

# Site Allocations and Development Management Policies DPD: Consultation March/April 2014

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Summaries of Representations and Council responses.

Chapters 1-2

July 2015

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
<b>Whole Document</b>					
01139/2/001 Environment Agency		✓		Many previous comments (dated 03/04/2013) on DM Policies were not taken through into the Consultation Draft. Support some of the policies and paragraphs, but many require further refinement to improve the strength/clarity and comply with National and Local Policies before we could support them. Sequential Test and where necessary the Exceptions Test should be carried out where site allocations are proposed in areas of flood risk as required by NPPF para 100, 101 and 102. We note sites H2 and H7 both lie partially within Flood Zone 3, which forms part of the flood plain for the Borehamwood Brook and the King George Drain Main Rivers. It's important that the Council's evidence base, the Strategic Flood Risk Assessment (dated 2008) is used as a basis for applying the sequential test. At the moment it's not clear how the sequential test has been applied to the sites and whether the Council considers that these sites would pass. We may find your site allocations unsound if the sequential test has not informed your choice of sites and forms part of the evidence base.	We have considered both the previous response and this response as part of this exercise. See responses to Environment Agency throughout this document.
01210/1/001 Watford Borough Council			✓	Watford Borough Council have reviewed the SADM DPD for Hertsmere and are supportive of the approach.	Noted
01275/1/001 Warren Estate Residents			✓	Support whole document	Noted

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01240/1/001 HCC Environmental Resource Planning		✓		Concern about integration between policies in Chapters 4, 5 and 6 on matters of sustainable design - policies compartmentalised in such a way that the interdependencies between them are not made apparent. Risk to achieving integrated and well-thought out design when applicants and Council are formulating and considering proposals, and raises a doubt as to whether the internal consistency and cumulative impact of these policies on the quality of design has been properly considered. Should describe relationships between these policies eg matrix table showing the correlation between SADM policies and the Core Strategy objectives.	Noted. <b>Relevant Core Strategy Key Objectives have been added to the boxes at the start of each of Chapters 2-7 and provide a clear direction for the policies in each chapter.</b>

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01187/1/001 Nathaniel Lichfield and Partners for Commercial Estates Group	✓			<p>Hertsmere committed to early partial review of Core Strategy within 3 years including work on objectively assessed housing needs. Should either do the review first, or roll Core Strategy review and SADM into one. SADM will work towards fulfilling Core Strategy housing targets but this delivers less housing than necessary to meet full objectively assessed needs. NPPG says CLG household projections should be used - latest are 553 pa 2011 - 2021 for Hertsmere (double Core Strategy figs). Hertsmere is aware the housing need won't be fully met by CS1. SADM should include updated housing target. NPPF para 153 "in producing a Local Plan, any additional development plan documents should only be used where clearly justified." There is no clear justification for SADM being completed now, and not as part of the impending review.</p>	<p>The Core Strategy is clear that a Site Allocations and Development Management Policies DPD (SADM) will be prepared. One of its key purposes is to help implement the Core Strategy, including implementation of the stated housing target. The preparation of SADM enables a review of all development management policies and boundaries of policy areas in the Local Plan (within the context provided by the Core Strategy). It is therefore quite appropriate, reasonable and, indeed, necessary to complete SADM in accordance with the Local Development Scheme (subject to any updating of the timetable). The completion of SADM will in effect modernise the planning policy base and, together with the existing Core Strategy, create a new Local Plan,</p> <p>The NPPF accepts that local plans may be reviewed as a whole or in part. It accepts there may be separate development plan documents, provided that is explained rationally.</p> <p>The Council is committed to a review of key elements in the Core Strategy – specifically to consider housing and employment needs further. The review of the strategic issues and commissioning of key evidence with neighbouring authorities began in late 2014 and will continue beyond the planned adoption of SADM. If objectively assessed housing needs are very substantially higher than currently planned for within the housing market, then there are serious and potentially controversial issues to be debated with the</p>

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					<p>public. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available, and without the complication of a myriad of many other issues.</p> <p>The Council considers that its approach to the preparation and review of its planning policies is justifiable, and reasonable.</p> <p><b>No change.</b></p>
00234/2/002 Elstree and Borehamwood Town Council		✓		<p>Seek assurances in relation to development proposals that the following will be taken into account:- impact on wildlife (especially railway banks and gardens) - building on railway banks should be realistic and not pose a significant nuisance to local residents- design should be sympathetic to character of local area and street scene- conversion of garages to residential units should be avoided- impact of conversions from Borough owned sites eg garages should not cause undue negative impact - loss of storage and parking</p>	<p>Development proposals will be assessed in relation to relevant policies contained in the Core Strategy and Site Allocations and Development Management Policies DPD. Relevant policies seek to protect wildlife (CS12) protect the occupiers of sites and the local community (CS16) and ensure good quality design (CS22, SADM31, Planning and Design Guide SPD). The conversion of garages to residential use is in many cases not controllable due to permitted development allowances; where appropriate it may be controllable through conditions / Article 4 directions. Where development proposals involve the potential loss of garage courts it is necessary to investigate their current usage and, if possible, alternative provision should be identified. <b>This criterion is added to the Site Specific Requirements for H1, The Director's Arms proposed housing site.</b></p>

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01350/1/003 Shire Consulting for Exchange Ltd		✓		When taken with the existing Core Strategy the current document is much too long. Some duplication with Core Strategy eg SADM 26 = two 'Development Plan' policies concerned with heritage assets. Neither adds anything 'Hertsmere specific' over and above the NPPF. Policies in the District Plan should not duplicate or repeat those in the NPPF and should not cover matters already dealt with in other legislation. SADM Policies 10, 12, 13, 18, & 27 are just a few examples where nothing is added to the national position and SADM9 is not a policy at all. Removing such unnecessary policies will reduce the risk of the Plan being found 'unsound'.	This response has been considered along with other responses, including those from statutory consultees. It is considered that the policies listed are necessary and expand on national policy. The policies have been updated in response to feedback.
01242/1/001 Shire Consulting for Radlett Preparatory School		✓		When taken with the existing Core Strategy the current document is much too long. Some duplication with Core Strategy eg SADM 26 two 'Development Plan' policies concerned with heritage assets. Neither adds anything 'Hertsmere specific' over and above the NPPF. Policies in the District Plan should not duplicate or repeat those in the NPPF and should not cover matters already dealt with in other legislation. SADM Policies 10, 12, 13, 18, & 27 are just a few examples where nothing is added to the national position and SADM9 is not a policy at all. Removing such unnecessary policies will reduce the risk of the Plan being found 'unsound'.	This response has been considered along with other responses, including those from statutory consultees. It is considered that the policies listed are necessary and expand on national policy. The policies have been updated in response to feedback.

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01243/1/001 Shire Consulting for Aldenham School		✓		When taken with the existing Core Strategy the current document is much too long. Some duplication with Core Strategy eg SADM 26 two 'Development Plan' policies concerned with heritage assets. Neither adds anything 'Hertsmere specific' over and above the NPPF. Policies in the District Plan should not duplicate or repeat those in the NPPF and should not cover matters already dealt with in other legislation. SADM Policies 10, 12, 13, 18, & 27 are just a few examples where nothing is added to the national position and SADM9 is not a policy at all. Removing such unnecessary policies will reduce the risk of the Plan being found 'unsound'.	This response has been considered along with other responses, including those from statutory consultees. It is considered that the policies listed are necessary and expand on national policy. The policies have been updated in response to feedback.
01350/1/002 Shire Consulting for Exchange Ltd		✓		National policy emphasises positive growth, presumption in favour of sustainable development, meeting development needs of local area, encourage economic growth, support prosperous local economy. Social dimension of NPPF - deliver wide choice of quality homes, boost housing supply, conserve and enhance historic environment. LPA must identify sites for 5 year housing supply. LPA must also consider review of green belt when producing Local Plan. Whole plan will fail when tested on all grounds - soundness, positively prepared, justified, effective and consistent with national policy.	The document sets out a housing supply and this covers a period of 15 years and is summarised at table 1. In addition to this, Hertsmere Borough Council has a 5 year housing land supply and this is set out in detail and updated annually in the Annual Monitoring Report. Hertsmere Borough Council will review its Core Strategy following submission of the Site Allocations and Development Management Policies DPD.
01242/1/002 Shire Consulting for Radlett Preparatory School		✓		National policy emphasises positive growth, presumption in favour of sustainable development, meeting development needs of local area, encourage economic growth, support prosperous local economy. Social dimension of NPPF - great weight to need to create expand or alter schools. Whole plan will fail when tested on all grounds - soundness, positively prepared, justified, effective and consistent with national policy.	The plan has been prepared positively in accordance with national policy, national guidance and best practice. In relation to the social dimension, the plan now includes Policy SADM33 Key Community Facilities which is particularly relevant to schools. New Policy SADM34 Provision for Faith Communities has also been included.

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01243/1/002 Shire Consulting for Aldenham School		✓		National policy emphasises positive growth, presumption in favour of sustainable development, meeting development needs of local area, encourage economic growth, support prosperous local economy. Social dimension of NPPF - great weight to need to create expand or alter schools. Whole plan will fail when tested on all grounds - soundness, positively prepared, justified, effective and consistent with national policy.	The plan has been prepared positively in accordance with national policy, national guidance and best practice. In relation to the social dimension, the plan now includes Policy SADM33 Key Community Facilities which is particularly relevant to schools. New Policy SADM34 Provision for Faith Communities has also been included.
01229/1/001 Natural England, Sustainable Land Use and Regulation		✓		<ol style="list-style-type: none"> <li>Reasonably satisfied that the DPD seeks to deliver the three pillars of sustainable development as set out in the NPPF through proposed site allocations and draft policies. The allocation of sites appears to be guided by a clear strategic approach to the protection, enhancement and creation of habitats, taking a positive approach to both development and the environment by identifying on-site and off-site opportunities for net increases in biodiversity. There is only one statutorily designated conservation site within the Borough, Redwell Wood SSSI. We are satisfied that development proposed through the plan is unlikely to have an adverse effect on this or other statutorily designated sites.</li> <li>However, some sites are close to locally designated wildlife sites and/or green infrastructure and may support BAP priority habitats and species. The plan could be strengthened to clarify how site allocations have sought to avoid these and relevant plan policies should seek to ensure their protection and enhancement. The plan should allocate development sites of least environmental value; encouraging effective use of previously developed land, avoiding adverse effects upon ecologically sensitive sites and valued landscapes. Where required allocation policies should specify on-site or off-site mitigation required to avoid adverse effects upon protected sites and species.</li> </ol>	<ol style="list-style-type: none"> <li>The comments of support are welcomed.</li> <li>Policy SADM11 Biodiversity and Habitats identifies statutory and local designated sites and requires developers to avoid causing harm to these sites, setting out criteria on which planning decisions will be based. All plan policies, including SADM11 will be a consideration in the determination of all planning applications so it is not considered necessary to replicate this in the site specific requirements. <b>No change.</b></li> </ol>



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<b>Chapter 1 Introduction</b>					
00194/1/002 resident (owner of site)		✓		Para 1.6 says the council is obliged to review its Core Strategy within 3 years of adoption in order to consider housing (and employment) needs further. This version of SADM is Interim as it will need reviewing alongside the revised Core Strategy (or Local Plan, as it may be referred to); and re-issuing soon after in order to ensure that there are sufficient sites available in sustainable locations to meet the housing needs of the borough over the plan period. If our site (land adj Wilton End Shenley) not included in current SADM, we would request that consideration is given to its allocation in Core Strategy review. Details in rep 00194/1/001. SHLAA form also submitted.	SADM delivers the adopted Core Strategy. The site is now included in the SHLAA at the request of the owner. It can be reconsidered at appropriate junctures in the future, including when the Core Strategy is reviewed, together with other housing options. However it is stressed that inclusion of a site in the SHLAA does not mean it will come forward. Work has commenced in preparation for the required partial review of the Core Strategy. <b>No change.</b>
<b>Duty to Co-operate</b>					
01188/1/001 Thames Water Property Services		✓		<b>Paragraphs 1.18-1.25 Duty to Co-operate/Consultation</b> Wastewater from Hertsmere is treated at the Blackbirds and Maple Lodge Sewage Treatment Works (STWs). These works also treat wastewater from outside the District (Chiltern, Dacorum, St Albans, Three Rivers, Watford and Welwyn Hatfield). Therefore development within the borough can have effects on network and treatment upgrades required outside the district and vice versa. Accordingly neighbouring authorities should work closely with each other, and Thames Water, in the allocation and phasing of housing. Thames Water entered a statement of common ground with Hertsmere Borough Council in relation to the Core Strategy. However, the agreed wording was not incorporated into the Core Strategy. Consequently there has been subsequent correspondence to agree the inclusion of policy on water and wastewater infrastructure in the Development Management Policies DPD.	The comments are noted. The agreed wording in the Statement of Common Ground has been incorporated within the supporting text to the policies on flooding, and the comments received in February 2013 have been incorporated in the supporting text and policy on wastewater.

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01238/1/003 Welwyn Hatfield Council		✓		What arrangements will be put in place to review the Site Allocations document should provision need to be made to meet the needs arising from neighbouring authorities? (Core Strategy to be reviewed by 2016 to satisfy housing and employment needs in market areas). (The 'Positively Prepared' test of soundness is described as 'seeking to meet objectively assessed development requirements including unmet requirements from neighbouring authorities where it is reasonable to do so'.)	The Core Strategy will be reviewed following submission of the Site Allocations and Development Management Policies DPD. Hertsmere Borough Council continues to work with Welwyn Hatfield Borough Council through the duty to cooperate. <b>No change.</b>
<b>Consultation</b>					
01188/1/019 Thames Water Property Services		✓		<b>Paragraphs 1.18-1.25 Duty to Co-operate/Consultation</b> Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding, pollution of land and water courses and / or issues with water supply in the form of no or low water pressure. Thames Water seeks to co-operate and maintain a good working relationship with the local authority and to provide the support they need with regards to the provision of water and wastewater infrastructure. For Thames Water to provide this essential service most effectively, it is vital that they are consulted at the earliest possible stage in the planning process. The importance of consulting water and wastewater companies is detailed in the Government's National Planning Practice Guidance.	Noted. Thames Water is a statutory consultee with whom the Council will continue to work closely.
00831/1/001 resident		✓		Consultation not well advertised	Consultation was advertised in local press, Hertsmere News, website, Twitter, letters to organisations and people on our consultation database and to those affected by specific proposals. Documents were available in local offices/libraries, and exhibitions were held in 5 different locations across the Borough. Local posters were suggested

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					in some locations and will be used in future SADM consultation exercises where appropriate.
<b>Chapter 2 Housing</b>					
<b>Housing Supply and Table 1 Site Allocations in relation to the Housing Supply 2012 - 2027</b>					
01263/1/001 resident	✓			para 2.8 - sites in green belt only allocated if significant PDL; sites only allocated if 10 or more. Object as this means the odd dwellings pushed into gardens and small spaces - destroys residents' privacy, loses garden space and makes the area cramped.	Allocating additional sites in the Green Belt in SADM would be inconsistent with the adopted Core Strategy and NPPF and is not needed in order to achieve the Core Strategy housing target. Within the urban area it is not feasible to identify all small sites which could be developed. Proposals for gardens and small sites are assessed against adopted Development Guidelines which seek to safeguard the amenity of existing and future residents. <b>No change.</b>
00982/1/001 Woolf Bond Planning	✓			Bring forward Core Strategy review in order to accord with NPPF requirement to meet full objectively assessed housing needs for market and affordable housing. SADM is based on an out of date housing requirement, and is therefore not sound. The Council should use DCLG household projections (NPPF advice) - these project an increase in households by 5,527 2011 - 2021 (552 pa). Reference is made to the duty to cooperate in relation to St Albans Council – their housing market area extends into other districts including Hertsmere. Either SADM should make provision for a higher housing requirement or the Council should commence a review of the Core Strategy in form of a Local Plan (this should include a Green Belt review). There are concerns about the delivery of housing. The current strategy is too restrictive because it assumes sufficient housing can be provided in the urban area without adequately testing individual sites. Table 1 leaves no margin for error in delivery assumptions, and fails to provide a flexible or responsive supply of housing land.	The Core Strategy is clear that a Site Allocations and Development Management Policies DPD (SADM) will be prepared. The Core Strategy was independently examined in the light of the NPPF and subsequently adopted. One of SADM's key purposes is to help implement the Core Strategy, including implementation of the stated housing target. The preparation of SADM enables a review of all development management policies and boundaries of policy areas in the Local Plan (within the context provided by the Core Strategy). It is therefore quite appropriate, reasonable and, indeed, necessary to complete SADM in accordance with the Local Development Scheme (subject to any updating of the timetable). The completion of SADM will in effect modernise the planning policy base and, together with the existing Core Strategy, create a new Local Plan. The Council is committed to a review of key elements in the Core Strategy – specifically to consider housing and

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				<p>The windfall rate is not justified.</p> <p>The following sites should therefore be allocated for development to help meet identified need:</p> <p>Land east of Baker Street, Potters Bar (for about 70 dwellings);</p> <p>Land west of Barnet Road, Potters Bar (for about 170 dwellings);</p> <p>Land east of Cowley Hill, Borehamwood (for about 950 dwellings and related development);</p> <p>Land east of Well End Road, Borehamwood (for about 460 dwellings, 5.68 ha employment development and related development). While all would be releases from the Green Belt, the land would provide sustainable urban extensions, would not undermine the purposes of the Green Belt and would provide long term Green Belt boundaries.</p>	<p>employment needs further. The review of the strategic issues and commissioning of key evidence with neighbouring authorities began in late 2014 and will continue beyond the planned adoption of SADM. If objectively assessed housing needs are very substantially higher than currently planned for within the housing market, then there are serious and potentially controversial issues to be debated with the public. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available, and without the complication of a myriad of many other issues. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. The Council considers that its approach to the preparation and review of its planning policies is justifiable, and reasonable. The current development strategy is contained in the Core Strategy adopted in January 2013. The Core Strategy does not indicate any significant change to the Green Belt. The housing target and land supply assumptions behind the housing target were justified by the Council, and tested and accepted by a Planning Inspector through independent examination of the Core Strategy. These have been brought forward into SADM. The Strategic Housing Land Availability Assessment (SHLAA) contains an analysis of a large number</p>

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					<p>of sites – some of which accord with the Core Strategy (and are being taken forward) and a number in the Green Belt which do not. The Council has worked with the relevant landowners/developers and is confident the allocated sites now included can be delivered. There has been some adjustment to the sites and net housing capacity in Policy SADM1 and Policy SADM2 as a result of new information and updating. The overall effect is to confirm that Table 1 is sound.</p> <p>The housing supply in Table 1 includes a large number of sites with planning permission. Elstree Way Corridor includes sites with planning permission, as well as proposals. The Area Action Plan for Elstree Way Corridor was the subject of examination in October 2014: the figure in Table 1 has been revised in the light of this examination. The explanation of the windfall assumptions is given in the SHLAA which was used for the Core Strategy and is part of the evidence base for SADM: this was revised in evidence to the examination (Housing Supply Update: August 2012). The windfall assumptions have been further checked and as appropriate adjusted.</p> <p>Table 1 has been updated and is considered sound. The SHLAA has been updated again.</p> <p>The calculation of the housing land supply allows for some flexibility and contingency by the nature of the assumptions used. Policy SADM2 provides a modest supply of safeguarded land which can be brought forward for housing. The supply figure in Table 1 excludes safeguarded land and in any event exceeds the Core Strategy target</p>

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					<p>(even if only by a small amount).  The scale of change in the Green Belt suggested by the objector (about 1,650 dwellings) is unwarranted and would seriously conflict with the Core Strategy. It would undermine the Green Belt purposes. While it would be reasonable to consider the extent of the contribution each of the sites to the Green Belt purposes in the Green Belt Study for the Core Strategy Review, it is important to remember that there is a wider context. Not only have housing and employment needs to be objectively reassessed, the balance between development in the Green Belt and development needs should be reviewed in co-operation with neighbouring authorities. There are alternative sites/locations within the Green Belt (possibly outside Hertsmere as well as within the borough) to consider if the Council is to reach the most sustainable choices.</p> <p><b>No change other than a relatively minor updating of Table 1 (and related changes) is justified in this context.</b></p>
01187/1/002 Nathaniel Lichfield and Partners for Commercial Estates Group	✓			<p>Windfalls: unclear how Core Strategy windfall figs, from which SADMP figs are derived, have been calculated. Also - windfalls by definition are unexpected, so cannot be planned for. Assumption of 675 dwellings seems excessive.  Allocations in SADM1: derived from SHLAA 2010 - out of date. Sites within Green Belt not considered. Hertsmere hasn't complied with NPPF requirements in reviewing Green Belt sites for housing.  Reviewed sites against 5 purposes for including land in the green belt (NPPF para 80) - wrong tests for assessing potential housing sites, not fulfilled requirements of green belt review. Safeguarded sites:</p>	<p>See response to Woolf Bond Planning (00982/1/001) above. SADM is delivering the Core Strategy housing target: the Core Strategy does not signal the release of Green Belt land in order to meet the target, rather the strategy focuses on the ability of urban areas to yield the necessary capacity. The assumptions behind the housing land supply have been reported in the SHLAA (2010) and its Update (2011), and tested through examination: this was revised in evidence to the examination (Housing Supply Update: August 2012). The windfall assumptions have been further checked and as</p>

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				unnecessary to safeguard - clear that housing target is not full objectively assessed housing need so must include safeguarded sites now. Sites have been restricted to meeting pre-identified target, not identified from a thorough review of capacity in the Borough.	<p>appropriate adjusted. The windfall assumptions are therefore reasonable and consistent with Government advice.</p> <p>The SHLAA has been updated again. There has been some adjustment to the sites and net housing capacity in Policy SADM1 and Policy SADM2 as a result of new information and updating. The overall effect is to confirm that Table 1 is sound.</p> <p>Policy SADM2 provides a modest supply of safeguarded land which can be brought forward for housing. Retaining safeguarded land is a reasonable contingency consistent with Government advice (NPPF paragraph 85).</p> <p>The review of the Core Strategy, which the Council is committed to, is a separate exercise. It will require a new SHMA, Economy Study and Green Belt Study, and further co-operation with adjoining authorities. If, as a result, objectively assessed housing needs are very substantially higher than currently planned for within the housing market, then there are serious and potentially controversial issues to be debated with the public. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities.</p> <p><b>No change other than a relatively minor updating of Table 1 (and related changes) is justified in this context.</b></p>
01123/2/001 Heronlea		✓		SADM and EWCAAP are a substantial part of the housing delivery for Hertsmere. Are they deliverable to ensure five and fifteen year	Elstree Way Corridor Action Plan has been subject to separate examination. The Council is following the

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				housing land supply? Have SADM1 sites been assessed consistently to the principles applied during site capacity calculations taken from the SHLAA, given the site specific requirements could impact the expected yields? Potters Bar Garage may not be available in the 15 year housing land supply. We can assist with site(s) to help achieve numbers required.	<p>conclusions of the examination.</p> <p>All identified sites have been tested and, where appropriate reviewed, through the SHLAA and its updates.</p> <p>The Potters Bar Bus Garage has been removed from the list of sites in SADM1. See responses under Policy 1 Site H11.</p> <p>There has been some adjustment to the sites and net housing capacity in Policy SADM1 and Policy SADM2 as a result of new information and updating. The overall effect is to confirm that Table 1 is sound.</p> <p><b>No change other than a relatively minor updating of Table 1 (and related changes) is justified in this context.</b></p>
01290/1/001 Chair of Governors, Hertswood Academy		✓		Should review all SHLAA sites in SADM for transparency.	<p>SHLAA sites have been reviewed and updated. Appropriate sites are included in SADM, both in Table 1 and Policy SADM1.</p> <p><b>No change.</b></p>
01290/1/004 Chair of Governors, Hertswood Academy		✓		SADM1 excludes some key SHLAA sites: S14 Fire and Ambulance station; S15 Library and adjoining clinic; S37 Old Haberdashers sports ground; S52 Land adjacent to north east of Borehamwood; S150 Civic offices car park; S155 Job Centre. If these sites are no longer considered suitable for residential development, consideration should be given to other possible uses, especially key community facilities under SADM29.	<p>SHLAA sites have been reviewed and updated. Appropriate sites are included in SADM, both in Table 1 and Policy SADM1.</p> <p>Sites S14, S15, S150 and S155 are covered by the Elstree Way Corridor Area Action Plan. SADM reflects conclusions on the examination of the Action Plan.</p> <p>Site S52 would be a major Green Belt release and is considered inappropriate. It is also not needed to deliver the Core Strategy housing target.</p> <p>Site S37 is currently open land. The issues are considered more fully under Croxdale Road Sports pitches, Borehamwood, the objection from URS on behalf of Old Haberdashers and Barratt Homes (01217/1/001).</p> <p><b>No change arising from this comment.</b></p>



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01290/1/002 Chair of Governors, Hertswood Academy		✓		Check for consistency for what is said in all strategic documents about what is required over next 15 years. 4299 / almost 4200 etc. Should include information about what proportion will be in which parts of borough.	The housing target is at least 3,900 net additional homes. What is considered to be deliverable will vary over time. <b>No change arising from this comment.</b>
01227/1/005 RPS Planning & Development Ltd	✓			Council needs to find sites to accommodate at least a further 1,326 dwellings to meet the housing target. 17% of total supply of 4,005 dwellings relies on windfall. We object to the strong reliance on windfall sites to deliver such a significant proportion of the housing supply - evidence not there to support it (as per NPPF). Allowance for 360 dwellings to be delivered on large scale windfall sites in the 11-15 year period of the plan should be removed / reduced, and the allowance for small scale windfall sites (300) be reduced to 200 to ensure no contribution is assumed within the first five years of the plan.  Allocate additional land to compensate for removal of the windfall allowances from the supply and to ensure the total supply exceeds the minimum Core Strategy target. Housing land should be allocated for at least 1,200 dwellings.  Related rep – land off Watford Road, Elstree for housing, village envelope change.	The assumptions behind the housing land supply have been reported in the SHLAA (2010) and its Update (2011), and tested through examination: this was revised in evidence to the examination (Housing Supply Update: August 2012). The figures do not include any allowance for small scale windfall in the first five years of the plan. The windfall assumptions have been further checked and as appropriate adjusted. The windfall assumptions are therefore reasonable and consistent with Government advice. The SHLAA has been updated again. There has been some adjustment to the sites and net housing capacity in Policy SADM1 (and Policy SADM2) as a result of new information and updating. The overall effect is to confirm that Table 1 is sound.  There is no reason to increase the land supply by 1,200 dwellings in order to achieve the Core Strategy housing target. <b>No change arising from this comment.</b>
01350/1/004 Shire Consulting for Exchange Ltd		✓		Of the 651 units in Policy SADM1 sites, nearly 60% are dependent upon existing uses on those sites being relocated elsewhere first (sites H6, H9 & H11). 42% is represented by one site (H6 Hertswood School). Site H2 (7% of the allocation) is constrained by flood risk and contamination assessments and H10 (6% of the allocation) may not be able to make a full contribution, due to the policy requirement to retain some of its trees. Calls into question the 'availability' of these	The assumptions behind the housing land supply have been reported in the SHLAA (2010) and its Update (2011), and tested through examination. The windfall assumptions are reasonable and consistent with Government advice. The SHLAA has been updated again. This takes account of discussions with landowners/developers and site constraints.

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				allocations for the Five Year Supply.	<p>The Potters Bar Bus Garage has been removed from the list of sites in SADM1. See responses under Policy 1 Site H11. However, all the other sites referred to are retained in SADM1.</p> <p>There has been some adjustment to the sites and net housing capacity in Policy SADM1 (and Policy SADM2) as a result of new information and updating. The overall effect is to confirm that Table 1 is sound.</p> <p><b>No change arising from this comment.</b></p>
01218/1/001 Knight Frank on behalf of LB Enfield	✓			<p>Sites in SADM1 unlikely to deliver anticipated numbers. This will increase pressure on other sources in order to deliver numbers required.</p> <p>Safeguarded sites will need to be released but these are unlikely to provide sufficient supply of deliverable / developable housing land to address delivery shortfalls likely to emerge later in plan period. SADM should reconsider safeguarded land allocations through detailed review of Green Belt sites in order to ensure suitable sites for release are identified at the initial stage - should have sufficient capacity to accommodate range of house types and sizes in highly accessible locations. This will also help keep pressure off Green Belt elsewhere in the the longer term.</p> <p>(See related representation to allocate Land to the south east of Potters Bar and North of M25, Potters Bar as safeguarded).</p>	<p>The assumptions behind the housing land supply have been reported in the SHLAA (2010) and its Update (2011), and tested through examination. The windfall assumptions are reasonable and consistent with Government advice. The figures do not include any allowance for small scale windfall in the first five years of the plan.</p> <p>The SHLAA has been updated again. This takes account of discussions with landowners/developers and site constraints.</p> <p>The issue of whether any of the reserve sites should have their safeguarded status removed is considered under Policy SADM2 Safeguarded Land for Housing below.</p> <p>No further safeguarded land should be identified now. The review of the Core Strategy, which the Council is committed to, is a separate exercise. It will require a new SHMA, Economy Study and Green Belt Study, and further co-operation with adjoining authorities. If, as a result, objectively assessed housing needs are very substantially higher than currently planned for within the housing market, then there are serious and potentially controversial</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					issues to be debated with the public. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. This would be the appropriate context to consider whether any additional or alternative safeguarded land for housing should be identified. <b>No change arising from this comment.</b>
01238/1/001 Welwyn Hatfield Council (Planning Policy)		✓		Lack of clarity of how reached windfall supply numbers. NPPG says windfall can be justified in 5 year supply if compelling evidence. Table 1 shows windfall allowance for 15 years. Absence of compelling evidence means plan unsound.	The assumptions behind the housing land supply have been reported in the SHLAA (2010) and its Update (2011), and tested through examination: this was revised in evidence to the examination (Housing Supply Update: August 2012). The figures do not include any allowance for small scale windfall in the first five years of the plan. The windfall assumptions have been further checked and as appropriate adjusted. The windfall assumptions are therefore reasonable and consistent with Government advice. <b>It has been clarified that no windfall assumption includes an allowance for the first five years.</b>
01350/1/001 Shire Consulting for Exchange Ltd		✓		SADM uses Core Strategy requirement figure of 3990 (Based on Regional Strategy figs). Market signals show significantly higher level of demand than SE and national averages. Also likely increasing demand from London unable to meet own housing requirements. Core Strategy Review and establishment of true housing growth required in order to produce SADM. Core Strategy was found sound on basis of partial review within 3 years. Para 2.2 says review in 2016 - not the same timescale.	SADM is delivering the Core Strategy housing target. There is no requirement or request from the Greater London Authority to accommodate housing demand from London. The Local Development Scheme 2013 states: "A partial review of the adopted Core Strategy Local Plan (2013) will commence before January 2016. The partial review will focus on housing need (including gypsy and traveller pitch requirements) and employment land needs." <b>No change.</b>

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<b>Housing Allocations</b>					
01214/1/008 Flood Management Team, Herts County Council		✓		<p>i) Any site allocations which are major developments coming forward after relevant date will require prior approval from SAB. Developers encouraged to seek Pre-application advice. (also where reserved matters follow outline granted prior to date).</p> <p>ii) Any site allocations that include an Ordinary Watercourse, the developer will need to consult with the Lead Local Flood Authority to confirm if any works as part of the development affecting the flow of the watercourse will need a Land Drainage Consent under section 23 of the Land Drainage Act 1991. This should be established early in the design of the site to ensure the proposals are acceptable.</p>	<p>i) Noted. <b>The government has now cancelled the introduction of the SAB, so the LPA is responsible for SuDS on all schemes from April 2015, but the Lead Local Flood Authority (LLFA) is a statutory consultee on major proposals. Developers are encouraged to obtain pre-app advice from the LLFA..</b></p> <p>ii) This will apply to all major developments, not only those on allocated sites. Reference to need to consult Lead Local Flood Authority is already included within the supporting text to the policy on Watercourses. <b>No change.</b></p>
01283/1/22 English Heritage		✓		Some sites identify heritage assets as potential constraints but inconsistent. Limited info on how sites might be developed - difficult for EH to assess full impact. Keen for preferred sites to include development criteria to guide future proposals, inc. references to historic environment where needed. Danger of allocating sites without such criteria, establishing principle of development without guidance. Significance of heritage assets, and the potential impact of allocations, needs to be understood and justified.	<b>Site specific requirements (SSR) for relevant sites (as notified by English Heritage) have been modified to reference heritage assets.</b> All proposed development on any of the sites is expected to comply with SADM30 – Heritage Assets.
01240/1/002 HCC Environmental Resource Planning		✓		In line with NPPF paragraph 62 and CS para 6.15, recommended that Hertfordshire Design Review Panel is utilised at early stage to inform proposals for final SADM site allocations.	Recommendation noted.
<b>Policy SADM1 Housing Allocations</b>					
01139/2/002 Environment Agency		✓		Sequential / Exceptions Tests required where sites in areas of flood risk. Must use Strategic Flood Risk Assessment as basis for applying Sequential test. Not clear how it's been used. May find it unsound if sequential test has not informed the choice of sites.	Para 2.6 indicates that flooding has been taken into consideration in identifying sites for housing in SADM1. A part of two sites (H2 and H7) are within Flood Risk Zones 2 or 3; <b>the site specific requirements for these sites have been updated to indicate that development will not be</b>

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					<b>allowed within the areas at risk of flooding.</b>
01139/3/002 Environment Agency		✓		From a brief check of our previous comments I think there were only 2 sites (H2 Gas Holders Site and H7 Lincolns Field) that were at risk of fluvial flooding so will need to ensure the requirements of the NPPF on sequential test, exceptions test and evidence base are addressed.	<b>The site specific requirements for these sites have been updated to indicate that development will not be allowed within the areas at risk of flooding.</b>
01210/1/002 Watford Borough Council			✓	Watford Borough Council supports the residential sites, including in the neighbouring area of Bushey.	Support noted.
01229/1/002 Natural England, Sustainable Land Use and Regulation		✓		No objection to any of the housing allocation sites - none are close to statutorily designated sites or landscapes. Some allocations are close to locally designated sites. SADM1 should require proposals to protect and enhance these in line with NPPF requirements. Allocations may include areas of green infrastructure and BAP habitats and species. SADM1 should require proposals to protect and enhance these in line with NPPF requirements. Development proposals should be accompanied by a detailed ecological appraisal and suitable mitigation measures identified where necessary.	Policy SADM11 Biodiversity and Habitats identifies statutory and local designated sites and sets out the criteria on which planning decisions will be based in order to avoid harm to these sites. The site specific requirements in SADM1 do not specify mitigation as SADM11 will be a consideration in the determination of all planning applications and it is not considered necessary to replicate this. <b>No change.</b>
01232/1/002 resident	✓			Object to adverse effect of more development in Hillside ward. All Borehamwood sites are in Hillside, as is part of Elstree Way Corridor.	The adopted Core Strategy identifies Borehamwood as a strategic housing location where up to 60% of new housing during the period to 2027 may be developed, and indicates that 'it is anticipated that, in particular, suitable brownfield sites in Borehamwood will deliver a significant proportion of the required affordable and market housing... This will include a large amount of new housing in the Elstree Way corridor, a priority regeneration area.' Within this context a comprehensive review of sites put forward for residential development through the SHLAA has informed the identification of sites for inclusion in the SADM to accommodate most of the minimum target of 3990 homes

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					required in the Borough over the period to 2027. In accordance with the adopted Core Strategy new development proposals are directed towards the existing urban areas thus avoiding developing on greenfield land in the Green Belt; opportunities for new development are limited by the geography of the Borough and the achievability and deliverability of individual sites. <b>No change.</b>
01241/1/004 resident	✓			Object to adverse effect of more development in Hillside ward. All Borehamwood sites are in Hillside, as is part of Elstree Way Corridor.	The adopted Core Strategy identifies Borehamwood as a strategic housing location where up to 60% of new housing during the period to 2027 may be developed, and indicates that 'it is anticipated that... suitable brownfield sites in Borehamwood will deliver a significant proportion of the required affordable and market housing... This will include a large amount of new housing in the Elstree Way corridor, a priority regeneration area.' Within this context a comprehensive review of sites put forward for residential development through the SHLAA has informed the identification of sites for inclusion in the SADM to accommodate most of the minimum target of 3990 homes required in the Borough over the period to 2027. In accordance with the adopted Core Strategy new development proposals are directed towards the existing urban areas thus avoiding developing on greenfield land in the Green Belt; opportunities for new development are limited by the geography of the Borough and the achievability and deliverability of individual sites. <b>No change.</b>
01255/1/001	✓			Object to more housing in Borehamwood - congestion, pollution,	The adopted Core Strategy identifies Borehamwood as a

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resident				overcrowding, cyclists at risk, problems for ambulances (including potholes).	strategic housing location where up to 60% of new housing during the period to 2027 may be developed, and indicates that 'it is anticipated that... suitable brownfield sites in Borehamwood will deliver a significant proportion of the required affordable and market housing... This will include a large amount of new housing in the Elstree Way corridor, a priority regeneration area.' Where appropriate developments are required to contribute to the enhancement of local infrastructure provision, in line with the Council's Developer Contribution Framework. <b>No change.</b>
00234/2/001 Elstree and Borehamwood Town council		✓		Concern re ability for local infrastructure to be able to meet requirements of scale of envisaged development in Borehamwood area	The adopted Core Strategy identifies Borehamwood as a strategic housing location where up to 60% of new housing during the period to 2027 may be developed, and indicates that 'it is anticipated that...suitable brownfield sites in Borehamwood will deliver a significant proportion of the required affordable and market housing... This will include a large amount of new housing in the Elstree Way corridor, a priority regeneration area.' Where appropriate developments are required to contribute to the enhancement of local infrastructure provision, in line with the Council's Developer Contribution Framework. <b>No change.</b>
00834/1/001 resident	✓			Object to proposed growth of Borehamwood – traffic and infrastructure problems	The adopted Core Strategy identifies Borehamwood as a strategic housing location where up to 60% of new housing during the period to 2027 may be developed, and indicates that 'it is anticipated that...suitable brownfield sites in Borehamwood will deliver a significant proportion of the required affordable and market housing... This will include a

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					large amount of new housing in the Elstree Way corridor, a priority regeneration area.' Where appropriate developments are required to contribute to the enhancement of local infrastructure provision, in line with the Council's Developer Contribution Framework. <b>No change.</b>
<b>Site H1 Directors Arms, Borehamwood</b>					
00838/1/001 resident		✓		Will continuous access to private garage r/o Cranes Way (required) be available?	HBC Estates acknowledge that access should be maintained; resident has been advised to contact HBC in order to regularise the situation. <b>Need for continuous garage access added to Site Specific Requirements.</b>
01188/1/004 Thames Water		✓		Sewerage network capacity insufficient. Concern re cumulative effect of this and other proposals sites. Request specific constraint information to be added as follows: further investigation required, possibly at developer's expense. If upgrade to assets needed, lead-in time can be up to 3 years. Add "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	<b>Additional requirement added to Site Specific Requirements.</b>
01222/1/001 HBC Parks		✓		Existing amenity open space on the site should be re-provided and in more user friendly manner.	The Open Space Study 2011 found that open space is valued by residents in the borough and has an important recreational and environmental role. It recommended that 'there should be no loss of current open space unless it can be sufficiently justified or alternative provision provided within a suitable catchment and of quality. If sites are lost they should be replaced by a site of the same typology and



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					size.’ This site includes a piece of open space which was identified as Minor Amenity Land in the Green Spaces and Amenity Land Study 2012. This is not a particularly visible or well used site, but is important locally for biodiversity and amenity and should not be lost altogether as a result of development. <b>Requirement to provide some public amenity space within any development proposals added to Site Specific Requirements.</b>
01232/1/001 resident	✓			Object to residents losing parking and storage facilities – needs to be fully explored - parking is already difficult in this area.	HBC Estates indicate that existing garage tenants would be relocated, prioritising the most local available garages for their use. <b>Requirement to investigate current useage of garages and if necessary identify alternative provision added to Site Specific Requirements.</b>
01241/1/001 resident	✓			Object to residents losing parking and storage facilities – needs to be fully explored - parking is already difficult in this area.	HBC Estates indicate that existing garage tenants would be relocated, prioritising the most local available garages for their use. <b>Requirement to investigate current useage of garages and if necessary identify alternative provision added to Site Specific Requirements.</b>
01263/1/003 resident		✓		Loss of parking and storage facilities needs to be fully explored - parking already difficult in this area.	HBC Estates indicate that existing garage tenants would be relocated, prioritising the most local available garages for their use. <b>Requirement to investigate current useage of garages and if necessary identify alternative provision added to Site Specific Requirements.</b>
01370/1/001 HCC Highways		✓		Access to the site would need to be an acceptable distance from the roundabout junction and where possible the number of accesses to the site (currently 3) should be reduced. Apart from this, there is unlikely to be any Highways objection to the proposed use of the site for residential purposes, subject to meeting normal highway design and assessment requirements.	<b>Highway requirements added to Site Specific Requirements</b>

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<b>Site H2 Gas Holders site, Station Road, Borehamwood</b>					
00987/2/001 resident	✓			Site access is via Station Road where there is already conflict between buses and other traffic. Either find alternative access to the site, or introduce measures to protect buses, including at Allum Lane/Theobald Street/Shenley Road junction.	HCC Highway Authority consider that the site is a sustainable location, in close proximity to the railway station and shopping facilities. Parking requirements and trip generation are therefore likely to be lower than less sustainable sites. Station Road is sufficiently wide along the site frontage to enable appropriate access to be achieved. It is acknowledged that the existing junction is congested, but the Highway Authority does not consider that the level of development proposed would generate significant additional trips which would worsen the situation to a severe level. <b>No change.</b>
01139/2/003 Environment Agency		✓		Support requirement for Flood Risk Assessment. Development must be located outside Flood Zones 2 and 3 (Sequential approach). Site specific requirements should refer to 'sequential approach on site to avoid placing vulnerable development in areas of highest flood risk'. Proposals should de-culvert and enhance Borehamwood Brook Main River. Development should be set back from the top of the bank and this naturalised buffer area managed on operational and ecological principles. Known contaminated site – support inclusion of contamination and remediation strategy.	<b>Additional requirements re need to avoid flood zones 2 and 3 (northern part of site) and to if possible deculvert and enhance the Borehamwood Brook Main river running through the site added to Site Specific Requirements.</b> Site Specific Requirements already specify requirement for flood risk assessment, and contamination and remediation strategy.
01159/1/001 National Grid			✓	Strong support for allocation (site surplus to National Grid requirements) – PDL, highly sustainable location. Request higher density is considered – estimated 64 units.	A density of up to 100 units per hectare, equating to 43 units, is identified in the SHLAA (Site 129) and is considered to be reasonable for the site. This density is already very high for Hertsmere. The precise number of dwellings achievable on the site will depend upon the design and layout of a proposed scheme, which must comply with relevant Local Plan policies, development standards and the Site Specific Requirements in the SADM. Meeting the

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					requirement to avoid flood zones 2 and 3 may in any case reduce the number of units which can be achieved on the site. <b>No change.</b>
01188/1/011 Thames Water		✓		Sewerage network capacity insufficient. Concern re cumulative effect of this and H3 and other proposals sites. Request specific constraint information to be added as follows: further investigation required, possibly at developer's expense. If upgrade to assets needed, lead-in time can be up to 3 years. Add "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	<b>Additional requirement added to Site Specific Requirements.</b>
01222/1/002 HBC Parks		✓		Integrate linking paths between H2, H3 and Shakespeare Drive estate.	<b>Additional sentence added to Site Specific Requirements.</b>
01232/1/003 resident	✓			Decontamination will be expensive. Traffic congestion at Allum Lane/Theobald Street/Shenley Road/Station Road involving taxis, buses and commuters, plus minicabs waiting for fares in Station road and commuter parking.	Site specific requirements already specify contamination and remediation strategy to be provided. It is acknowledged that the existing junction is congested, but the Highway Authority does not consider that the level of development proposed would generate significant additional trips which would worsen the situation to a severe level. <b>No change.</b>
01241/1/002 resident	✓			Decontamination will be expensive. Traffic congestion at Allum Lane/Theobald Street/Shenley Road/Station Road involving taxis, buses and commuters, plus minicabs waiting for fares in Station road and commuter parking.	Site specific requirements already specify contamination and remediation strategy to be provided. It is acknowledged that the existing junction is congested, but the Highway Authority does not consider that the level of development proposed would generate significant additional trips which would worsen the situation to a

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					severe level. <b>No change.</b>
01263/1/004 resident		✓		Decontamination will be expensive. Traffic congestion at Allum Lane/Theobald Street/Shenley Road/Station Road involving taxis, buses and commuters, plus minicabs waiting for fares in Station road and commuter parking.	Site specific requirements already specify contamination and remediation strategy to be provided. It is acknowledged that the existing junction is congested, but the Highway Authority does not consider that the level of development proposed would generate significant additional trips which would worsen the situation to a severe level. <b>No change.</b>
01370/1/002 HCC Highways		✓		The site is considered to be a sustainable location, in close proximity to the railway station and shopping facilities. Parking requirements and trip generation are likely to be lower than less sustainable sites. It is recognised that the existing junction at Allum Lane/Theobald Street/Shenley Road junction is congested. However, the level of development proposed is unlikely to generate significant additional trips which would worsen the situation to a severe level. The normal highway design and assessment requirements will apply.	Noted. Highway requirements will be addressed through the normal planning application process. <b>No change.</b>
<b>Site H3 Land south of Elstree and Borehamwood Station</b>					
00573/1/001 resident	✓			Site unsuitable for development - too close to existing housing. Will compromise privacy of existing residents. Access and construction traffic will be difficult given location close to existing housing.	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					not planning considerations.
00574/1/001 resident	✓			Site too small and will result in over population creating greater demand on services such as schools, GPs and local transport. Risk of flooding by over development in small area.	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
00575/1/001 resident	✓			i) Noise and Air Pollution and vibrations of building site adjoining respondent's garden ii) removal of trees and plants iii) effect on privacy and quality of home life of existing occupiers iv) site unsuitable for development; concern over subsidence caused by vibrations of railway; will effect quality of life for existing and future occupiers.	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.

