph 3.7 states that 251 dwellings have 'prior approval' for change of use from office to residential use in 2014/15, but no allowance seems to have been included for the continuation of this source of dwellings in 2015/16, or for other changes of use to residential now permitted. The Council's assumptions about the duration of windfall supply are also considered to be unrealistic given the Borough's location in relation to London and the Green Belt. The methodology used to create Table 1, as set out in the Background Paper to Table 1, dated July 2015, is therefore questioned and should be reconsidered, leading to the preparation of a revised Table in the Plan.

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

- 7. Please set out as precisely as possibly <u>what change(s)</u> you consider necessary to make the Plan
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The methodology and assumptions used to create Table 1, as set out in the Background Paper to Table 1, dated July 2015, should be reconsidered, leading to the preparation of a revised Table in the Plan.
(continue on a separate sheet/expand box if necessary

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cha	anges to the Plan which reflect your suggested change, would you be prepared to enter
int	o a 'Statement of Common Ground' with this Council?

Yes	V	No	



-	presentation is seekin participate at the ora	_	ion/change to the Plan, do y Examination?	you consider it
No, I do not the oral Exar	wish to participate at nination		Yes, I wish to participate at to oral Examination	the
=	ish to participate at the to be necessary:	ne oral part o	f the Examination, please oເ	utline why you
residential develo	pment, and CPRE Hertfordshi	re wishes to be ab	sion making on planning applications ar le to fully explain its understanding of th pply in Hertsmere , to the Inspector.	
			(continue on a separate sheet/ex	pand box if necessary)
	•		ost appropriate procedure to he oral part of the Examinati	
Signature:		Steve Ba	ıker, Planning Manager	
Date: 11 th S	eptember 2015			
Part C	(Only needed once))		
Name (Print): Steve Baker, CPRE	Hertfordshire		
	you wish to be informe ate, please tick this box		of the submission of the Plan to	o the Secretary of
Se	•		nmendations of the Inspector a pendent Examination of the Pl	• •
	you wish to be informe lease tick this box.	d of the adopt	ion of the Plan by Hertsmere E	Borough Council
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IMPORTANT: Please use a separate Part B form for each representatio 3. To which part of SADM ('the Plan') does this representation relate?	n
Paragraph Policy Policies Map	Other part of Plan (specify)
	tick which boxes apply
4(b) Compliant with the Yes No no composition No Duty to Co-operate	ment to make
4(c) Sound Yes No no com	ment to make
If you have entered 'No' to 4(c), please continue to Q5. In all other circumstance	es, 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	
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Monitoring Table 4 includes at SADM 1 and SADM 36 of the total dwelling capacity by 2027'. CPRE Hertfords would encourage development in excess of Housing N as the Housing Target for the Plan. The Plan's monitor 'complete 100% of the Local Plan's target for Housing.	shire strongly objects to such a 'target' which leed and what is defined in the Core Strategy ing target for Housing should therefore be to
	(continue on a separate sheet/expand box if necessary)
 7. Please set out as precisely as possibly what che plan legally compliant or sound (having regard to the criteria you tick you will need to say why this change will make the helpful if you are able to put forward your suftext. 	ed at 5 above relating to soundness). The Plan legally compliant or sound. It will
The entries for SADM 1 and SADM 36 in the 'Target' of complete 100% of the Housing Target in the Core Stra	
	(continue on a separate sheet/expand box if necessary
Please note your representation should cover succinct information necessary to support/justify the represent not normally be a subsequent opportunity for further sare currently making. After this current publication state made at the Inspector's request, based on the made at the Inspector's request.	ly all the information, evidence and supporting tation and the suggested change, as there will submissions based on the representation you tage, further submissions will only be able to
8. If you do not consider the Plan to be sound a changes to the Plan which reflect your suggested into a 'Statement of Common Ground' with this	d change, would you be prepared to enter