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00576/1/001 resident	✓			<p>Site H3 is not a sensible site for development.</p> <ul style="list-style-type: none"> <li>i) Creating sensible access to H3 will be difficult</li> <li>ii) Creating decent quality housing so close to the train line and in such a thin strip of land will be difficult. We experience strong vibrations due to passing freight trains and any development must take the impact of vibrations on our properties into account.</li> <li>iii) We are keen to preserve the trees and vegetation which creates a pleasant environment near these houses</li> <li>iv) Our privacy may be compromised by having houses build overlooking our gardens and into our windows</li> <li>v) Pressure on local amenities eg. schools and doctors.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00576/2/001 residents (summary of multiple residents' comments)	✓			<ul style="list-style-type: none"> <li>i) The land is not geographically or topographically suited to housing. Not wide enough - you cannot fit a road, houses and gardens on this land.</li> <li>ii) Quality of life for future occupiers. Proximity to high speed trains – noise and vibration. Vibrations can and do cause non-structural damage to buildings, such as cracked plaster and breaking window frames</li> <li>iii) Creating sensible access to H3 will be difficult. Safety issues with creating a new junction with Coleridge Way.</li> <li>iv) Increased traffic on Coleridge Way and impact on parking.</li> <li>v) The land is natural habitat to wildlife.</li> <li>vi) Development will harm the amenity of our own homes. We will lose privacy and light.</li> <li>vii) The town needs to deal with traffic issues, school places and GP surgery waiting times before we increase the capacity of the town.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
00578/1/001 resident	✓			<p>Site H3 is not a sensible site for development.</p> <p>i) Creating sensible access to H3 will be difficult</p> <p>ii) Creating decent quality housing so close to the train line and in such a thin strip of land will be difficult. We experience strong vibrations due to passing freight trains and any development must take the impact of vibrations on our properties into account</p> <p>iii) We are keen to preserve the trees and vegetation which creates a pleasant environment near these houses</p> <p>iv) Our privacy may be compromised by having houses build overlooking our gardens and into our windows</p> <p>v) Pressure on local amenities eg. schools and doctors.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00579/1/001 resident	✓			<p>Removal of vegetation near the train line which provides a pleasant environment, and is home to an ecosystem. If these trees are removed, it will leave no natural vegetation in the area.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00580/1/001	✓			<p>Pressure on local amenities eg. schools and doctors.</p>	<p>Planning permission was granted in 2014 for 43 residential</p>

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resident					units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
00581/1/001 resident	✓			i) Would be an eyesore. ii) Would block light to our homes. iii) Not enough room for these homes to be built.	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
00582/1/001 resident	✓			i) Building on greenbelt land. ii) Strain on local resources (in particular schools).	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<ul style="list-style-type: none"> <li>iii) Habitat for animals and birds.</li> <li>iv) Overlooking of existing houses by 3 storey houses.</li> <li>v) Noise and disruption and impact on our daily lives. This will breach our right to a satisfactory living environment and severely reduce light to our property.</li> <li>vi) We were advised by our solicitor that this area would not be built upon due to safety reasons, primarily for its proximity next to a railway line. I would be interested to know why the area is deemed suitable now.</li> <li>vii) I would be grateful if you could advise where I can lodge a formal appeal against this work.</li> </ul>	<p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00582/2/001 resident	✓			<ul style="list-style-type: none"> <li>i) Invasion of privacy. Impacts of building work and subsequent noise. 3 storey buildings will restrict light to existing houses.</li> <li>ii) Train noise and shaking - substantial cracking in our house from this. Unsuitable area for development. Rights of current residents to a satisfactory living environment.</li> <li>iii) Pressure on local resources and infrastructure – schools, doctors.</li> <li>iv) Natural environment - habitats and trees.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00583/1/001 resident	✓			I am writing to you to object to the planned development behind the street that I live on Coleridge Way	The objection is noted.
00584/1/001	✓			i) It is an real invasion of privacy - they will be overlooking the	Planning permission was granted in 2014 for 43 residential

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
resident				<p>properties and too close and noisy for the residents.</p> <p>ii) We were assured when the properties were build that there would never be development on that land.</p>	<p>units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00584/1/002 resident	✓			<p>i) Area will have increased traffic and noise.</p> <p>ii) 50 houses won't be able to get appropriate access - too many houses.</p> <p>iii) Protected trees and vegetation being destroyed.</p> <p>iv) Have been assured there would be no development on the site.</p> <p>v) Railway line - dangerous for children living close.</p> <p>vi) Where will they go to school - hard to get children into schools, especially Jewish ones.</p> <p>vii) Ground conditions poor.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00585/1/001 resident	✓			<p>i) Loss of light and significant overlooking issues to rear of our property.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<ul style="list-style-type: none"> <li>ii) Loss of trees and vegetation.</li> <li>i) Poor quality of proposed housing and access issues due to proximity to train line.</li> </ul>	<p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00611/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) The proposed access is not suitable as this will form a dead end with one narrow accessway. Additional traffic towards the station and roundabout. There will not be sufficient access for emergency vehicles contrary to Policy SADM35.</li> <li>ii) Vibrations from freight trains is excessive. Properties generally vibrate along Wordsworth Gardens and any closer properties will be far worse.</li> <li>iii) TPO 23/2010. Impact on landscape and loss of screening.</li> <li>iv) There are better, more suitable sites in Hertsmere for development with less impact on the environment and amenity.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00631/1/001 resident	✓			<p>Site H3 is not a sensible site for development.</p> <ul style="list-style-type: none"> <li>i) Creating sensible access to H3 will be difficult.</li> <li>ii) Creating decent quality housing so close to the train line and in such</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<p>a thin strip of land will be difficult. Strong vibrations from freight trains - impact of vibrations on our properties needs to be taken into account.</p> <p>iii) We are keen to preserve the trees and vegetation which creates a pleasant environment near these houses.</p> <p>iv) Privacy may be compromised by overlooking. Impact of building disruption, loss of vegetation, privacy and sunlight.</p> <p>v) Pressure on local amenities eg. schools and doctors.</p> <p>vi) Devaluation of property.</p>	<p>account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00633/1/001 resident	✓			<p>Site H3 is not a sensible or practical site for development.</p> <p>i) Creating sensible access to H3 will be difficult.</p> <p>ii) Increased pressure on parking, which is already under-provided for in the area.</p> <p>iii) Creating decent quality housing so close to the train line and in such a thin strip of land will be difficult. We experience strong vibrations due to passing freight trains and any development must take the impact of vibrations on our properties into account.</p> <p>iv) We are keen to preserve the wildlife, trees and vegetation which creates a pleasant environment near these houses.</p> <p>v) Ground (gardens) is already excessively wet, even in years with low rain levels. More housing and concrete will reduce natural drainage.</p> <p>vi) Privacy may be compromised by overlooking.</p> <p>vii) Pressure on local amenities e.g. schools and doctors.</p> <p>viii) I would be keen to understand how I could purchase the land behind and adjacent to my property to extend my garden and offset any financial interest from the proposal and retain the natural</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				environment already there.	
00635/1/001 resident	✓			<p>Site H3 is not a sensible or practical site for development.</p> <ul style="list-style-type: none"> <li>i) Creating sensible access to H3 will be difficult.</li> <li>ii) Increased pressure on parking, which is already under-provided for in the area.</li> <li>iii) Creating decent quality housing so close to the train line and in such a thin strip of land will be difficult. We experience strong vibrations due to passing freight trains and any development must take the impact of vibrations on our properties into account.</li> <li>iv) We are keen to preserve the wildlife, trees and vegetation which creates a pleasant environment near these houses.</li> <li>v) The ground (gardens) in this area is already excessively wet, even in years with low rain levels. The addition of more housing and concrete will reduce the natural drainage to the area.</li> <li>vi) Privacy may be compromised by overlooking.</li> <li>vii) Pressure on local amenities e.g. schools and doctors.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00636/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Would compromise privacy and block sunlight.</li> <li>ii) Land at the back of my garden is already subsiding substantially. I feel that if building work was to take place then it would jeopardise my property and possibly make it unstable. If building work is to proceed on such a small strip of land then the work would cause great distress to my young family due to the noise and further vibrations.</li> <li>iii) The extra residents would have great affect on the surrounding local amenities such as schools and nurseries.</li> <li>iv) My house shakes extensively because of the passing freight trains and cracks are starting to show. I believe that work on this land would make existing and new properties more susceptible to subsidence. Unsuitable site for residential due to proximity to train</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<p>lines.</p> <p>v) There are several long lasting oak trees in the proposed site and this would be an extreme shame to remove these as they create a pleasant environment and should be preserved.</p> <p>vi) Buildings overlooking would reduce property value making sale more difficult.</p>	
00654/1/001 resident	✓			<p>i) We require more information to assess the plan of developing 50 new dwellings.</p> <p>ii) Additional noise and nuisance to front and back of houses in Coleridge Way due to additional residents.</p> <p>iii) Extending access from Station road and new pedestrian link will cause light pollution to existing houses.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00655/1/001 resident	✓			<p>Site H3 is not a sensible or practical site for development.</p> <p>i) Creating sensible access to H3 will be difficult.</p> <p>ii) Increased pressure on parking, which is already under-provided for in the area.</p> <p>iii) Creating decent quality housing so close to the train line and in such a thin strip of land will be difficult. We experience strong vibrations due to passing freight trains and any development must take the impact of vibrations on our properties into account.</p> <p>iv) We are keen to preserve the wildlife, trees and vegetation which</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<p>creates a pleasant environment near these houses.</p> <p>v) The ground (gardens) in this area is already excessively wet, even in years with low rain levels. The addition of more housing and concrete will reduce the natural drainage to the area.</p> <p>vi) Privacy may be compromised by overlooking.</p> <p>vii) Pressure on local amenities e.g. schools and doctors.</p>	<p>new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00656/1/001 resident	✓			<p>i) Proximity to back garden (Wordsworth Gardens) will result in loss of amenity, loss of sunlight and loss of privacy due to overlooking.</p> <p>ii) Building on Site H3 would not be in keeping with the rest of the area.</p> <p>iii) Creating sensible access to H3 will be difficult.</p> <p>iv) Increased pressure on parking, which is already under-provided for in the area.</p> <p>v) Creating decent quality housing so close to the train line and in such a thin strip of land will be difficult. We experience strong vibrations due to passing freight trains and any development must take the impact of vibrations on our properties into account.</p> <p>vi) We are keen to preserve the wildlife, trees and vegetation which creates a pleasant environment near these houses.</p> <p>vii) The ground (gardens) in this area is already excessively wet, even in years with low rain levels. The addition of more housing and concrete will reduce the natural drainage to the area.</p> <p>iii) Pressure on local amenities e.g. schools and doctors.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00657/1/001 resident	✓			<p>i) Proximity to back garden (Wordsworth Gardens) will result in loss of amenity, loss of sunlight and loss of privacy due to overlooking.</p> <p>ii) Building on Site H3 would not be in keeping with the rest of the area.</p> <p>iii) Creating sensible access to H3 will be difficult.</p> <p>iv) Increased pressure on parking, which is already under-provided for</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<p>in the area.</p> <p>v) Creating decent quality housing so close to the train line and in such a thin strip of land will be difficult. We experience strong vibrations due to passing freight trains and any development must take the impact of vibrations on our properties into account.</p> <p>vi) We are keen to preserve the wildlife, trees and vegetation which creates a pleasant environment near these houses.</p> <p>vii) The ground (gardens) in this area is already excessively wet, even in years with low rain levels. The addition of more housing and concrete will reduce the natural drainage to the area.</p> <p>iii) Pressure on local amenities e.g. schools and doctors.</p>	<p>capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00658/1/001 resident	✓			<p>i) It will create an obstruction to the limited sunlight my house already gets. It will affect the privacy of my house.</p> <p>ii) It will create more traffic in the area.</p> <p>iii) It will create more noise.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00659/1/001 resident	✓			<p>i) Proposal would create noise and take away privacy, and reduce the amount of light our house gets.</p> <p>ii) Would also generate more traffic.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning</p>



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					<p>application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00661/1/001 resident	✓			<p>i) The site is currently Greenfield Land full of trees, bushes and wildlife (including deer and bats). Removal of lots of trees (some with protection orders) could cause severe issues such as subsidence to existing neighbouring properties as well as increased flood risk.</p> <p>ii) There are better places to build in Borehamwood (e.g. Elstree Corridor, car park opposite BP garage or Gas Works on Station Road).</p> <p>iii) Rain and digging in the area left huge puddles that took days to drain away. The more trees are removed and areas concreted over, the more risk of flood occurs. There appear to be underground streams.</p> <p>iv) Chance of land slip onto railway due to removal of trees which the Council will be responsible for.</p> <p>v) A new road would have to be created. Flats have been built on Station Road meaning it will be very difficult to now build road access there (as is the current plan). Station Road not suitable for large volumes of traffic. Increase in traffic would be dangerous children and commuters. Traffic and parking would be a problem.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>

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				<p>Took over 7 years to arrange for a CPZ in the existing developments. Resident will have at least one car per residence, more likely two. The traffic generally on Furzehill at rush hour is awful.</p> <p>vi) Noise, vibrations etc will be excessive. Houses already shake on Coleridge Way when freight trains run through. Many flats in Elstree next to the station/tracks appear to still be empty.</p> <p>vii) 3 storey buildings would be overbearing . Simply because some existing properties are three stories, does not mean that limiting the new properties to the same height is appropriate. Overlooking to gardens and lower floors of the current houses. Excessive noise and smell from numerous properties, vehicles and bins. Disturbance, overshadowing and loss of privacy to existing residents. Loss of existing views.</p> <p>viii) This area is currently green, and its loss would impinge on the character of the neighbourhood, impinging on existing trees and on local wildlife.</p> <p>ix) Impact on local amenities e.g. doctors surgery (the Grove) is full, station and schools (there aren't many of them as you have already sold them off and approved developments on them).</p>	
00825/1/001 resident	✓			<p>i) Trees smother railway noise. Vibration from trains a problem. Felling trees will greatly increase noise levels. New houses will also suffer from noise and movement in structure to a greater extent.</p> <p>ii) Houses built adjoining garden will invade privacy and restrict right to light.</p> <p>iii) Conversion of the garage to the front refused permission to preserve the "street scene" yet have no qualms whatsoever about destroying forever the street scene from the rear.</p> <p>iv) This is just an attempt to extort more money for the Borough, by cramming more people into unsuitable strips of land where local</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				resources are already in thin supply. v) Access from Station Road inadequate due to pedestrian use, narrow and will run close to the residents at that end of Coleridge Way. There has already been a fatal accident on that strip of road, in my opinion making it a thoroughfare for a development of 50 houses is negligent.	Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
00835/1/001 resident	✓			i) Access to site - where will it be and what traffic impact will it have on current residents. ii) If houses/flats are put up behind my property, there will be loss of light considerations, neighbours overlooking, increase in noise, and general decrease to current quality of light and air. iii) Loss of trees (currently protected) on the strip running along the rail line behind Coleridge Way. iv) The space there at the moment seems miniscule. How many houses are proposed etc.	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
00856/1/001 resident	✓			i) Lack of parking, ii) Safety of children due to traffic and building works. iii) Risk of flooding as natural drainage will be removed.	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding. All planning applications are assessed on their individual merits, so these matters would remain considerations if a

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
00857/1/001 resident	✓			Access roads in and out of Borehamwood are already overloaded and building yet more homes without improved roads will just make a bad situation worse.	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
00858/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Access to the site is limited and would create safety concerns for adjoining cul-de sacs/roads.</li> <li>ii) Area is already above capacity with residential development.</li> <li>iii) Unfit location for scale of development given proximity to other properties and railway line.</li> </ul>	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
00859/1/001 resident	✓			<p>i) Concern re privacy - my house may be overlooked.</p> <p>ii) Congestion in the area. Parking is already a problem - driveways blocked, cars parked on pavement. More housing brings more cars.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00860/1/001 resident	✓			Area will become too crowded. Reduce property values.	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views,</p>

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					construction noise and phone/TV signal interference are not planning considerations.
00861/1/001 resident	✓			Unsuitable site. Creating sensible access will be difficult.	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
00865/1/001 resident	✓			Unsuitable site. Creating sensible access to H3 will be difficult.	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees and flooding.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					not planning considerations.
00987/2/002 resident	✓			Access from Station Road – existing conflict between buses and other vehicles causing delays to buses. Need either (a) alternative vehicular routes (b) protection for buses in Station Road, including Allum Lane/Theobald Street/Shenley Road junction.	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01043/2/001 resident		✓		Site could hold high wildlife quality. Not been surveyed: lack of evidence so cannot make a reliable sustainability appraisal. Invertebrates are particularly vulnerable: would not support any proposal to develop this site until an invertebrate survey (NOT AN INVERTEBRATE SITE QUALITY ASSESSMENT) was undertaken to assess the site quality and the site was graded of low importance.	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01125/2/001 resident		✓		H3: Need to ensure that effect on existing wildlife is minimal - land alongside railways are generally a valuable haven for all sorts of wildlife.	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01128/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Traffic impact on Coleridge Way/Wordsworth Gardens - dangerous. Borehamwood generally already congested.</li> <li>ii) Schools overcrowded - need new Primary school. Doctors/Dentists full capacity.</li> <li>iii) Train services over capacity.</li> <li>iv) Stop building more houses.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01129/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Restricting views from my back windows.</li> <li>ii) Noise.</li> <li>iii) More traffic into &amp; out of Borehamwood.</li> <li>iv) Not enough schools, doctors surgeries.</li> <li>v) Not enough parking.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01130/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Privacy, blocking sunlight.</li> <li>ii) Chance of subsidence.</li> <li>iii) Pollution from the cars.</li> <li>iv) Noise from construction [I work nights, this would cause sleep deprivation during the day],</li> <li>v) Disturbance and stress to wildlife and pets.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01130/1/002	✓			Last 8 years - hole has opened up in bottom back fence - signs of	Planning permission was granted in 2014 for 43 residential

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resident				subsidence.	units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
01133/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Effect on traffic, access and parking.</li> <li>ii) Schools, GP's.</li> <li>iii) Scale, appearance &amp; impact of proposals on surrounding area &amp; adjoining neighbours. Loss of light, overlooking and loss of privacy. Noise and disturbance</li> <li>iv) Effect on nature conservation and loss of trees.</li> <li>v) Whether the use would be appropriate for the area;</li> <li>vi) Existing houses experience strong vibrations due to passing trains. Cracks in paintwork. Concerns about safety of underground car park (Coleridge Way flats) due to train vibrations. New houses will experience really loud noise and really strong vibrations. It will not be a decent place to live.</li> <li>vii) Byron Avenue lockup garages block access. New flats being built at H&amp;H timber yard on Station Road. Using small access next to 78 Coleridge Way will turn pedestrian walkway into a junction. No sidewalk on access from station road to Coleridge Way. Hundreds of</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>

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				people use this to access the train station every day. There has already been a fatality on Station Road in recent years.	
01134/1/001 resident	✓			<p>i) The site is too narrow - building on it would be oppressive to neighbouring properties. Due to the closeness, the buildings would be overwhelming and oppressive to existing residents. Noisy for the current residents of Coleridge Way as the houses would be built so near to existing houses. If windows were open in the summer, you'd be able to hear every word.</p> <p>ii) Removal of trees.</p> <p>iii) Access: Byron Avenue already has lots of cars. Will be dangerous and noisy. New road at end of gardens - noise from cars all day and night.</p> <p>iv) Parking will be difficult - it is near to the station and until any road is adopted traffic will be bad. This is dangerous and noisy for current residents.</p> <p>v) Land was churned up by vehicles - this left dents where huge puddles slow to drain away - would be worsened if trees and plants removed.</p> <p>vi) Concern about subsidence if mature trees are removed.</p> <p>vii) Local infrastructure can't support more residents - doctors surgery, primary schools are packed.</p> <p>viii) Houses next to train tracks - vibration would be bad. Disturb sleeping children.</p> <p>ix) Wrong to consider building on green land when far better places in Borehamwood exist.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01135/1/001 resident	✓			<p>i) Unsuitable site. Creating sensible access to H3 will be difficult.</p> <p>ii) Increased pressure on local amenities.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01136/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Traffic in the area is bad, this would make it worse.</li> <li>ii) It will also worsen the pressure on all the nearby amenities.</li> <li>iii) It will overlook all the other properties on Coleridge Way.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01137/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Will affect my property due to train vibrations.</li> <li>ii) Loss of privacy and security.</li> <li>iii) Loss of vegetation.</li> <li>iv) Construction disturbance for the next two years, causing disturbance and nuisance.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<ul style="list-style-type: none"> <li>v) Increased traffic on such residential roads.</li> <li>vi) Overcrowding in such a small area.</li> <li>vii) Impact of parking and will cause tension amongst neighbours. Quality of life will be affected.</li> </ul>	<p>vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01139/2/004 Environment Agency		✓		River restoration: this should be included in the site specific requirements and could be worded as follows: 'requirement for development to deculvert and enhance the watercourse running through the site.'	<b>Wording relating to deculverting the watercourse has been added to site specific requirements.</b>
01143/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Privacy may be compromised – overlooking.</li> <li>ii) Pressure on local amenities e.g. doctors and schools.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01144/1/001 resident	✓			Overlooking to bedroom. Small garden would leave no privacy.	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).

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					<p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01145/1/001 resident	✓			<p>i) Being overlooked, overcrowding and our right to natural light. Any housing built on this land will be in extremely close proximity to the rear of our house. Overlooking to bedrooms at rear of house. Effect on light to garden and house.</p> <p>ii) Underground drain on site.</p> <p>iii) Negative impact on property value and ability to sell property in the future.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01146/1/001 resident	✓			<p>i) Traffic congestion.</p> <p>ii) Too close proximity to existing housing, spoiling living environment for existing residents.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into</p>

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				iii) Infrastructure, roads, schools, doctors etc struggling to cope as it stands.	account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
01147/1/001 resident	✓			i) Too close to railway line. ii) New properties would impinge on houses in Coleridge Way and Wordsworth Gardens.	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
01148/1/001 resident	✓			i) The noise and pollution. ii) Too close to our garages blocking important light. Too close to our development-privacy issue. iii) The resources in our area schools, medical centres and roads are at	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<p>a maximum already this will cause chaos for the area.</p> <p>iv) The mess and general disturbance.</p>	<p>application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01152/1/001 resident	✓			<p>NB this is second, more detailed, objection to same site from same person (00860/1/001).</p> <p>i) Pressure on NHS GP Surgeries, school places in the local area. Plans to build new housing and increase the residential population should include plans to increase availability of school places and GP surgeries.</p> <p>ii) Traffic in the morning is a nightmare and First Capital Connect is packed in the morning, and no seating.</p> <p>iii) Parking management.</p> <p>iv) The building itself would be very unpleasant for residents due to the close proximity of feasible building land to resident's houses.</p> <p>v) Construction noise and disruption.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01161/1/001 resident	✓			<p>i) Impact on privacy.</p> <p>ii) Value of property value going down.</p> <p>iii) Land is protected green strip &amp; cutting trees /destroying them was banned</p> <p>iv) Too narrow – not a good site to build new houses.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and</p>



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				<ul style="list-style-type: none"> <li>v) no body knows how the new project is going to affect the vibrations caused by the heavy trains</li> <li>vi) May affect our signal receptions eg- mobile &amp; internet signals.</li> <li>vii) Two years ago when I asked for extension to be built in my backyard I was not allowed saying it will affect neighbours privacy.</li> </ul>	<p>vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01162/1/001 resident	✓			The streets will be very full.	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01169/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Increased volume in traffic; risk to people walking to and from the station. Big increase in traffic volume through Borehamwood, especially along the Main Shenley Road in the mornings and evenings over last 7 years. Fatal accident on Station Road.</li> <li>ii) Use of Wordsworth Gardens for parking and as a cut through to avoid Furzhill Road. 50-100 extra cars will make this worse.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure</p>

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				<ul style="list-style-type: none"> <li>iii) Increased impact on services like schools, doctors surgeries, parking for the main shopping areas, churches, synagogues, parks, etc.</li> <li>iv) Further stress to wildlife in Woodcock Hill area. Strip along the railway should remain natural to allow that wildlife a bit of space from the built-up areas.</li> </ul>	<p>capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01171/1/001 resident	✓			Over development and excess traffic.	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01173/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Available space for parking is already under pressure</li> <li>ii) Will create traffic through a development which has a lot of children, as well as past a school and playground.</li> <li>iii) Disruption during construction.</li> <li>iv) Too close to a railway line.</li> <li>v) Tree Preservation Orders on site.</li> <li>vi) Overshadowing of gardens. Impact on privacy for existing houses.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p>

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				vii) Road access - Station Road already chaotic at the best of times. What about new pedestrian access to the station?	All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
01179/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) This does not seem a sensible piece of land on which to build the proposed number of new homes. The site is narrow and sloping.</li> <li>ii) Difficult to see how sensible access from Station Road can be created.</li> <li>iii) Would block sunlight to existing houses.</li> <li>iv) Loss of habitat for various wildlife on the site; deer spotted.</li> <li>v) Vibrations from passing freight trains; developing the site could destabilise the land and make these vibrations worse, possibly causing structural damage. I would like any potential vibrations to be assessed prior to any development going ahead.</li> <li>vi) Pressure on local roads.</li> <li>vii) Pressure on amenities such as schools and doctors surgeries.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01181/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Squeeze on local amenities.</li> <li>ii) Noise.</li> <li>iii) Concern for foundations, especially if trees were removed.</li> <li>iv) Increased traffic brought to neighbourhood, especially if a new "through road" was created.</li> <li>v) Decent quality housing couldn't be created in so small a space.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual</p>

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					merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
01183/1/001 resident	✓			<p>i) Noise mitigation would reduce energy efficiency during construction.</p> <p>ii) Noise and vibration study required - surely can't recommend building here especially given freight trains that go through between 3am and 5am. Concerned that vibrations from railway will come through to existing houses via foundations to new houses.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01188/1/008 Thames Water		✓		<p>Concerns regarding Waste Water Services: sewerage network capacity unlikely to support the demand anticipated from this development. Investigations needed (takes 12 weeks). If an upgrade to TW assets required, need &lt;3 years lead-in.</p> <p>Request to add the following paragraph:          "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers</p>	<p>Concerns are noted.</p> <p>A sentence noting that the adequacy of waste water capacity is to be assessed and adequate capacity should be made available before development is occupied has been <b>added to the site specific requirements for H3 and other sites.</b></p> <p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p>

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				to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure." Concerns about potential cumulative impact of this site with flows from H2 and other development sites.	
01192/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Sloping site - excavation work needed – this may impact the stability of existing homes.</li> <li>ii) Access will compromise residents of Coleridge Way/Station Road and pedestrians who use the existing footpath. Increase of up to 100 cars – potentially hazardous.</li> <li>iii) Congestion at Shenley Road junction.</li> <li>iv) There are a number of existing commercial and/or industrial sites in the area which should be considered above a green space which is less suitable.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01196/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Increased traffic flow on my road.</li> <li>ii) Increase pressure on doctors and local schools.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views,</p>

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					construction noise and phone/TV signal interference are not planning considerations.
01199/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Thin site - houses will be too close to existing houses or railway.</li> <li>ii) No proper access.</li> <li>iii) Up to 80 new dwellings will cause noise and smells to existing houses. Loss of light and privacy (many have ground floor bedrooms).</li> <li>iv) Cars will be danger to children.</li> <li>v) Green site - should be preserved.</li> <li>vi) Drainage – concern about flooding if trees are removed.</li> <li>vii) Poor residential amenity for new residents.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01200/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Area would become a slum; loss of amenity to the current residents.</li> <li>ii) The land is too thin for decent housing to be built.</li> <li>iii) Noise and vibration for potential residents.</li> <li>iv) Drainage bad and generally be a nuisance.</li> <li>v) Furthermore, there is no adequate access to the site.</li> <li>vi) Green land with mature trees and shrubs and wildlife. Other brownfield sites should be built on first.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					not planning considerations.
01203/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Anything more than bungalows would be oppressive to existing houses. Light, privacy and general amenity affected. Once built, the general noise will be too much, with cars, people, parties etc.</li> <li>ii) The noise of the build will be unacceptable.</li> <li>iii) Mature trees.</li> <li>iv) There is no proper access to the site.</li> <li>v) People do not want to live right on the tracks.</li> <li>vi) The area is already overcrowded and the local amenities will suffer.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01206/1/001 Rapleys (for Taylor Wimpey and Network Rail)			✓	<ul style="list-style-type: none"> <li>i) Support inclusion of site for mixed residential flats and housing</li> <li>ii) Support 3 storey</li> <li>iii) Support capacity of approximately 50 new dwellings</li> <li>iv) Object to "The height and design of buildings must not harm the amenity of the occupiers of the neighbouring two storey properties." Reword to "The height and design of buildings must not cause significant harm to the amenity of the occupiers of the neighbouring two storey properties."</li> <li>v) Clarify access arrangements – HCC Highways no objection in principle to Coleridge way and Byron Ave as access routes into site.</li> </ul>	<ul style="list-style-type: none"> <li>i) Noted</li> <li>ii) Noted</li> <li>iii) Noted</li> <li>iv) Although planning permission has now been granted, the wording will be left as existing in order to protect the amenity of neighbouring occupiers. The site specific requirements will be weighed against other planning considerations when a decision is made on a planning application for the site. The Council's Design Guide SPD contains detailed guidance on separation distances between buildings and will be followed when any planning application on this site is determined.</li> <li>v) The access arrangements via Byron Avenue and</li> </ul>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					Coleridge Way have been established through the planning permission granted in 2014.
01207/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) Being Overlooked - very thin site - our property and privacy will be compromised and overlooked. Blocked sunlight</li> <li>ii) Proximity to railway line; vibrations</li> <li>iii) Noise - construction noise, additional traffic noise and noise that new residents would create.</li> <li>iv) School places - . How will the council ensure every child in Borehamwood attends a school with a 'GOOD' Ofsted rating and not just a select few. Local GP Services - already stretched</li> <li>v) Extra Traffic on Station Road and Shenley Rd/Alum Lane/Theobald St roundabout</li> <li>vi) Trains - additional residents would mean busier trains</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01208/1/001 resident	✓			<ul style="list-style-type: none"> <li>i) H3 Land is unstable London clay, not good with drenching rain which could result in land slip.</li> <li>ii) Erosion of important green corridor for flora and fauna.</li> </ul>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).</p> <p>Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology.</p> <p>All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council.</p> <p>Certain other matters such as property values, views, construction noise and phone/TV signal interference are</p>



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					not planning considerations.
01222/1/003 Hertsmere Borough Council, Parks Project Officer		✓		Ideally the chance should be taken to integrate linking paths between these schemes and the adjacent Shakespeare Drive estate. Our previous comments on 13/4007/PA would still be relevant and need to be incorporated in to any future schemes.	<b>Additional sentence on linking paths added to Site Specific Requirements.</b> Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats).
01232/1/004 resident	✓			i) Vibration and noise from trains. If the Rail Freight Terminal were to be built at Park Street the movements of large container freight trains, north and south, day and night, would make residents lives a misery. ii) It is projected in the plan that no access would be allowed through Station Rd therefore the only points of access would be through the Byron Estate and/or through the Fire Research Estate.	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
01241/1/003 resident	✓			i) Vibration and noise from trains. If the Rail Freight Terminal were to be built at Park Street the movements of large container freight trains, north and south, day and night, would make residents lives a misery. ii) It is projected in the plan that no access would be allowed through Station Rd therefore the only points of access would be through the Byron Estate and/or through the Fire Research Estate.	Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology. All planning applications are assessed on their individual

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
01263/1/005 town councillor/resident	✓			<p>i) Vibration and noise from trains. If the Rail Freight Terminal were to be built at Park Street the movements of large container freight trains, north and south, day and night, would make residents lives a misery.</p> <p>ii) It is projected in the plan that no access would be allowed through Station Rd therefore the only points of access would be through the Byron Estate and/or through the Fire Research Estate.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology. All planning applications are assessed on their individual merits, so these matters would remain considerations if a new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.</p>
01348/1/001 resident	✓			<p>i) Too much traffic and limited parking around this development.</p> <p>ii) Building more houses will make congestion worse.</p>	<p>Planning permission was granted in 2014 for 43 residential units (a mix of houses and flats). Many of the concerns raised would have been taken into account as part of the consideration of the planning application, including the amenity of neighbours, noise and vibrations, highways and traffic, local infrastructure capacity, trees, flooding and ecology. All planning applications are assessed on their individual merits, so these matters would remain considerations if a</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					new planning application was submitted to the Council. Certain other matters such as property values, views, construction noise and phone/TV signal interference are not planning considerations.
01370/1/003 HCC Highways		✓		A current planning application has been responded to by the Highway authority. No objection has been raised to the proposals (access from Coleridge Way and Byron Ave). It is not considered that the impact on Wordsworth Gardens would be of an unacceptable scale. It is not considered that the proposals would have a significant impact on the surrounding road network.	Noted.
<b>Site H4 Land at Bushey Hall Golf Club, Bushey</b>					
01188/1/009 Thames Water		✓		Sewerage network capacity insufficient. Request specific constraint information to be added as follows: further investigation required, possibly at developer's expense. If upgrade to assets needed, lead-in time can be up to 3 years. Add "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	<b>Additional requirement added to Site Specific Requirements.</b>
01190/1/001 DMH Stallard for Veladail Leisure			✓	Support allocation of site for housing. Request consideration of increased number of dwellings.	Support for allocation noted. The site adjoins the Green Belt (the site itself is proposed to be removed from the Green Belt as a minor rounding off of the urban area). The priority is to ensure an open treed setting that protects the Green Belt context. Consequently a figure of 13 dwelling

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					<p>units (i.e. at 44 dwellings per hectare) is considered to be the appropriate estimate of future dwellings for the site, providing a guide for future development. The precise number of dwellings achievable will of course depend upon the design and layout of a proposed scheme, which must in any case comply with other relevant Local Plan policies and development standards.</p> <p><b>No change in relation to this comment.</b></p> <p>However, development would be expected to be accompanied by the re-provision of a clubhouse and parking (as pointed out by Knight Frank LLP for CJ Stillitz Will Trust (01351/1/001) in promoting land at Hartsbourne Golf and Country Club, Bushey for housing). <b>A planning requirement has been added to secure the re-provision of a clubhouse and parking in a landscaped setting compatible with the Green Belt.</b></p>
01370/1/004 HCC Highways		✓		In principle, the Highway authority is unlikely to make a highways objection to development on this scale on this site. The normal highway design and assessment requirements will apply.	Noted. Highway requirements will be addressed through the normal planning application process. <b>No change.</b>
<b>Site H5 Land at Rossway Drive, Bushey</b>					
01158/1/001 Barratt North London			✓	Support allocation of site for housing. Capacity estimate of 61 is not supported by any evidence / viability assessment; estimate for the site should be not less than 82 dwellings.	A planning permission has been granted for residential development on the site (14/0727/FUL) for 82 dwellings. <b>Capacity changed to 82.</b> The capacity figure of 61 dwellings (30 dwellings per hectare) in the Consultation Draft document reflected the Hertsmere SHLAA methodology and is considered to be reasonable for this site. The precise number of dwellings achievable on the site will depend upon the design and layout of a proposed scheme, which must in any case comply with other relevant Local Plan

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					policies and development standards. Any proposals for development at greater density than 61 dwellings must be to enable affordable housing provision and be justified on viability grounds.
01164/1/001 resident	✓			Too many houses proposed. Will result in additional traffic using Little Bushey Lane and Coldharbour Lane. Need to widen entrance and provide better visibility. Request traffic monitoring at peak times to resolve parking and flow issues related to Coldharbour Lane /The Birches junction. Existing parking problems already due to Community Centre related mini-buses.	A planning permission has been granted for residential development on the site (14/0727/FUL). In principle, the Highway authority has indicated that it is unlikely to make a highways objection to development on this scale on this site with the access available. It considers visibility to be satisfactory, and the detailed design of the access (width, visibility splays etc) will need to comply with normal highway design requirements. Spillover parking in the surrounding area is not anticipated as full parking standards will have to be met within the site. There is not a significant problem in this area that would justify refusal of planning permission on highways grounds. . <b>Sentence added to Site specific Requirements: 'Developer contributions may be required to address wider traffic issues in the area'</b> should a planning permission be implemented.
01172/1/001 resident	✓			Additional traffic (especially peak) on an already busy through road and at roundabout with Coldharbour Lane, plus parked cars (Bushey Meads School) will make crossing the road safely impossible (blind corner). Accident likely. Additional school and doctors places would be needed.	In principle, the Highway authority has indicated that it is unlikely to make a highways objection to development on this scale. It does not consider that there is a significant problem in this area that would justify refusal of planning permission on highways grounds. <b>Sentence added to Site specific Requirements: 'Developer contributions may be required to address wider traffic issues in the area'</b> should a planning permission be implemented. HCC's comment in relation to a planning application for the development of the site for residential purposes (14/0727/FUL, permission

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					granted) concludes that overall the intensification of use of the access is unlikely to result in significant impact on adjacent traffic flows. The issue of additional infrastructure needs is one which applies across the Borough and is of relevance to development other than on those sites specifically identified in the Site Allocations document. The Council will continue to address the issue of infrastructure delivery through the Developer Contributions framework. <b>No change.</b>
01188/1/010 Thames Water		✓		On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted.
01235/1/001 CPRE		✓		Criteria for development should ensure that there is no greater impact on the openness of the Green Belt. Consider reducing extent of site in order to prevent unacceptable impact on the GreenBelt.	Site specific requirements already require site layout to provide significant areas of open space in order to enhance the openness of the Green Belt. <b>No change.</b>
01283/1/001 English Heritage		✓		Welcome requirements for masterplan and for significant areas of open space in order to enhance the openness of the Green Belt. Setting of the Grade II Tyler’s Farm House to the north west should be protected and enhanced.	Noted. <b>Additional sentence added to Site Specific requirements referring to Tylers Farm House.</b>
01351/1/002 Knight Frank for CJ Stillitz Trust	✓			Impact of scrap /motor use on openness of Green Belt is limited. Scale of housing proposed is disproportionate and incongruous. Location not sustainable. Site separated from Bushey Heath by Green Belt land. No defensible boundary to the wider Green Belt, therefore a further greater impact on openness will result. Part of the site is greenfield.	A planning permission has been granted for residential development on the site (14/0727/FUL). The current breakers yard and other industrial uses are considered highly inappropriate in the Green Belt. They do not complement the Green Belt status of the site and are considered detrimental both to the visual amenity of the Green Belt and the amenity of neighbouring residential occupiers. Although also not appropriate in the Green Belt, the harm from housing relative to this existing use would be

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					reduced provided development takes an acceptable form and complies with relevant Local Plan policies and development standards. The site will remain as green belt and the layout is required to provide significant areas of open space in order to enhance the openness of the Green Belt. It is acknowledged that a portion of the site is not PDL; any development proposals would need to demonstrate very special circumstances whereby the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations; this could include the removal of the significant and unsightly 'bad neighbour'. <b>No change.</b>
01370/1/005 HCC Highways		✓		<p>In principle, the Highway authority is unlikely to make a highways objection to development on this scale on this site with the access available. Visibility is considered to be satisfactory, and the detailed design of the access (width etc) will need to comply with normal highway design requirements. Full parking standards will need to be met within the site so spillover parking in the surrounding area is not anticipated.</p> <p>Highways have responded to a recent planning application on this site, identifying problems with the internal layout and pedestrian links.</p> <p>There is not a significant problem in this area that would justify refusal of planning permission on highways grounds. There may be an opportunity to address wider highway issues with s106 money should a planning permission be implemented.</p>	Noted. Highway requirements will be addressed through the normal planning application process. <b>Use of Developer contributions to address wider traffic issues added to Site Specific Requirements.</b>
<b>Site H6 Hertswood Upper School, Thrift Farm Lane, Borehamwood</b>					
00975/1/001	✓			Loss of habitat for wildlife including bats, newts, lizards; request full	There is a TPO on the site; the Site Specific Requirements

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resident				assessment. Loss of trees – request full survey and TPO where appropriate. Woodland screens former MGM Studio site (development will intrude on properties backing onto it). Shenley Road (residential) suffers speeding, parking on grass verges and has 3 schools on it – should not increase traffic and exacerbate problems.	indicates that protected trees should be retained and/or replaced. Other considerations will be addressed as part of determination of any future planning application for the site. HCC Highway Authority accepts that there are concerns about the possible impact on the wider highway network and the highway. These issues will be considered as part of the planning application process. In principle, this is a suitable site for residential development with the number of residential units proposed. <b>No change.</b>
00987/2/003 resident	✓			Permission for housing should only be granted if land reserved for school. 2FE primary required in Borehamwood; local opinion hostile to proposed location in Maxwell Park (Elstree Way Corridor AAP).	The site is allocated for housing in order to help meet Hertsme's requirement for new housing provision and to enable the re-provision of education and other key community facilities on the Lower school site. Alternative sites for a primary school are being investigated. <b>No change.</b>
01043/2/002 resident		✓		Part of site should be allocated for new primary school.	The site is allocated for housing in order to help meet Hertsme's requirement for new housing provision and to enable the re-provision of education and other key community facilities on the Lower school site. Alternative sites for a primary school are being investigated. <b>No change.</b>
01074/2/002 Sport England	✓			Lack of clarity and detail re relocation of Hertswood Academy's playing fields. Site specific requirements should require replacement playing fields on the Lower School site to be equivalent or better in terms of quantity and quality. Request discussion.	Discussions concerning Sport England's concerns in relation to the planning applications for this and the Lower School site, and the opportunities for mitigation measures to compensate for possible overall reduction in amount of playing field space have been ongoing. <b>Add to Site Specific Requirements for H6 and Lower School site in SADM33: Key Community Facilities: 'Proposals should seek to</b>



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					minimise any reduction in the overall quantity of playing field provision; appropriate improvements to the quality and accessibility of playing field and sports provision will be required as part of any mitigation strategy that may be agreed.' Sentence in H6 also amended as follows: 'Residential development is linked to and must enable the development of new school facilities <i>and other key community facilities in line with Core Strategy Policy CS19 on the Hertswood Lower School site.</i> '
01139/2/005 Environment Agency		✓		Flood Risk Assessment required. Proposals should de-culvert and enhance watercourse on site. Development should be set back from the top of the bank and this area managed to enhance ecological value. This is to comply with WFD requirements and Core Strategy CS16.	<b>Additional requirement re FRA and for development if possible to deculvert and enhance the watercourse running through the site added to Site Specific Requirements.</b>
01188/1/015 Thames Water		✓		Sewerage network capacity insufficient. Concern re cumulative effect of this and other proposals sites. Request specific constraint information to be added as follows: further investigation required, possibly at developer's expense. If upgrade to assets needed, lead-in time can be up to 3 years. Add "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	<b>Additional requirement added to Site Specific Requirements.</b>
01222/1/004 HBC Parks		✓		Scheme must provide sufficient open space (no OS proposals in Elstree Way Corridor AAP); provision of pedestrian access links between Shenley Road and Elstree Way should be investigated.	Site Specific Requirements indicate leisure and public amenity space, and pedestrian links to Elstree Way area to be provided. <b>Requirement to investigate provision of good connectivity with adjoining open space and greenway links</b>

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					<b>added to Site Specific Requirements.</b>
01263/1/006 resident		✓		Concern about gap when Ark theatre and sports centre facilities will not be available. Thrift Farm Lane unsuitable access road. Concern re future maintenance of highways, street lights and drainage.	Concern noted. Site Specific Requirements seek to ensure school facilities including playing fields are available throughout the development period. It is accepted that it may not be possible for the Ark building to be immediately replaced but facilities to enable activities to continue should be provided. <b>Wording changed.</b> The Highway Authority has commented that it is currently engaged in pre application discussions and that in principle, this is a suitable site for residential development. If estate roads are not adopted by the Highway Authority the developer will be required to make arrangements (secured by legal agreement) for future maintenance.
00234/2/008 Elstree and Borehamwood Town Council		✓		Concern that attention has been paid to ensuring current Ark and Sports Centre clients not lost during temporary closure – ensure sufficient facilities during development.	Concern noted. Site Specific Requirements seek to ensure school facilities including playing fields are available throughout the development period. It is accepted that it may not be possible for the Ark building to be immediately replaced but facilities to enable activities to continue should be provided. <b>Wording changed.;</b>
01290/1/003 Hertswood Academy		✓		Site specific requirements should indicate a higher number of dwellings (310) and reflect gap between theatre demolition and replacement.	A figure of 276 dwellings (57 dwellings per hectare) is identified in the Site Specific Requirements (in accordance with the Hertsmere SHLAA methodology) and is considered to be reasonable for this site. The precise number of dwellings acceptable on the site will depend on the eventual design and layout of development. <b>No change to proposed site capacity.</b> It is accepted that it may not be possible for the Ark building to be immediately replaced but facilities to enable activities to continue should be provided. <b>Wording changed.;</b>

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01370/1/006 HCC Highways		✓		The Highway Authority is currently engaged in pre application discussions. In principle, this is a suitable site for residential development. There are concerns about the possible impact on the wider highway network. These issues will be considered as part of the planning application process.	Noted. Highway requirements will be addressed through the normal planning application process. <b>No change.</b>
<b>Site H7 Land at Lincolnsfield, Bushey</b>					
01139/2/006 Environment Agency		✓		Proposals should de-culvert and enhance King George Drain Main River. Development should be set back 8m from the top of the bank and this area managed on operational and ecological principles. Necessary to comply with requirements under WFD and Core Strategy CS16. Sequential approach to development required (part of site in Flood Zones 2 and 3 – no development in these areas). Site specific requirements should refer to ‘sequential approach on site to avoid placing vulnerable development in areas of highest flood risk’. Site lies within a Source Protection Zone 2 (vulnerable area where groundwater ultimately feeds into public drinking water supply) therefore Preliminary Risk Assessment required if potential for contamination on site exists. Site specific requirements must refer to these issues. Support reference that Flood Risk Assessment (FRA) required.	<b>Requirement for development to if possible deculvert and enhance the Borehamwood Brook Main river running through the site and need to avoid flood zones 2 and 3 added to Site Specific Requirements as requested. Need for Preliminary Risk Assessment added to Site Specific Requirements as requested.</b> Requirement for FRA already included in Site Specific Requirements.
01188/1/016 Thames Water		✓		Sewerage network capacity insufficient. Request specific constraint information to be added as follows: further investigation required, possibly at developer’s expense. If upgrade to assets needed, lead-in time can be up to 3 years. Add “Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste	<b>Additional requirement added to Site Specific Requirements.</b>

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				water infrastructure.”	
01223/1/004 HCC Historic Environment Unit		✓		Potential for development severely constrained by nationally important archaeological remains. Site may contain significant heritage assets - English Heritage should be consulted before the site is put forward for development.	<b>Additional requirement to consult English Heritage and record any remaining features of historic interest in line with English Heritage recommendations added to Site Specific Requirements.</b>
01283/2/001 English Heritage		✓		Likely wartime heritage. Recommend a recording condition.	<b>Additional requirement to consult English Heritage and record any remaining features of historic interest in line with English Heritage recommendations added to Site Specific Requirements.</b>
01224/1/001 Planning Works, for Rachel Charitable Trust			✓	Owner supports allocation – site is PDL, sustainable, available and deliverable. For clarity site specific requirements should quote NPPF para 89.6 not interpret it. Remove reference to technical requirements that are covered by any other policy within SADM. Request boundary amendment to exclude paddock not in Trust’s ownership (used by Lincolnsfield Children’s Centre) and include standalone parcel to east needed for affordable housing. Increase capacity to 25-30 dwellings (including standalone parcel). (plan submitted)	Support noted. NPPF para 89 applies; <b>First sentence amended to “Building coverage should be limited so as to ensure no greater impact on the openness of the Green Belt.”</b> Site specific requirements indicate issues of particular relevance to the site. Technical requirements are specified when they have a particular bearing on potential development proposals; they provide initial guidance on main constraints and should therefore be helpful to developer and provide reassurance for those affected by the proposals or with a particular interest in them and are therefore retained.  A planning permission has been granted for residential development of 23 units (including the standalone parcel of land). It is acknowledged that a planning permission for a special school has been granted and partially implemented but the nature of that development – both in terms of use and design – would have much less impact on the openness of the Green Belt and the character of the area than would be likely with a residential development of similar floorspace. The precise number of dwellings acceptable on

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					the site will depend on the eventual design and layout of development. <b>Capacity revised to 23 and boundary is adjusted as requested to reflect planning permission granted.</b>
01235/1/002 CPRE		✓		Site specific requirements should include criteria to ensure that development will create no greater impact on the openness of the Green Belt.	<b>First sentence amended to “Building coverage should be limited so as to ensure no greater impact on the openness of the Green Belt.”</b>
01351/1/003 Knight Frank LLP for CJ Stillitz Will Trust	✓			Site is in green belt; current buildings may not be permanent and impact on openness of Green Belt is limited. Scale of housing proposed is disproportionate and incongruous. Site separated from Bushey Heath by Green Belt land. No defensible boundary to the wider Green Belt, therefore a further greater impact on openness will result. Site is greenfield so not PDL. Location not sustainable.	A planning permission has been granted for residential development of 23 units (including the standalone parcel of land). The site will remain as green belt and the layout is required to provide significant areas of open space in order to protect the openness of the Green Belt. <b>No change.</b>
01370/1/007 HCC Highways		✓		In principle, the Highway authority is unlikely to make a highways objection to development on this scale on this site. The normal highway design and assessment requirements will apply.	Noted. Highway requirements will be addressed through the normal planning application process. <b>No change.</b>
<b>Site H8 Europcar House, Aldenham Road, Bushey</b>					
01188/1/017 Thames Water		✓		Sewerage network capacity insufficient. Request specific constraint information to be added as follows: further investigation required, possibly at developer’s expense. If upgrade to assets needed, lead-in time can be up to 3 years. Add “Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.”	<b>Additional requirement added to Site Specific Requirements.</b>
00980/1/001		✓		Support housing allocation. Sustainable location, accessible	Support noted. 50-60 dwellings would represent a density

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Nathaniel Lichfield for Locksbridge Estates				brownfield site, consistent with NPPF. Concerned re detailed guidance unduly constraining redevelopment. Capacity should be 50-60 dwellings. Given site characteristics and surrounding development object to height being limited to 2 storeys (especially rear of site) and to requirement for semi-detached / terraced on Aldenham Road. Request Site specific requirements be amended to read 'The design and layout of the new development should create a stronger building line, improve the street scene and provide a better relationship with other surrounding properties. Development should make the fullest use of the site reflecting the scale of the existing development and the wider context along this part of Aldenham Road, incorporating both flats and houses.'	of up to 130 dwellings per hectare which is considered excessive for this site. The figure of 19 dwellings is identified in the Site Specific Requirements (in accordance with the Hertsmere SHLAA methodology – site S13/2) – and is considered reasonable for the site. It is accepted that given recent development in the area there is potential for some development of up to three storeys to be acceptable, subject to the development being domestic in scale and the remaining Site Specific Requirements being met. <b>Site specific requirements amended to allow some 3 storey development; third last sentence amended to read properties instead of houses. A mix of houses and flats could be acceptable subject to compliance with all other policies and development guidance.</b>
01370/1/008 HCC Highways		✓		In principle, the Highway authority is unlikely to make a highways objection to development on this scale on this site. The normal highway design and assessment requirements will apply.	Noted. Highway requirements will be addressed through the normal planning application process. <b>No change.</b>
<b>Site H9 former Sunny Bank School, Potters Bar</b>					
00238/2/001 HCC Estates		✓		Allocation welcomed. Soundness would be improved if justification provided as to why 1.4 ha is required as public open space.	The site lies within a densely built up area with significant open space deficiency; retention of the existing playing fields or similar area within the site will contribute to much needed local provision. Parks study indicates only around 56% of required open space exists within the ward. Opportunities for alternative provision elsewhere within the area do not exist. Further discussion on the means to achieving the open space will be necessary. <b>No change to principle of requirement for Open Space.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01188/1/018 Thames Water		✓		On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
00350/1/001 resident		✓		Noise and pollution from nearby M25. Poor access to area, including on-street parking. Investigate new road access from Baker Street or Barnet Road. Why remove school when additional places are needed?	<p>The proposed housing does not appear to be any nearer to the M25 than existing housing in the area. <b>However, requirement to mitigate any intrusive noise and pollution emanating from the M25 added to Site Specific Requirements.</b></p> <p>The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways.</p> <p>It is unlikely that the number of dwellings proposed on the site would justify consideration of major new road building to create an alternative access to the area.</p> <p>Hertfordshire County Council, who are the Education Authority have indicated that there is no forecast deficit for primary places in Potters Bar and that apart from the retention of premises for the ESC, the site is not required for education purposes.</p>
00829/1/001 resident	✓			Field View Road, Sunnybank Road and Meadow Way totally inadequate to support additional traffic flow from both construction and the development (parking reduces width to single car). Will cause additional congestion, pollution and danger. Noise and pollution during construction will be intolerable.	The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways. <b>No change.</b>
00830/1/001 resident	✓			Field View Road, Sunnybank Road and Meadow Way totally inadequate to support additional traffic flow from both construction and the development (parking reduces width to single car). Will cause additional congestion, pollution and danger. Noise and pollution during construction will be intolerable.	The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways. <b>No change.</b>
00839/1/001 resident		✓		Not opposed to housing but concerned re access (narrow carriageways). Only access through Sunnybank should be Field View Road. Suggest access also from Baker Street (may require CPO). Concern re surface water run-off affecting properties lower down (ref SADM p22-24). To what building line does the comment in Site Specific Requirements relate? Previous assurances that development would only be on existing footprint; are the playing fields protected from development?	The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways. It is understood from HCC that the ESC is remaining on the site, separately accessed from Sunnybank Road. <b>The expectation that the primary access to any residential development on the remainder of the site will therefore be via Field View Road is added to the Site Specific Requirements.</b> It is unlikely that the number of dwellings proposed on the site would justify consideration of major new road building to create an alternative access to the area. The issue of control of surface water run-off will be dealt



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					with through the development management process. Building line relates to the need for development on the site to fit with the grain of surrounding residential development. <b>Site specific requirement for this clarified.</b> HCC are still considering how they wish to develop the site in the context of the decision to retain one of the former school buildings for the ESC. The Site Specific Requirements indicate that 1.4ha should be reserved for open space provision.
00839/2/001 resident	✓			Understand plan is to build affordable housing on playing field and leave existing buildings in place. This is outside the 'Site Specific Requirements'. History of drainage / sewerage issues in area - needs to be resolved.	It is understood that HCC intends re-using one of the two main buildings on the site for the ESC. The detailed layout of the remainder of the site has not been resolved. The normal policy requirement for 35% of housing provided on the site to be affordable, in line with Core Strategy CS4, applies. Thames Water have indicated that they do not have concerns about Waste Water capacity in the area. Run-off and other drainage issues will be addressed as part of the development management process. <b>No change.</b>
00848/1/001 resident		✓		Where are ESC children to go? Area needs more school places – even more if site developed. Access – roads narrow and on-street parking. NO GP, shops, school or convenient bus within easy walk.	It is understood from HCC that the Key Stage 3 ESC is remaining on the site in the former Infant (southern) building, separately accessed from Sunnybank Road. HCC have indicated that there is no forecast deficit for primary places in Potters Bar and that apart from the retention of premises for the ESC, the site is not required for education purposes. The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area,

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways.</p> <p>The density proposed reflects the site's location, including the distance from services, amenities and public transport.</p> <p><b>No change.</b></p>
00962/1/001 resident	✓			<p>Meadow Way and Sunny Bank Roads narrow, cars parked - proposed development would increase traffic, cause delay and frustration to existing residents (many elderly). Construction noise and traffic would lower quality of life and cause accidents and disruption to existing residents. Increased pressure on doctors and schools. Must protect green belt. Open space /play area will attract teenagers at night - disruptive.</p>	<p>The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways. It is understood from HCC that the ESC is remaining on the site, separately accessed from Sunnybank Road. <b>The expectation that the primary access to any residential development on the remainder of the site will therefore be via Field View Road is added to the Site Specific Requirements.</b></p> <p>The density proposed reflects the site's location, including the distance from services, amenities and public transport. The issue of additional infrastructure needs is one which applies across the Borough and is of relevance to development other than on those sites specifically identified in the Site Allocations document. The Council will continue to address the issue of infrastructure delivery through the Developer Contributions framework.</p> <p>The site is partially previously developed land and is</p>

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					contained on three sides within the built up area; it is not therefore considered that its development will encourage urban sprawl. There is a requirement to retain a large part of the site as open space which will contribute to protecting the openness of the area. The open space will be designated as Local Green Space and therefore be protected against future development. <b>Site specific requirements to include open space to be well designed.</b>
00966/1/001 resident	✓			Meadow Way and Sunny Bank Roads narrow, cars parked - proposed development would increase traffic, cause delay and frustration to existing residents (many elderly). Construction noise and traffic would lower quality of life and cause accidents and disruption to existing residents. Increased pressure on doctors and schools. Must protect green belt. Open space /play area will attract teenagers at night - disruptive.	<p>The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways. It is understood from HCC that the ESC is remaining on the site, separately accessed from Sunnybank Road. <b>The expectation that the primary access to any residential development on the remainder of the site will therefore be via Field View Road is added to the Site Specific Requirements.</b></p> <p>The density proposed reflects the site's location, including the distance from services, amenities and public transport. The issue of additional infrastructure needs is one which applies across the Borough and is of relevance to development other than on those sites specifically identified in the Site Allocations document. The Council will continue to address the issue of infrastructure delivery</p>

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					through the Developer Contributions framework. The site is partially previously developed land and is contained on three sides within the built up area; it is not therefore considered that its development will encourage urban sprawl. There is a requirement to retain a large part of the site as open space which will contribute to protecting the openness of the area. The open space will be designated as Local Green Space and therefore be protected against future development. <b>Site specific requirements to include open space to be well designed.</b>
00970/1/001 resident	✓			Access to site not suitable for construction traffic. Leave the school as a school. New houses will need a school plus all other amenities.	<p>The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways.</p> <p>Hertfordshire County Council, who are the Education Authority, have indicated that there is no forecast deficit for primary places in Potters Bar and that apart from the retention of premises for the ESC, the site is not required for education purposes.</p> <p>The issue of additional infrastructure needs is one which applies across the Borough and is of relevance to development other than on those sites specifically identified in the Site Allocations document. The Council will continue to address the issue of infrastructure delivery through the Developer Contributions framework.</p>

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00971/1/001 resident	✓			Meadow Way and Sunny Bank Roads narrow, cars parked - proposed development would increase traffic, cause delay and frustration to existing residents (many elderly). Construction noise and traffic would lower quality of life and cause accidents and disruption to existing residents. Increased pressure on doctors and schools. Must protect green belt. Open space /play area will attract teenagers at night - disruptive.	<p><b>No change.</b></p> <p>The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways. It is understood from HCC that the ESC is remaining on the site, separately accessed from Sunnybank Road. <b>The expectation that the primary access to any residential development on the remainder of the site will therefore be via Field View Road is added to the Site Specific Requirements.</b></p> <p>The density proposed reflects the site's location, including the distance from services, amenities and public transport. The issue of additional infrastructure needs is one which applies across the Borough and is of relevance to development other than on those sites specifically identified in the Site Allocations document. The Council will continue to address the issue of infrastructure delivery through the Developer Contributions framework.</p> <p>The site is partially previously developed land and is contained on three sides within the built up area; it is not therefore considered that its development will encourage urban sprawl. There is a requirement to retain a large part of the site as open space which will contribute to protecting the openness of the area. The open space will be</p>

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					designated as Local Green Space and therefore be protected against future development. <b>Site specific requirements to include open space to be well designed..</b>
00972/1/001 resident	✓			Purchased property on basis of no through road (have children). Residential development will cause disruption and congestion in narrow roads SunnyBank Road and Meadow Way. Should re-open SunnyBank school as school places are over-subscribed every year.	<p>The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways. It is understood from HCC that the ESC is remaining on the site, separately accessed from Sunnybank Road. <b>The expectation that the primary access to any residential development on the remainder of the site will therefore be via Field View Road is added to the Site Specific Requirements.</b></p> <p>Hertfordshire County Council, who are the Education Authority have indicated that there is no forecast deficit for primary places in Potters Bar and that apart from the retention of premises for the ESC, the site is not required for education purposes.</p>
01043/2/003 resident	✓			Return site to educational use as a school.	Hertfordshire County Council, who are the Education Authority have indicated that there is no forecast deficit for primary places in Potters Bar and that apart from the retention of premises for the ESC, the site is not required for education purposes. <b>No change.</b>
01074/2/003 Sport England	✓			Object to loss of playing fields - offer the potential to meet any unmet community needs in the area if converted to community use as part of	<b>Site specific requirements amended to read "The layout should include a minimum of 1.4ha of open space which</b>

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				the development. H9 doesn't accord with NPPF para 74 or Sport England's playing fields policy. Council's evidence in relation to playing pitch provision is no longer up-to-date. Not demonstrated that the playing fields that would be lost are surplus to community requirements. Request amend Site Specific Requirements to: "A minimum of 1.4ha should be provided and managed as a public open space. This must be usable, well-designed and safely and conveniently accessible from the surrounding housing area. The public open space should be designed to allow it to be used for formal sport such as playing pitches in order to mitigate the loss of the former school playing fields." Alternatively, amend to require off-site replacement playing field provision to be made (if the Council's new evidence base identifies a need for new or improved playing field provision to meet current or future community needs).	<b>will thereafter be treated as Local Green space for planning policy purposes. The Developer will be required to make a contribution towards the cost of implementation and maintenance of this open space. The space must be usable, well-designed and safely and conveniently accessible from the surrounding housing area. It should enable formal sports use unless satisfactory off-site replacement playing field provision is secured or demonstrated not to be required. The developer will be required to produce a masterplan indicating how the whole site is proposed to be laid out."</b>
01157/1/001 resident		✓		Poor vehicle access - surrounding narrow congested streets. Congestion onto and on Baker Street will increase. Concern re pressure on school places.	The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways. It is unlikely that the number of dwellings proposed on the site would justify consideration of major new road building to create an alternative access to the area. The wider traffic impacts on the surrounding road network will be considered as part of any planning application for this site. Hertfordshire County Council, who are the Education

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					Authority have indicated that there is no forecast deficit for primary places in Potters Bar and that apart from the retention of premises for the ESC, the site is not required for education purposes.
01160/1/001 resident	✓			Will increase volume of traffic on narrow estate roads. Large delivery lorries already cause house to vibrate. We are no longer served by the local bus so everyone uses their car.	The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways. <b>No change.</b>
01163/1/001 resident	✓			Worried houses lower down will flood due to run-off (only JUST ok now). Concerned re overlooking, reduced daylight. Any relaxation of requirement for low density 2 storey development would be totally unacceptable. If the housing were to be restricted to the footprint of the buildings currently on the site, the proposal may be just about acceptable.	Thames Water have indicated that they do not have concerns about Waste Water capacity in the area. Run-off and other drainage issues will be addressed as part of the development management process. The normal design and layout requirements which protect the amenity of adjoining residential properties will apply and any planning application for residential development on the site will be assessed in order to ensure compliance with the requirements of relevant policies including SADM31 Design Principles and Hertsmere's Planning and Design Guide. HCC are still considering how they wish to develop the site in the context of the decision to retain one of the former school buildings for the ESC. The Site Specific Requirements indicate that 1.4ha should be reserved for open space provision. <b>The need for a masterplan to be produced indicating how the site would be laid out is added to the Site Specific Requirements.</b>



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01174/1/001 resident plus 54 signature petition	✓			<p>Object to significant further housing development in Potters Bar - intolerable burden on community, educational and other services. Need info to back up whether change of use should be undertaken: a) projected population changes - can you confirm there is no need for Sunnybank School to provide more primary school places in future; b) traffic surveys to show area can cope with construction phase and new development; c) utilities - can they all cope? Access and egress - narrow roads - construction traffic will make life intolerable for residents. Development will increase use of cars - exacerbate Daleside bottleneck - long queues in Baker Street and surrounding local roads at peak hours. Full assessment of traffic impact required. Impact on environment - air quality, loss of natural drainage. Concern re sewerage and other utility services, drainage. Not clear how much of the site will be developed. Must ensure green space is not eroded. Concern that HCC considers the site as available. GP services not close to the site. No bus route through or close to Sunnybank. Cranbourne School is nearest primary school - over a mile away. Using some temporary buildings since closure of Sunnybank school. Should look at reinstating infant and junior schools at Sunnybank. Quiet area with country feel, wildlife - will be lost. Environmental Impact Assessment required. Residents benefit from genuine sense of community in a safe, supportive close knit area. Traffic and loss of green space will compromise this - especially for joggers and dog walkers. Uncertainty impacts on property values. If this goes ahead need amenities to support growth in population - local community centre, shop, park, bus service. Control of construction working times, noise generation will be required. Reduction in Council tax required. Restoration/improvement of roads, lighting, footways, trees etc required.</p>	<p>The density proposed reflects the site's location, including the distance from services, amenities and public transport. The issue of additional infrastructure needs is one which applies across the Borough and is of relevance to development other than on those sites specifically identified in the Site Allocations document. The Council will continue to address the issue of infrastructure delivery through the Developer Contributions framework.</p> <p>Hertfordshire County Council, who are the Education Authority have indicated that there is no forecast deficit for primary places in Potters Bar and that apart from the retention of premises for the ESC, the site is not required for education purposes.</p> <p>The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways.</p> <p>The wider traffic impacts on the surrounding road network will be considered as part of any planning application for this site.</p> <p>Thames Water do not have any concerns about the proposal for development on the site but would in any case</p>

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					<p>be consulted on a planning application. Policies SADM15, 16 and 18 address the issues of flooding, drainage and water supply.</p> <p>HCC are still considering how they wish to develop the site in the context of the decision to retain one of the former school buildings for the ESC. There is a requirement to retain a large part of the site as open space which will contribute to protecting the openness of the area. The open space will be designated as Local Green Space and therefore be protected against future development. The open space will be carefully designed so as to minimise the potential for disruption to local residents. This will also help to protect the existing character of the area. <b>The need for a masterplan to be produced indicating how the site would be laid out is added to the Site Specific Requirements.</b> The Council will continue to address the issue of infrastructure delivery through the Developer Contributions framework.</p> <p>Control of the manner in which construction will be organised would be a matter to be dealt with when a planning application is determined. The developer would be required to make good any damage to existing infrastructure.</p>
01175/1/001 resident		✓		Use as a school – shortage of places in Potters Bar (portacabins being used as classrooms). Infrastructure needed prior to any further development - more schools, etc., not more houses. Annandale and Highview Surgeries are moving to the High Street, next to the library.	Hertfordshire County Council, which is the Education Authority has indicated that there is no forecast deficit for primary places in Potters Bar and that apart from the retention of premises for the ESC, the site is not required for education purposes.

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					The issue of additional infrastructure needs is one which applies across the Borough and is of relevance to development other than on those sites specifically identified in the Site Allocations document. The Council will continue to address the issue of infrastructure delivery through the Developer Contributions framework. The density proposed reflects the site's location, including the distance from services, amenities and public transport. <b>No change.</b>
01176/1/001 resident		✓		No objections provided housing is in keeping with surrounding area i.e. no flats. 3 main concerns: access to new houses, impact of construction traffic and location of new homes next to the motorway (air pollution). Need trees planted around the edge to absorb the emissions from motorway traffic.	The Site Specific Requirements specify the need to respect the character of the surrounding area, and that development should be detached or semi-detached with spacious plots. The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways. The proposed housing does not appear to be any nearer to the M25 than existing housing in the area. <b>However, requirement to mitigate any intrusive noise and pollution emanating from the M25 added to Site Specific Requirements.</b>
01177/1/001 resident		✓		No objections provided housing is in keeping with surrounding area i.e. no flats. 3 main concerns: access to new houses, impact of	The Site Specific Requirements specify the need to respect the character of the surrounding area, and that

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				construction traffic and location of new homes next to the motorway (air pollution). Need trees planted around the edge to absorb the emissions from motorway traffic.	development should be detached or semi-detached with spacious plots. The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways. The proposed housing does not appear to be any nearer to the M25 than existing housing in the area. <b>However, requirement to mitigate any intrusive noise and pollution emanating from the M25 added to Site Specific Requirements.</b>
01191/1/001 resident	✓			Strongly object. Will increase air, light and noise pollution significantly. Potential overshadowing and loss of light will negatively impact our enjoyment of the current environment and also the value of our home. Will encouraging urban sprawl. Concern re access - surrounding roads are narrow, with on-street parking. Daleside / Baker Street junction busy. Additional houses will exacerbate these issues. Strongly object to making Meadow Way a through road and the sole access road to the homes. Why demolish a school when there is a shortage of places in Potters Bar?	All development is expected to comply with policy SADM21 – Environmental Pollution and Development. The normal design and layout requirements which protect the amenity of adjoining residential properties will apply and any planning application for residential development on the site will be assessed in order to ensure compliance with the requirements of relevant policies including SADM27 Design Principles and Hertsmere’s Planning and Design Guide.  The site is partially previously developed land and is contained on three sides within the built up area; it is not therefore considered that its development will encourage urban sprawl.

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					<p>The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways.</p> <p>The wider traffic impacts on the surrounding road network will be considered as part of any planning application for this site.</p> <p>It is not proposed to make Meadow Way the sole access to future residential development; it is understood from HCC that the ESC is remaining on the site, separately accessed from Sunnybank Road. <b>The expectation that the primary access to any residential development on the remainder of the site will therefore be via Field View Road is added to the Site Specific Requirements.</b></p> <p>Hertfordshire County Council, which is the Education Authority has indicated that there is no forecast deficit for primary places in Potters Bar and that apart from the retention of premises for the ESC, the site is not required for education purposes.</p>
01197/1/001 resident	✓			<p>Vehemently object to vehicular access from either Sunnybank Road or Meadow Way (very busy, congested, access would be dangerous). Further development will exacerbate problems. Access should be via Field View (existing access). Is development other than where existing buildings are allowed?</p>	<p>The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore</p>

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					<p>use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways.</p> <p>It is understood from HCC that the ESC is remaining on the site, separately accessed from Sunnybank Road. <b>The expectation that the primary access to any residential development on the remainder of the site will therefore be via Field View Road is added to the Site Specific Requirements.</b></p> <p>HCC are still considering how they wish to develop the site in the context of the decision to retain one of the former school buildings for the ESC. The Site Specific Requirements indicate that 1.4ha should be reserved for open space provision. <b>The need for a masterplan to be produced indicating how the site would be laid out is added to the Site Specific Requirements.</b></p>
01198/1/001 resident		✓		Vehicular access should be via Field View Close (existing access) only. Narrow roads and parked cars a problem re construction traffic. Bus service more than 5 minutes away.	<p>It is understood from HCC that the ESC is remaining on the site, separately accessed from Sunnybank Road. <b>The expectation that the primary access to any residential development on the remainder of the site will therefore be via Field View Road is added to the Site Specific Requirements.</b></p> <p>The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>impact on surrounding highways.</p> <p>The density proposed reflects the site's location, including the distance from services, amenities and public transport.</p>
01201/1/001 resident	✓			<p>Negative effect on community, quality of life, environment. Increase air, light and noise pollution. Encouraging urban sprawl. Relocation of educational facilities not sustainable. Visual impact - especially in relation to conservation area. Adverse impact during construction. Adverse impact on trees, drainage and water supplies. Land is higher therefore potential overshadowing / loss of light for properties lower down. Increase demand on utilities. Increased light pollution impact on landscape character, wildlife habitat. Impact on junctions with Baker Street and wider area. Object to creating through route down Sunnybank Road / Meadow Way - compromise safety and out of character. Access should be via Fairview Road. Contrary to Human rights - right to peaceful enjoyment of possessions (includes home) and right to respect for their private and family life.</p>	<p>All development is expected to comply with policy SADM21 – Environmental Pollution and Development. The normal design and layout requirements which protect the amenity of adjoining residential properties will apply and any planning application for residential development on the site will be assessed in order to ensure compliance with the requirements of relevant policies including SADM31 Design Principles and Hertsmere's Planning and Design Guide. Control of the manner in which construction will be organised would be a matter to be dealt with when a planning application is determined. The developer would be required to make good any damage to existing infrastructure. Thames Water do not have any objection to the proposed development of the site. Policies SADM15, 16 and 18 address the issues of flooding, drainage and water supply.</p> <p>The site is partially previously developed land and is contained on three sides within the built up area; it is not therefore considered that its development will encourage urban sprawl.</p> <p>Hertfordshire County Council, which is the Education Authority has indicated that there is no forecast deficit for primary places in Potters Bar and that apart from the</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>retention of premises for the ESC, the site is not required for education purposes.</p> <p>The Site Specific Requirements set out the need to respect the character of the surrounding area, particularly the Royds Conservation Area.</p> <p>The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways.</p> <p>The wider traffic impacts on the surrounding road network will be considered as part of any planning application for this site.</p> <p>It is understood from HCC that the ESC is remaining on the site, separately accessed from Sunnybank Road. <b>The expectation that the primary access to any residential development on the remainder of the site will therefore be via Field View Road is added to the Site Specific Requirements.</b></p>
01222/1/005 HBC Parks		✓		Support more public open space in Potters Bar (currently insufficient provision). This proposal is within Parkfield ward where currently only 45% of the required open space exists. Should include a fully equipped play area, such as a NEAP.	The Site Specific Requirements indicate that 1.4ha should be provided as public open space. Residential development, at the density appropriate here, on the area remaining once the ESC is removed from the site would fall below the level where the provision of a NEAP would be required to be funded by the development. Given the large number of



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					houses in the area and the lack of alternative play provision however space for a NEAP should be identified within the public open space area.
01283/1/002 English Heritage		✓		Welcome the requirement that development should respect the character of the Royds Conservation Area; development should be required to preserve or enhance the setting of the Royds Conservation Area.	Reference is already made in the Site Specific Requirements that development should respect the character of the surrounding area, particularly the adjacent conservation area. <b>Wording added: 'development should be required to preserve or enhance the setting of the Royds Conservation Area.'</b>
01370/1/009 HCC Highways		✓		<p>The previous use of the site as a primary school generated a level of traffic. A proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential development is considered appropriate in terms of the impact on surrounding highways.</p> <p>It is unlikely that the number of dwellings proposed on the site would justify consideration of major new road building to create an alternative access to the area.</p> <p>The wider traffic impacts on the surrounding road network will be considered as part of any planning application for this site. There may be an opportunity to address wider highway issues with s106 money should a planning permission be implemented.</p> <p>HCC Highways agree it is essential that the ESC should provide adequate on-site parking to meet all its own needs in order to avoid creating a nuisance to neighbouring residents and affecting their amenity.</p>	Noted.