-	representation is seeking a modification/change to the Plan, do you consider it to participate at the oral part of the Examination?
	ot wish to participate at xamination Yes, I wish to participate at the oral Examination
-	wish to participate at the oral part of the Examination, please outline why you his to be necessary:
CPRE Hertfor	dshire wishes to take part in order to explain the wider implications, in particular for the Green Belt, of nousing development in excess of a Housing Target that takes into account both Housing Need and the constraints nt, including the Green Belt, that apply under Government Planning Policy, to Hertsmere.
	(continue on a separate sheet/expand box if necessary
	te: the Inspector will determine the most appropriate procedure to hear those who rated that they wish to participate at the oral part of the Examination.
Signature	: Steve Baker, Planning Manager
Date: 11 ^t	September 2015
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Name (Pri	int): Steve Baker, CPRE Hertfordshire.
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Part B CPRE Hertfordshire Name or organisation:	For office use only Ref No: support: object:
	change:
IMPORTANT: Please use a separate Part B form for each representation	
Paragraph 2.10 Policy Policies Map Other (specific specific sp	
4. In relation to the part of the Plan you identified in 3, do you consider the Please tick w	Plan to be: hich boxes apply
4(a) Legally Compliant Yes No no comment t	o make
4(b) Compliant with the Yes No no comment to Duty to Co-operate	o make
4(c) Sound Yes No no comment t	o make
If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, plea	ase 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	
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The current wording of the paragraph on land which is to remain undeveloped until there is a future shortage of suitable development land, does not make it clear that this land will continue to be subject to Green Belt policies, to be reviewed in a future Development Plan.
(continue on a separate sheet/expand box if necessary)
7. Please set out as precisely as possibly <u>what change(s)</u> 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 text of paragraph 2.10 should be amended as suggested above to provide a fuller context for
Policy SADM 2
(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?



-	to participate at the oral part	t of the Examination?	consider it	
	ot wish to participate at xamination	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)	
	•	e the most appropriate procedure to hea pate at the oral part of the Examination.	r those who	
Signature:	:	Steve Baker, Planning Manager		
Date: 11 th	September 2015			
Part C	(Only needed once)			
Name (Pri	nt): Steve Baker, CPRE Hertf 31a Church Street, Welv	•		
	If you wish to be informed of the State, please tick this box.	he date of the submission of the Plan to the	Secretary of	
	-	he recommendations of the Inspector appoint the independent Examination of the Plan, p	-	
	If you wish to be informed of the please tick this box.	he adoption of the Plan by Hertsmere Borou	ugh Council	
	If you no longer wish to receive this box.	e communications from the Council on SADI	M please tick	





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).

Part A	1. Personal details*	2. Agent details (if applicable)
Title	Mr	
First name	Steve	
Last name	Baker	
Job title (where relevant)	Planning Manager	
Organisation (where relevant)	CPRE Hertfordshire	
Address	31a Church Street Welwyn Herts	
Post Code	AL6 9LW	
Telephone number	01438 717587	
Email address	office@cpreherts.org.uk	



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 <u>private individuals</u>, including Contact details, will not however be made publicly available.

Part B	For of	fice use only
CPRE Hertford		
Name or organisation:	suppo	rt:
	object	::
	chang	0.
	chang	e.
IMPORTANT: Please use a separate Part	B form for each representation	
3. To which part of SADM ('the Plan') doe	es this representation relate?	
	Other part	
Paragraph 2.25 Policy	Policies Map of Plan	
	(specify)	
4. In relation to the part of the Plan you i	dentified 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 Yes	No no comment to make	
Duty to Co-operate		
4(c) Sound Yes	No no comment to make	
If you have entered 'No' to 4(c), please contin	ue to Q5. In all other circumstances, please go to C	16 .
5. If you consider the Plan to be unsound	d is this because it is not:	
5(a) Positively prepared	Please tick which box(es) a	pply
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 Cooperate 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.