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
<b>Site H10 Birchville Court and haulage yard, Heathbourne Road, Bushey Heath</b>					
01188/1/005 Thames Water		✓		On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability	Noted. <b>No change.</b>
01219/1/001 AKT Planning			✓	Support allocation. PDL, sustainable and accessible location. Offers potential to replace haulage yard use with a high quality and amenity value residential scheme, which integrates well with the surrounding uses and Green Belt and will provide Affordable Housing. The allocation of the site also provides for a defensible boundary to the Green Belt.	Noted. <b>No change.</b>
01219/1/002 AKT Planning		✓		The site is closely surrounded by Green Belt land and contains a number of existing trees, many TPO. The adjacent property at County End is Listed Building. These constraints affect the housing capacity of the site, with the developable part of the site likely to be less than the total site area of 1.4 hectares(plan submitted) - nearer 1.05 hectares. Based upon this, the realistic capacity of the site is likely to be nearer 31 units.	The site capacity figures suggested in the SADM draft are indicative and the precise number of dwellings achievable on each site will depend on detailed layout and design. Development on this site at a similar density to that indicated but on a (smaller) area which excludes the trees around the periphery would however be more likely to achieve around 29 – 31 dwellings. However the agreed scheme is for 17 units on the site so <b>site capacity amended to 17.</b>
01233/1/001 resident			✓	Not opposed to allocation. Please consider Land r/o County End for future housing use as this adjoins the site.	Support noted. The rectangular piece of garden, together with County End itself, is proposed to be removed from the formerly safeguarded area for housing and incorporated into the urban area. Development for residential purposes would therefore be appropriate subject to complying with relevant policies and development standards. The site could sensibly be considered for development jointly with the adjoining Birchville Court/haulage yard site H10, into which it currently encroaches; access to the site may be more appropriately taken from the adjoining site rather than Magpie Hall Road. <b>Comment added to Site Specific</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<b>Requirements for H10 promoting consideration of joint development with this piece of land.</b>
01370/1/010 HCC Highways		✓		In principle, the Highway authority is unlikely to make a highways objection to development on this scale on this site. Would support inclusion of County End garden. The normal highway design and assessment requirements will apply.	Noted. Highway requirements will be addressed through the normal planning application process. <b>No change.</b> <b>Comment added to Site Specific Requirements promoting consideration of joint development with adjoining piece of garden land.</b>
<b>Site H11 Potters Bar Bus Garage, High Street, Potters Bar</b>					
00660/1/001 resident			✓	Support, especially if reduce (empty and/or not serving local area) bus traffic in High Street.	Noted. <b>The site has however been deleted from the list of housing sites in SADM1</b> as it is understood not to be available. It will remain under review in the context of updates to the Strategic Housing Land Availability Assessment.
00663/1/001 resident			✓	Support, especially if reduce (empty and/or not serving local area) bus traffic in High Street. Noise and fumes from buses being washed at night. Buses park on pavement at night.	Noted. <b>The site has however been deleted from the list of housing sites in SADM1</b> as it is understood not to be available. It will remain under review in the context of updates to the Strategic Housing Land Availability Assessment.
00847/1/001 resident	✓			140-200 additional cars will use local congested roads. Amalgamation of Annandale Highview on previous ante-natal site will dramatically increase parking virtually opposite Bus garage.	Subject to detailed design checks, in principle, the Highway Authority has indicated that is unlikely to make a highways objection to development on this scale on this site. This is a sustainable town centre location, where the Highway Authority is of the opinion that traffic impact is unlikely to be a concern. <b>The site has however been deleted from the list of housing sites in SADM1</b> as it is understood not to be available. It will remain under review in the context of updates to the Strategic Housing Land Availability Assessment.
00855/1/001		✓		Are these plans for family homes or starter homes and are they for	<b>The site has been deleted from the list of housing sites in</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
resident				private or council use? How will we cope with schooling? What is the impact going to be on our travel connections? Will we lose the 84 link to Barnet just as we bring more people into the area? Can you encourage more bus routes to service Potters Bar?	<b>SADM1</b> as it is understood not to be available. It will remain under review in the context of updates to the Strategic Housing Land Availability Assessment.
00987/2/004 resident	✓			Bus garage is an important community facility, which should be preserved. If public transport is to be promoted, adequate bus depot facilities are essential. Suitable relocation unlikely.	This proposal would only go ahead if the bus depot owner / operator was suitably relocated and wished to release the site. <b>The site has been deleted from the list of housing sites in SADM1</b> as it is understood not to be available. It will remain under review in the context of updates to the Strategic Housing Land Availability Assessment.
01151/1/001 resident			✓	Support subject to adequate infrastructure to meet with the increase in new residents e.g. doctor's surgeries, dentists, etc. and adequate parking for each new dwelling. Relocation of the bus garage will reduce the air pollution in the town and improve the air quality providing health benefits to residents.	Noted. <b>The site has however been deleted</b> from the list of housing sites in SADM1 as it is understood not to be available. It will remain under review in the context of updates to the Strategic Housing Land Availability Assessment.
01175/1/002 resident		✓		Bus garage well used. Where would replacement be?	This proposal would only go ahead if the bus depot owner / operator was suitably relocated and wished to release the site. <b>The site has been deleted from the list of housing sites in SADM1</b> as it is understood not to be available. It will remain under review in the context of updates to the Strategic Housing Land Availability Assessment.
01188/1/006 Thames Water		✓		On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability.	Noted. <b>The site has however been deleted from the list of housing sites in SADM1</b> as it is understood not to be available. It will remain under review in the context of updates to the Strategic Housing Land Availability Assessment.
01222/1/006 HBC Parks		✓		Boundary treatment with the adjacent Parkfield, drainage and levels and provision of access into the park need to be considered. New play area will need to be included and located within the development as a	Noted. <b>The site has however been deleted from the list of housing sites in SADM1</b> as it is understood not to be available. It will remain under review in the context of

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				play area is not in keeping with the park environment.	updates to the Strategic Housing Land Availability Assessment.
01370/1/011 HCC Highways		✓		Subject to detailed design checks, in principle, the Highway authority is unlikely to make a highways objection to development on this scale on this site. The normal highway design and assessment requirements will apply. This is a sustainable town centre location; traffic impact is unlikely to be significant concern.	Noted. <b>The site has however been deleted from the list of housing sites in SADM1</b> as it is understood not to be available. It will remain under review in the context of updates to the Strategic Housing Land Availability Assessment.
<b>Other Sites proposed</b>					
<b>Croxdale Road Sports pitches, Borehamwood</b>					
01217/1/001 URS on behalf of Old Haberdashers and Barratt Homes	✓			The site should be allocated for housing. Barratt Homes have a conditional contract to purchase; Old Haberdashers have agreement to provide high quality replacement playing pitches. Other SADM1 sites in Borehamwood are small and/or constrained, and challenging to develop satisfactorily. Hertsmere needs more sites capable of early delivery in order to meet anticipated supply requirements (already falling behind on annual completions needed to meet targets, and no buffer). Elstree Way Corridor may not have the capacity – further clarity is required about this. Land at Croxdale Road could supply 150 - 180 dwellings (with some open space): this would help to achieve housing numbers and reduce the risk of having to release Green Belt land. The site has no technical constraints, and is an area of high demand for housing, a sustainable location and transport development area. Will provide some affordable homes and publicly accessible open space for residents. Current open space has no public access. Detailed report filed. Related objection to designation as Major Green Space.	The site is currently designated as open land within the urban area in the Local Plan. The Consultation Draft SADM recommends an equivalent, major green space. Before confirming whether this is the most appropriate future designation of the land, it is reasonable to consider alternatives. The main options are: A. major green space; B. housing; C. a mix of housing and green space. It would also be possible to consider a primary school as an alternative to green space in Option C. Old Haberdashers have been seeking a permanent alternative and higher quality sports ground for a number of years: they have secured an alternative site at Radlett. Some enabling development at Croxdale Road would be helpful to fund this. The SHLAA appeared to favour Option C: “There is presently no public access to the site, thereby impairing its use by the community. Should the site be developed for

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>housing...approximately half the site would remain as open space and be open to the community. In these circumstances, development of the site for housing may be acceptable subject to the further matters below and the need to relocate the sports facilities elsewhere. This site is within 10 minutes walking distance of a primary school, GP surgery and food store and within five minutes walking distance of frequent bus services to Borehamwood Town Centre and Train Station." The SHLAA suggested 107 housing units and about 2 hectares would be open space. Other studies have different conclusions. The Open Space Study and Green Spaces and Amenity Land Report both favour Option A. The Open Space Study had generally concluded:</p> <p>"...open space is valued by residents in the borough and has an important recreational and environmental role. It is recommended the current planning policy approach is maintained and that there should be no loss of current open space unless it can be sufficiently justified or alternative provision provided within a suitable catchment and of quality." And,"When compared to population the lowest supply of outdoor sport facilities is within the Borehamwood sub area. The sub-area has 0.56ha per thousand of outdoor sport facilities not including school pitches; as a result the sub area is reliant on dual use arrangements." The Green Spaces and Amenity Land Report recommended the 4.05 ha site as a major green space. The three studies are all technical reports and not in themselves Council policy.</p>

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					<p>The Council accepts that the site is accessible to services, and generally well-located and technically feasible for housing. It also accepts that demand and need for housing is strong. There is likely to be sufficient highway capacity to accommodate extra traffic, at least for Option C. However, the effects of additional traffic would need to be tested further were there any housing proposal.</p> <p>The key considerations guiding future planning policy are:</p> <ul style="list-style-type: none"> <li>• the need for playing pitches – allowing the satisfactory relocation of the private sports club onto new pitches is appropriate and adds to supply. The new site would be in Radlett, meaning there would remain a distributional shortfall of pitches affecting Borehamwood. This would be higher or lower depending on the use of the Croxdale Road site. Factors affecting any shortfall are public availability and durability (quality) of the pitches and the number.</li> <li>• the need for public open space – use of any of the Croxdale Road site would add to the current supply. The Open Space Study suggests supply in Borehamwood exceeds a minimum acceptable standard. Aberford Park is a short walk away. Any new housing would require additional space particularly for children’s play, and there is no inherent reason why the provision of open space cannot exceed a minimum standard by a significant margin contributing to the character of an area for residents..</li> <li>• the need for housing – the demand for housing is strong and there is a high need for affordable housing. The</li> </ul>

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					<p>SHMA (which commenced in January) will help determine more precisely what those needs/demands are. However the site is not needed to meet the Core Strategy housing target. Were there a genuine shortfall in supply, the argument would be different. As the Core Strategy promotes urban sites over Green Belt, this site may be considered more appropriate for housing than sites in the Green Belt around the town and possibly safeguarded land. In this scenario Option C (with the replacement of the existing pitches) could be preferable.</p> <ul style="list-style-type: none"> <li>• the character of the surrounding estate, including the need for and availability of local services and facilities</li> <li>• the need for a primary school has been identified by the County Council within the town, rather than this specific area. While other options are being assessed, part of the site could offer an alternative if these fail to materialise.</li> </ul> <p>The Council concludes that Old Haberdashers Sports Ground should be designated as major green space. The Council owns the freehold of the Old Haberdashers Sports Ground and can ensure that this happens. The relocation of Old Haberdashers Sports Club to a different site may in itself be acceptable, but that is not the key point. The use of the present Sports Ground as a playing field is appropriate. It adds to the character of the area and to the supply of open space. Its link to a particular club is not necessary. The Sports Ground is and has been open land within a residential area of the town for many years. The Council prefers to continue that use. The Council is not seeking the</p>



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					relocation of Old Haberdashers Sports Club, but if that happened the Council has options over the management of the space. One would be to consider greater public use. Others would be to support particular sports or a particular club. The need for housing is not so great as to require its release for housing. And if the housing target were substantially higher, many more sites would come into consideration; it does not then follow that this one should be used for housing. There are currently alternatives for the siting of a new primary school, e.g. within the Elstree Way Corridor Area Action Plan.
01263/1/002 resident			✓	Support the decision not to allocate the Old Haberdashers RFC site in Croxdale Road for development.	Noted.
01347/1/001 JPB Architects		✓		Old Haberdashers Sports ground was identified in Local Plan 2003 and SHLAA as suitable for housing. Sports ground can be relocated. Client owns title to access road adjoining Croxdale Road - will assist with efficient and sustainable planning of the site. Can unlock site and deliver housing development here.	See response to the objection from URS on behalf of Old Haberdashers and Barratt Homes (01217/1/001) above. Hertsmere Local Plan (2003) designates the site as Urban Open Land.
<b>Elstree Distribution Park, Borehamwood (Elstree Way, Borehamwood - Employment Area)</b>					
01184/1/001 CGMS for HSBC Bank (as trustee for Hermes Property)	✓			<p>Submissions were made at the pre-publication stage to the inclusion of the site within the Site Allocations Plan as a housing allocation. No response was received to these informal submissions.</p> <p>The published plan does not include the site within those sites listed in <i>Policy SADM1 - Housing Allocations</i></p> <p>The site should therefore be removed from its designation as part of a wider employment area and re-designated for housing under this policy; there is no land safeguarded for housing in Borehamwood.</p>	<p>The site was put forward through the SHLAA in 2006 when it was considered as unsuitable for housing due to the loss of B class employment land.</p> <p>Location is sustainable given its accessibility to Borehamwood Town Centre and public transport links along Elstree Way. Site is within a Designated Employment Area (2003 Local Plan), promotes the use of land for B Use Classes. Policy CS8 of the Core Strategy (2013) also identifies the Elstree Way, Borehamwood Employment area.</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				The site was promoted through the LDF process in 2006 and is referred to in the 2010 SHLAA under reference S27. The site is located within a sustainable location and is therefore appropriate for housing.	Loss of existing distribution centre could result in loss of land needed for B Use Classes in the Borough. Distribution centre forms a large part of the B8 component of the employment area. The site is not considered suitable for residential use because it would result in a significant loss of B8 floorspace for the borough, and would undermine the integrity of the employment area as a whole. <b>No change.</b>
<b>Borehamwood Mail Delivery Office</b>					
01211/1/001 DTZ (on behalf of Royal Mail Group)		✓		No current plans to close or relocate. Site suitable for inclusion due to sustainable location and unencumbered Freehold. Location - edge of Borehamwood Shopping Park surrounded by retail warehouse and residential uses - within Borehamwood 'Town and District Centre' (policy SADM36). Could accommodate a mixed use scheme including town centre uses and housing (policy H1). Consistent with NPPF policies for the development of sustainable communities. Relocation/re-provision of Royal Mail's operations is essential prior to redevelopment of the sites. Relocation will need to be viable for and commercially attractive to Royal Mail. Proceeds from the disposal of the sites will need to yield both sufficient value to fund the purchase and fit-out of new sites and the relocation of their operations thereto. Also needs to be commercially attractive. New facilities required prior to demolition of existing. Plans and further info submitted.	It is noted that the Royal Mail Delivery Office is within Borehamwood town centre and that there are no current plans to relocate or close, therefore the site is not considered to be suitable for inclusion within policy SADM1 at this time. <b>No change.</b>
<b>SHLAA site S52, Borehamwood</b>					
01290/1/007 Hertswood Academy		✓		Consider allocating site S52 for housing (plus possible primary school instead of Maxwell Park)	Site S52 would be a major Green Belt release. It is not needed to deliver the Core Strategy housing target and is therefore inappropriate.

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					<p>Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt.</p> <p>The County Council are assessing potential options for a new primary school for Borehamwood and the practicality of its delivery. The Council will support an appropriate scheme. While that would not rule out part of S52 for a primary school, housing development is not justified in itself.</p> <p><b>No change.</b></p>
<b>Land East of Cowley Hill, Borehamwood</b>					
00982/1/007 Woolf Bond Planning for owner		✓		Proposals document for mixed development submitted ( 950 dwellings plus infrastructure).	<p>This area is in the Green Belt. Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major</p>

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					<p>consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt.</p> <p>Land east of Cowley Hill would entail a major Green Belt release. It is not needed to deliver the Core Strategy housing target and is therefore inappropriate.</p> <p><b>No change.</b></p>
<b>land East of Well End Road, Borehamwood</b>					
00982/1/008 Woolf Bond Planning for owner		✓		Proposals document for mixed development submitted - 460 dwellings, local centre, 5.68ha employment, open space, sports pitches, community woodland.	<p>This area is in the Green Belt. Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt.</p> <p>Land east of Well End Road would entail a major Green Belt release. It is not needed to deliver the Core Strategy housing target and is therefore inappropriate.</p> <p><b>No change.</b></p>

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<b>Elton House, Bushey</b>					
01213/1/001 Preston Bennet (on behalf of Clearview Homes)		✓		Should be allocated as a Housing Allocation in Policy SADM1. Strategically located A41/Hartspring Lane junction, outside Green Belt. Current Permitted Development Class B1 to C3 Prior Approval application and on-going advanced pre-application discussions with HBC for the demolition and complete redevelopment for approx. 100 units. Sustainable site, contribute to meeting housing needs. Deliverable - single ownership, deliverable early within the Plan period and outside of the flood plain.	This site may appropriately be used site for housing. The Council has approved planning application 14/0911/FUL for 102 units and would wish this to proceed in preference to a conversion of the existing building on the site. <b>The proposal has therefore been included in Policy SADM1. The number of units will be added to the commitments in Table 1: Site Allocations in relation to the Housing Supply 2012 – 2027.</b>
<b>Land at County End, Magpie Hall Lane, Bushey</b>					
01233/1/002 resident			✓	Land at the back of County End to be considered for future housing use as this is adjacent to H10.	The rectangular piece of garden, together with County End itself and Oak Hurst Lodge, are proposed to be removed from the formerly safeguarded area for housing and incorporated into the urban area. The site could sensibly be considered for development jointly with the adjoining Birchville Court/haulage yard site H10, into which it currently encroaches; access to the site may be more appropriately taken from this adjoining site rather than from Magpie Hall Road. <b>Comment added to Site Specific Requirements for H10 promoting consideration of joint development with this site, and that development of H10 should allow for future access to this site.</b>
<b>Hartsbourne Golf and Country Club, Bushey</b>					
01351/1/001 Knight Frank LLP for CJ Stillitz Will Trust	✓			Allocate the built up part for housing (plan submitted). This would be consistent with the allocation of H5 and H7, which are previously developed sites within the Green Belt. There has not been a thorough review of all PDL within Green Belt: this is not precluded by the Core Strategy not requiring a review of Green Belt boundaries.	To accommodate the suggested housing development would entail a significant change to the Green Belt boundary. The additional housing which this area could accommodate is not needed to meet the Core Strategy housing target. The present boundary is defensible and it is

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				<p>H4 is at Bushey Hall Golf Club - shows that loss of existing facilities associated with an active golf course is acceptable and that if they are to be replaced within the Green Belt, the provision of new golf course related buildings within the Green Belt is an acceptable use. Staff accommodation and Studio Cottage at Hartsbourne Golf and Country Club are already residential: buildings form a distinctive urban edge within a Green Belt setting. The proposed site is PDL. Its designation for housing would be consistent with the NPPF exception to new buildings being inappropriate in Green Belt. Its exclusion from the Green Belt would entail a small, natural extension to the existing settlement boundary. The location is sustainable – with public transport and schools nearby. The site is available and can be delivered to contribute to the Council's housing supply.</p>	<p>difficult to see how an alternative would not be worse. The circumstances at sites H4, H5 and H7 are each different. H4 would entail a small rounding off of the Green Belt boundary. Sites H5 and H7 would remain in the Green Belt. H5 would entail the removal of a car breakers yard and removal of land contamination associated with that use. H7 is small scale and would involve the redevelopment of existing buildings without any infilling. While the use of PDL in the Green Belt may be appropriate for housing, it is not necessary to complete a fully comprehensive review of PDL. The Council has made an allowance under rural windfall to cover potential Green Belt PDL sites. The Council has also separately assessed whether specific sites (which are PDL in the Green Belt) should be identified as part of the proposed (identified) supply. The clubhouse and staff accommodation at Hartsbourne Golf Course are locally listed buildings. The Council would not recommend their loss or any inappropriate change in their setting. The buildings are not tightly grouped and are not appropriate for designation as a Key Green Belt Site under Policies SADM21 and CS13. Overall the Council therefore has concluded that any potential change to the Green Belt is more appropriately considered when the Green Belt Study is undertaken as part of the Core Strategy review. This is without prejudice to the outcome.</p> <p><b>No change.</b></p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
00965/1/002 Hartsbourne Manor Residents Association		✓		Lease of Hartsbourne Golf and Country Club (within Green Belt) coming up for renewal. Freeholders may want to carry out some form of redevelopment (some buildings have / have had residential use). Association want to be included in any consultation on future of the site. Council should consider future usage and development options in order to achieve proper planning and community involvement.	
<b>r/o Stagg Ridge Flats, Potters Bar</b>					
00662/3/001 owner		✓		Allocate for housing. 5 acres of which approximately 40,000 sq ft is PDL. Propose 10 new build dwellings/apartments. On site communal facilities, staff accommodation and grounds. Illustrative proposals and agricultural report submitted.	From a proposal for a fodder storage barn in August 2014, it appears that the area is part of a larger (130 ha.) farm holding. Agricultural use is an appropriate Green Belt use. To the contrary, residential development is not an appropriate Green Belt use, except in very limited circumstances (e.g. rural affordable housing). There is no suggestion that the Green Belt boundary should be changed, indeed it would not be appropriate to do so. The land is on the south side of the M25 away from the settlement of Potters Bar. The land is not needed to deliver the Core Strategy housing target and therefore there are no evident exceptional circumstances to allocate the land as a housing proposal. The owner's suggestion links to another proposal on adjoining land, a former highway (representation reference 00662/1/001). It is doubtful whether the suggested employment use on the former highway would be compatible with residential development at Stagg Ridge (existing) and on land to the rear (proposed). However even if they would be, it is not clear whether there would be any benefit to the Green Belt. New residential building, in addition to employment development, is more likely to

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>cause harm to the openness and character of the Green Belt, because both proposals seek to use land more intensively.</p> <p>The Council notes that if there are exceptional circumstances affecting the site which warranted any change, it is possible to do this on an individual planning application basis. The context for determining any application would be NPPG Green Belt policy.</p> <p><b>No change.</b></p>
<b>land east of Baker Street Potters Bar</b>					
00982/1/005 Woolf Bond Planning for owner		✓		Masterplan for housing development submitted (70 dwellings).	<p>This area is in the Green Belt. The current boundary is clear and defensible. Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt.</p> <p>Land east of Baker Street would entail a large Green Belt release. It is not needed to deliver the Core Strategy housing target and is therefore inappropriate.</p> <p><b>No change.</b></p>
<b>land West of Barnet Road, Potters Bar</b>					



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
00982/1/006 Woolf Bond Planning for owner		✓		Concept masterplan for housing development submitted (170 dwellings).	This area is in the Green Belt. The current boundary is clear and defensible. Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. Land west of Barnet Road would entail a major Green Belt release. It is not needed to deliver the Core Strategy housing target and is therefore inappropriate. <b>No change.</b>
<b>Potters Bar Golf Course</b>					
01187/1/004 Nathaniel Lichfield & Partners for owners	✓			Core Strategy supporting evidence identified club house/car park as a potential previously developed site. Also indicated as available, achievable and developable in SHLAA (2010). Sustainable location. Could deliver a mix of development including up to 300 residential units plus improved leisure offer. Partially brownfield site. Would like to discuss potential development - help achieve Council objectives and secure substantial benefits to local residents. More sustainable location than other sites that have been included (see Green Belt objection). Potters Bar GC remains available within 5 years.	This area is in the Green Belt. It is quite normal for appropriate open Green Belt uses such as golf courses and playing fields to include building and car parking. Indeed they are necessary to help sustain the use and protect the openness of the Green Belt. The current Green Belt boundary is clear and defensible. Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. Developing the Potters Bar golf course would entail a major Green Belt release. It is not needed to deliver the Core Strategy housing target and is therefore inappropriate. <b>No change.</b>
<b>Starveacres, Radlett</b>					
00973/1/002 Phillips Planning Services for owner	✓			Allocate for housing now (not safeguard). Housing provision insufficient to meet Core Strategy CS1. Buffer of 0.03% (Table 1) is contrary to NPPF (requires at least 5%). Too much reliance on windfall - exceeds proposed allocations in SADM1 and 27.6% of assumed supply once completions and commitments are deducted. Constraints on allocated, town centre and Elstree Corridor sites (relocating existing uses, complex site assembly, assumptions re viability) make Table 1 unrealistic. Majority of dwellings proposed likely to be flats - need for larger homes. Allocations proposed won't help deal with overcrowding (para 2.16). Other safeguarded sites (para 2.11) have been allocated or granted planning permission. Site has no constraints, is sustainable location (as per SHLAA), would contribute to meeting housing need, be consistent	Starveacres is a substantial site which is protected from general housing development as if it was in the Green Belt. However if additional land needs to be identified for housing in order to meet the Core Strategy target, the Council accepts that as a matter of principle safeguarded sites should be used in preference to new greenfield Green Belt sites. SADM is delivering the Core Strategy housing target: the Core Strategy does not signal the release of Green Belt land nor all of the hitherto safeguarded land in order to meet the target. Safeguarded land should only be released upon review of the plan according to Government advice in NPPG (paragraph 85). That review will be the review of the Core Strategy itself. The development of Starveacres is not needed in order to

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<p>with Core Strategy SP2. Council should not accept development of land in Green Belt (less sustainable in terms of location, access to facilities, services and public transport) - contrary to NPPF para 14. Linked objection to inclusion in SADM2.</p>	<p>meet the Core Strategy housing target. The housing land supply is adequate. The assumptions behind the housing land supply have been reported in the SHLAA (2010) and its Update (2011), and tested through examination: this was revised in evidence to the examination (Housing Supply Update: August 2012). The windfall assumptions have been further checked and as appropriate adjusted. The windfall assumptions are therefore reasonable and consistent with Government advice. The SHLAA has been updated again. There has been some adjustment to the sites and net housing capacity in Policy SADM1 and Policy SADM2 as a result of new information and updating. The overall effect is to confirm that Table 1 is sound. The figures allow for some contingency or margin of error. The objector's suggestion of an additional across the board buffer of 5% does not accord with Government advice (NPPF paragraph 47): the buffer relates to the 5 year supply, not the supply over the whole plan period. <b>No change other than a relatively minor updating of Table 1 (and related changes) is justified in this context.</b></p>
<b>Land r/o The Warren, Radlett</b>					
01228/1/001 Capita for owner	✓			<p>Allocate for housing - would provide some limited growth on sustainably located Radlett site, in line with Core Strategy. Ecological features would be built into development proposals. Should remove Wildlife Site designation, and amend development boundary to reflect natural boundary of Kittswell Brook to the north, and footpath/golf course to the east. 7 houses and public open space. Proposals</p>	<p>The area covers approximately 2 hectares of Green Belt land. The present Green Belt boundary is sufficiently clear and defensible as it is. Most of the site is designated as a local wildlife site. The area alongside Kittswell Brook lies within flood zones 3 and the land is at risk of flooding. While flood risk and wildlife</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				Brochure submitted.	mitigation measures may be possible, this is a constrained site. The constraints inevitably affect the site's sustainability for built development. Developing this open site would entail a significant Green Belt release. It is not needed to deliver the Core Strategy housing target and is therefore inappropriate. <b>No change.</b>
<b>adj Wilton End Cottage, Shenley</b>					
00194/1/001 resident (owner)	✓			Allocate for housing: 1.21 hectares, available within 5 years. Could accommodate c36 new homes. Could provide for local older people to downsize, or general housing. Good location, walking distance of local shops, GP surgery , 2 schools, buses. CS spatial objective for Shenley is to address local housing affordability. Would be happy to comply with Core Strategy CS4 - site could deliver a mix of housing tenures (private, shared ownership and/or social rented) and house sizes. (linked representation to SADM2).	The area lies within the Green Belt land. The present Green Belt boundary is clear and defensible as it is. Indeed it is difficult to see where a rational alternative long term boundary would be. Developing this site would entail encroachment into an open area and a significant Green Belt release. It is not needed to deliver the Core Strategy housing target and is therefore inappropriate. The site is now included in the SHLAA at the request of the owner. It can be reconsidered at appropriate junctures in the future together with other housing options. However it is stressed that inclusion of a site in the SHLAA does not mean it will come forward. <b>No change.</b>
00194/2/001 resident (owner)		✓		Completed SHLAA questionnaire for Wilton End (SADM response also submitted – see 00194/1/001 above )	The site is now included in the SHLAA at the request of the owner. It can be reconsidered at appropriate junctures in the future together with other housing options. However it is stressed that inclusion of a site in the SHLAA does not mean it will come forward <b>No change.</b>
<b>Land adjacent to St Albans Road and Blackhorse Lane, South Mimms. South Mimms Plot A</b>					

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01215/1/002 Aylward Town Planning for King Properties	✓			0.8 ha agricultural land south of Catharine Bourne should be allocated for housing. The village envelope should be extended to include the proposal and/or the proposal identified as an “envelope for appropriate infilling”. The site is deliverable, close to existing urban centre and proposed MSA, and adjacent to existing residential. More deliverable than some other sites considered and closer to S Mimms centre than some parts of the existing proposed envelope. Sustainable location. Available now. An estimated 30 units would include affordable housing.	<p>This area is in the middle of the Green Belt. It is agricultural land and not physically part of the built area of South Mimms village.</p> <p>South Mimms village is being delineated in SADM for the purposes of Policy CS13 in the Core Strategy. The area being defined by the village envelope is part of the Green Belt: within the village envelope, limited infilling may be appropriate.</p> <p>As a matter of approach, village envelope boundaries are drawn reasonably tightly around the main built area of each village, taking into account green space, larger plots with minimal development and gaps in the built frontage. Permitting <i>small-scale</i> development in the infilling areas would have limited impact on the openness of the Green Belt.</p> <p>The size of the proposal is considered to be substantially beyond the scale of limited infilling. It would therefore be inappropriate to adjust the boundary of the village envelope to accommodate the proposal.</p> <p>The proposal represents a significant change to the Green Belt, more appropriately considered as part of a major review of the Green Belt. The review of the Core Strategy will require a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed because of needs (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					number of existing communities, including South Mimms. This may include the capacity of services, the scale of change and impact on the nature of the settlement. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 or 2016 to reassess the contribution of land to the Green Belt. Allocating this land would entail a major Green Belt release. Such an allocation is not needed to deliver the Core Strategy housing target, and is therefore inappropriate. <b>No change.</b>
01215/3/001 Aylward Town Planning for King Properties	✓			Further information submitted in support of allocating site for housing	See above response (to representation 01215/1/002). <b>No change.</b>
<b>Land adjacent to St Albans Road and Blackhorse Lane, South Mimms. South Mimms Plot B</b>					
01215/2/002 Aylward Town Planning for King Properties	✓			7 ha agricultural land north of Catharine Bourne should be allocated for housing. The village envelope should be extended to include the proposal and/or the proposal identified as an “envelope for appropriate infilling”. The site is deliverable, close to existing urban centre and proposed MSA, and adjacent to existing residential. More deliverable than some other sites considered and as distant from S Mimms centre as some other parts of the existing proposed envelope. Sustainable location. Available now. An estimated 200 units would include affordable housing.	This area is in the middle of the Green Belt. It is agricultural land and not physically part of the built area of South Mimms village. South Mimms village is being delineated in SADM for the purposes of Policy CS13 in the Core Strategy. The area being defined by the village envelope is part of the Green Belt: within the village envelope, limited infilling may be appropriate. As a matter of approach, village envelope boundaries are drawn reasonably tightly around the main built area of each village, taking into account green space, larger plots with minimal development and gaps in the built frontage. Permitting small-scale development in the infilling areas

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>would have limited impact on the openness of the Green Belt.</p> <p>The size of the proposal (whether added to Plot A or not) is considered to be substantial and well beyond the scale of limited infilling. It would therefore be inappropriate to adjust the boundary of the village envelope to accommodate the proposal.</p> <p>The proposal represents a substantial change to the Green Belt, more appropriately considered as part of a major review of the Green Belt. The review of the Core Strategy will require a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed because of needs (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities, including South Mimms. This may include the capacity of services, the scale of change and impact on the nature of the settlement. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. Allocating this land would entail a major Green Belt release. Such an allocation is not needed to deliver the Core Strategy housing target, and is therefore inappropriate.</p> <p><b>No change.</b></p>
01215/4/001	✓			Further information has been provided. Plot B has been reduced from	See above response (to representation 01215/2/002). The

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Aylward Town Planning for King Properties				the original proposal (under 01215/02/002) to 4.3 ha to better reflect an envelope for appropriate infilling. It would accommodate around 105 units and be accessed via Plot A. Development would be designed to take account of flood risk.	principles at issue are considered to be the same, notwithstanding the different size of the proposals. <b>No change.</b>
<b>Land off Watford Road, Elstree</b>					
01227/1/002 RPS Planning and Development for Bluemark Projects Ltd	✓			Should be allocated for housing. Adjacent to proposed Elstree village envelope. Highly sustainable location - primary school, food store, GP surgery, frequent bus services - convenient access to other services and amenities in Elstree and neighbouring areas. Capacity to deliver around 70- 90 dwellings. Site flat and unconstrained, not susceptible to flooding, no known contamination. Site is deliverable achievable and capable of meeting short term housing needs. Plan & SHLAA Questionnaire (for continuing care community rep 01353/1/001) also submitted. Related objections to SADM1 figs and village envelope boundary.	This area is in the Green Belt. The current Green Belt boundary is clear and defensible. The proposal area adjoins Elstree village envelope. The area defined by the village envelope is part of the Green Belt: within the village envelope, limited infilling may be appropriate. The size of the proposal is not remotely of the scale of limited infilling. It would therefore be inappropriate to amend the boundary of the village envelope to accommodate the proposal. If the proposal were accepted, it would furthermore raise the issue of whether the whole of the northern part of Elstree should be excluded from the Green Belt (and not be an infilling village contrary to Policy CS13 in the Core Strategy). However this is considered, the proposal represents a major change to the Green Belt. Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities, including Elstree. This may



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					include the capacity of services, the scale of change and impact on the nature of the settlement. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 or 2016 to reassess the contribution of land to the Green Belt. Allocating this land would entail a major Green Belt release. Such an allocation is not needed to deliver the Core Strategy housing target, and is therefore inappropriate. <b>No change.</b>
01353/1/001 Pegasus Group		✓		Proposals for a Continuing Care Retirement Community at land to the rear of High Street/Watford Road, Elstree – primarily a request for inclusion in SHLAA, but also for inclusion in SADM. Details filed.	See response to rep 01227/1/002 above. The site is now included in the SHLAA as requested in this representation. It can be reconsidered at appropriate junctures in the future together with other housing development options. It is stressed that inclusion of a site in the SHLAA does not mean it will come forward. It is acknowledged that this proposal is for a continuing care retirement community. <b>No change.</b>
<b>Fortune Oaks, Elstree</b>					
01234/1/002 DLA Town Planning		✓		Include site within Elstree village, for housing. Site deliverable and developable. Special circumstances exist that would justify release from Green Belt. Closely linked to urban area - housing to north, commercial to south. Formerly part of curtilage of current nursing home to west. Would achieve highway improvements to Summer Grove and Fortune Lane. Would provide key worker housing and public open space. Single ownership, looking to develop. SHLAA said it was suitable for housing. Detailed report filed	The site is within the Green Belt and Elstree Conservation Area and is therefore a sensitive location. The current Green Belt boundary is clear and defensible. Allocating land at Fortune Oaks for housing would involve a significant Green Belt release. Such an allocation is not needed to deliver the Core Strategy housing target, and is therefore inappropriate. A review of the Core Strategy will be undertaken over the next two years. This requires a reassessment of objectively assessed needs for housing and employment development

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>and a comprehensive Green Belt Study. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14) in response to needs, but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Core Strategy Review is a fundamental review of the 'local plan' and is the appropriate vehicle to consider the identification of releases of land from the Green Belt.</p> <p>There may be benefits from this particular proposal, but none are considered so important as to constitute exceptional circumstances warranting a reallocation of Green Belt land now.</p> <p><b>No change.</b></p>
<b>Patchetts Green Equestrian Centre, Aldenham</b>					
01350/1/005 Shire Consulting for Exchange Ltd		✓		<p>Allocate for housing. PDL, adjoining M1. Includes a number of large built structures, café and a substantial area of car parking. Contains listed buildings, within Conservation Area. Site losing money - listed buildings need investment, but no funding available. Housing development would form a logical extension to the village, whilst conserving and enhancing the heritage assets. Site is within settlement, no development constraints, available. SHLAA assessment needs to be redone, 'testing', rather than just 'accepting' the 'appropriateness of previously defined constraints' and the land considered properly.</p>	<p>The Council's approach to planning for housing is reasonable, and the appropriate supply is being provided. Patchetts Green Riding Stables (or a part of it) is not needed to meet the housing target.</p> <p>The current development strategy is contained in the Core Strategy adopted in January 2013. The Core Strategy does not indicate any significant change to the Green Belt. The Core Strategy was independently examined in the light of the NPPF and subsequently adopted. One of SADM's key purposes is to help implement the Core Strategy, including implementation of the stated housing target. The preparation of SADM enables a review of all development</p>

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					<p>management policies and boundaries of policy areas in the Local Plan (within the context provided by the Core Strategy).</p> <p>The Council is committed to a separate review of key elements in the Core Strategy – specifically to consider housing and employment needs further. The review of the strategic issues and commissioning of key evidence with neighbouring authorities began in late 2014 and will continue beyond the planned adoption of SADM. If objectively assessed housing needs are very substantially higher than currently planned for within the housing market, then there are serious and potentially controversial issues to be debated with the public. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. The Council considers that its approach to the preparation and review of its planning policies is justifiable, and reasonable.</p> <p>The housing target and land supply assumptions behind the housing target were justified by the Council, and tested and accepted by a Planning Inspector through independent examination of the Core Strategy. These have been brought forward into SADM. The Strategic Housing Land Availability Assessment (SHLAA) contains an analysis of a large number of sites – some of which accord with the Core Strategy (and</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>are being taken forward) and a number in the Green Belt which do not. The Council has worked with the relevant landowners/developers and is confident the allocated sites now included can be delivered. There has been some adjustment to the sites and net housing capacity in Policy SADM1 and Policy SADM2 as a result of new information and updating. The overall effect is to confirm that Table 1, and the housing land supply to deliver the Core Strategy target is sound.</p> <p>Patchetts Green is a relatively loose collection of buildings, including ribbon development along Hilfield Lane. Patchetts Green has no services (except the PH) and is not defined as a village for planning purposes. This is therefore not a particularly sustainable location for new housing. Removal of an (unspecified) area from the Green Belt for general housing purposes is not considered appropriate.</p> <p>The equestrian use of Patchetts Green Riding Stables is however appropriate in the Green Belt and its continued operation is supported by the Council.</p> <p>The identification of the Riding Stables as a Key Green Belt site under Policies SADM21 and CS13 allowing infilling or redevelopment within a defined area is not favoured. The purpose behind Key Site designation is to support the existing use, not to encourage residential development per se. The built area is within a conservation area and contains listed buildings: not only is the retention of these buildings important but so is their setting. The indoor show jumping arena is a major industrial-type building, and while there are other small-scale buildings as well, possible reuse</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					or redevelopment is best considered on their merits, if circumstances arise. The NPPF (paragraph 89), supplemented by Policy SADM23, provides guidance on the reuse and redevelopment of previously developed land. These policies, together with guidance on heritage assets, would be sufficient by which to judge any future development proposals. <b>No change.</b>
<b>Safeguarded Land</b>					
00982/1/003 Woolf Bond Planning	✓			Bring forward Core Strategy review in order to accord with NPPF requirement to meet full objectively assessed housing needs for market and affordable housing. SADM is based on an out of date housing requirement, and is therefore not sound. The Council should use DCLG household projections (NPPF advice) - these project an increase in households by 5,527 2011 - 2021 (552 pa). Reference is made to the duty to cooperate in relation to St Albans Council – their housing market area extends into other districts including Hertsmere. Either SADM should make provision for a higher housing requirement or the Council should commence a review of the Core Strategy in form of a Local Plan ( this should include a Green Belt review). There are concerns about the delivery of housing. The current strategy is too restrictive because it assumes sufficient housing can be provided in the urban area without adequately testing individual sites. Table 1 leaves no margin for error in delivery assumptions, and fails to provide a flexible or responsive supply of housing land. The windfall rate is not justified. The following sites should therefore be allocated for development to help meet identified need:	See response under ‘Housing Supply and Table 1 Site Allocations in relation to the Housing Supply 2012 – 2027’ to objection 00982/1/001 Woolf Bond Planning. This explains that the housing land supply is adequate. The appropriate time to consider the potential allocation of new safeguarded land is following a Green Belt review. SADM is delivering the Core Strategy housing target: the Core Strategy does not signal the release of Green Belt land nor all of the hitherto safeguarded land in order to meet the target. Safeguarded land should only be released upon review of the plan according to Government advice in NPPG (paragraph 85). That review will be the review of the Core Strategy itself. <b>No change.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				Land east of Baker Street, Potters Bar (for about 70 dwellings); Land west of Barnet Road, Potters Bar (for about 170 dwellings); Land east of Cowley Hill, Borehamwood (for about 950 dwellings and related development); Land east of Well End Road, Borehamwood (for about 460 dwellings, 5.68 ha employment development and related development). While all would be releases from the Green Belt, the land would provide sustainable urban extensions, would not undermine the purposes of the Green Belt and would provide long term Green Belt boundaries.	
<b>Policy SADM2 Safeguarded Land for Housing</b>					
01238/1/002 Welwyn Hatfield Council		✓		Are all 3 sites available and deliverable and can they be brought forward if needed? If not, may need to identify additional sites as contingency.	A review of the Core Strategy will be undertaken over the next two years. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. The Core Strategy Review is the fundamental review of the 'local plan' and is the appropriate vehicle to consider the identification of further sites as safeguarded land. The land currently identified as safeguarded in SADM was also safeguarded in the Local Plan 2003. The land is not

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					considered to be necessary as part of the current housing land supply, and is not sought by the Council. However, it is a contingency and therefore likely to be used in the longer term (i.e. following the review of the Core Strategy). There is no evidence to suggest the safeguarded land would not come forward. Starveacres is being actively promoted now, and the owner of the largest site on Heathbourne Road (Greenacres) has expressed an interest in bringing the site forward (August 2012: Housing Supply Update). <b>The text relating to land east of Farm Way has been edited to read: "...is greenfield and remains safeguarded."</b> <b>No further change.</b>
01235/1/003 CPRE		✓		Suggested additional text to take account of other sources of housing land within Hertsmere. Amend final paragraph to include word 'suitable', so as to read '...there is insufficient suitable land available...', and insert the words '...or other identified sites consistent with Local Plan and national planning policy' after 'within the then defined urban area'	Appropriate additional text can be added so as to provide clarification when safeguarded sites would be formally released. <b>Text changed</b>
01236/1/001 Herts and Middlesex Wildlife Trust		✓		The sites identified as Safeguarded Land for Housing are in large part undeveloped or having a greater proportion of semi-natural habitat within the site than those allocated for housing under policy SADM1. If they come forward consideration required to their wildlife value and must maintain and enhance their biodiversity and its contribution to the local ecological network. The council should follow the NPPF policy and mitigation hierarchy. Suitable, sufficient and up-to-date ecological surveys must be required by the council to establish the ecological value and interest of the site. This and other information about the local ecological network (including opportunities and priorities for restoration and enhancement) should inform and guide	<b>Supporting text to SADM2 updated to include: Safeguarded land is in large part open or undeveloped, normally with a greater proportion of semi-natural habitat compared to the allocated sites in Policy SADM1. It will therefore be important to control the form of development, when eventually it is accepted as being necessary, in order to protect the environment and any significant open use: mitigation and/or compensation measures may be necessary.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				avoidance, mitigation and compensation actions and where possible deliver enhancement of biodiversity and the ecological network as part of any development of these sites.	
<b>Land east of Farm Way, Bushey</b>					
01222/1/007 HBC Parks		✓		If land is developed replacement play provision needs to be included.	The site is not being considered for development at present so it is not appropriate to add site specific constraints at this stage. <b>No change.</b>
01236/1/002 Herts and Middlesex Wildlife Trust		✓		Development must not lead to any adverse impact on quality and integrity of the adjacent Local Wildlife Site (84/032 - 'Meadow N.W. of Tylers Farm'). Where possible development should enhance the Local Wildlife Site and/or strengthen the surrounding ecological network to achieve a net gain for nature.	The site is not being considered for development at present so it is not appropriate to add site specific constraints at this stage. <b>No change. However supporting text to SADM2 updated to include: 'Safeguarded land is in large part open or undeveloped, normally with a greater proportion of semi-natural habitat compared to the allocated sites in Policy SADM1. It will therefore be important to control the form of development, when eventually it is accepted as being necessary, in order to protect the environment and any significant open use: mitigation and/or compensation measures may be necessary.'</b>
01370/1/012 HCC Highways		✓		The site appears to be landlocked – access may be an issue?	Subject to further investigation at the appropriate time, access should be feasible. The site is safeguarded for future housing use; detailed access issues can be addressed if and when the site is needed for housing. <b>No change.</b>
<b>Land bounded by Heathbourne Road, Windmill Lane and Clay Lane, Bushey</b>					
01236/1/003 Herts and Middlesex Wildlife Trust		✓		Much of this site wooded. Suitable avoidance, mitigation and compensation on site should be implemented to maintain and enhance any existing wildlife value and maintain or improve habitat connectivity.	The site is not being considered for development at present so it is not appropriate to add site specific constraints at this stage. <b>No change. However supporting text to SADM2 updated to include: 'Safeguarded land is in large part open or undeveloped, normally with a greater proportion of semi-natural habitat compared to the allocated sites in</b>



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<b>Policy SADM1_ It will therefore be important to control the form of development, when eventually it is accepted as being necessary, in order to protect the environment and any significant open use: mitigation and/or compensation measures may be necessary.'</b>
01370/1/013 HCC Highways		✓		In principle, the Highway authority is unlikely to make a highways objection to development on this site. The normal highway design and assessment requirements will apply.	Noted. Highway requirements will be addressed through the normal planning application process. <b>No change.</b>
<b>Starveacres, 16 Watford Road, Radlett</b>					
01370/1/014 HCC Highways		✓		Subject to detailed design checks, in principle, the Highway authority is unlikely to make a highways objection to development on this site. Acceptable road width would need to be provided for access road. The normal highway design and assessment requirements will apply.	Noted. Highway requirements will be addressed through the normal planning application process. <b>No change.</b>
00973/1/001 Phillips Planning Services for owner	✓			Allocate for housing. Housing provision insufficient to meet Core Strategy CS1. Buffer of 0.03% (Table 1) contrary to NPPF (requires at least 5%) . Too much reliance on windfall - exceeds proposed allocations in SADM1 and 27.6% of assumed supply once completions and commitments are deducted. Constraints on allocated, town centre and Elstree Corridor sites (relocating existing uses, complex site assembly, assumptions re viability) make table 1 unrealistic. Majority of dwellings proposed likely to be flats - need for larger homes. Allocations proposed won't help deal with overcrowding (para 2.16). Other safeguarded sites (para 2.11) have been allocated or granted planning permission. Site has no constraints, is sustainable location (as per SHLAA), would contribute to meeting housing need, be consistent with Core Strategy SP2. Council should not accept development of land in Green Belt (less sustainable in terms of location, access to	Starveacres is a substantial site which is protected from general housing development as if it was in the Green Belt. However if additional land needs to be identified for housing in order to meet the Core Strategy target, the Council accepts that as a matter of principle safeguarded sites should be used in preference to new greenfield Green Belt sites. SADM is delivering the Core Strategy housing target: the Core Strategy does not signal the release of Green Belt land nor all of the hitherto safeguarded land in order to meet the target. Safeguarded land should only be released upon review of the plan according to Government advice in NPPG (paragraph 85). That review will be the review of the Core Strategy itself.

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				facilities, services and public transport) - contrary to NPPF para 14. Linked objection to non- inclusion in SADM1.	The development of Starveacres is not needed in order to meet the Core Strategy housing target. The housing land supply is adequate. <b>No change.</b>
<b>Other Sites proposed</b>					
<b>Land adj Wilton End Cottage, Shenley</b>					
00194/1/003 owner	✓			Some sites removed from policy SADM2 and availability of another is doubtful – may be a risk that insufficient Safeguarded Land allocated. Want this site allocated, but could also be safeguarded for housing: 1.21 hectares, available within 5 years. Could accommodate c36 new homes. Could provide for local older people to downsize, or general housing. Good location, walking distance of local shops, GP surgery , 2 schools, buses. CS spatial objective for Shenley is to address local housing affordability. Would be happy to comply with Core Strategy CS4 - site could deliver a mix of housing tenures (private, shared ownership and/or social rented) and house sizes. (linked rep SADM1)	The area lies within the Green Belt land. The present Green Belt boundary is clear and defensible as it is. Allocating this land for housing would entail encroachment into an open area and a significant Green Belt release. Such an allocation is not needed to deliver the Core Strategy housing target or provide a necessary contingency now, and is therefore inappropriate. Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. This information will provide the basis of a more wide ranging public debate on the future (growth) of settlements within the borough. <b>No change.</b>
<b>land to the south of Watford Road (A411) and Aldenham Reservoir</b>					
01212/1/001 Preston Bennett on behalf of Safari Developments Ltd		✓		Request designation of land to the south of Watford Road (A411) and Aldenham Reservoir as a 'Safeguarded Housing Site' in order to facilitate development of Reservoir as key community facility. HCC lease on reservoir will not be renewed 2015. Funds needed to retain, repair and restore the reservoir, which will be managed by a Trust, and provide public access and ecological benefit. Residential 'enabling development' would generate the required funding and therefore	This area is in the Green Belt. The current boundary is clear and defensible. Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				constitute very special circumstances (Green Belt). Site is between main road, existing Centennial Park and Elstree Hill housing development - well defined. Will help meet housing targets in medium term. Linked to (and pre-requisite for) request to designate Reservoir as key community facility under SADM29. Detailed submission filed.	Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. In weighing up future options, the possible benefits of public access, habitat protection and maintenance of the reservoir can be considered. Allocating land to the south of Watford Road would entail a major Green Belt release, whether as safeguarded land or not. Such an allocation is not needed to deliver the Core Strategy housing target or provide a necessary contingency now, and is therefore inappropriate. <b>No change.</b>
<b>LB Enfield land SE of Potters Bar, N of M25</b>					
01218/1/002 Knight Frank on behalf of LB Enfield		✓		Allocate as safeguarded for housing. Wouldn't conflict with 5 purposes of maintaining land as green belt. New housing wouldn't lead to unrestricted sprawl, coalescence, encroach into open countryside or impact on important views. SHLAA 2011 indicates 151 dwelling capacity, could come forward within 11-15 year period. More sustainable than existing identified safeguarded sites. Large site, can deliver range of affordable units alongside market housing. Could also accommodate employment development alongside new housing if required.	This area is in the Green Belt. The current boundary is clear and defensible. Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. Allocating land to the south east of Potters Bar would entail a major Green Belt release, whether as safeguarded land or not. Such an allocation is not needed to deliver the Core Strategy housing target or provide a necessary contingency now, and is therefore inappropriate. <b>No change.</b>
<b>Land off Watford Road, Elstree</b>					
01227/1/003 RPS Planning and Development for Bluemark Projects Ltd	✓			Prefer to promote the land for allocation for housing for delivery within the plan period to 2027. If not, then safeguard for future housing to enable its to meet any future shortfall in housing supply. Support the proposed wording of Policy SADM2 to release the identified sites, in the event that a review of the plan indicates a deficit in land supply within the urban areas, to meet long term housing needs. (plan submitted) (Also see SADM1 reps).	This area is in the Green Belt. The current boundary is clear and defensible. Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. Allocating other land adjoining Watford Road would entail a major Green Belt release, whether as safeguarded land or not. Such an allocation is not needed to deliver the Core Strategy housing target or provide a necessary contingency now, and is therefore

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					inappropriate. <b>No change.</b>
<b>Housing Development</b>					
01235/1/004 CPRE		✓		Para 2.16 Seek a wording change to reflect changes to permitted development rights and their likely effect on housing supply which should be reflected in windfall calculations and so may reduce scale of need for development in Green Belt.	The text has been edited to ensure that it is up to date and reflects the latest permitted development rights. The effect on the windfall assumptions in Table 1 is taken into account insofar as possible. Any change related to a planning permission or prior approval (e.g. office to residential) is covered. However, there will probably be a small number of cases where neither planning nor prior approval is required (e.g. change of a space above a small shop to flat): in such cases the change is not recorded. The extent to which this might influence windfall calculations is very small, but it does build a small margin of flexibility into the figures. There is no material effect on the need for any development in the Green Belt. <b>Text changed</b>
01186/1/013 Aldenham Parish Council	✓			Para 2.17 refers to the SHMA which said 'there is a consistently high need for...a significant number of larger homes'. Will bring forward evidence (for the Neighbourhood Plan) that there is a need for smaller housing in Radlett.	Comment noted. Core Strategy CS7 requires housing developments in excess of 10 units to contain some variation within their mix. The supporting text to CS7 references the previous SHMA modelling work which indicated that around 5% of supply should be 4 or more bedroomed properties. A new SHMA has been commissioned jointly with neighbouring Boroughs in order to inform the forthcoming Core Strategy review. <b>No change.</b>
00968/1/002 resident		✓		Enough large expensive houses in Shenley. Need smaller, affordable houses for sale. Too many gated communities and large houses	Noted. Core Strategy CS7 requires housing developments in excess of 10 units to contain some variation within their

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				surrounded by fences. An apartment block would perhaps free up family homes currently occupied by one person.	mix. The adopted Planning and Design Guide indicates that gated developments will be resisted by the Council and gives guidance on acceptable forms of development. <b>No change.</b>
01356/1/001 resident		✓		Stop giving planning permission to build out of character huge houses - increases rich/poor gap. Build 2 houses instead of 1 huge one. Very wealthy don't participate in local community. Bungalows, flats with easy access, improved pavements required for elderly and disabled people.	Noted. The adopted Hertsmere Planning and Design Guide expects all development proposals to respect the context of the surrounding area. Core Strategy CS7 requires housing developments in excess of 10 units to contain some variation within their mix. However at the level of one or two houses on a site it is not considered appropriate to exercise control over the precise number of houses unless necessary for consistency with the Planning and Design Guide. <b>No change.</b>
01263/1/008 resident		✓		Para 2.18 Agree that a concentration of housing conversions and houses in multi occupancy and neighbours' amenity can have a detrimental effect on local character Need to address and enforce this – Borehamwood in particular. Concern also re development in back gardens.	Noted. In relation to back garden development, proposals will be assessed for consistency with the adopted Hertsmere Planning and Design Guide. <b>Policy SADM3 clarifies Council policy in respect of residential development</b>
<b>Policy SADM3 Residential Developments</b>					
01186/1/011 Aldenham Parish Council			✓	Support requirement for development of gardens to comply with other development plan policies.	Noted. <b>No change.</b>
01186/1/012 Aldenham Parish Council			✓	Support refusal of proposals which would result in the net loss of satisfactory residential units or accommodation.	Noted. <b>No change.</b>
01224/1/002 Rachel Charitable Trust	✓			Amend para 2 to make it clear that redevelopment of sites outside of the existing urban areas can also be acceptable, subject to relevant Development Plan Policies and National Guidance.	This part of Policy SADM3 relates to redevelopment within the urban area. Other policies apply in relation to proposals outside the urban area eg proposed housing sites (SADM1), within villages (SADM24), and in Key Green Belt sites

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					(SADM25). Core Strategy policy CS13 indicates that development proposals in the green belt will be assessed in relation to the NPPF. Additional clarification of SADM3 is not considered necessary. <b>No change.</b>
01235/1/005 CPRE		✓		Should include criteria for developments involving sites that are currently in non-residential use.	Policy SADM31 (Design Principles) covers the design aspects of all new development including residential development of sites currently in non-residential use. Other policies in the SADM cover other more detailed 'development management' requirements and so it is not considered additional criteria need to be added to SADM3 to cover sites in non-residential use. <b>No change.</b>
<b>Gypsies and Travellers</b>					
01238/1/005 Welwyn Hatfield Council	✓			Para 2.20-2.22. No transit provision approach proposed (Core Strategy commits to work with neighbouring authorities to do so). No working with neighbouring authorities. Doesn't meet Duty to Cooperate and not sound.	The recent study of Gypsy and Traveller Accommodation Needs undertaken for Hertsmere by ORS (2014) concludes that there is no requirement for additional transit provision in Hertsmere; the Borough already provides the only transit site in South West Hertfordshire (at South Mimms). The latest traveller site data indicates that whilst most of the transit pitches were occupied, there was still some capacity on the site. <b>No change. Comment added to make clear that the Gypsy and Traveller assessment concluded that there is no need for additional transit provision in Hertsmere.</b>
01238/1/006 Welwyn Hatfield Council		✓		Para 2.20-2.22. Proposal Sites for gypsies should be insets within green belt.	GT2 and GT3 are small sites which although unauthorised are already in existence. GT1 is a very small proposed extension to an authorised site which has also been in existence for some time. It is not considered appropriate to re-draw the Green Belt boundary around these existing sites. <b>No change.</b>
<b>Policy SADM4 Gypsy, Traveller and Travelling Showpeople Sites</b>					

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
00664/1/001 Alison Heine			✓	Support protection of existing sites and regularisation of existing sites – low cost, deliverable. But sites are already occupied so do not make provision for on-going household formation, concealed need and those in bricks and mortar.	Support noted. Sites GT1 is new provision, GT2 and GT3 are unauthorised and not counted in current supply so are additional supply. This level of provision made in SADM delivers the commitment made in the adopted Core Strategy 2013, for the provision of 2 pitches per year post 2011 up until 2017. SADM already notes that a fresh assessment of Gypsy and Traveller accommodation needs is being undertaken for Hertsmere (by ORS) and that the Council will take steps to accommodate any new need arising, if necessary through the allocation of new Gypsy and Traveller sites. Evidence from the emerging study indicates that in the period to 2028, a total of 28 additional pitches will be required in order to meet identified need. The council considers that the most appropriate means of providing for this may well be in the context of green belt boundary adjustments, which Government guidance indicates should only be undertaken through the plan making process. The adopted Core Strategy, within which context SADM has been prepared, makes only limited adjustments to the green belt and these do not provide an opportunity for the provision of additional pitches. The council is, however, committed to an early partial review of the Core Strategy, for which SHMA, Economy, and Green Belt studies are already being prepared. The Local Development Scheme 2015 states: “A partial review of the adopted Core Strategy Local Plan (2013) has recently commenced. The partial review will focus on housing need (including gypsy and traveller pitch requirements) and employment land needs.” <b>Commitment to the</b>



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<b>identification of means of provision for additional pitches as part of the review of the Core Strategy added to SADM.</b>
00664/1/003 Alison Heine	✓			Relies on out of date needs assessment (2005) examined in 2009. SADM not likely to be adopted before 2017. Plan should be addressing need up to 2017 and future 5 years 2017-2022 in accordance with NPPG/ PPTS. Council will be vulnerable on appeal if fails to identify sites for future. More sites should be identified now. Current GTAA likely to identify on-going need that SADM4 fails to address therefore SADM4 not sound.	The level of provision proposed delivers the commitment made in the adopted Core Strategy 2013, for the provision of 2 pitches per year post 2011 up until 2017. SADM already notes that a fresh assessment of Gypsy and Traveller accommodation needs is being undertaken for Hertsmerre (by ORS) and that the Council will take steps to accommodate any new need arising, if necessary through the allocation of new Gypsy and Traveller sites. Evidence from the emerging study indicates that in the period to 2028, a total of 28 additional pitches will be required in order to meet identified need. The council considers that the most appropriate means of providing for this may well be in the context of green belt boundary adjustments, which Government advises should only be undertaken through the plan making process. The adopted Core Strategy, within which context SADM has been prepared, made only limited adjustments to the green belt and these do not provide an opportunity for the provision of additional pitches. The council is, however, committed to an early partial review of the Core Strategy, for which SHMA, Economic, and Green Belt studies are already being prepared. The Local Development Scheme 2013 states: "A partial review of the adopted Core Strategy Local Plan (2013) has recently commenced. The partial review will focus on housing need (including gypsy and traveller pitch requirements) and employment land needs." <b>Commitment to the identification of means of providing for additional</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<b>pitches as part of the review of the Core Strategy added to SADM.</b>
01238/1/004 Welwyn Hatfield Council	✓			Policy not been positively prepared or justified and is not consistent with national policy. Failed to identify supply of sites to meet NPPTS. GT1 pitches at Sandy Lane already implemented. GT2 and GT3 not additional pitches. Provision to 2017/18 not 5 year land supply. No provision made for longer term needs. Temp site shouldn't be included in supply figs.	Site GT1 is new provision, GT2 and GT3 are unauthorised and not counted in current supply so are additional supply. The temporary permission will not expire until 2016, when it can be renewed. The level of provision proposed delivers the commitment made in the adopted Core Strategy 2013, for the provision of 2 pitches per year post 2011 up until 2017. SADM already notes that a fresh assessment of Gypsy and Traveller accommodation needs is being undertaken for Hertsmeare (by ORS) and that the Council will take steps to accommodate any new need arising, if necessary through the allocation of new Gypsy and Traveller sites. Evidence from the emerging study indicates that in the period beyond to 2028, a total of 28 additional pitches will be required in order to meet identified need. The council considers that the most appropriate means of providing for this may well be in the context of green belt boundary adjustments, which Government advises should only be undertaken through the plan making process. The adopted Core Strategy, within which context SADM has been prepared, made only limited adjustments to the green belt and these do not provide an opportunity for the provision of additional pitches. The council is, however, committed to an early partial review of the Core Strategy, for which SHMA, Economic, and Green Belt studies are already being prepared. The Local Development Scheme 2013 states: "A partial review of the adopted Core Strategy Local Plan

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					(2013) has recently commenced. The partial review will focus on housing need (including gypsy and traveller pitch requirements) and employment land needs.” <b>Commitment to the identification of means of providing additional pitches as part of the review of the Core Strategy added to SADM.</b>
00664/1/005 Alison Heine		✓		No reference to need for additional transit provision.	The recent study of Gypsy and Traveller Accommodation Needs undertaken for Hertsmere by ORS concludes that there is no requirement for additional transit provision in Hertsmere; the Borough already provides the only transit site in South West Hertfordshire (at South Mimms). The latest traveller site data indicates that whilst most of the transit pitches were occupied, there was still some capacity on the site. <b>No change. Comment added to make clear that the Gypsy and Traveller assessment concluded that there is no need for additional transit provision in Hertsmere.</b>
00664/1/004 Alison Heine		✓		One Acre has room for more pitches in addition to the extra 2 the owner needs for his family. Site could also accommodate transit pitches for which there is a need. Area suitable for traveller pitches, can accommodate more on existing pitch (as at Gullimore Farm or Sandy Lane).	The appeal against refusal of planning permission for additional pitches at One Acre has been dismissed by the Secretary of State. The recent study of Gypsy and Traveller Accommodation Needs undertaken for Hertsmere by ORS (2014) concludes that there is no requirement for additional transit provision in Hertsmere; the Borough already provides the only transit site in South West Hertfordshire (at South Mimms). The latest traveller site data indicates that whilst most of the transit pitches were occupied, there was still some capacity on the site. <b>No change. Comment added to make clear that the Gypsy and Traveller assessment concluded that there is no need for additional transit provision in Hertsmere.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01204/1/001 Potters Bar Society		✓		Recent government announcement - single issue of unmet demand unlikely to outweigh harm to the green belt and other harm to constitute the 'very special circumstances' justifying inappropriate development in the green belt' ; traveller sites are inappropriate development in the green belt and planning policy should protect green belt land from such development. Ministers also want to consider the case for changes to the planning definition of 'travellers' to only those who actually travel.	Decisions in relation to provision for Gypsies and Travellers will be made in accordance with Government guidance in force at the appropriate time. <b>No change.</b>
01204/1/002 Potters Bar Society	✓			Brookes Place - the Society opposes any further increase in the number of pitches and notes the number of caravans on site still exceeds the number for which permission was granted in September 2013.	Noted. There is no proposal in SADM to increase the number of authorised pitches at Brookes Place. It is worth pointing out that a single pitch may in many cases legally accommodate more than one caravan. <b>No change.</b>
01229/1/003 Natural England		✓		No objection to any of the proposed sites - none located close to statutorily designated sites or landscapes. SADM4 should ensure that allocations will not have an adverse effect on local sites or BAP habitats and species through the submission of a detailed ecological assessment and mitigation strategy.	Core Strategy Policy CS6 Gypsy and Traveller Sites indicates that consideration will be given, when assessing the suitability of any site for traveller accommodation, to "ensuring that adverse effects on the ...natural environment are avoided." Relevant SADM policies will also apply to any proposed new site. <b>No change.</b>
<b>Proposal Site GT1 Sandy Lane</b>					
00238/2/002 HCC Development Services		✓		Deliverability of 3 additional plots uncertain until flood plain and funding are resolved. Site plan should be amended to include land on the North West site boundary - the 3 plots given permission recently and the 3 additional proposed.	Noted. <b>Site plan corrected.</b>
00664/1/002 Alison Heine	✓			Concern at concentration at Sandy Lane site – already crowded. Over concentration in one place contrary to CLG guidance 2008. Need to provide choice.	Noted. This comment will be borne in mind in any future identification of sites. <b>No change.</b>
00826/1/001 Bushey Green Belt Assoc; Little	✓			Object to Bushey traveller pitches - 58% plus of Hertsmere travellers' pitches.	Noted. Whilst the Bushey sites do not currently have planning permission they do already exist; apart from the proposed 3 additional pitches at Sandy Lane they are not

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Bushey Residents Assoc					additional to pitches already in use. This comment will however be borne in mind in any future identification of sites. <b>No change.</b>
<b>Proposal Site GT2 Gullimore Farm</b>					
00826/1/002 Bushey Green Belt Assoc; Little Bushey Residents Assoc	✓			Object to Bushey traveller pitches - 58% plus of Hertsmere travellers' pitches.	Noted. Whilst the Bushey sites do not currently have planning permission they do already exist; apart from the proposed 3 additional pitches at Sandy Lane they are not additional to pitches already in use. This comment will however be borne in mind in any future identification of sites. <b>No change.</b>
<b>Proposal Site GT3 Chapman's Yard</b>					
00826/1/003 Bushey Green Belt Assoc; Little Bushey Residents Assoc	✓			Object to Bushey traveller pitches - 58% plus of Hertsmere travellers' pitches.	Noted. Whilst the Bushey sites do not currently have planning permission they do already exist; apart from the proposed 3 additional pitches at Sandy Lane they are not additional to pitches already in use. This comment will however be borne in mind in any future identification of sites. <b>No change.</b>

# Site Allocations and Development Management Policies DPD: Consultation March/April 2014

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Summaries of Representations and Council responses.

## Chapter 3

July 2015

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
<b>Chapter 3 Employment Economy</b>					
01229/1/004 Natural England, Sustainable Land Use and Regulation		✓		No objection to any of the employment allocation sites -none are located close to statutorily designated sites or landscapes. However, policies should ensure that allocations will not have an adverse effect on local sites or BAP habitats and species through the submission of a detailed ecological assessment and mitigation strategy.	Policy SADM11, Biodiversity and Habitats, sets out requirements for ecological assessments and mitigation measures, and any proposed development would be expected to comply with this policy and all others in the plan, so it is not condered necessary to replicate SADM11 here. Should any applications for development in Employment Areas come forward, relevant policies relating to biodiversity and geodiversity will apply. <b>Reference to this has been added to the supporting text, and a list of currently known assets added as an Appendix.</b>
<b>Policy SADM5 Employment Areas</b>					
<b>Elstree Way, Borehamwood Employment Area</b>					
01184/1/002 CGMS Consulting for HSBC	✓			SHLAA site 27 - remove from employment area and re-designate for housing. Character of area has changed - bounded by residential and Wickes/Toolstation/Halfords. Should amend boundary of employment area on eastern side.	The site is not considered suitable for residential use because it would result in a significant loss of B8 floorspace for the borough, and would undermine the integrity of the employment area as a whole. (See response to 01184/1 on Chapter 1). <b>No change.</b>
<b>Cranborne Road, Potters Bar Employment Area</b>					
01236/1/005 Herts and Middlesex Wildlife Trust		✓		Adjacent to Furzeffield Wood and Lower Halfpenny Bottom LNR / Local Wildlife Site, Hertfordshire Way bridleway and Potters Bar Brook. Any development must not lead to any adverse impact on the quality and integrity of the Local Wildlife Sites/LNR or people's enjoyment of the nature reserve. Where possible development should lead to the enhancement of the LNR for people and wildlife and/or strengthen the surrounding ecological network to achieve a net gain for nature. Opportunities to restore or enhance the water course should also be sought.	Should any applications for development in Employment Areas come forward, relevant policies relating to biodiversity and geodiversity will apply. <b>Reference to this has been added to the supporting text, and a list of currently known assets added as an Appendix.</b>
<b>Policy SADM7 Locally Significant Employment Sites</b>					

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
<b>Locally Significant Employment Site: Wrotham Business Park</b>					
01283/1/003 English Heritage		✓		Wrotham Business Park site within Wrotham Park (on Register of Historic Parks and Gardens). It contains three Grade II listed buildings, the Home Farm buildings and is adjacent to a further three Grade II listed buildings, also associated with Home Farm. Development should be required to protect, conserve and enhance the heritage assets at Wrotham Park and their settings.	Should any applications for development in Employment Areas come forward, relevant policies relating to heritage assets will apply. <b>Reference to this has been added to the supporting text, and a list of currently known assets added as an Appendix.</b>
01223/1/006 HCC Historic Environment Unit		✓		Nationally important archaeological remains may be present. Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ.	Should any applications for development in Employment Areas come forward, relevant policies relating to heritage assets will apply. <b>Reference to this has been added to the supporting text, and a list of currently known assets added as an Appendix.</b>
<b>Locally Significant Employment Site: Hollies Way Business Park, Potters Bar</b>					
01222/1/008 HBC Parks		✓		Won't Hollies Way Business Park look out of place following the redevelopment of the bus garage in SADM1 H11? Parks experience some disturbance in the park from this area by means of run-off and noise.	Comments noted. H11 has been deleted as a proposed Housing site as it is understood not to be available. <b>No change.</b>
01283/1/004 English Heritage		✓		Hollies Way Business Park site adjoins the Grade II listed Green Man Public House. Development should be required to respect the setting of this heritage asset.	Should any applications for development in Employment Areas come forward, relevant policies relating to heritage assets will apply. <b>Reference to this has been added to the supporting text, and a list of currently known assets added as an Appendix.</b>
<b>Locally Significant Employment Site: Beaumont Gate, Radlett</b>					
01283/1/005 English Heritage		✓		Policy SADM7: Beaumont Gate site is adjacent to the Radlett North Conservation Area to the west. Development at this location should be required to preserve or enhance the established character of this area.	Should any applications for development in employment Areas come forward, relevant policies relating to heritage assets will apply. <b>Reference to</b>



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<b>this has been added to the supporting text, and a list of currently known assets added as an Appendix.</b>
<b>Locally Significant Employment Site: Farm Close sites, Shenley</b>					
01283/1/006 English Heritage		✓		Policy SADM7: Farm Close sites, are adjacent to the Grade II * St Botolphs Church and the Grade II memorial to Nicholas Hawksmoor. Development should be required to protect and enhance the setting of these heritage assets.	Should any applications for development in Employment Areas come forward, relevant policies relating to heritage assets will apply. <b>Reference to this has been added to the supporting text, and a list of currently known assets added as an Appendix.</b>
01223/1/008 HCC Historic Environment Unit		✓		Nationally important archaeological remains may be present. Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ.	Should any applications for development in Employment Areas come forward, relevant policies relating to heritage assets will apply. <b>Reference to this has been added to the supporting text, and a list of currently known assets added as an Appendix.</b>
<b>Proposed new site: Land r/o Stagg Ridge flats, Potters Bar</b>					
00662/1/001 owner			✓	Request allocate former highway (stopped up) as employment land. Became redundant approximately 1986 when the M25 was opened and Stagg Hill (A111) was rerouted to create a safer entrance onto the new junction 24 roundabout. Since being Stopped Up it has had a variety of commercial uses. Requires no material change to accommodate a B8 (Storage) use. The site is located just off the Stagg Hill (A111) near the M25 junction 24. Not overlooked by any public footpaths or roads.	The site is not considered suitable for employment use because it is situated within the Green Belt and part of the site is a designated wildlife site. <b>No change.</b>
<b>Policy SADM8 Safeguarded Land for Employment Development</b>					

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01235/1/007 CPRE		✓		Unsure that the final sentence of the paragraph is enforceable in terms of Green Belt policy set out in the NPPF; a separate policy statement may need to be included setting out the criteria to be applied and the reasons for them.	It is not clear how the final sentence is not 'enforceable'. The sentence effectively states that applications on safeguarded land, until/unless that land is formally released, are to be treated as if they are in the Green Belt and Green Belt policy criteria (including the criteria in Policy SADM27 Development Standards in the Green Belt) would apply. <b>No change</b>
<b>Land adj Cranbourne Road: Safeguarded land for Employment Development</b>					
01236/1/0014 HMWT		✓		Land adjacent to the Cranborne Road Employment Area. The Cranborne Road Industrial Estate is adjacent to Furze field Wood and Lower Halfpenny Bottom LNR and Local Wildlife Site (LWS refs. 78/012 and 78/022), the Hertfordshire Way bridleway and Potters Bar Brook. It must be ensured that any development of the safeguarded land or redevelopment of the existing employment area does not lead to any direct or indirect adverse impact on the quality and integrity of the Local Wildlife Sites/LNR or people's enjoyment of the nature reserve. Where possible development should lead to the enhancement of the LNR for people and wildlife and/or strengthen the surrounding ecological network to achieve a net gain for nature. Opportunities to restore or enhance the water course should also be sought.	The comments are noted but as this site is not being specifically allocated for development and only being safeguarded for <i>potential</i> future employment development, it is not considered necessary or appropriate to include site-specific requirements. Should any applications come forward on this site in future, they would be expected to demonstrate that the environmental significance of the site has been considered as part of that submission. <b>No change to Policy. However a sentence has been added to the supporting text: 'The safeguarded land is in large part open or undeveloped with semi-natural habitat and watercourses. It will therefore be important to control the form of development, when eventually it is accepted as being necessary, in order to protect the environment.'</b>
<b>Land on Rowley Lane: Safeguarded land for Employment Development</b>					

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01235/1/006 CPRE		✓	✓	Note and welcome amendment to Safeguarded Land area from that shown during Core Strategy EIP but consider additional wording suggested for Policy SADM2 [safeguarded housing land] should be included in SADM8 to take account of alternative sources of land supply.	Additional text can be added so as to provide clarification when safeguarded sites would be formally released. <b>Text changed</b>
01074/2/004 Sport England	✓			The safeguarded area in the policy only safeguards the area for employment development without the need for mitigation for the loss of the former playing fields. This potential loss without any mitigation would result in the loss of a significant amount of playing fields that could meet unmet community needs. There is a concern that the approach in the allocation policy would not accord with Government policy in para 74 of the NPPF or Sport England's playing fields policy both of which apply to former as well as current playing fields. The Council's evidence in relation to playing pitch provision is no longer up-to-date and the Council have committed to updating it. At present it has not been satisfactorily demonstrated that the playing fields that would be lost are surplus to community requirements. It is requested that policy SADM8 (b) be amended to recognise that the former playing fields within this safeguarded area would be expected to be used for a potential sports hub/sports centre or alternatively, off-site playing field mitigation would be required if there is evidence that a need for new or improved playing field provision exists.	Sport England have acknowledged that the playing fields in question are 'former playing fields' and this is reflected in the description of the land in paragraph 3.7 of the SADM. The land is understood not to have been used as playing fields for at least 5 years and as such the Council does not consider there is a specific requirement to 'replace' them. Were the area to be developed as a sports hub or centre of excellence, the Council would want to explore the potential for pitches to be made available for the local community, but it is not considered necessary to amend the text in Policy SADM8 to reflect this. <b>No change.</b>
01370/1/015 HCC Highways		✓		Access will be taken off Rowley Lane. In principle, the Highway authority considers an access strategy could be developed to enable future development of the site. The normal highway design and assessment requirements will apply.	Noted. <b>No change.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01223/1/009 Historic Environment Unit Herts County Council		✓		A risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, are present at Safeguarded Land for Employment Land on Rowley Lane. Because the presence of such remains could be a reason for refusal of any planning application, need an archaeological assessment before the application is submitted. Scope will be dependant upon the nature of any development proposal. Rapid archaeological assessment should be undertaken before being allocated for development, in order to determine if the importance and extent of archaeological remains are such that they might affect the principle of development on the site. Such assessments normally comprise desk-based studies and carefully targeted archaeological test-pitting or trial trenching and are relatively inexpensive.	The comments are noted but as this site is not being specifically allocated for development and only being safeguarded for <i>potential</i> future employment development, it is not considered necessary or appropriate to include site-specific requirements about archaeological assessments. Should any applications come forward on this site, they would be expected to demonstrate that the archaeological significance of the site has been considered as part of that submission. <b>No change.</b>
00981/1/001 Nathaniel Lichfield and Partners	✓			On behalf of LG who own land east of Rowley Lane, Borehamwood. SADM8 says safeguarded land will be treated as if it is Green Belt until required. Text accompanying SADM19 says safeguarded land is removed from the Green Belt. Request last sentence of SADM8 be deleted to ensure clear and consistent approach.	Safeguarded Land is by definition land identified to meet longer-term development needs and cannot be allocated for development in the meantime. This is recognised in the NPPF and as such, it must be treated as if it were Green Belt land. However, the policy will be clarified to state that inappropriate development of this land will not be approved, except in very special circumstances, reflecting established local and national Green Belt policy. <b>Wording changed...Until that time they will be treated as if they are in the Green Belt: <i>inappropriate development will not be approved, except in very special circumstances.</i></b>
01166/1/001 David Lander for RRHE Ltd	✓			Para 5.9 of Core Strategy - Statement of Common Ground says "The Holiday Inn site, at the southern end of this area, is recognised to have a significant amount of previously developed land and buildings and proposals for infilling, partial or complete redevelopment of the site will, in the interim period, be considered on their individual merits." Should be reflected in SADM. Para 3.7	It is recognised that the Council agreed that any proposals for the Holiday Inn site, due to it containing significant previously developed land and buildings, would need to be considered on their individual merits. However, the Council cannot

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<p>of SADM cross refers to Core Strategy para 5.9 but neither this nor SADM8 reflect agreed position re Holiday Inn site - indicates whole area subject to Green Belt policy pending review of Plan. This is incorrect. Propose:(1) An amendment to the start of the second paragraph of Policy SADM8 to read: "With the exception of the Holiday Inn site as referred to in the next paragraph, these sites will be released".(2) An additional paragraph to be added to Policy SADM8 to read as follows: "Proposals for infilling, partial or complete redevelopment of the Holiday Inn site within the Rowley Lane safeguarded area will not be subject to the restrictions set out in the previous paragraph but will be considered on their individual merits in accordance with other relevant policies of this Plan."Inset Map D and the Plan showing Policy SADM8 (Land on Rowley Lane) page 42 need amending to distinguish between curtilage of Holiday Inn site and Safeguarded Land for Employment Area (plan submitted by consultee showing boundary).</p>	<p>allocate land within a safeguarded area. It also cannot remove this site from the area to be safeguarded without returning the site to the Green Belt, as it would be anomalous for the Holiday Inn site to be neither Safeguarded Land nor Green Belt at this stage. However, it is recognised that the policy (now Policy SADM10 Safeguarded Land for Employment Development) needs to recognise the difference between the main part of the Safeguarded Land and the Holiday Inn site, to reflect para 5.9 of the Core Strategy. <b>Policy changed....Until that time they will be treated as if they are in the Green Belt: inappropriate development will not be approved, except in very special circumstances. The Holiday Inn site, at the southern end of the area of safeguarded land, contains a significant amount of previously developed land and buildings: any proposal for development on this site will be considered on its individual merits, within the context of the current appearance and use of the site and other relevant policies in this Plan.</b></p>

# Site Allocations and Development Management Policies DPD: Consultation March/April 2014

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Summaries of Representations and Council responses.