Paragraph 2.25 is now incorrect following the removal from the NPPG of the restriction on scale of housing development to which the requirement for affordable homes can apply.
(continue on a separate sheet/expand box if necessary)
 7. Please set out as precisely as possibly 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.
Paragraph 2.25 should be deleted to reflect the change to the NPPG referred to above.
(continue on a congrete sheet/evpand boy if necessary)
(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 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?



	Examination	oral Examination	
-	u wish to participate at the oral p this to be necessary:	eart of the Examination, please outlin	e why you
		(continue on a separate sheet/expand	hov if necessary)
	•	he most appropriate procedure to hea e at the oral part of the Examination.	r those who
Signature	e: Ste	ve Baker, Planning Manager	
Date: 11 ^{tt}	th September 2015		
Part C	(Only needed once)		
Name (Pri	rint): Steve Baker, CPRE Hertford	dshire.	
	If you wish to be informed of the of State, please tick this box.	date of the submission of the Plan to the	Secretary of
		recommendations of the Inspector appo independent Examination of the Plan, p	•
	If you wish to be informed of the a please tick this box.	adoption of the Plan by Hertsmere Boro	ugh Council
	If you no longer wish to receive co	ommunications from the Council on SAD	M please tick





Publication Stage Representation Form

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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).

Part A	1. Personal details*	2. Agent details (if applicable)
Title	Mr	
First name	Steve	
Last name	Baker	
Job title (where relevant)	Planning Manager	
Organisation (where relevant)	CPRE Hertfordshire	
Address	31a Church Street Welwyn Herts	
Post Code	AL6 9LW	
Telephone number	01438 717587	
Email address	office@cpreherts.org.uk	



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 <u>private individuals</u>, including Contact details, will not however be made publicly available.

Part B	For office use only
CPRE Hertfordshire	Ref No:
Name or organisation:	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 2.17 Policy Policies Map Other paragraph (specify	
4. In relation to the part of the Plan you identified in 3, do you consider the Plan	ı to be:
Please tick which	boxes apply
4(a) Legally Compliant Yes No no comment to m	ake
4(b) Compliant with the Yes No no comment to m Duty to Co-operate	ake
4(c) Sound Yes No no comment to m	ake
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 bo	x(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 Cooperate 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.



Paragraph 2.17 states that current policy to encourage change of use of various categories of land use to residential is temporary, and that its consequences should not be allowed for in the Plan. This wording should be amended and any consequential housing supply figures reconsidered because it is clear that this Government policy shift will continue to facilitate the provision of many new dwellings in locations not previously envisaged by the Council during the period of the Plan. The effect of this will also need to be considered by the review of the Core Strategy, but its consequences for housing supply need to influence decisions on housing allocations and planning applications. It is also relevant to the Plan's Employment Chapter including paragraph 3.2.

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

- 7. Please set out as precisely as possibly 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 phrase on the change of use provisions being temporary in comparison with the timescale of the Plan should be deleted for the reasons set out above. A similar change should be made to the final sentence of paragraph 3.2.

(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						
-	our represen		_	_	_	the Plan, do	you co	nsider it
-	do not wish to ral Examination		t	1	e s, I wish to al Examinati	participate at on	the	
	you wish to p der this to be	•	at the oral p	art of the	e Examinat	ion, please o	outline	why you
					(continue on a	separate sheet/e	expand bo	x if necessary)
	e note: the Ins	•				•		those who
Signat	ture:		Ste	ve Baker	, Planning I	Vlanager		
Date:	11 th Septeml	ber 2015						
Pa	rt C (Onl	y needed o	nce)					
Name	(Print): Stev	ve Baker, CP	PRE Hertford	dshire.				
	-	sh to be info ease tick this		date of th	e submissio	n of the Plan	to the S	ecretary of
	1					the Inspector ation of the F	• •	-
	1 -	sh to be info	rmed of the a	adoption (of the Plan k	y Hertsmere	Boroug	h Council
	If you no this box.	_	to receive co	ommunica	tions from t	he Council or	sADM	please tick