## Chapter 4

July 2015

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
<b>Chapter 4 Open Land and the Environment</b>					
01214/1/001 Flood Management Team, Herts County Council		✓		<p>i) Would like to see SuDS (Sustainable Drainage Systems) promoted within other policies that relate to biodiversity, amenity, green spaces and water quality/ pollution. SuDS are not just about flood risk management. These policies must stand on their own without the involvement of the SAB which will only be assessing sites classified as 'Major Developments' for first 3 years from commencement. Anything below this threshold and anything between now and the date of commencement for major developments will be for LPA to assess.</p> <p>ii) No mention of new Surface Water Flood Maps. Developers should use these to ascertain if sites at risk of surface water flooding and the SFRA.</p> <p>iii) SFRA update needed to reflect changes in legislation and data including surface water maps to ensure evidence in SFRA is up to date to guide for developers and to inform local policies.</p>	<p><b>ii) Reference to SuDS added to Policy SADM38 New and Improved Public Open Spaces. Text added to SADM11 Biodiversity and Habitats which states: “(ii) the opportunity available to create, incorporate, enhance, or restore habitats or biodiversity as part of the development;”</b> SuDS present such an opportunity.</p> <p><b>ii) Reference to the Surface Water Flood Maps added to supporting text within Flood Risk and Drainage section.</b></p> <p><b>iii) The Council is committed to updating the Strategic Flood Risk Assessment, and is in the early stages of commissioning this work.</b></p>
01237/1/001 Hertfordshire County Council (Landscape)		✓		<p>In opening list of references relevant Landscape Character Assessment should be referenced.</p> <p>Taking account of the “<i>character of different areas</i>,” and the “<i>intrinsic character and beauty of the countryside</i>” is a core planning principle of the NPPF (paragraph 17). Indeed, taking into account local landscape character and quality, and ‘sense of place’ or local distinctiveness, is a golden thread running throughout the framework.</p> <p>It should inform the landscape baseline for EIA and Landscape and Visual Impact Assessments submitted with planning applications. Historic Landscape Characterisation should also be mentioned. In planning and managing landscape must acknowledge that landscape goes beyond trees and hedgerows. The European Landscape</p>	<p><b>A quote from NPPF has been added to Chapter 4: “...planning should recognise the intrinsic character and beauty of the countryside. Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside.”</b> (<a href="http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/landscape/#paragraph_001">http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/landscape/#paragraph_001</a>).</p> <p>A new policy (SADM12) has been included on Landscape Character, and the assessments are referred to within the</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				Convention (ELC) defines landscape as, "an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors." It covers natural, rural, urban and peri-urban areas.	supporting text to this section. Townscape and the character of the urban environment is referenced within SADM31 Design Principles which requires that new development contributes to a sense of place by complementing the local character, pattern of development or distinctiveness of its surroundings. The Planning and Design Guide SPD, which is also referred to in this policy, provides greater detail on this. <b>No change, however a new policy SADM12 has been added on Landscape Character.</b>
01043/2/004 resident		✓		How are protection and enhancement of wildlife habitats and development pressures on biodiversity to be monitored? Need policy to produce something positive and measurable. (examples and sources of information given). Policies SADM 10 and SADM 11 are judged against the sustainability criteria and a guess is made of the positive or negative effects of the proposals on the policy. No intention to monitor for water quality. Water quality is vital. New and existing development can have a huge impact on water quality. Can be done economically by volunteers. Funding needs are small. Developers or householder could contribute to get the equipment required, the volunteers do the rest. Plan doesn't attempt to find opportunities to produce positive outcomes for education and training for the landscape and biodiversity sustainability policies eg provide training opportunities sponsored through 106 agreements.	Policies SADM11Biodiversity and Habitats and SADM13 Trees Landscape and Development have been amended to include greater detail to address comments made by statutory and other consultees. The relevant statutory bodies (including Hertfordshire Ecology, Herts and Middlesex Wildlife Trust and the Environment Agency) are consulted when planning proposals are received which may impact on designated sites of importance for biodiversity,habitats and trees, and their advice taken into consideration rather than a guess being made about the impacts. The amenity space requirements for new developments are set out in the Planning and Design Guide Part D 2013. At sensitive locations statutory bodies may require particular mitigation measures to be put in place by a developer. The revised Policy SADM11 Biodiversity and Habitats make provision for this. A more detailed policy on Sustainable Drainage Systems (SADM16) has been drafted, and the inclusion of SuDS on new developments should result in improved water quality. The importance of water quality is acknowledged, however



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>quality monitoring does not fall within the remit of the Local Planning Authority and is monitored by the Environment Agency (Main Rivers only) or the Lead Local Flood Authority (Hertfordshire County Council) (other watercourses).</p> <p>All contributions sought through section 106 need to be justified using 3 tests set out in the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) which are that they must be:</p> <ol style="list-style-type: none"> <li>1. necessary to make the development acceptable in planning terms</li> <li>2. directly related to the development; and</li> <li>3. fairly and reasonably related in scale and kind to the development.</li> </ol> <p>Developers are able to challenge the need for these contributions at appeal, and it would be very difficult to sustain a case that education and training on biodiversity issues meets these tests. <b>No change.</b></p>
<b>Natural Environment</b>					
01151/1/005 resident		✓		Are parts of Potters Bar Golf Course a Wild Life site?	No.
01168/1/005 Hertfordshire Ecology		✓		<b>Para 4.3</b> - 'Hertfordshire Biological Records Centre' (HBRC) should be referred to here as 'Hertfordshire Ecology'. HERC could also be referred to if considered appropriate in providing the evidence base underpinning the Local Plan, but does not provide planning advice.	Noted. <b>Reference changed to Herts Ecology.</b>
01168/1/006 Hertfordshire Ecology		✓		<b>Para 4.4</b> -The BAP should also have a date (2008 - the last revision date). This document has effectively been replaced by the Local Nature Partnership, which has endorsed 'Planning for Biodiversity and the Natural Environment in Hertfordshire - guiding principles (consultation version 2013)'. This document should now be referred to within the list	<b>Date has been added to the Biodiversity Action Plan. 'Planning for Biodiversity and the Natural Environment in Hertfordshire - guiding principles (consultation version 2013) added to list of documents. BS 42020:2013 Biodiversity - Code of Practice for Planning</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				of guidance documents. It is consistent with Policy SADM10. British Standard BS 42020:2013 'Biodiversity - Code of Practice for Planning and Development' should also be referred to.	<b>and Development added to list of documents.</b>
01168/1/007 Hertfordshire Ecology		✓		<b>Para 4.5</b> - HBRC should be referred to as Hertfordshire Environmental records Centre and Hertfordshire Ecology, now separate bodies but providing advice and guidance to the recourse of designated sites. Rather than 'working lists', we consider the reference should be to the 'sites being based upon the latest available information' which implies a degree of working flexibility as necessary given the dynamic nature of ecology and management.	Noted. <b>Reference within Biodiversity section changed to Herts Ecology and to 'sites identified in the Plan are based upon the latest available information'.</b>
01236/1/006 Herts and Middlesex Wildlife Trust		✓		<b>Paragraphs 4.3 and 4.5</b> make reference to the Hertfordshire Biological Records Centre. The functions of the old Hertfordshire Biological Records Centre have been separated and are now delivered by different organisations. The Hertfordshire Environmental Records Centre (www.hercinfo.org.uk) manages the county's biological/ecological records, including maintaining and updating the Hertfordshire Local Wildlife Sites boundary dataset.	Noted. <b>Reference changed to Herts Ecology.</b>
01168/1/008 Hertfordshire Ecology		✓		<b>Para 4.6</b> - This should include '...sufficient survey information 'and mitigation or compensation proposals' at the time ...This is because the LPA needs to be assured that the legally protected ecological resource will be adequately secured by appropriate means if an application is approved.	<b>Wording added to Biodiversity section. "and mitigation or compensation proposals".</b>
01237/1/002 Hertfordshire County Council (Landscape)		✓		<b>Para 4.1 – 4.6</b> - Plan focus is on Biodiversity, habitats and wildlife. Should expand on role of green and blue infrastructure. GI "the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect villages, towns and cities. It is a natural service-providing infrastructure that is often more cost-effective, more resilient and more capable of meeting social, environmental and economic objectives". GI a key mechanism for climate change mitigation and adaptation.	<b>Noted. Supporting text expanded to include role of green and blue infrastructure.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01125/2/002 HBC Councillor		✓		<b>Para 4.6</b> Gardens are important for wildlife, natural diversity, natural drainage. Don't sacrifice for small increase in housing. More development means more pollution, congestion. Should allow some development of less valuable green belt land in order to avoid impacts of over development on town centre sites.	Proposals for gardens are assessed against Hertsme're's adopted Planning and Design Guide which seek to safeguard the amenity of existing and future residents. Policy SADM31 Design Principles requires development proposals to comply with this document. Allocating additional sites in the green belt in SADM would be inconsistent with the adopted Core Strategy and NPPF. <b>No change.</b>
01237/1/003 Hertfordshire County Council (Landscape)		✓		<b>Para 4.7</b> - Plan emphasises consideration of loss of trees. Needs to be consideration of all aspects of trees, hedgerows and other important landscape and water features in all schemes regardless of existence or loss of trees on site. In addition to the hedgerow regulations there is BS 5837:2012 trees in relation to design, demolition and construction. Also, British Standards in relation to the management of topsoil / plant handling etc. It would be beneficial to see this chapter really promoting good landscape design, supported with robust site surveys, to ensure high quality outputs.	<b>Noted. The policy has been expanded to include a requirement for proposals to include appropriate landscaping schemes.</b> BS 5837 is already referenced within the policy.
01168/1/0010 Hertfordshire Ecology		✓		<b>Para 4.43</b> - We suggest the following wording 'impact on the 'natural' environment and amenity' 'details of the schemes 'and appropriate mitigation and / or appropriate design to minimise light pollution' are required."should be provided as well as any associated landscaping proposals to minimise the impact of artificial light where necessary'.	<b>The supporting text has been amended to reflect the comments received.</b>
<b>Policy SADM9 Biodiversity and Habitat Sites</b>					
01168/1/002 Hertfordshire Ecology		✓		LNR Policy SADM9: Boundary amendments:(N.B. latest GIS boundaries of LNRs available from Herts Environmental Records Centre).op.43 Hilfield (not Hillfield) Park Reservoir - remove the pumping station on west side from boundary. Also small bit of woodland on east side opposite the pumping station is plantation and not in the LNR boundary. op.44 Furzefield Wood LNR is called "Furzefield Wood & Lower Halfpenny Bottom". op.45 Fishers Field LNR is called "Fisher's	<b>MAPPING</b> <b>The maps have been updated using the latest data from HERC. The corrections are noted.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				Field".	
01236/1/007 HMWT		✓		The policy mentions 'Wildlife Sites'. HMWT recommends this be amended to 'Local Wildlife Sites' for clarity and to ensure consistency with the terminology agreed and used by the Hertfordshire Wildlife Sites Partnership, and with the language of the NPPF and the government's Local Sites guidance <a href="http://archive.defra.gov.uk/rural/protected/localsites.htm">http://archive.defra.gov.uk/rural/protected/localsites.htm</a> , which is also referenced in the National Planning Practice Guidance. <b>This comment applies to the whole document where the term 'Wildlife Site' is used.</b>	Noted. <b>The terminology has been changed wherever Wildlife Sites are referred to within policies and supporting text.</b>
01236/1/004 Herts and Middlesex Wildlife Trust		✓		The sites identified as Safeguarded Land for employment ( <b>SADM8</b> ) are in large part undeveloped or having a greater proportion of semi-natural habitat within the site than those allocated for housing under policy <b>SADM5</b> . If they come forward consideration required to their wildlife value and must maintain and enhance their biodiversity and its contribution to the local ecological network. The council should follow the NPPF policy and mitigation hierarchy. Suitable, sufficient and up-to-date ecological surveys must be required by the council to establish the ecological value and interest of the site. This and other information about the local ecological network (including opportunities and priorities for restoration and enhancement) should inform and guide avoidance, mitigation and compensation actions and where possible deliver enhancement of biodiversity and the ecological network as part of any development of these sites.	<b>Comment is more on SADM8 (now SADM10) than on Chapter 4. Supporting text to SADM10 Safeguarded Land for Employment Development updated to include: 'The safeguarded land is in large part open or undeveloped with semi-natural habitat and watercourses. It will therefore be important to control the form of development, when eventually it is accepted as being necessary, in order to protect the environment.'</b>
<b>Policy SADM10 Biodiversity and Habitats</b>					
01168/1/009 Hertfordshire Ecology		✓		Policy SADM10 - Biodiversity and Habitats. We advise the following wording should be added '...will not normally be permitted 'consistent with legislation and planning policy guidance'. This allows for the sequential approach to sites and appropriate methodology or licensing to secure adequate protected species conservation, leading on to the	<b>The principals within the suggested wording have been incorporated within SADM11 Biodiversity and Habitats and the supporting text.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				next paragraph. We consider the following should be added 'i) ...value of the site 'and / or species affected'. The following should also be added: The Council will work in partnership with the Hertfordshire Local Nature Partnership, Hertfordshire Environmental Records Centre, Hertfordshire Ecology, the Wildlife Trust and Natural England to minimise the impacts on biodiversity and geodiversity in Hertsmere. (Biodiversity can be considered as the sum of living things, including both habitats and species.)	
01236/1/008 Herts and Middlesex Wildlife Trust		✓		Welcome inclusion of SADM10. Could be improved to more effectively promote the conservation and enhancement of the borough's natural environment. Not suitably clear or specific in establishing how habitats and sites of nature conservation value will be protected in planning and it does not provide a basis for landscape-scale conservation or restoration and enhancement of ecological networks. Recommend revise policy to 1) recognise the differences between different types and levels of designation/protection of geological and nature conservation sites, and implications for planning applications affecting them; 2) integrate and respond more clearly to the mitigation hierarchy (NPPF para 118); 3) require suitable and sufficient ecological information to be submitted with an application, so that likely impacts of the proposal on biodiversity can be considered; 4) more clearly support protection, restoration and enhancement of ecological networks. NPPF para 117. Plan should identify and map the components of existing ecological network, including linking habitats and areas for enhancement and restoration (both including and outside of protected sites). SADM10 must be revised or expanded to effectively work to maintain, restore and strengthen the borough's biodiversity networks, (for consistency with NPPF and to achieve Hertsmere's strategic policies (eg. SP1 and CS12)); 5) make clear what actions council will take to promote protection and enhancement of biodiversity eg planning conditions,	<b>SADM11 Biodiversity and Habitats has been substantially amended in response to these comments and those received from Hertfordshire Ecology, and the principles within the suggested wording have been incorporated.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				obligations.Point ii) - more helpful to focus on the likely impact of the development (whether positive or negative) on the ecological interest and integrity of the site or habitat concerned and the wider ecological network. Point iii) - For clarity, we recommend a revision of wording. For instance: The Council.... will have regard to.... the opportunities available to create, incorporate, enhance or restore habitats or biodiversity as part of the development. Where such opportunities exist and where appropriate, the council will use planning conditions or obligations to secure their delivery and ongoing maintenance.Point v). We welcome the inclusion of this important point, however the pre-eminence of this consideration must be made clear. Again, the mitigation hierarchy has not been sufficiently integrated into the policy. Development should not be permitted on areas of nature conservation value (including but not limited to Local Wildlife Sites) where an alternative site of less impact exists, or where the development could be repositioned within the application site to avoid harmful impacts on the habitat or feature or interest, or on the reason for the site's designation. More detail in submission.	
01229/1/005 Natural England, Sustainable Land Use and Regulation		✓		<p>Satisfied that SADM10 seeks to ensure that development will protect and enhance biodiversity and geodiversity, including statutorily designated sites, as far as possible. We welcome that the Council will work in partnership with relevant bodies, including Natural England, to minimise impacts on biodiversity and geodiversity in Hertsmere.</p> <p>Policy could be extended to include reference to the requirement for proposals to conserve and enhance the landscape character of the area; relevant proposals should be supported by an up-to-date landscape character assessment.</p>	<p>The support is noted. SADM11 Biodiversity and Habitats has been amended in response to other representations received.</p> <p><b>A new policy SADM12 has been added on Landscape Character.</b></p>
<b>Trees and Landscaping</b>					
01231/1/002		✓		Tighten 4.11 to safeguard umbrella of protected tree[s] from	Developers are expected to make good any off-site damage

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Radlett Society & Green Belt Association				manoeuvring of large construction vehicles, especially very high cranes. Council should consider requiring developers to deposit a financial bond against the repair and/or replacement of trees, verges, crossings, kerbs, signs etc	caused during construction. Trees with TPO and in Conservation Areas are already protected. A tree protection plan in accordance with the current BS5837 (as referenced in the Biodiversity Trees and Landscape SPD) would be expected to cover protection of tree umbrellas but for emphasis. <b>A reference to this has been made within the supporting text as requested.</b>
01356/1/005 resident		✓		Don't allow tarmac over all gardens. Ensure developers replant more trees and shrubs. Introduce a standard for an amount of a front garden that should be soft landscaping to improve amenity and flood resilience.	Surface treatment within garden curtilages is often permitted development so outside planning control. Where permission is required, Policy SADM31 Design Principles requires compliance with Hertsmere's Planning and Design Guide which sets out expectations for landscaping and garden space (including statement that the council is likely to refuse applications that do not provide porous surfaces where large areas of parking are provided). <b>No change.</b>
01222/1/010 HBC Parks		✓		Para 4.9 - mention an additional comment on any interaction between existing or proposed trees and the buildings within the development or adjacent sites with regards to future issues - to the health of trees, potential damage to the buildings and also the visual impact on the residents.	The Biodiversity Trees and Landscaping SPD advises that layouts should be designed so that trees have space to reach maturity without the need for regular tree surgery, do not dominate buildings, cause unreasonable reduction in light to habitable buildings, or completely block direct sunlight to gardens. For emphasis, <b>additional sentence added to refer to need to consider future relationship between trees and buildings as trees mature added.</b>
01349/1/001 resident		✓		Plant new evergreen trees eg along Elstree Way. Environmental benefits - reduce pollution, lower energy costs, improve appearance, ecosystem, habitat and food for birds and other animals, absorb carbon dioxide and gases, reduce surface water run off, reduce chemicals getting into streams. Personal and Social benefits - living legacy for next generation, health benefits, reduce highway noise which in turn lowers stress, health problems, aggressive behaviour. Community benefits - improved	Para 4.7 and the Biodiversity Trees and Landscape SPD recognise the wide ranging benefits of trees. The Council seeks both to protect existing trees and require appropriate new planting where development is proposed. The objectives for Elstree Way set out in the EWCAAP emphasise the need to improve the physical appearance of corridor as a key gateway to the town, landscaping being a

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				perception of area, community pride, enhance economic stability by attracting businesses and visitors, reduce crime.	key element of this. <b>No change.</b>
<b>Policy SADM11 Trees, Landscaping and Development</b>					
01206/1/002 Rapleys for Taylor Wimpey / National Rail	✓			Policy should be amended so that only trees worthy of retention are protected so that site development is not unnecessarily restricted. (H3 has Woodland TPO but only 1 tree of significant age and size).	Where a group of trees has been assessed as meriting TPO designation the presumption is that they should all be retained. If a developer considers individual trees within a group TPO are not worthy of being retained then it would be open to them to submit an arboricultural report in support of this view. <b>No change.</b>
01224/1/003 Planning Works for Rachel Charitable Trust	✓			Contradiction between policy aims (to protect all trees unless they are diseased or not of high quality) and para 4.10 (accepts that the loss of trees due to development can be acceptable with appropriate compensatory landscaping). Policy criteria ii) too subjective - what is high quality? Amend policy to clarify and to resolve contradiction.	It is not considered that this is a contradiction. The overarching aim of the Policy is to ensure that all healthy high quality trees are retained. However as SADM already acknowledges, there are some circumstances where the benefits of development is judged to outweigh (a) tree'(s) contribution to amenity and biodiversity, and thus development together with replacement planting can be acceptable. <b>No change.</b>
01236/1/009 Herts and Middlesex Wildlife Trust		✓		Revise wording to recognise benefits other than amenity - habitat, ecological links, climate change adaptation, flood risk reduction, air quality improvements, improving health and wellbeing.	The Biodiversity Trees and Landscaping SPD, which is referenced in the text and Policy SADM13 Trees Landscape and Development, acknowledges the wide range of benefits that trees provide. <b>Policy wording expanded to include 'environment' as well as 'amenity'.</b>
01242/1/007 Shire Consulting for Radlett Preparatory School	✓			SADM11 does not accord with the NPPF, in that it is not 'justified' by any proper evidence and is not positively prepared. It is therefore 'unsound' and should be deleted. Highly subjective	This response has been considered along with other responses, including those from statutory consultees. It is considered that policy SDAM11 (now SADM13) Trees, Landscaping and Development is necessary and expands on national policy. <b>No change.</b>
01243/1/008 Shire Consulting for Aldenham School	✓			SADM11 contrary to NPPF, in that it is not 'justified' by any proper evidence and is not positively prepared. It is therefore 'unsound' and should be deleted. Highly subjective.	This response has been considered along with other responses, including those from statutory consultees. It is considered that policy SDAM11 (now SADM13) Trees,



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					Landscaping and Development is necessary and expands on national policy. <b>No change.</b>
01350/1/010 Shire Consulting for Exchange Ltd	✓			SADM11 contrary to NPPF, in that it is not 'justified' by any proper evidence and is not positively prepared. It is therefore 'unsound' and should be deleted. Highly subjective.	This response has been considered along with other responses, including those from statutory consultees. It is considered that policy SDAM11 (now SADM13) Trees, Landscaping and Development is necessary and expands on national policy. <b>No change.</b>
01229/1/006 Natural England, Sustainable Land Use and Regulation			✓	We welcome SADM11 which seeks to ensure the protection of trees and hedgerows through development.	The support is noted.
01382/1/004 Savill's for Hartsbourne Golf and Country Club			✓	The golf course is covered by TPO - majority of trees focused around the clubhouse and dividing each fairway. The Club contend that the trees on site are an important part of the environment and contribute to the amenity of the area. Furthermore, the National Planning Practice Guidance (NPPG), sets out extensive guidance particularly in regard to the amenity value of trees. In relation to this TPO, the trees predominantly located around the built up part of the site have a significant positive impact on the local environment due to their visibility from the public realm. Policy SADM28 identifies that trees located in this area of the District provide a positive contribution to the special character of the Bushey Heath MOD Housing Area. Club maintain that the trees are an important part of the site's character and offer enjoyment to users of the facility and the wider area. Their continued protection would bring a significant degree of public benefit in the present and future.	Support noted.
<b>Water, Drainage and Flood Risk</b>					
01139/2/016 Environment Agency		✓		Ensure SFRA informs policies (P70-71 of SFRA contains DM policy recommendations).	The DM policy recommendations from the SFRA are considered to be met within the Core Strategy along with the requirements of the NPPF and the Environment Agency.

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					However, the policies have been checked and amended to ensure that they are informed by the SFRA.
01139/2/015 Environment Agency		✓		<p>We had previously recommended the inclusion of a separate policy on watercourses. This would help show how Core Strategy Policy CS12 is to be achieved in relation to its aim to conserve and enhance the natural environment of the borough (e.g. rivers and river corridors).  <i>'All new development on sites that contain a watercourse or are situated next to a watercourse shall:</i></p> <ul style="list-style-type: none"> <li><i>i. Not culvert or build over culverted watercourses.</i></li> <li><i>ii. Deculvert the watercourse (if culverted) for flood risk management and biodiversity benefits.</i></li> <li><i>iii. Set back the development a minimum of 8 metres from a main river watercourse with an undeveloped strip of land and 5 metres from an ordinary watercourse with an undeveloped strip of land.</i></li> <li><i>iv. Look for opportunities to undertake river restoration and enhancement as part of the development. If this is not possible on site, a developer contribution shall be made to a river restoration or enhancement scheme within the river catchment as identified by the Council.</i></li> <li><i>v. Provide a Water Framework Directive (WFD) assessment, if appropriate, which is required for any proposals involving the re-alignment of a river or that impact on a river.</i></li> <li><i>(vi. Include an assessment of the condition of existing assets (e.g. bridges, culverts, river walls). Refurbishment and/ or renewal should be made to ensure the lifetime is commensurate with the lifetime of development. Developer contributions should be sought for this purpose.'</i> (Note - this may be better in the flood risk section, as it relates to reducing flood risk?.) )</li> </ul> <p>Supporting text:  <i>Rivers and watercourses enhance the quality of the environment within</i></p>	<p><b>A new Watercourses section and Policy SADM17 Watercourses have been added as advised.</b></p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<p><i>Hertsmere. Their protection and enhancement will improve the enjoyment for everyone, whether it is for residents or for visitors. Enhancing the quality of rivers will also bring benefits in terms of biodiversity.</i></p> <p><i>A healthy water body has thriving populations of fish, invertebrates, plants and diatoms (microscopic algae). They depend upon a healthy flow of water and a variety of natural habitats. All of these are affected by the levels of pollution and nutrients in the water, and the shape and structure of the water body.</i></p> <p><i>The deculverting of any culverted watercourses is supported by the Council's SFRA which states that all new developments with culverts running through their site should deculvert rivers for flood risk management and conservation benefit (SFRA section 6.3.3 - recommended policy options).</i></p> <p><i>The provision of an undeveloped strip (buffer zone) is important to ensure the Borough's wildlife corridors and biodiversity is protected and enhanced and to ensure the preservation of acceptable flood flow routes and is supported by the Council's SFRA. It is also an aim of the NPPF which highlights the importance of establishing coherent ecological networks (such as rivers and river corridors) that are more resilient to current and future pressures.</i></p> <p><i>This policy approach is also supported by the Water Framework Directive (Directive 2000/60/EC). WFD requires member states to prevent deterioration of water bodies (rivers, lakes, reservoirs, streams, canals, estuaries, coastal and groundwater) and to improve or maintain them with the aim to meet 'good status' in all water bodies. Under the WFD the aim is for all such waterbodies to be in good ecological health by 2027.</i></p> <p><i>WFD Article 13 requires the Environment Agency to publish river basin management plans (RBMPs) that identify measures to achieve WFD</i></p>	

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				<p>requirements for all water bodies in England and Wales. Regulation 17 of the Water Environment (WFD)(E&amp;W) Regulations 2003 places a duty on each public body including local planning authorities to 'have regard to' RBMPs.</p> <p>NPPF parag 114 says 'Local Authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'.</p> <p>This is also supported by Hertsmere's SFRA.</p>	
01139/2/010 Environment Agency		✓		<p><b>Paragraph 4.14:</b> Welcome inclusion but needs amending to strengthen the emphasis on reducing flood risk and removing the reference to building on stilts. This could be worded as follows: 'Flood risk should not be increased, and it should be improved through development proposals where possible, e.g. by restoring the natural flood plain, by removing or relocating buildings away from flood risk areas and/or by increasing the ground area that is permeable.' Buildings on stilts can be susceptible to blockages causing obstruction to flood flows - could increase flood risk to the property and surrounding properties which is unacceptable. There's also difficulty in ensuring those voids will be checked regularly and maintained. Suggested wording to replace building on stilts is: 'flood risk mitigation measures'.</p>	<p><b>Noted. Supporting text amended to refer to flood risk mitigation measures in place of the reference to buildings on stilts.</b></p>
01139/2/013 Environment Agency		✓		<p><b>Paragraph 4.18:</b> To comply with the Flood and Water Management Act 2010 and your Core Strategy Policy CS16 - Environmental impact of development, all new developments will need to incorporate sustainable drainage (SuDS). SuDS are designed to mimic the natural drainage of surface water, typically managing rainfall close to where it falls. The drainage hierarchy shows that traditional piped/tanked systems are the least sustainable of all SuDS techniques as they do not improve water quality or provide environmental benefits, so should only be used as a last resort. Techniques such as ditches, drains, swales,</p>	<p><b>Noted. Supporting text amended accordingly and the SuDS policy SADM16 Sustainable Drainage Systems and supporting text have been strengthened in response to the recent national policy changes and HCC guidance.</b></p>

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				detention basins, green roofs and filter strips are considered as suitable SuDS.	
01139/2/007 Environment Agency		✓		<b>Paragraph 4.21</b> Replace "Technical Guidance to the NPPF" with "Planning Practice Guidance".	<b>Supporting text updated to refer to the PPG.</b>
01139/3/00 1 Environment Agency		✓		As a general comment there are references throughout the text to your SFRA dated 2008. Your SFRA will have been based on the Upper Colne Model in 2005 which has since been updated in 2010. Your SFRA/maps will need to be updated to reflect the new Upper Colne Model. If your SFRA also mapped surface water it should be updated to take account of the latest surface water modelling which should be available to download from our website.	The Council is looking into updating the SFRA at the moment, although no timescale has been set for this as yet. The latest surface water flood maps have been downloaded from datashare (as advised at the SuDS event in Stevenage on Friday 20 March), and will be uploaded into the Council's planning constraints system.
01139/3/003 Environment Agency		✓		<b>Para 4.20 (in the updated draft):</b> This paragraph refers to Hertsmere's Land Drainage Byelaws which stipulate no obstructions within 9 metres of a watercourse and this is reflected in SADM14 'Watercourses.' This is fine and we support however bear in mind that the Environment Agency from April 2015 will only comment on developments that affect main river watercourses through consultations on planning applications. The Local Authority are responsible for consenting ordinary watercourses and will need to be aware (hopefully are already aware) of your 9 metre Hertsmere Byelaw distance.	Noted. The supporting text has been amended to state that the Council will continue to work closely with the Environment Agency on specific sites <i>affecting main rivers</i>
01139/3/004 Environment Agency		✓		<b>4.29 (in the updated draft):</b> Regarding the mention of SAB approval and 10 units. SuDs Approval Bodies are no longer being taken forward by the Government as per their proposals to make Lead Local Flood Authorities (Herts CC) statutory consultees for major development for surface water drainage. The definition of major development encompasses the residential development of 10 or more dwellings and the non-residential of 1 hectare or more or 10,000 square metres of new floor space. It's probably more accurate to refer to 'major development' as defined in the Planning Practice Guidance.	<b>The paragraph and SADM16 Sustainable Drainage Systems have been updated to include a reference to major development. (Should be 1,000 square metres rather than 10,000).</b>

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01188/1/002 Thames Water Property Services		✓		<p><b>Paragraphs 4.12-4.23 Water, Drainage and Flood Risk</b></p> <p>i) Within paragraphs 4.12-4.23 reference should be made to all forms of flooding, including sewer flooding.</p> <p>ii) With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage thus reducing the risk of sewer flooding.</p> <p>The originally agreed wording which was omitted from the Core Strategy stated:</p> <p><i>“The Council recognises that sewer flooding can occur due to a lack of capacity within the existing sewer network. New development may be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to sewer flooding. Where there is a known capacity problem and no improvements are programmed by the statutory undertaker, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development. The Council will work with Thames Water in order to ensure that strategic waste water infrastructure required to support growth will be delivered alongside development.”</i></p> <p>Similar wording should be provided in the supporting text for Policy SADM13.</p>	<p>i) Reference to all types of flooding has been added to the supporting text.</p> <p>ii) The supporting text has been amended to reflect the principles within the comments.</p>
01188/1/013 Thames Water Property Services			✓	<p><b>Paragraph 4.24 Water Supply and Waste water</b></p> <p>Thames Water support the text within paragraph 4.24 of the draft DPD. In order to ensure that the drainage requirements of development proposals are understood and that any upgrade requirements are identified, all developers should be encouraged to contact Thames</p>	<p><b>Additional information has been added to this paragraph based on the comments received to encourage developers to contact Thames Water.</b></p>

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				<p>Water Developer Services in advance of the submission of planning applications. Thames Water recommend that developers engage with them at the earliest opportunity to establish the following:</p> <ul style="list-style-type: none"> <li>• the developments demand for water supply infrastructure both on and off site and can it be met;</li> <li>• the developments demand for wastewater infrastructure both on and off site and can it be met; and</li> <li>• the surface water drainage requirements and flood risk of the development both on and off site.</li> </ul> <p>Information for Developers on water/wastewater infrastructure can be found on Thames Water’s website at:  <a href="http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm">http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm</a>  Contact can be made with Thames Water Developer Services by:  Post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY  Telephone on: 0845 850 2777  Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a>”</p>	
01214/1/002 Flood Management Team, Herts County Council		✓		<p>i) Check no. of properties at risk of surface water flooding quoted matches the local flood risk management strategy.  ii) <b>Paragraph 4.13</b> What is meant by 'unacceptable level of risk' how is this measured? What makes the risk unacceptable?  iii) <b>Paragraph 4.14</b> What about reducing the risk from existing surface water flooding? All measures mentioned mainly relate to risk of fluvial flooding – need to include measures to manage and mitigate surface and ground water flooding?  iv) <b>Paragraph 4.15</b> may be watercourses not in flood zones because they are too minor or classified as Ordinary Watercourses- sensible to say that before any development can go ahead, any potential sources of flooding should be assessed to establish the risk over the lifetime of the development- this should be based on local evidence i.e. there</p>	<p>i) This has been checked and is correct.  ii) This text refers to adopted Core Strategy Policy CS16. <b>No change.</b>  iii) Noted. <b>SuDS have been included as a mitigation measure against surface water flooding.</b>  iv) Noted. <b>New paragraph has been added.</b>  v) <b>Sentence added to the supporting text to make developers aware of</b> the LFRMS and its supporting documents, and be aware of the overall aims of managing and mitigating flood risk in Hertfordshire and the wider implications of any new development on the surrounding area, not just within the boundary of the site.</p>

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				<p>may be local records of flooding from a minor watercourse but no flood maps, this evidence should be taken into account within a FRA to support the proposed development.</p> <p>v) <b>Paragraph 4.16</b> it would be useful to state here how that interacts with planning and development, pointing developers to this document and any supporting documents to ensure they are aware of the overall aims of managing and mitigating flood risk in Hertfordshire and the wider implications of any new development on the surrounding area not just within the red line boundary.</p> <p>vi) <b>Paragraph 4.17</b> 8m buffer applies to Main Rivers only unless Hertsmeire BC has their own Bylaws for Ordinary Watercourses. This applies from the 'top of bank'.</p> <p>vii) <b>Paragraph 4.18</b> The Flood and Water Management Act 2010 has recognised that the current legislation within the NPPF does not provide the necessary requirement to ensure SuDS are implemented on all new development and retro-spective development. Schedule 3 of the Act was developed to make the LLFA the SuDS Approval Body for its area, in this respect Hertfordshire County Council, to approve appropriate drainage measures using the best practice principles of Sustainable Drainage Systems which promote space for water, ground water recharge, improved water quality, biodiversity enhancement and useful amenity spaces. Note the SAB will only be assessing 'Major Developments' for the first 3 years from the date of commencement, anything classed as minor will continue to be assessed by the LPA. Hertfordshire are likely to become the SAB within 2014, however until this has been confirmed through parliament at the end of April 2014 via the secondary legislation being passed this can not be confirmed and this draft site allocations document will be updated once this has been announced.</p> <p>viii) <b>Paragraph 4.21</b> has the SFRA been updated to include the new</p>	<p>vi) Hertsmeire Bylaw states 9m from all watercourses. The text has been amended accordingly. <b>Text added to paragraph to state that a 9m buffer is required to be maintained between the 'top of the bank' of any watercourse and any proposed development.</b></p> <p>vii) <b>This is now out of date given the change in national policy SuDS and SABs. Alternative wording has been added to the supporting text to reflect the current situation and updated PPG.</b></p> <p>viii) The SFRA has not yet been updated to include the new national surface water flood maps, however the Council has begun the process of updating it.</p> <p>ix) <b>The supporting text has been amended in response to the national planning policy changes..</b></p> <p>x) <b>The supporting text has been amended in response to the national planning policy changes.</b></p>



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<p>national surface water flood maps? These are available from the Environment Agency and are monitored by the LLFA.</p> <p>ix) <b>Paragraph 4.22</b> When the SAB is commenced a desk top study to establish surface water flood risk will not be sufficient due to the requirement for a full detailed assessment including permeability tests in order to obtain SAB Approval. As a matter of best practice all proposals for surface water management should be considered at the early concept stages of the development to ensure best practice is employed to promote sustainable use and disposal of surface water from source to discharge of the surface water. It would be more difficult to consider this once the layout has been approved.</p> <p>x) <b>Paragraph 4.23</b> Before the commencement of the SAB, it has been recognised that for larger development sites where they are likely to be phased, SuDS may be approved before and after the legislation has been commenced which means some of the drainage of the site may be adopted by a 'management company' of other body and anything else after the commencement by the SAB (if above 1 property). Hertfordshire County Council have therefore adopted a 'Interim Policy on Adoption of SuDS' to provide voluntary adoption for SuDS where it meets a set of criteria- this guidance can be found here <a href="http://www.hertsdirect.org/services/envplan/water/floods/suds/hertsudspolicy/">http://www.hertsdirect.org/services/envplan/water/floods/suds/hertsudspolicy/</a></p>	
01214/1/005 Flood Management Team, Herts County Council				<p><b>Paragraph 4.24</b> Once the SAB is commenced the automatic right to connect to a sewer is removed and a SAB Approval will be required to gain that connection for all major developments for the first 3 years- this policy will therefore be relevant for all minor developments and until the SAB is commenced. The SAB will consult the relevant water company to ensure the developer has obtained their advice that the sewers have capacity and any upgrades to the drainage system are undertaken prior to adoption.</p>	<p><b>The supporting text has been amended in response to the national planning policy changes. Reference has been made to include the need to consult Thames Water on proposed connections to public sewers.</b></p>

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<b>Policy SADM12 Flood Zones</b>					
01139/2/008 Environment Agency		✓		<p>i) Replace reference to NPPF Technical Guidance with PPG.</p> <p>ii) Welcome a policy on flood zones, but need to reference sequential test properly. This policy could be worded as follows: <i>Developments must avoid and reduce the risk of flooding and not increase flood risk elsewhere by: i. Locating development within areas of lower flood risk through the application of the Sequential test in line with the National Planning Policy Framework (NPPF). An Exception test will also be required in line with the NPPF. The risk associated with other types of flooding will also be taken into account. ii. Ensuring that proposals in flood risk areas, where they are required to satisfy the Sequential and Exception test actively manage and reduce flood risk by applying the sequential approach at site level, where possible reducing the footprint of existing buildings, making sure the development is safe, incorporating flood resilient/resistant design and flood mitigation measures.</i> This incorporates the aim of the Core Strategy to reduce flood risk (Core Strategy paragraph 5.31, Climate Change &amp; Water &amp; policy CS16).</p>	<p>i) <b>Wording amended</b></p> <p>ii) <b>Policy amended to reflect the wording suggested in 2013 consultation response from the EA.</b></p>
<b>Policy SADM13 Water, Drainage and Flood Risk</b>					
01188/1/012 Thames Water Property Services		✓		<p>Policy SADM13 should be revised to read as follows to ensure that it is effective at addressing the risk from all forms of flooding:  <i>"The risk of flooding <b>from all forms of flooding</b>, will not be worsened and, where possible, will be improved as a consequence of development."</i></p>	<p><b>Reference to "all forms of flooding" added to Policy SADM15 Flood Risk .</b></p>
01139/2/009 Environment Agency		✓		<p>i) Change title of policy from Water to Watercourses.</p> <p>ii) Policy needs improvements to be supported. SFRA recommendations need to be included.</p> <p>iii) Amend statement 'The natural environment of watercourses and areas of water will at least be maintained' to 'be improved wherever possible'.</p>	<p>i) <b>New policy on Watercourses added.</b></p> <p>ii) Noted</p> <p>iii) <b>Statement amended from 'the natural environment of watercourses and areas of water will <i>at least be maintained</i>' to '<i>be improved wherever possible</i>' in SADM14 The Water Environment and 'be conserved or</b></p>

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				<p>iv) Support inclusion of 'where possible, watercourses including culverts, land adjacent to rivers, functional floodplains and flood storage areas will be restored to their natural state.' But developers need to be aware of what needs to be done to ensure flood risk is reduced:</p> <p>Suggested policy wording:</p> <p><i>Development should normally be set back from a main river (as defined by the Environment Agency) with a minimum 8m wide undeveloped buffer zone and from any other watercourse with a minimum 5m wide buffer zone to prevent any significant impact from flooding, and to provide biodiversity enhancement.</i></p> <p><i>b) Wherever possible, the natural environment of water courses and areas of water will be improved through development. Watercourses including culverts, land adjacent to rivers, functional floodplains and flood storage areas will be restored to their natural state.</i></p> <p><i>c) Development will only be permitted where it would not be subject to unacceptable risk of flooding; and would not unacceptably exacerbate risk of flooding elsewhere. Where practicable existing flood risks should be reduced.</i></p> <p><i>d) A Flood Risk Assessment (FRA) will be required for development proposals of 1ha or more in Flood Zone 1 and for proposals for all new development in Flood Zones 2 and 3; or in an area in Flood Zone 1 where proposed development or change of use to a more vulnerable class may be subject to other forms of flooding as identified in the SFRA. Land in Flood Zone 1 surrounded by areas of Zones 2 or 3 will be treated as if in the higher risk Zone and an FRA will be required to demonstrate that access and egress would be satisfactory and that the development would not be unacceptably vulnerable during a flood period.</i></p> <p><i>e) New development will not be permitted in Flood Zone 3b, as</i></p>	<p><b><i>improved' in SADM17 Watercourses.</i></b></p> <p><b>iv) SADM15 Flood Risk has been amended based on the representation (the reference to 300mm 'freeboard' has been removed as this nautical term is probably not familiar to most developers).</b></p> <p><b>v) Principles of the suggested wording added to SADM17 Watercourses.</b></p> <p>vi) Noted. These points have now been moved to a new policy SADM14 The Water Environment.</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<p><i>defined by the SFRA. Redevelopment of existing built development in that Zone will only be permitted if the proposals are of a compatible use class and would not increase flood risk elsewhere.</i></p> <p><i>f) Within sites at risk of flooding the most vulnerable parts of the proposed development should be located in areas of lowest risk unless there are overriding reasons to prefer different locations.</i></p> <p><i>g) Development at risk of flooding should be flood resilient and resistant, including safe access and escape routes where required; and it should be demonstrated that residual risks can be safely managed.</i></p> <p><i>h) Floor levels of development in Flood Zones 2 and 3 should be situated above the 1% (1 in 100 years) plus climate change predicted maximum water levels, plus a minimum freeboard of 300mm.</i></p> <p><i>i) Where appropriate, developers will be required to show that any necessary flood protection and mitigation measures will not have unacceptable impacts on nature conservation, landscape character, recreation or other important matters.</i></p> <p>v) Potentially include this clause here:  <i>Include an assessment of the condition of existing assets (e.g. bridges, culverts, river walls). Refurbishment and/ or renewal should be made to ensure the lifetime is commensurate with the lifetime of development. Developer contributions should be sought for this purpose.' (Note - this may be better in the flood risk section, as it relates to reducing flood risk?)</i></p> <p>vi) Support inclusion of 'Reservoirs and water attenuation areas which help reduce flood risk downstream will be retained.'            Strongly support the inclusion of 'Development that would be likely to pollute the aquifer or unduly affect the water table will not be granted permission. Where there may be a risk to groundwater the criteria adopted will be as described in the Environment Agency's</p>	

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				publication 'Groundwater protection: Principles and practice (GP3)' (as amended).'	
01139/3/005 Environment Agency		✓		<p>i) "Where possible the risk of flooding should be improved as a consequence of development" –we'd suggest swapping the word 'improved' to 'reduced' – that wording would fit a bit better with the intention of this paragraph and the NPPF.</p> <p>ii) Part ii) sets out the instances in which an FRA will be required. We would recommend keeping the requirement for an FRA short and succinct and maybe expanding on the instances where an FRA would be required in the supporting text rather than having it in the policy. Recommend change the wording to: Ensuring developments in flood risk areas are submitted with a site specific Flood Risk Assessment in line with the NPPF.' Alternatively keep the first three bullets which match footnote 20 in the NPPF and place the remaining two in the supporting text as other instances in which an FRA might be required. The supporting text on this should reference the Environment Agency's Flood Risk Standing Advice and any requirements the Lead Local Flood Authority may have.</p> <p>iii) Part (iii) repeats what's in policy SADM12 Flood zones part (ii) where it endorses the sequential approach on site. Could delete this.</p> <p>iv) Parts iv, v, vi and vii are fine. I think the policy is still missing a focus on the importance of flood storage and SuDs. Retaining reservoirs and water attenuation areas does not adequately cover this. Recommend the following is included:</p> <ul style="list-style-type: none"> <li>Ensuring there is no net loss in flood storage on site, preserving flood flow routes and where possible maximising flood storage through the use of green infrastructure and SuDs.</li> </ul>	<p>i) The suggested change has been made to SADM15 Flood Risk.</p> <p>ii) <b>The suggested change has been madeDetail on the sequential test has been moved to the supporting text.</b></p> <p>iii) <b>Point deleted.</b></p> <p>iv) <b>Wording added to SADM15 Flood Risk to cover:</b></p> <ul style="list-style-type: none"> <li><b>no net loss in flood storage on site;</b></li> <li><b>preserving flood flow routes: and</b></li> <li><b>where possible maximising flood storage through the use of green infrastructure and SuDs.</b></li> </ul>
01214/1/003 Flood Management		✓		i) How does this meet the requirements of the Water Framework Directive which promotes betterment to water quality and	<b>i) A new policy on Watercourses SADM17 Watercourses has been included which references the need to provide</b>

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Team, Herts County Council				<p>biodiversity where there is a discharge to a watercourse, works to a watercourse etc?</p> <p>ii) A drainage statement should be included for all sites not just ones that are within Flood Zone 1, surface water should be considered for all sites.</p> <p>iii) Also if there is a watercourse on the site which does not have a flood zone should be assessed as a source of flooding, as this does not mean it does not flood, its just not modelled by the EA.</p> <p>iv) Once the SAB has commenced, it will determine assessment of risk to ground water in consultation with EA. Requirement for developer to demonstrate no risk of ground water flooding/risk of pollution to ground water by infiltration by use of a 'treatment train' using a variety of SuDS which attenuate and clean the water before discharge into a watercourse or into the ground. This practice should be adopted by the LPA for minor developments where the SAB would not be involved.</p>	<p><b>a Water Framework Directive (WFD) assessment, if appropriate. This is required for proposals involving the re-alignment of a river or that impact on a river, as advised by the Environment Agency for Main Rivers or LLFA for other watercourses.</b></p> <p><b>ii) The policy requires a site-specific flood risk assessment for all sites in a flood risk area, not only those within Flood Zone 1.</b></p> <p><b>iii) The Council's SFRA shows watercourses and their floodzones, including watercourses not modelled by the EA. The policy has been changed to require an FRA where development is proposed in a 'flood risk area' which could include a watercourse which the EA do not model.</b></p> <p>iv) See comments on SADM14 (now SADM16 Sustainable Drainage Systems in Submission draft) below.</p>
01214/1/006 Flood Management Team, Herts County Council (comments received 15/04/2015)		✓		<p>i) May want to consider reducing vulnerability use or encourage using land for water compatible use</p> <p>ii) Suggested added point: "Assessment of all sources of flooding such as ordinary watercourses, main rivers, surface water and ground water"</p>	<p>i) <b>(New Policy on The Water Environment)_Compatible uses within floodzone 3b are referenced, which includes water compatible uses.</b> The application of the sequential approach contained within the PPG is required through new policy on Flood Risk. This requires less vulnerable uses to be considered within areas at risk of flooding. This policy does not seek to repeat this.</p> <p>ii) This point is covered in the requirement for a Flood Risk Assessment to be submitted.</p>
01206/1/003 Rapleys for Taylor Wimpey/ National Rail	✓			Object to current wording. Restoration of water courses - should look at feasibility on a site by site basis. Shouldn't preclude or limit development on sustainable sites where suitable mitigation measures or design solutions for watercourse can be delivered. No ref made to need to balance Plan objectives or to make maximum use of sustainable	It is not considered appropriate to accept this requested change. It is not considered appropriate to give blanket precedence to achieving maximum density of development over and above water course restoration. New policy on the Water Environment says that the natural environment of

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				sites for development. Reword to:"Where possible, and where it does not prejudice the delivery of other key objectives of the Plan and the Borough including ensuring maximum use of sustainable sites for new development, watercourses including culverts, land adjacent to rivers, functional floodplains, and flood storage areas will be restored to their natural state. Feasibility of restoration of watercourses should be assessed on a site by site basis when assessing proposals for new development, and where suitable mitigation measures or design solutions can be delivered that would ensure that maximum use can be made of sustainable sites for development, proposals should be allowed."	watercourses and areas of water will be improved wherever possible through Policy SADM17 (Watercourses). <b>No change.</b>
01236/1/010 HMWT			✓	The Trust welcomes this Policy, in particular the requirement to maintain the natural environment of water courses and promoting the restoration where possible of watercourses, their associated habitats and floodplain as part of development.	The support is noted.
01229/1/007 Natural England, Sustainable Land Use and Regulation			✓	Support SADM13 and welcomes that watercourses will be returned to their natural state where possible. Measures to ensure development will not pollute the aquifer or unduly affect the water table are also welcomed.	The support is noted.
<b>Policy SADM14 Sustainable Urban Drainage Systems</b>					
01139/2/011 Environment Agency		✓		i) Support inclusion of SuDS policy but currently not compliant with Core strategy CS16 or Herts CC 'Interim SuDS Policy Statement'. Uncertainty over the timing of SABs policy needs to be clear on expected standards. Should set out how developments will be expected to incorporate Sustainable Drainage Systems to reduce the risk of surface water flooding, improve water quality and provide amenity/habitat. This should include a requirement to meet Greenfield runoff rates, including from existing brownfield sites. Suggested policy:	<b>i) Policy has been amended to include more detail and comply with the new regime effective from April 2015.</b> <b>ii) Policy title amended to Sustainable Drainage Systems.</b>

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				<p>'All new development on Brownfield and Greenfield sites is required to demonstrate that sustainable drainage (SuDS) has been incorporated into the design of the proposal. All new development will be required to show the following:</p> <ul style="list-style-type: none"> <li>i. Selection of SuDS measures that provide the most sustainable option from the drainage hierarchy;</li> <li>ii. Aim to achieve Greenfield runoff rate;</li> <li>iii. 1 in 100 year attenuation taking into account climate change;</li> <li>iv. Space should be specifically set aside for SuDS and used to master plan the overall site layout (including integrating public space, biodiversity and water quality benefits);</li> <li>v. Developer contributions should be sought for improving surface water drainage systems and SuDS;</li> <li>vi. Future maintenance responsibilities for SuDS need to be identified prior to development commencing.'</li> </ul> <p>ii) Please also note that Sustainable Urban Drainage Systems is the previous term (in policy title), and it's now Sustainable Drainage Systems without the 'urban'.</p>	
01139/3/007 Environment Agency (comments on revised policy March 2015)		✓		<ul style="list-style-type: none"> <li>i) Very much welcome the changes to the policy – much improved and set clearer standards expected of developers. It may be that there should be some reference to the role Lead Local Flood Authorities will have from 15th April in this policy – you may want to check with Herts CC if you haven't done so already.</li> <li>ii) You may need to explain what is meant by 'multiple benefits' of SuDS in your supporting text somewhere.</li> </ul>	<ul style="list-style-type: none"> <li>i) Noted. <b>A reference has been added</b> as advised by HCC – the date is from 16 April 2015.</li> <li>ii) <b>The policy has been amended to reference some benefits of SuDS in within the policy text.</b></li> </ul>
01214/1/004 Flood Management Team, Herts County Council		✓		<ul style="list-style-type: none"> <li>i) Comment iv) on SADM13 above.</li> <li>ii) Change SADM14 to state <i>'the LPA will expect evidence to be submitted to support the planning application to demonstrate that the proposed drainage is technically feasible, sustainable, promotes an improvement to managing flood risk, water quality, biodiversity</i></li> </ul>	<ul style="list-style-type: none"> <li>i) <b>Policy SADM15 Flood Risk amended in line with the advice from the EA, HCC and the national policy changes.</b></li> <li>ii) <b>Policy SADM16 Sustainable Drainage Systems amended in light of these comments and the recent changes to</b></li> </ul>



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				<p><i>and amenity in line with best practice national guidance and any relevant local guidance provided by the LLFA'. It is not sufficient to just accept information on SuDS, it needs to be demonstrated they can be implemented before planning permission is granted to ensure drainage is not an after thought which could result in the development increasing flood risk, increasing pollution to surface waters and reducing the potential for biodiversity and amenity enhancements. The LLFA does not assess local planning applications except where the developer is looking for early adoption of open SuDS features. We are more than happy for them to be directed to our guidance and other nationally approved guidance. The current competent authority to assess and comment on proposed drainage is the LPA. When the commencement of the SAB takes place, the SAB will be the competent body to assess the following: - all new development classified as 'major development' for the first 3 years from commencement, this includes; - Outline Planning Applications; - Full Planning Applications; - Reserved Matters Applications submitted 1 year after the date of commencement (i.e. if commenced on 1st Oct 2014, any reserved matters submitted from 1st Oct 2015). These applications will require a separate SAB Approval. Without this development can not commence as required by Schedule 3 of the Flood and Water Management Act 2010. There will be two ways of applying for SuDS Approval; - Stand Alone application direct to the SAB; - Combined Application (SAB and Planning) to the LPA via the planning portal. Anything classified as a 'minor development' for the first 3 years from commencement of the SAB is still assessed and approved by the LPA as is now for any new development until Schedule 3 in commenced. It is important therefore that the LPA works closely with the SAB to develop or refer to guidance to enable them to assess drainage for minor</i></p>	<p><b>national planning policy.</b></p>

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				developments so it meets the requirements of the NPPF and the wider aims of the Local Flood Risk Management Strategy for Hertfordshire.	
01214/1/007 Flood Management Team, Herts County Council (comments received 15/04/2015)		✓		<ul style="list-style-type: none"> <li>i) Need to add in requirement to undertake and submit a drainage assessment for all major applications following the update NPPF and NPPG. Priority given to SUDs.</li> <li>ii) Need to refer to your own Byelaws- Terry Batchleor at Hertsmeres will be able to provide further advice on this</li> </ul>	<ul style="list-style-type: none"> <li>i) SuDS policy requires that all major development includes SuDS. Inclusion of this will require a drainage assessment, and the LLFA will be consulted on major developments. There does not appear to be a requirement in the NPPF/PPG for submission of a drainage assessment.</li> <li>ii) (Now within Watercourses Policy) Not sure that this is necessary within the policy. Should an application be submitted which involved the negotiation of contributions for refurbishment/renewal of assets, the Drainage Team would be consulted, and would advise on a case by case basis.</li> </ul>
01242/1/008 Shire Consulting for Radlett Preparatory School	✓			HCC not yet appointed to Lead Local Authority so policy premature. It is also unduly onerous to expect all applicants as part of any planning application to include detail regarding such measures. This is 'unsound' and should be deleted.	NOTE: HCC is LLFA and SuDS a national policy requirement for major development from April 2015. This response has been considered along with other responses, including those from statutory consultees such as the Environment Agency and Hertfordshire County Council. SADM14 (now SADM16) Sustainable Drainage Systems has been updated in response to feedback.
01243/1/009 Shire Consulting for Aldenham School	✓			HCC not yet appointed to Lead Local Authority so policy premature. It is also unduly onerous to expect all applicants as part of any planning application to include detail regarding such measures. This is 'unsound' and should be deleted.	NOTE: HCC is LLFA and SuDS a national policy requirement for major development from April 2015. This response has been considered along with other responses, including those from statutory consultees such as the Environment Agency and Hertfordshire County Council. SADM14 (now SADM16) Sustainable Drainage Systems has been updated in response to feedback.

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01350/1/011 Shire Consulting for Exchange Ltd	✓			HCC not yet appointed to Lead Local Authority so policy premature. It is also unduly onerous to expect all applicants as part of any planning application to include detail regarding such measures. This is 'unsound' and should be deleted.	NOTE: HCC is LLFA and SuDS a national policy requirement for major development from April 2015. This response has been considered along with other responses, including those from statutory consultees such as the Environment Agency and Hertfordshire County Council. SADM14 (now SADM16) Sustainable Drainage Systems has been updated in response to feedback.
01236/1/011 HMWT			✓	HMWT strongly advocates the provision of sustainable drainage as part of all new development. We would also encourage the council to promote or favour the provision in larger developments in particular of SUDs that also provide benefits in terms of amenity and biodiversity enhancement.	Noted. <b>Policy SADM16 Sustainable Drainage Systems has been updated following other representations received and the government changes to SABs.</b>
01229/1/008 Natural England, Sustainable Land Use and Regulation			✓	Support SADM14. We welcome the requirement for all development proposals to comply with the principles and standards set out by the Lead Local Flood Authority for SUDS. We trust that this includes requirements for SUDS to be designed to provide multifunctional benefits including enhancement of biodiversity, landscape and amenity, in addition to drainage. SUDS should be integrated into the wider green infrastructure of the site and green corridors should ensure connectivity to offsite green infrastructure.	The support is noted. <b>Policy SADM16 Sustainable Drainage Systems has been updated following other representations received and the government policy changes. These comments have been taken into account in doing so, and the Addendum to the Local Flood Risk Management Strategy (March 2015) contains A SuDS Policy Statement which provides detailed policies which the LLFA will use when responding to statutory consultations from 6 April 2015</b>
<b>New SADM15 - Watercourses</b>					
01139/3/006 Environment Agency (comments on revised policy March 2015)		✓		<ol style="list-style-type: none"> <li>1. Very much welcome the addition of this policy. Sometimes the word watercourse appears as a split word i.e. water courses – spelling needs to be consistent throughout.</li> <li>2. Perhaps remove the word 'help' from part (iii) as appears redundant and will then read as 'enhance biodiversity.'</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Noted. This has been amended to 'watercourses' throughout.</b></li> <li>2. <b>This has been removed.</b></li> <li>3. This is noted, and <b>opportunities to undertake river restoration and enhancement have been referred to.</b></li> </ol>

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				<p>3. Suggested addition to part (iv) of the policy to specifically reference the Thames River Basin Management Plan because there are specific actions that will apply to rivers in Hertsmere that will include restoration and enhancement measures, wording as follows:  <i>"Look for opportunities to undertake river restoration and enhancement as part of the development <b>supporting the actions of the Thames River Basin Management Plan</b>. If this is not possible on site, a development contribution may be requested to a river restoration or enhancement scheme within the river catchment as identified by the Council."</i></p> <p>It's important the Thames RBMP is specifically mentioned in the policy as it will assist our efforts to get some of the actions implemented where we are consulted on planning applications and help the watercourse achieve good status under WFD.</p> <p>4. The second sentence of part (v) needs to include the word 'assessment' after 'A WFD....'</p>	<p>Developer contributions are covered elsewhere in the Council's policies and are not necessary in each individual policy.</p> <p><b>4. The word 'assessment' has been added.</b></p>
<b>Policy SADM15 Water Supply and Waste Water</b>					
01188/1/014 Thames Water Property Services		✓		<p>Thames Water support the inclusion of Policy SADM15, however, it is considered that the wording should be revised to read as follows to ensure that the policy is effective in ensuring development is aligned with any necessary water and wastewater infrastructure upgrades required:</p> <p><i>"Development proposals must take into account the demand for off-site water <b>and wastewater</b> service infrastructure. The Council will support applications where:</i>  <i>(i) sufficient infrastructure capacity already exists; or</i>  <i>(ii) extra capacity can be provided in time to serve the development"</i></p>	<p><b>Noted. The policy has been amended to require developers to demonstrate adequate waste water capacity and the two points have been added to SADM18 Water Supply and Waste Water.</b></p>
01139/2/014		✓		Our Catchment Abstraction Management Strategy and figures for	<b>The principles within the suggested wording have been</b>

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Environment Agency				<p>average water use show Hertsmere lies in an area of 'serious water stress' and water use is higher than the national average.</p> <p>Need include policy re water efficiency:  <i>'The Council expects new development to achieve a high standard of water efficiency by incorporating appropriate measures to minimize the use of water by reduction in use, re-use and recycling. It is expected that major housing developments will show how they will achieve a maximum usage of 105 litres of potable water per person per day in line with the Code for Sustainable Homes and BREEAM.'</i></p> <p>Supporting text and justification:  Hertsmere Borough Council sits within an area of 'serious' water stress. This means there is a high population with high water demands and limited water availability - it does not reflect water companies' ability to supply water. In fact there is less water available per person in the South East than Sudan or Syria. Average water use in Hertsmere Borough is 175 litres per person per day in 2008-2009 litres per person per day which is above the England and Wales average of 148 litres per person per day. Inefficient use of water can lead to unnecessary carbon emissions. Currently water use accounts for 27 percent of all carbon emissions from our homes. Building a house to 105 l/h/d will save 79 kilograms of CO2 and 15 cubic meters of water per year, per house, over and above building regulations (125l/h/d).  Appropriate measure to improve water efficiency include, but not limited to - dual flush toilets, low flow bathroom and kitchen fittings, low water consumption appliances, grey water and water recycling systems, water butts and other on-site water retention systems.'</p> <p>This policy would help achieve the aims of Core Strategy CS16. The</p>	<p><b>added to the policy and supporting text.</b>  <b>Water efficiency standards added to policy SADM18 Water Supply and Waste Water.</b></p>

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				figures shown above are from 2008-2009 - it may be worth contacting Affinity Water to obtain updated figures.	
01139/3/008 Environment Agency (comments on revised policy March 2015)		✓		<ol style="list-style-type: none"> <li>1. Welcome the requirement for developments to take into account the demand for off-site and waste water infrastructure, has this issue been assessed strategically through a Water Cycle Study? This may be an issue for your site allocations document so we recommend discussing this further with us.</li> <li>2. The policy proposes that developments are expected to incorporate measures to improve water efficiency and achieve a maximum potable water usage of 105 litres per person per day which is welcome and in line with previous comments. However, Code for Sustainable Homes will likely be replaced with new National Housing Standards with updated standards for water efficiency in Building Regs. DCLG proposes default standard (<a href="https://www.gov.uk/government/consultations/housing-standards-review-technical-consultation">https://www.gov.uk/government/consultations/housing-standards-review-technical-consultation</a>) of 125 litres per person per day with an optional requirement for 110 litres per person per day. We recommend you delete the reference to Code for Sustainable Homes in light of this. Consider using the optional 110 in your policy rather than the previous 105 litres. The consultation states that planning applications would have to be conditioned with the optional standard of 110 litres.</li> <li>3. BREEAM is the standard we refer to for non-residential buildings. We recommend setting a water efficiency standard for new non-household development, including refurbishments, such as BREEAM (BRE Environmental Assessment Method) 'Excellent' with a maximum number of 'water credits'. (It is possible to achieve</li> </ol>	<ol style="list-style-type: none"> <li>1. No, we do not currently have a Water Cycle Study. <b>The standard has been changed in policy SADM18 Water Supply and Waste Water to 110 litres per person per day in line with the DCLG proposal, and the reference to the Code for Sustainable Homes has been deleted. Expectation that non-residential buildings should comply</b> with maximum standards for water use (BREEAM and Association for Environment Conscious Building).</li> </ol>

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				<p>'Excellent' standard without incorporating water saving measures. We therefore recommend buildings should achieve the maximum number of water credits in accordance with the requirements of the relevant BREEAM scheme, with the exception of credits awarded for greywater/rainwater systems. These systems should only be installed where cost effective and the system is designed to ensure that energy use and carbon emissions are minimised). Alternatively buildings could meet the 'best practice' level of the AECB (Association for Environment Conscious Building) Water Standards.</p>	
01229/1/009 Natural England, Sustainable Land Use and Regulation			✓	Support SADM15 as it requires sufficient infrastructure to be available in time to serve development This should help to ensure that adverse effects on the natural environment are minimised.	<b>The support is noted.</b>
<b>Minerals and Waste</b>					
01188/1/003 Thames Water Property Services		✓		<p><b>Paragraphs 4.25-4.27 Minerals and Waste</b> Public water mains and sewers may lie across land from which it is proposed to extract minerals. Thames Water encourages early consultation by the developer to establish the position of such mains and sewers, and to arrange for them to be diverted where necessary. Where public sewers or water mains cross the site the developer will be responsible for the reasonable costs of diverting the asset. Where public water mains and / or sewers lie across a site from which it is proposed to extract minerals, and the developer does not take responsibility for diverting the asset, Thames Water will not be responsible for the sterilisation of the mineral resource as a result of the location of Thames Water's asset.</p>	This issue is considered to be a matter for HCC as Minerals Planning Authority, and has been passed to them for their attention in taking the new Minerals Plan forward.
01209/1/002 HCC Minerals and Waste			✓	Pleased to see acknowledgement that developers are expected to consider effects of prospective development on mineral resources within the borough, as the whole of the plan area (apart from the	Noted.

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				designated barren area) is within the sand and gravel belt, which is a mineral consultation area. <b>Para 4.26</b> - Welcome recognition of Tyttenhanger Quarry as major sand and gravel extraction source until 2032, which is being progressively infilled with inert waste.	
01209/1/003 HCC Minerals and Waste		✓		<p>i) Considered appropriate to include additional information on waste including detail which can be implemented at the DM stage, to that in the adopted Core Strategy in policies SP1, CS16 and CS10.</p> <p>ii) EU Waste Framework Directive (2008/98/EC) requires all LPAs to consider waste management issues in plan making. DCLG highlights the need for Local Planning Authorities 'to help to contribute to delivering the waste hierarchy' in the <i>Guidance for Local Planning Authorities on implementing planning requirements of the European Union Waste Framework Directive (2008/98/EC)</i>. As waste is generated by all types of development, from construction and throughout its life, there is a need to ensure all development considers impact of waste generation which will need to be appropriately managed.</p> <p>Vision, strategic objectives, waste hierarchy and the following policies in the Waste Core Strategy and Development Management Policies document are important:  Policy 1: Strategy for the Provision for Waste management Facilities  Policy 1A: Presumption in Favour of Sustainable Development  Policy 2: Waste Prevention and Reduction  Policy 5: Safeguarding of Sites  Policy 12: Sustainable Design, Construction and Demolition</p> <p>iii) <b>In line with the waste hierarchy it is expected that all construction and demolition projects would prevent waste generation as much as possible and waste encouraged to be dealt with close to its source as possible. This could be achieved by both</b></p>	<p>i) <b>New policy added on Waste Storage on New Developments.</b></p> <p>ii) Noted. <b>Waste management and storage has been included within the supporting text to the new Waste policy SADM20.</b></p> <p>iii) <b>Waste management and storage has been included within the supporting text to the new Waste policy.</b></p> <p>iv) Noted. <b>Reference has been made to the Waste Core Strategy and DM Policies in the supporting text to the Waste Storage policy SADM20.</b></p>



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				<p>careful designing of the scheme as well as employing sustainable waste management practices on site such as the re-use of construction and demolition material and use of recycled materials within buildings, all contributing to a reduction in waste sent to landfill. Should be adequate provision for storage and collection of waste and recyclables, including recycling boxes, wheelie bins and compost bins which should be positioned to enable refuse vehicle access. For larger development sites, public recycling banks may be appropriate.</p> <p>iv) Requirement for Site Waste Management Plans with planning apps for all projects worth over £300,000) and construction and demolition data to be forwarded onto the county council is laid out in Waste Core Strategy and Development Management Policy 12. Link to this policy would be worthwhile especially for pre-application discussion.</p> <p>Intention not for replication of HCC policy but drawing together principles of waste prevention and reduction measures into all construction and demolition projects and to ensure design of new development considers appropriate access for waste bin storage and provision of public recycling banks on larger developments.</p>	
<b>Land Contamination</b>					
00234/2/005 Elstree and Borehamwood Town Council		✓		Concern that cost of dealing with contaminated sites should not be unduly costly to the authority	Noted. Where development is proposed on contaminated sites it is the developer's responsibility to undertake investigations and necessary mitigation work (Core Strategy CS16, SADM21 Environmental Pollution and Development and supporting text). Developer is also required to make provision for monitoring by Environmental Health if appropriate (SADM21).

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<b>No change.</b>
<b>Policy SADM17 Promoting Healthy Environments</b>					
01168/1/001 Hertfordshire Ecology		✓		Light i) should be suitable ' <b>and appropriate</b> ' for the area' ii) minimise light spillage ' <b>and glare</b> ' and do not cause harm	<b>Wording 'appropriate' and 'and glare' added to policy SADM21 Environmental Pollution and Development.</b>
01229/1/010 Natural England, Sustainable Land Use and Regulation		✓		Requirements in SADM17 should help to ensure that adverse environmental effects, through air, noise and light pollution and land contamination, will be minimised.	The support is noted.
<b>Green Belt</b>					
00982/1/004 Woolf Bond Planning for Gilston Investments	✓			Proper review of housing needs and preparation of replacement Local Plan including local review of GB boundary at Borehamwood and Potters Bar required. Green Belt boundary should be reviewed to ensure boundaries endure beyond Plan period in accordance with NPPF. SADM only planning for 267 dwellings pa instead of DCLG projected requirement of 552 pa - not clear that GB boundary will not need to be amended to allow for additional site releases. Spatial strategy too restrictive - assumes sufficient housing can be achieved within urban areas without adequately testing individual sites. SHLAA sites S52, S53, S54, S56 should be allocated for development as sustainable urban extensions helping to meet identified housing needs. They are developable at early stage subject to a review of the Green Belt. Would not result in unrestricted sprawl, coalescence, would prevent more peripheral countryside locations from encroachment, there is no special character to be preserved, and would provide for mix of homes, including affordable (see separate reps). NB detailed report and plans for proposed housing / development sites submitted. Objection also to Chapter 2, SADM1 and SADM2	One of SADM's key purposes is to help implement the Core Strategy (which was independently examined in the light of the NPPF and subsequently adopted), including implementation of the stated housing target. The preparation of SADM enables a review of all development management policies and boundaries of policy areas in the Local Plan, within the context provided by the Core Strategy.  The Council is committed to a separate review of key elements in the Core Strategy – specifically to consider housing and employment needs further. The review of the strategic issues and commissioning of key evidence with neighbouring authorities began in late 2014 and will continue beyond the planned adoption of SADM. If objectively assessed housing needs are very substantially higher than currently planned for within the housing market, then there are serious and potentially controversial issues to be debated with the public. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>accommodating major development could have major consequences for the Green Belt and a number of existing communities. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. The Council considers that its approach to the preparation and review of its planning policies is justifiable, and reasonable.</p> <p>The housing target and land supply assumptions behind the housing target were justified by the Council, and tested and accepted by a Planning Inspector through independent examination of the Core Strategy. These have been brought forward into SADM. The Strategic Housing Land Availability Assessment (SHLAA) contains an analysis of a large number of sites – some of which accord with the Core Strategy (and are being taken forward) and a number in the Green Belt which do not. The Council has worked with the relevant landowners/developers and is confident the allocated sites now included can be delivered. There has been some adjustment to the sites and net housing capacity in Policy SADM1 and Policy SADM2 as a result of new information and updating. The overall effect is to confirm that Table 1, and the housing land supply to deliver the Core Strategy target is sound.</p> <p>The sites put forward here are in the Green Belt. The current boundary is clear and defensible.</p> <p>The allocation of these for development would entail a large Green Belt release. This is not needed to deliver the Core Strategy housing target and is therefore inappropriate.</p> <p><b>No change.</b></p>
01187/1/003	✓			Para 4.47 onwards identify changes to Green Belt. Doesn't meet NPPF	The changes to the Green Belt proposed in SADM do not

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Nathaniel Lichfield and Partners for Commercial Estates Group				<p>para 83 requirements for undertaking Green Belt review. NPPF para 84 says Green Belt review should be to promote sustainable patterns of development. But SADM allocates housing sites that are less sustainable than others available (eg Potters Bar Golf Course available but not allocated). Other SHLAA sites that HAVE been allocated eg Bushey Hall Golf Club, Rossway Drive Bushey are less sustainable. (PDL is not a justification for developing non- sustainable sites in the Green Belt) . NPPF para 85 requires LPA to be satisfied Green Belt boundary won't need to be changed at end of Plan period. Clear that boundary won't meet development needs beyond Plan period (either 2016 CS review, or 2027 SADM end date). CLG figs for household projections indicate significantly higher housing target than is currently being planned for. Shouldn't be reviewing Green Belt now, and then again in 2016 when housing need assessment calculated. Hertsmere should: a) identify objectively assessed needs; b) review the Green Belt in line with paragraphs 83-85 of the NPPF; c) wrap up the outputs of this process within the partial review integrated with the Site Allocations. Only then is the process consistent with the NPPF. Without it the proposals are unsound.</p>	<p>constitute a comprehensive review of the boundary. The changes proposed are small in number and each relate to one of several specific circumstances:</p> <ul style="list-style-type: none"> <li>• signalled in the adopted Core Strategy,</li> <li>• minor adjustments to take account of the existing situation on the ground,</li> <li>• Bushey Hall Golf Club (site H4) and SunnyBank School (site H9) entail a small rounding off of the Green Belt boundary.</li> </ul> <p>Rossway Drive (site H5) entails the removal of a car breakers yard and removal of contamination associated with that use and will remain within the green belt.</p> <p>The Core Strategy does not indicate any significant change to the Green Belt. The Core Strategy housing target and land supply assumptions behind the housing target were justified by the Council, and tested and accepted by a Planning Inspector through independent examination of the Core Strategy. The Core Strategy is clear that a Site Allocations and Development Management Policies DPD (SADM) will be prepared. One of SADM's key purposes is to help implement the adopted Core Strategy, including implementation of the stated housing target. Implementation of the policies and proposals within SADM will deliver the Core Strategy housing target and additional green belt releases in SADM are not therefore required.</p> <p>A full review of the Green Belt will be undertaken as part of the Core Strategy review. The review of the strategic issues and commissioning of key evidence with neighbouring</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>authorities began in late 2014 and will continue beyond the planned adoption of SADM. If objectively assessed housing needs are very substantially higher than currently planned for within the housing market, then there are serious and potentially controversial issues to be debated with the public. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available, and without the complication of a myriad of many other issues. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. The Core Strategy Review is a fundamental review of the 'local plan' and is the appropriate vehicle to consider the identification of releases of land from the Green Belt.</p> <p>The Council considers that its approach to the preparation and review of its planning policies is justifiable, and reasonable. It is quite appropriate, reasonable and, indeed, necessary to complete SADM in accordance with the Local Development Scheme (subject to any updating of the timetable). The completion of SADM will in effect modernise the planning policy base and, together with the existing Core Strategy, create a new Local Plan. <b>No change.</b></p>
01238/1/007 Welwyn Hatfield Council		✓		Should remove Gypsy and Traveller proposal sites G1, G2 and G3 from the Green Belt. Otherwise inappropriate development.	GT1 constitutes a minor extension to an existing site. GT2 and GT3 are small sites where although unauthorised, there is a long history of Gypsy and Traveller occupation. It is not

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					considered appropriate to re-draw the Green Belt boundary around these existing sites. <b>No change.</b>
01238/1/008 Welwyn Hatfield Council		✓		Some sites listed in paragraph 4.49 (a) and (b) to be removed from Green Belt not referred to in Core Strategy CS13. Is SADM inconsistent with Core Strategy?	The proposed changes are small in number and relate either to local realignments to reflect changed circumstances on the ground or, in the case of Bushey Hall Golf course and former Sunny Bank School Potters Bar, specific proposals contained within SADM. <b>The proposal to realign the Green Belt boundary at Heath Road, Potters Bar, is deleted. No other change.</b>
01350/1/009 Shire Consulting for Exchange Ltd		✓		NPPF's para 89 relates to any previously developed green belt land regardless of whether it is specifically defined as an MDS, or not. Partial or complete redevelopment of previously developed land is not inappropriate in the Green Belt. Core Strategy Inspector said current policy for previously developed green belt land required a review to ensure consistency with NPPF. This hasn't been done.	Policy SADM23 (now SADM 27) Development Standards in the Green Belt is consistent with and expands on national policy and guidance. It sets out the local approach for Hertsmere which is a key role of local plan. <b>No change.</b>
01237/1/004 Hertfordshire County Council (Landscape)		✓		Landscape setting and open character of the area should be protected. It is suggested that the LCA provides a valuable tool in respect of this aim.	<b>A new policy has been added on Landscape Character.</b>
01235/1/008 Campaign to Protect Rural England		✓		<b>Para 4.56</b> We believe the sentence with the quote from the NPPF to be incomplete.	<b>The context for the sentence has been added in the text.</b>
<b>Oakbank etc, Radlett</b>					
01186/1/001 Aldenham Parish Council			✓	Para 4.49. Support redrawing of the Green Belt boundary around Oakbank; 5-23 (odd nos.) Watling Street; First Place Nursery; and 10 Cobden Hill to form a more logical boundary	Noted. <b>No change.</b>
01231/1/001 Radlett Society & Green Belt		✓		We're not sure what is intended about this redrawing of boundary around Oakbank, Watling Street, Radlett. The 'First Place Nursery' no longer exists; the whole site with play area and orchard is now housing.	The redrawing of the boundary is in order to more accurately reflect the boundary between the existing built up area and the surrounding Green Belt. <b>No change.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Association					
<b>Land r/o 29-37 Heath Road</b>					
00846/1/001 resident	✓			Moving Green Belt boundary to allow building is contrary to aim of Green Belt. Building not appropriate given surrounding environment. Lochinver House School causes severe traffic and safety problems. This will make it worse.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
00849/1/001 resident	✓			Moving Green Belt boundary creates a precedent. Issue was examined 10 years ago and Government Inspector concluded "I am firmly of the view that the green belt boundary should not be altered from that shown on the plans for 1951-1991." Green Belt boundary should only be altered from earlier plans in exceptional circumstances - these do not exist.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
00850/1/001 resident	✓			Public Inquiry 2001 confirmed and established existing boundary - no exceptional circumstances justifying relocation. Would be contrary to NPPF. Would create dangerous precedent for future. Boundary move would provide opportunity for possible housing development - creating traffic hazard. Lochinver House School traffic already causes problems for Heath Road area. Would have major adverse impact on the area.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
00851/1/001 resident	✓			Current boundary is not an anomaly - it is correct and was agreed by Inspector (and Council and residents) in 2001.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>

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00852/1/001 resident	✓			Boundary is not an anomaly. Long established with regard to existing physical features. Agreed at Public Inquiry. Proposal being made in order to release land for development. Proposal is contrary to NPPF - there are no exceptional circumstances which justify altering Green Belt boundary here.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
00853/1/001 resident	✓			Have been 4 failed attempts by developers to build on this land since 1973. Incorrect boundary was shown on map released 'in error' by Planning in 2001 and resulted in attempt by developer to achieve residential development. This 'error' was suspicious.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
00854/1/001 Heath-Ways Residents' Association representing 80 households	✓			Huge local opposition. Inspector advised, and Hertsmere BC agreed to maintain the line of the boundary in 2001. NPPF and CLG letter to Planning Inspectorate 3 March 2014 say Green Belt boundary should only be altered in exceptional circumstances. None exist. Could provide opportunity for residential development. Already massive traffic and safety issues in Heath Road due to Lochinver House School. Development would increase traffic problems and impact on amenity and values of homes in area. Particularly Heath Road and Green Meadow. Boundary change would set a precedent for moving boundary even further west at a later date. This is not a minor adjustment to the boundary - its significance is major. HBC did not notify proposals directly to the householders who would be most affected.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b> Individual letters were sent to residents in the surrounding roads advising them of the consultation exercise on the SADM DPD consultation draft, where they could see the plans, and how to make representations.
00953/1/001 resident	✓			Boundary was decided by Public Enquiry in 2001 and there is no need to change it.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The</b>



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					<b>proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
00954/1/001 resident	✓			Planning Inspector ruled the boundary should not be moved 2001. Supported by HBC. No exceptional circumstances have arisen since. Moving boundary would lead to planning application for housing development almost opposite Lochinver House School - already severe and dangerous traffic. Moving boundary would be a dangerous precedent leading to further erosion of the Green Belt.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
00955/1/001 resident	✓			Keep the boundary as it is.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
00961/1/001 resident	✓			Boundary location clearly established following Public Enquiry in 2001 and remains in same location today. Removal of the area from the Green Belt would open up prospect of new cul-de-sac with entrance opposite Lochinvar House School - already traffic congestion near bend in Heath Road.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time.. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
00967/1/001 resident	✓			Public Enquiry 2001 Inspector ruled boundary was clearly defined. Moving boundary could result in development proposals. Existing traffic congestion and parking problems due to Lochinvar House School and commuter parking. Preservation of Green Belt is essential for well being.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<b>Policies Map E.</b>
00969/1/001 resident	✓			Dangerous precedent for whole area. Already problems with parking. Cul-de-sac of houses opposite Lochinver House School could cause chaos and danger. Put safety first.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
00976/1/001 resident	✓			No benefit to moving, is clearly defined, no exceptional circumstances to justify moving it. Residents and owners are opposed to moving it, and would provide opportunity for proposal to build cul-de-sac of houses in unsuitable location.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
00977/1/001 resident	✓			No good reason or special circumstances for moving Green Belt. Position was agreed 2002 after Public Enquiry. Moving boundary could provide opportunity for cul-de-sac of houses - opposite school with huge traffic flows.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
00978/1/001 resident	✓			Moving Green Belt boundary could open way for housing proposal. Access would be via Heath Road or Green Meadow - both narrow, densely occupied residential areas. Building work would cause chaos and inconvenience to local residents. Busy roads already subject to major traffic congestion at peak times in Darkes Lane, Church Road and Potters Bar High Street delaying local traffic.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
01150/1/001	✓			Boundary agreed 2001 as a result of a public enquiry. Boundary was and	The line of the existing long-standing boundary is evident

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resident				still is at the end of the original gardens of 33 and 35. Why go against Green Belt policy for this one site?	on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
01151/1/002 resident	✓			May facilitate future housing development (access road by the side of the large bungalow). Precedent for further erosion of the surrounding Green Belt.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
01153/1/001 resident	✓			Boundary challenged and confirmed 2001. Current proposal is identical to previous challenge. The boundary appears to run through gardens at #31 and #37 but these gardens were extended when an extra orchard behind their gardens was sold to them. Location of the existing boundary is well known to all.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
01154/1/001 resident	✓			The green belt boundary was always at the end of the original gardens; nos 33 and 37 purchased additional land to extend their gardens. Public inquiry 2001 rejected proposal to move green belt boundary. Council policy is to protect green belt – why propose this change? Disappointed to only find out about this proposal through the local newspaper (directly affected).	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b> Individual letters were sent to residents in the surrounding roads advising them of the consultation exercise on the SADM DPD consultation draft, where they could see the

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					plans, and how to make representations.
01155/1/001 resident	✓			The green belt boundary was always at the end of the original gardens; nos 33 and 37 purchased additional land to extend their gardens. Public inquiry 2001 rejected proposal to move green belt boundary. Council policy is to protect green belt – why propose this change? Disappointed to only find out about this proposal through the local newspaper (directly affected).	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b> Individual letters were sent to residents in the surrounding roads advising them of the consultation exercise on the SADM DPD consultation draft, where they could see the plans, and how to make representations.
01156/1/001 resident	✓			Disappointed not to have been specifically consulted. Don't move boundary - not necessary and not wanted by majority of residents. It is a clear and understood boundary. Was thoroughly addressed in 2001. The green belt is essential to our community and well being. Suspect change is to enable future housing development.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b> Individual letters were sent to residents in the surrounding roads advising them of the consultation exercise on the SADM DPD consultation draft, where they could see the plans, and how to make representations.
01165/1/001 resident	✓			Object to this proposal and any development on Green Belt land. Precedent.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
01170/1/001 resident	✓			Previous decision 2001 that boundary was in correct place. Opening up potential for development in the green belt.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light

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					of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
01175/1/003 resident	✓			Inquiry in 2001 found in favour of keeping the boundary where it is. Are you going to waste more money in having another enquiry? Also object to removing any land from the Green Belt.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
01178/1/001 resident	✓			Will remove GB protection from our gardens. Have been contacted by developer wanting to purchase part of garden currently within the green belt. Concerned that not directly consulted. No justification - clearly defined by holly bush hedge. Decision already made in 2001 to keep existing boundary.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b> Individual letters were sent to residents in the surrounding roads advising them of the consultation exercise on the SADM DPD consultation draft, where they could see the plans, and how to make representations.
01180/1/001 resident	✓			Objecting to SHLAA site Ref S40 27 -31 Heath Road, Potters Bar but taken as an objection to moving green belt boundary at Heath Road. Boundary was previously established as the holly hedgerow which is still visible at 33 / 35 Heath Road. This is the edge of the green belt land.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
01185/1/001	✓			Potential for new house building - traffic already bad (Lochinver House	The line of the existing long-standing boundary is evident

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
resident				School). Quality of life during construction and sense of community would be disrupted. Drainage issues already exist - new houses would exacerbate. Negative effect on property prices.	on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
01193/1/001 Potters Bar Society (Town Group)	✓			Agree with Heath-Ways Residents' Association representation. No pressing need to change the boundary, so therefore it should not be changed just to encourage a developer.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
01205/1/001 resident	✓			Current green belt boundary satisfactory. Don't change it. It will be a blight to the environment.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
01182/1/001 Jeremy Peter Associates for resident	✓			Proposed boundary at rear of 29 Heath Road has been incorrectly drawn. It should be set set further back to the first tram line - this is where the garden to the property commences as distinct from the countryside to the west. Change in type of vegetation from garden to countryside. NPPF Paragraph 85 states that one of the considerations of defining Green Belt boundaries is to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. Request proposals map more accurately shows the position on the ground.	The line of the existing long-standing boundary is evident on site and well known locally. On balance, and in the light of comments received it is felt inappropriate to alter the green belt boundary in this location at this time. <b>The proposed change to the green belt boundary to the rear of 29-37 Heath Road is therefore deleted from the text and Policies Map E.</b>
<b>Print works at Bushey Hall Golf Course</b>					

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01190/1/002 DMH Stallard LLP for Veladail Leisure			✓	We support policy SADM19 and the modest revision to the Green Belt boundary at Bushey Hall Golf Club - does not contribute to the Green Belt, so doesn't need to be kept permanently open.	Noted. <b>No change.</b>
<b>Former Sunny Bank School, Potters Bar</b>					
01193/1/002 Potters Bar Society (Town Group)	✓			Object to green belt change at Sunnybank School. If this is removed from the Green Belt will be replaced with houses generating demand for a school to accommodate all the new residents' children. No pressing need to change the boundary.	The site is partially previously developed land and is contained on three sides within the built up area. Hertfordshire County Council, who are the Education Authority have indicated that there is no forecast deficit for primary places in Potters Bar and that apart from the retention of premises for the ESC, the site is not required for education purposes. The density of residential development proposed in the Plan reflects the site's location at the Green Belt boundary. There is a need to identify sufficient land to meet Hertsmere's housing target contained in the adopted Core Strategy; the part of HCC's land identified for housing development is considered to be an appropriate one to contribute to meeting this target. <b>No change.</b>
00238/2/003 Herts CC Development Services			✓	Para 4.49. Support removal of Sunnybank School site from Green Belt for housing. It also enables the establishment of a more appropriate GB boundary.	Noted.
00839/1/002 resident		✓		Para 4.49 states former Sunny Bank School has been removed from Green Belt. Is it still designated as Green Belt - only to be removed if the SADM is approved?	Correct. The Green Belt boundary is proposed to be changed on adoption of the SADM.
00957/1/001 resident		✓		All traffic from Sunnybank Rd, Meadow Way, Greenway, FieldView Road, The Byway, Brackendale, Fairacres Close merges into Daleside Drive and Baker Street. Very busy junction, Need to create access connecting site either to Baker Street beyond Pope Paul School or to Barnet Rd near Potters Bar Hospital. (through Green Belt BING estate).	The Highway Authority considers that the previous use of the site as a primary school generated a level of traffic and that a proposal that generates significantly fewer trips is likely to be of overall benefit to the surrounding area, compared to the current/former (Education) use. Therefore use of the site for an appropriate level of residential

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>development is considered appropriate in terms of the impact on surrounding highways.</p> <p>The wider traffic impacts on the surrounding road network will be considered as part of any planning application for this site.</p> <p>It is unlikely that the number of dwellings proposed on the site would justify consideration of major new road building to create an alternative access to the area.</p>
<b>Land on Rowley Lane</b>					
01166/1/002 David Lander for RRHE LLP	✓			<p>Consequential upon objection to Policy SADM8 (Rowley Lane safeguarded for employment). Need to distinguish between the curtilage of the Holiday Inn site and the safeguarded area as a whole. Sub para 4.49 (c) should be amended to read:"The following land is designated as Safeguarded Land for Employment Development in Policy SADM8 and is removed from the Green Belt: Land on Rowley Lane adjacent to the Elstree Way Employment Area, Borehamwood. An exception to the safeguarded status applies to the Holiday Inn site as shown on the Policies Map where proposals for infilling, partial or complete redevelopment will be considered on their individual merits in accordance with other relevant policies of this Plan."</p>	<p>It is recognised that the Council agreed that any proposals for the Holiday Inn site, due to it containing significant previously developed land and buildings, would need to be considered on their individual merits. However, the Council cannot allocate land within a safeguarded area. It also cannot remove this site from the area to be safeguarded without returning the site to the Green Belt, as it would be anomalous for the Holiday Inn site to be neither Safeguarded Land nor Green Belt at this stage. However, it is recognised that Policy SADM10 Safeguarded Land for Employment Development needs to recognise the difference between the main part of the Safeguarded Land and the Holiday Inn site, to reflect para 5.9 of the Core Strategy. <b>Policy changed.</b></p> <p><b>...Until that time they will be treated as if they are in the Green Belt: inappropriate development will not be approved, except in very special circumstances. The Holiday Inn site, at the southern end of the area of safeguarded land, contains a significant amount of previously developed land and buildings; any proposal for development on this site will continue to be considered on</b></p>



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<i>its individual merits, within the context of the current appearance and use of the site and other relevant policies in this Plan.</i>
<b>Policy SADM19 Green Belt Boundary</b>					
00994/2/004 resident			✓	Support SADM19	Noted. <b>No change.</b>
01165/1/003 resident	✓			If the fundamental principal that Green Belt Boundaries can be changed becomes established by virtue of the current Hertsmere proposals (Heath Road), then what is to stop yet further encroachments (be it Minor or Major) into the Green Belt area around Hertsmere. Accordingly we must maintain our objection to any development on Green Belt land under the protection of Hertsmere Borough Council.	The proposed changes are small in number and relate either to local realignments to reflect changed circumstances on the ground or, in the case of Bushey Hall Golf course and former Sunny bank School Potters Bar, to specific proposals contained within SADM. <b>The proposal to realign the Green Belt boundary at Heath Road, Potters Bar, is deleted.</b>
01242/1/004 Shire Consulting for Radlett Prep School	✓			No need for more policy concerning the Green Belt, particularly as there is nothing specific to Hertsmere (already have national policy and Core Strategy). SADM19 is not a policy.	Policy SADM23 (now SADM27) Development Standards in the Green Belt is consistent with and expands on national policy and guidance. It sets out the local approach for Hertsmere which is a key role of local plan. SDAM19 (now SADM23) Green Belt Boundary reviews the Green Belt boundary in accordance with Core Strategy policy CS13. <b>No change.</b>
01243/1/005 Shire Consulting for Aldenham School	✓			No need for more policy concerning the Green Belt, particularly as there is nothing specific to Hertsmere (already have national policy and Core Strategy). SADM19 is not a policy.	Policy SADM23 (now SADM27) Development Standards in the Green Belt is consistent with and expands on national policy and guidance. It sets out the local approach for Hertsmere which is a key role of local plan. SDAM19 (now SADM23) Green Belt Boundary reviews the Green Belt boundary in accordance with Core Strategy policy CS13. <b>No change.</b>
01350/1/006 Shire	✓			No need for more policy concerning the Green Belt, particularly as there	Policy SADM23 (now SADM27) Development Standards in

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Consulting for Exchange Ltd				is nothing specific to Hertsmere (already have national policy and Core Strategy). SADM19 is not a policy.	the Green Belt is consistent with and expands on national policy and guidance. It sets out the local approach for Hertsmere which is a key role of local plan. SDAM19 (now SADM23) Green Belt Boundary reviews the Green Belt boundary in accordance with Core Strategy policy CS13. <b>No change.</b>
01382/1/002 Savills for Hartsbourne Golf and Country Club			✓	<p>The Club is entirely located within the Metropolitan Green Belt. Section 81 of the NPPF states that once Green Belts have been defined, the Local Planning Authority should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation and to retain and enhance landscapes, visual amenity and biodiversity.</p> <p>SADM19 retains the Country Club within the Green Belt. NPPF para 89.2 supports this use of the site as exceptions include: provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it; The golf club facility sustains the openness and function of the Green Belt. In response to the Council's approach to maintaining the Green Belt boundary around Bushey Heath the Club fully supports policy SADM19.</p>	Support noted.
<b>Policy SADM20 Village Envelopes</b>					
<b>Elstree Village envelope</b>					
01223/1/007 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present. Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous	Policy SADM30 Heritage Assets already protects features of known or potential archaeological interest. <b>No change.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ.	
01227/1/004 RPS Planning and Development for Bluemark Projects Ltd	✓			Amend boundary to include land off Watford Road to enable its development for housing (reasons set out in objections to Policy SADM1).	<p>This area is in the Green Belt.</p> <p>The current Green Belt boundary is clear and defensible. The proposal area adjoins Elstree village envelope. The area defined by the village envelope is part of the Green Belt: within the village envelope, limited infilling may be appropriate. The size of the proposal is considered to be substantially beyond the scale of limited infilling. It would be inappropriate to amend the boundary of the village envelope to accommodate the proposal. If the proposal were accepted, it would furthermore raise the issue of whether the whole of the northern part of Elstree should be excluded from the Green Belt (and not be an infilling village contrary to Policy CS13 in the Core Strategy).</p> <p>However this is considered, the proposal represents a major change to the Green Belt.</p> <p>Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>number of existing communities, including Elstree. This may include the capacity of services, the scale of change and impact on the nature of the settlement. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 or 2016 to reassess the contribution of land to the Green Belt. Allocating this land would entail a major Green Belt release. Such an allocation is not needed to deliver the adopted Core Strategy housing target, and is therefore inappropriate.</p> <p><b>No change.</b></p>
01234/1/001 DLA Town Planning Ltd for Mr K Phippen		✓		<p>Amend boundary to Include Land at Fortune Oaks to enable development for housing. Site deliverable and developable. Special circumstances exist that would justify release from Green Belt. Closely linked to urban area - housing to north, commercial to south. Formerly part of curtilage of current nursing home to west. Would achieve highway improvements to Summer Grove and Fortune Lane. Would provide key worker housing and public open space. Single ownership, looking to develop. SHLAA said it was suitable for housing. Detailed report filed.</p>	<p>The site does not adjoin Elstree village envelope, and does not affect that. The southern part of Elstree is excluded from the Green Belt and the issue is whether this land should also be excluded from the Green Belt.</p> <p>The current Green Belt boundary is clear and defensible. Allocating land at Fortune Oaks for housing would involve a significant Green Belt release. Such an allocation is not needed to deliver the Core Strategy housing target, and is therefore inappropriate.</p> <p>A review of the Core Strategy will be undertaken over the next two years. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. A Green Belt Study will be commissioned in 2015 or 2016 to reassess the contribution of land to the Green Belt. It would be wrong to assume the village envelope boundary should be drawn to reflect housing needs, and solutions accommodating major development could have major consequences for the</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					Green Belt and a number of existing communities. The Core Strategy Review is a fundamental review of the 'local plan' and is the appropriate vehicle to consider any identification of releases of land from the Green Belt. There may be housing-related benefits from this particular proposal, but none are considered so important as to constitute exceptional circumstances warranting what has been sought by the representor. <b>No change.</b>
<b>Shenley Village envelope</b>					
00968/1/001 resident		✓		No more development should be allowed outside the present perimeter of the village.	The proposed village envelope boundary is drawn tightly around the main built area of Shenley. Outside of this boundary inappropriate development will not be acceptable unless very special circumstances exist.
00987/2/005 resident		✓		SADM20 Shenley boundary excludes former garden centre site in London Road which has now been developed for housing.	Incorrect. The proposed village envelope includes the former nursery site within its boundary.
01223/1/010 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present. Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ.	Policy SADM30 Heritage Assets already protects features of known or potential archaeological interest. <b>No change</b>
00979/1/001 resident	✓			Historically Shenley has evolved as a result of decisions to allow development in countryside / Green Belt. Object to Shenley Grange being excluded from Shenley village envelope. If the reason for	The proposed village envelope boundary has been carefully assessed following this consultation response. The proposed boundary is based on physical features that are

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				excluding it is to prevent infill development then there is already policy in relation to infilling in the villages which restricts development. Shenley Grange is within the Green Belt and Conservation Area so development is already controlled. Proposal disenfranchises Shenley Grange from village and is divisive; Shenley Grange is regarded as cornerstone of the village. Village boundary relating to Shenley Grange should remain 'broadly on the present line, or even more rationally as a line joining the built environment on both adjoining sides.'	readily recognisable and likely to be permanent. However, it is considered that part of Shenley Grange, beyond the Private Road, is physically separate and has a more open character and is therefore proposed to remain outside the envelope. <b>No change.</b>
<b>South Mimms Village Envelope</b>					
01223/1/011 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present. Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ.	Policy SADM30 Heritage Assets already protects features of known or potential archaeological interest. <b>No change</b>
01215/1/001 Aylward Town Planning Ltd on behalf of King Properties	✓			Propose extend village envelope and/or add a non-contiguous part to the 'Envelope for Appropriate Infilling' to include land adjacent to St Albans Road and Blackhorse Lane, South Mimms. (South Mimms- Plot A which should be allocated for housing - is deliverable, close to existing urban centre and proposed MSA, adjacent to existing residential. More deliverable than some other sites considered and closer to S Mimms centre than some parts of the existing proposed envelope. Sustainable location. Available now. Estimate 30 units, would include affordable housing. Remainder of land would stay in agricultural use. Maps and further information filed.	This area is in the middle of the Green Belt. It is agricultural land and not physically part of the built area of South Mimms village. South Mimms village is being delineated in SADM for the purposes of Policy CS13 in the Core Strategy. The area being defined by the village envelope is part of the Green Belt: within the village envelope, limited infilling may be appropriate. As a matter of approach, village envelope boundaries are drawn reasonably tightly around the main built area of each

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>village, taking into account green space, larger plots with minimal development and gaps in the built frontage. Permitting <i>small-scale</i> development in the infilling areas would have limited impact on the openness of the Green Belt.</p> <p>The size of the proposal is considered to be substantially beyond the scale of limited infilling. It would therefore be inappropriate to adjust the boundary of the village envelope to accommodate the proposal.</p> <p>The proposal represents a significant change to use of the Green Belt, more appropriately considered as part of a major review of the Green Belt. The review of the Core Strategy will require a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the village envelope boundaries in Hertsmere should automatically be changed because of needs but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities, including South Mimms. This may include the capacity of services, the scale of change and impact on the nature of the settlement. The relative sustainability of South Mimms would be a factor, though it is difficult to describe the village as a 'sustainable location'. Allocating this land would entail a major Green Belt release. Such an allocation is not needed to deliver the Core Strategy housing target, and is therefore inappropriate.</p> <p><b>No change.</b></p>
01215/3/002 Aylward Town	✓			Further information in support of inclusion of site within envelope	See above response (to representation 01215/1/001). <b>No change.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Planning Ltd on behalf of King Properties					
01215/2/001 Aylward Town Planning Ltd on behalf of King Properties	✓			<p>7 ha agricultural land north of Catharine Bourne should be allocated for housing. The village envelope should be extended to include the proposal and/or the proposal identified as an “envelope for appropriate infilling”. The site is deliverable, close to existing urban centre and proposed MSA, and adjacent to existing residential. More deliverable than some other sites considered and as distant from S Mimms centre as some other parts of the existing proposed envelope. Sustainable location. Available now. An estimated 200 units would include affordable housing.</p>	<p>This area is in the middle of the Green Belt. It is agricultural land and not physically part of the built area of South Mimms village.</p> <p>South Mimms village is being delineated in SADM for the purposes of Policy CS13 in the Core Strategy. The area being defined by the village envelope is part of the Green Belt: within the village envelope, limited infilling may be appropriate.</p> <p>As a matter of approach, village envelope boundaries are drawn reasonably tightly around the main built area of each village, taking into account green space, larger plots with minimal development and gaps in the built frontage. Permitting small-scale development in the infilling areas would have limited impact on the openness of the Green Belt.</p> <p>The size of the proposal (whether added to Plot A or not) is considered to be substantial and well beyond the scale of limited infilling. It would therefore be inappropriate to adjust the boundary of the village envelope to accommodate the proposal.</p> <p>The proposal represents a substantial change to use of the Green Belt, more appropriately considered as part of a major review of the Green Belt. The review of the Core Strategy will require a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the village envelope should automatically be</p>



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					changed because of needs, but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities, including South Mimms. This may include the capacity of services, the scale of change and impact on the nature of the settlement. Allocating this land would entail a major Green Belt release. Such an allocation is not needed to deliver the Core Strategy housing target, and is therefore inappropriate. <b>No change.</b>
01215/4/002 Aylward Town Planning Ltd on behalf of King Properties	✓			Further information has been provided. Plot B has been reduced from the original proposal (under 01215/02/002) to 4.3 ha to better reflect an envelope for appropriate infilling. It would accommodate around 105 units and be accessed via Plot A. Development would be designed to take account of flood risk.	See above response (to representation 01215/2/002). The principles at issue are considered to be the same, notwithstanding the different size of the proposals. <b>No change.</b>
<b>Key Green Belt Sites</b>					
00238/2/004 Herts CC Development Services		✓		Are tight development envelopes around Key Green Belt Sites needed? Envelopes are arbitrary if no feasibility work done or firm development proposals. More secondary schools likely to present expansion proposals (rising demand for school places already seen at primary level). Those with known redevelopment proposals can redraw their infilling envelopes within the emerging SADM but others can't. Suggest omitting the infilling envelopes would still provide control but would provide flexibility for the operators to expand if necessary.	Large parts of these sites do not constitute previously developed land; inappropriate development here would be resisted unless very special circumstances can be demonstrated. The infill envelopes give clarity to the areas where infilling or redevelopment may be appropriate and thus provide useful guidance within the context of the overall approach of the NPPF. With regard to schools, the need for expansion would, if demonstrated, be likely in any case to contribute to establishing very special circumstances enabling development outside identified envelopes to proceed. <b>No change.</b>
01226/1/001 RPS Planning and Development Ltd		✓		Para 4.56 NPPF quote is incomplete. Add "is not inappropriate" to end of quote.	The context for the sentence is missing. <b>Wording added.</b>

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for Bowmans Leisure Ltd					
<b>Policy SADM21 Key Green Belt Sites</b>					
01074/2/005 Sport England	✓			Additional criterion is required in relation to assessing proposals for infilling or redevelopment as many of the sites are school sites where such proposals may have an impact on the associated playing fields - need to make it clear that the impact on playing fields will need to be considered (consistent with Core Strategy policy CS19, NPPF para 74 and Sport England's playing fields policy). Request addition of (vi) The impact of proposals on playing fields"	Agree the addition of this criterion would be consistent with CS19. <b>Additional criterion added to policy SADM25 Key Green Belt Sites as requested. Supporting text added.</b>
01210/1/003 Watford Council			✓	WBC support the wider site boundary and infill site boundary approach to schools.	Support noted.
01235/1/009 CPRE		✓		<p>The expression 'Their continued use is supported' is ambiguous, and should be clarified or amended, assuming the intention is to support the continuation of their existing use.</p> <p>Consider proposed wording has been superseded by the NPPF and this may be due to the use of the word 'appropriate' rather than 'acceptable' in the second paragraph of the policy which should perhaps read 'Infilling or redevelopment may be acceptable ...' .</p> <p>The wording of criterion (ii) may also need to be reconsidered in the light of recent changes to permitted development rights.</p>	<p>Although the wording is considered to be clear, the word 'existing' will be added for additional clarification. <b>Add word.</b></p> <p>It is not considered that the overall wording of the policy has been superseded by the NPPF due to use of the word 'appropriate' although it is recognised that the concept of Major Developed Sites no longer exists in the NPPF. The identification of Key Green Belt sites to replace these is set out in the Core Strategy and was accepted by the Inspector.</p> <p>No change is considered necessary as the criteria only apply where planning permission is required.</p>
01242/1/003 Shire Consulting for Radlett	✓			NPPF's para 89 relates to any previously developed green belt land regardless of whether it is specifically defined as an MDS, or not. Partial or complete redevelopment of previously developed land is not	SADM21 (now SADM25) Key Green Belt Sites is consistent with and expands on national policy and guidance. It sets out the local approach for Hertsmere which is a key role of

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Preparatory School				inappropriate in the Green Belt. To be compliant with the NPPF this must now be recognised in emerging 'Development Plan' policy and there is no need to continue a policy such as SADM21 relating to the specifically defined Key Green Belt Sites. This policy is contrary to National policy, 'unsound' and therefore should be deleted.	local plan. <b>No change.</b>
01243/1/004 Shire Consulting for Aldenham School	✓			NPPF's para 89 relates to any previously developed green belt land regardless of whether it is specifically defined as an MDS, or not. Partial or complete redevelopment of previously developed land is not inappropriate in the Green Belt. To be compliant with the NPPF this must now be recognised in emerging 'Development Plan' policy and there is no need to continue a policy such as SADM21 relating to the specifically defined Key Green Belt Sites. This policy is contrary to National policy, 'unsound' and therefore should be deleted. Decision to remove two of the HLP MDS from the schedule of KGBS because they have been redeveloped for housing - another question mark against the soundness of the policy. (see also specific objection to boundary for Aldenham School below)	SADM21 (now SADM25) Key Green Belt Sites is consistent with and expands on national policy and guidance. It sets out the local approach for Hertsmere which is a key role of local plan. <b>No change.</b>
01236/1/012 HMWT		✓		Request Council takes into account the impact of SADM21 proposals on wildlife and the ecological network. Redevelopment or infilling should avoid as far as possible any adverse impact on habitats or features of nature conservation value, or on the functioning of the ecological network (eg. by fragmenting habitats). In view of their Green Belt location, proposals should respond to the opportunities and potential provided by the site and its surrounding environment to restore or enhance habitats and ecological connectivity.	<b>Need to consider ecological features added to supporting text. Criterion added to SADM25 Key Green Belt Sites on the impacts on wildlife and ecology.</b>
01283/1/007 English Heritage		✓		Key Green Belt sites - the recognition that future development will need to be carefully integrated into the landscape is welcomed.	The support is noted.
<b>a) Aldenham School</b>					
01283/1/008 English Heritage		✓		Site includes three Grade II Listed Buildings; the Library, School House and Elm Cottages. Development at the site should allow for the	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				retention and reuse of these assets. Development should be required to protect, conserve and enhance these assets and their setting.	<b>SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
01223/1/012 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present . Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ.	Policy SADM30 protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
01243/1/011 Shire Consulting for Aldenham School	✓			Definition of envelope at Aldenham School - little scope to add new buildings (also listed structures here). Much of school's approved development strategy envisages development outside envelopes. Lots of planting. Site can accommodate further new development without compromising openness of green belt. Site Infill boundary largely arbitrary, with much of the main Campus excluded, along with all of the School's activities and buildings on the southern side of Aldenham Road.	Policy SADM21 (now SADM25) Key Green Belt Sites, allows for limited infill or redevelopment. The site infill boundary is based on physical features that are readily recognisable and likely to be permanent. It is considered that the areas of the site not included within it are more open in character. <b>No change.</b>
<b>b) Bio Products Laboratory</b>					
01223/1/013 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present; Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				before determination of any application (and preferably before submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ.	
01371/1/001 Bio Products Laboratory Ltd		✓		Were we consulted? Some of the area requested to be within the developable envelope has been included. A couple of areas have not - to the side of building 33 (creating building 34) and to the rear of building 19, see site development proposal.pdf . Could they be included in our developable footprint?	Bio Products were consulted but no response was received. There is no objection to a slightly larger area to the north of the warehouse building than that shown on the draft Policies Map being included in the envelope; it is understood that the proposed 3-bay warehouse extension is to enable on-site storage of pallets which are currently stored off site at considerable cost. On-site storage would also be more secure. <b>The boundary to the envelope north of building 19 is adjusted accordingly.</b> In the absence of firm proposals for the area to the side of building 33 (R&D building – envelope already extended to include this building) it is considered premature to enlarge the envelope here, and this has been agreed with Bio Products. This issue can be re-visited once a clearer idea of how the company wishes to develop this area is available. <b>No change to the area adjoining building 33.</b>
<b>c) Blackbirds Sewage Works</b>					
01223/1/014 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present; Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				significant potential for archaeological remains worthy of preservation in situ.	
<b>d) Bushey Academy</b>					
01283/1/009 English Heritage		✓		Site is located within Bushey High Street Conservation Area. Development should be required to preserve or enhance the established character of the area.	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
01216/1/001 DLA Town Planning Ltd for First Place Nurseries	✓			Nursery Site should be included in urban area and allocated for housing (this representation treated as an objection although it was submitted as support). Site is deliverable. Previously developed. No impact on 5 purposes of green belt. Sustainable location. well related to existing pattern of development. Existing access from Falconer Road, services and utilities available, not within a flood zone. Single ownership. Should be released from green belt for housing development. Remove unsightly nursery building and hardstanding. Replace with approx 15 dwellings, 50% affordable, and soft landscaping. If can't release from green belt then retain green belt designation but still allocate for housing. Detailed report filed.	Falconer Road provides a defensible boundary to the Green Belt in a location where the gap between Bushey Village and the built up area of Watford/North Bushey is at its narrowest. Amending the Green Belt boundary in this location would not represent the most appropriate way to address the potential redevelopment of the site. The indicative plan submitted proposes the demolition of the existing building and the resiting of development nearer to Falconer Road; there may be scope to allocate the site for development on this basis, through Policy SADM1, without resorting to any change to the Green Belt boundary itself. <b>Amend Policy SADM1</b>
<b>e) Bushey Meads School</b>					
01149/1/001 Bushey Meads School		✓		LEA funding 1 form entry expansion - 150 additional students - due to shortfall in secondary places in SW Herts. Request enlargement of envelope to accommodate proposed development.	<b>Boundary of infill envelope adjusted to include proposed new buildings, (with the exception of 6<sup>th</sup> form block).</b> An amended boundary is proposed on the Coldharbour Lane frontage in order to retain an open green setting in this green belt location. The proposed car park and areas of hard and soft landscaping at periphery of area proposed for development (currently not within envelope) not included as impact of any further development in these areas on the openness of the Green Belt would depend on nature of any

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					proposals put forward.
01370/1/016 HCC Highways		✓		Pre application consultation with Highways included the requirement for a transport assessment/statement to establish whether traffic mitigation is necessary. There is also a requirement for a school travel plan. Additional staff parking may be required and further clarification on rationalising access to site.	Noted.
<b>h) Elstree Aerodrome</b>					
01238/1/009 Welwyn Hatfield Council		✓		Welwyn Hatfield welcome on-going discussions re future use and development. If Panshanger to close Elstree may need to take displaced aircraft.	Noted.
01283/1/010 English Heritage		✓		Development should be required to allow for the retention and reuse of Harmshall Cottage (Grade II listed), and to protect, conserve and enhance this asset and its setting. Development should be required to not materially harm the setting of Aldenham House Grade II Registered Park and Garden of Special Historical Interest; Penne's Place scheduled Ancient Monument; Hilfield Castle and Gatehouse Grade II * Listed buildings adjacent to the site.	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
01223/1/015 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present . Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ.	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
<b>i) Haberdashers' Aske's (Boys) School</b>					
01283/1/011		✓		Development should allow for the retention and reuse of Grade II*	Policy SADM30 protects heritage assets. <b>Criterion relating</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
English Heritage				Aldenham House and protect, conserve and enhance this asset and its setting. The site also sits within Aldenham House Park, a Grade II Registered Park and Garden of Special Historical Interest. Development at the school site should be required to not materially harm the setting of these sites	<b>to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
01223/1/005 HCC Historic Environment Unit		✓		Potential for development severely constrained by nationally important archaeological remains.	Policy SADM30 protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
01223/2/001 HCC Historic Environment Unit		✓		Consult English Heritage as there is a Scheduled Monument at the site. Any development proposals have the potential to contain heritage assets with high significance which could be a reason for refusal of any planning application. This may be on advice from English Heritage in relation to the Scheduled Monument or this office if highly significant heritage assets with archaeological interest are found. The proximity of the Scheduled Monument means that this is a known likelihood. Risk that archaeological remains that are nationally important, and thereby worthy of preservation <i>in situ</i> , are present - could be a reason for refusal of any planning application. Must consult HCC Historic Environment Unit and if necessary an archaeological assessment takes place before the application is submitted (NPPF 128).	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
01387/1/001 Haberdashers' Aske's Boys' School		✓		Request amendment of infill boundary to include buildings constructed and under construction with benefit of planning permission	The two proposed amendments relate to (i) changing rooms and maintenance buildings which have been constructed with planning permission and (ii) an existing sports centre (constructed 1980) and an adjoining sports facility currently under construction with planning approval. <b>The Proposals Map is amended to include these two areas within the infill boundary.</b>
<b>j) Haberdashers' Aske's (Girls) School</b>					



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01283/1/012 English Heritage		✓		The site sits within Aldenham House Park, a Grade II Registered Park and Garden of Special Historical Interest. Development at the school site should be required to not materially harm the setting of this asset. The site is adjacent to the Grade II Home Farm House to the south.	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
01223/1/016 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present . Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ.	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
<b>k) Cancer Research</b>					
01283/1/013 English Heritage		✓		Development should be required to preserve or enhance the established character of the adjoining Conservation Area.	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
01223/1/017 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present. Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ.	
<b>l) National Institute for Biological Standards and Control</b>					
01283/1/014 English Heritage		✓		Development should be required to preserve or enhance the established character of the adjoining Conservation Area.	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
01223/1/018 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present. Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
<b>n) Queens School</b>					
01223/1/021 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present. Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>

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				significant potential for archaeological remains worthy of preservation in situ. The potential for development here may have an impact upon heritage assets associated with site H7 site and their setting.	
<b>o) Purcell School</b>					
01223/1/020 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present. Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ.	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
<b>p) St Margaret's School</b>					
01283/1/015 English Heritage		✓		Development at the site should allow for the retention and reuse of Grade II Listed St. Margaret's Clergy Orphan School and Chapel. Development should be required to protect, conserve and enhance this asset and its setting.	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
<b>q) Willows Farm</b>					
01226/1/002 RPS Planning and Development			✓	Support SADM21 and inclusion of Willows Farm. No envelope shown for Willows Farm - see separate submission.	Noted.
01283/1/016 English Heritage		✓		Development should be required to protect and enhance the setting of Grade I Listed Tyttenhanger House and the associated Grade II Stable Block and Kitchen Garden Wall.	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>

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01223/1/019 HCC Historic Environment Unit		✓		Some risk that archaeological remains that are nationally important, and thereby worthy of preservation in situ, may be present. Need an archaeological site impact assessment before any development proposal is submitted to determine the extent to which any previous development on the site has affected its archaeological potential - normally desk-based studies plus geotechnical information as appropriate. Further archaeological field evaluation may be required before determination of any application (and preferably before submission of an application), if it is considered that the site still retains significant potential for archaeological remains worthy of preservation in situ.	Policy SADM30 Heritage Assets protects heritage assets. <b>Criterion relating to heritage assets also added to Policy SADM25 Key Green Belt Sites. Reference to Appendix listing known heritage assets and how they are to be taken into account added to text.</b>
<b>South Mimms Services (Bignell's Corner)</b>					
<b>Policy SADM22 South Mimms Special Policy Area</b>					
01363/1/001 Highways Agency		✓		Plan of South Mimms SPA missing so will Policy affect the operation of the HATO site and the Connect Plus Site located next to the services? Can policy be changed to include such activities as are carried out from these premises within the SPA, or the boundary of the SPA exclude these premises and their access. Please include us in consultations on the SPA development brief.	<b>Policy SADM26 South Mimms Special Policy Area – first paragraph – add ‘and activities relating to the management, operation and maintenance of the strategic road network.’ at the end of the sentence. Policy SADM26 South Mimms Special Policy Area – add after second of the 2 bullet points numbered (i) - add ‘(ii) have an adverse impact on the safe and effective operation of the strategic road network’.</b>
01370/1/017 HCC Highways		✓		Welcome proposed production of a development brief for this site and will work with Hertsmere Borough Council.	Noted. <b>No change.</b>
<b>Development Standards for the Green Belt</b>					
<b>Policy SADM23 Development Standards in the Green Belt</b>					
01226/1/004 RPS Planning and Development	✓			Object to criterion (iii) page 33 "existing open and green space in the area, including garden areas, should be retained". Unnecessarily restrictive and incompatible with NPPF 89 & 90 (which recognises that certain types of buildings and uses might be appropriate within Green	Para 90 of the NPPF restricts certain appropriate development to that which preserves the openness of the Green Belt (or the purposes of including land in the Green Belt). Consequently, it is considered logical for Policy

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				Belt). Could be that open space and green space is slightly encroached into without affecting the openness of the Green Belt, eg within established built sites. This could also prevent planning permission being granted for building extensions, for example, that are addressed through separate planning policy tests. Propose this criterion be removed. Propose that Criteria (i) to (iii) page 34 be omitted - paraphrases Paragraph 89 of the NPPF in terms of types of building.	SADM27 Development Standards in the Green Belt to set criteria for what the Council will consider proposals against, in terms of openness, when assessing development in the Green Belt. <b>No change.</b>
01231/1/003 Radlett Society & Green Belt Association		✓		Criterion iv) page 33 needs to be tighter. Should there be a certain level of screening from the footpaths to decrease the impact of development? Criterion i) page 34 need to specify what 'materially larger' means in in % terms. iii) - wording subjective.	Do not consider that criteria iv can or needs to be made more specific than it already is. <b>No change.</b>  Regarding 'materially larger', additional clarity will be provided by adding reference to floorspace, footprint and volume. It should be noted that additional floorspace can be achieved without materially impacting on the openness of the Green Belt, such as via a mezzanine or loft conversion to an existing building. <b>Change.</b>
01186/1/002 Aldenham Parish Council		✓		Criterion (i) page 34 - clarify what <u>materially</u> means in 'a replacement building (which is for the same use) must not be materially larger than the one it replaces'. Also, does it refer to ground area or total floor area?	It is difficult to be overly prescriptive here given the difference between sites but additional clarity will be provided by adding reference to floorspace, footprint and volume. It should be noted that additional floorspace can be achieved without materially impacting on the openness of the Green Belt, such as via a mezzanine or loft conversion to an existing building. <b>Change.</b>
01224/1/004 Rachel Charitable Trust	✓			Wording of criterion (iii) page 34 should be amended to remove the words <u>or character</u> - not a requirement of NPPF para 89.	<b>Agreed. The words 'or character' will be removed. Replaced by 'or purpose'.</b>
01229/1/011 Natural England			✓	We welcome SADM23 which seeks to ensure that development will respect the purpose of the green belt and protect and enhance ecology, landscape and open space.	Support noted.
01242/1/005 Shire		✓		No need for more policy concerning the Green Belt, particularly as	The Green Belt policies are consistent with and expand on

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Consulting for Radlett Preparatory School				there is nothing specific to Hertsmere. SADM23 duplicates NPPF	national policy and guidance. They set out the local approach for Hertsmere which is a key role of the local plan. <b>No change.</b>
01243/1/006 Shire Consulting for Aldenham School		✓		No need for more policy concerning the Green Belt, particularly as there is nothing specific to Hertsmere. SADM23 duplicates NPPF.	The Green Belt policies are consistent with and expand on national policy and guidance. They set out the local approach for Hertsmere which is a key role of the local plan. <b>No change.</b>
01350/1/007 Shire Consulting for Exchange Ltd		✓		No need for more policy concerning the Green Belt, particularly as there is nothing specific to Hertsmere. SADM23 duplicates NPPF	The Green Belt policies are consistent with and expand on national policy and guidance. They set out the local approach for Hertsmere which is a key role of the local plan. <b>No change.</b>
01235/1/010 Campaign to Protect Rural England		✓		SADM23 should start with a statement that Inappropriate Development will not be permitted unless very special circumstances exist that outweigh the harm caused.	This statement is set out in Paragraph 87 of the NPPF and in Core Strategy Policy CS13. This DPD should supplement rather than replicate the the Core Strategy and NPPF. <b>No change.</b>
01382/1/003 Savill's for Hartsbourne Golf and Country Club			✓	In accordance adopted policy CS13, policy SADM23 seeks to control changes to buildings, works and uses in the Green Belt in order to maintain its openness but support its continued functioning. Existing golf course is an appropriate use being in line with the NPPF and any proposed site works would seek to support its Green Belt location. Accordingly, the Club supports the Council's Green Belt development standards as set out in criteria (i) - (vii) in SADM23. Site comprises extensive open space (67 hectares). In line with criterion (iii) of SADM23, existing open and green space in the area should be retained. This is supported by Section 74 of the NPPF whereby existing open space should not be built upon unless a strong justification is given. The Club supports the retention of open space in order to	Support noted.

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				maintain the open character of this part of the Green Belt. For the above reasons the Club supports policy SADM23.	
<b>SADM24 Diversification and Development supporting the Rural Economy</b>					
01242/1/006 Shire Consulting for Radlett Preparatory School		✓		No need for more policy concerning the Green Belt, particularly as there is nothing specific to Hertsmere. SADM24 could well be overtaken by the recent changes to the General Permitted Development Order relating to the use of agricultural buildings	The Green Belt policies are consistent with and expand on national policy and guidance. They set out the local approach for Hertsmere which is a key role of the local plan. Policy SADM24 (now SADM 28) Diversification and Development supporting the Rural Economy has been reviewed and will be further reviewed prior to submission. <b>No change.</b>
01243/1/007 Shire Consulting for Aldenham School		✓		No need for more policy concerning the Green Belt, particularly as there is nothing specific to Hertsmere. SADM24 could well be overtaken by the recent changes to the General Permitted Development Order relating to the use of agricultural buildings.	The Green Belt policies are consistent with and expand on national policy and guidance. They set out the local approach for Hertsmere which is a key role of the local plan. Policy SADM24 (now SADM 28) Diversification and Development supporting the Rural Economy has been reviewed and will be further reviewed prior to submission. <b>No change.</b>
01350/1/008 Shire Consulting for Exchange Ltd		✓		No need for more policy concerning the Green Belt, particularly as there is nothing specific to Hertsmere. SADM24 could well be overtaken by the recent changes to the General Permitted Development Order relating to the use of agricultural buildings.	The Green Belt policies are consistent with and expand on national policy and guidance. They set out the local approach for Hertsmere which is a key role of the local plan. Policy SADM24 (now SADM 28) Diversification and Development supporting the Rural Economy has been reviewed and will be further reviewed prior to submission. <b>No change.</b>
01236/1/013 HMWT		✓		Welcome and recognise the need for this policy. However, appropriate rural development should not result in harm to biodiversity interests. Request revise the policy to include this requirement. Eg.	<b>SADM11 (Biodiversity and Habitats) has been revised following the consultation responses received.</b> Any development proposals considered against Policy

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				Diversification....will be supported, provided... the proposal will not adversely impact on ecological interests and the quality and integrity of the local ecological network. Alternatively, providing that a robust and effective policy SADM10 is developed, the council should consider specifying that development under Policy SADM24 must meet the requirements of Policy SADM10.	SADM28 Diversification and Development supporting the Rural Economy will also be considered against the other policies in the plan, so will automatically be required to meet the requirements of SADM11 Biodiversity and Habitats where it is relevant. <b>No change.</b>
<b>SADM25 Watling Chase Community Forest</b>					
01229/1/012 Natural England			✓	Natural England is pleased that the Watling Chase Forest Plan and SPG will be material considerations in the determination of planning applications in the Forest area.	Noted.
01235/1/011 Campaign to Protect Rural England		✓		<b>Para 4.69</b> Rather than referring to 'normal' Green Belt policies, it may be better to refer to Green Belt policies in the NPPF and the Development Plan.	Noted. Have added a reference to the paragraph "normal Green Belt policies <b>“set out in the NPPF”</b> will also apply here.
<b>Historic Environment</b>					
01283/1/021 English Heritage		✓		i) Wide definition of historic environment promoted by EH includes not only statutory designated land and buildings but also locally valued and important landscape/townscape components. ii) Below ground archaeology is often unknown. HER indicates areas of known interest. Borough and County Council archaeology and conservation staff should be consulted on all aspects of heritage, not just statutory.	<b>i) Reference to locally valued heritage assets added to supporting text.</b> ii) Noted. Appropriate consultations take place as part of assessing planning applications. <b>No change.</b>
01223/1/001 Herts County Council Historic Environment Unit		✓		i) Support para 4.70 & 4.76 - this should include archaeological remains, historic buildings and historic landscapes. ii) Para 4.75 should refer to the Historic Environment Record (HER) rather than the Sites and Monuments Record which has been superseded.	<b>iii) Reference to locally valued heritage assets added to supporting text.</b> <b>iv) Paragraph updated to refer to the HER</b>
01223/1/002 Herts County Council Historic		✓		i) Archaeological sites on policies maps - based on HCC dynamic resource, may not be up to date, and don't show all known heritage assets. May be as yet unidentified ones (NPPF para 169). Historic	<b>Noted. Policies Map in pre-submission draft will be updated in consultation with HER.</b>



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Environment Unit				Environment Record should be consulted during production of maps and policy documents.	
01356/1/002 resident		✓		More of Radlett should be listed. Save Edwardian style properties. Convert Victorian premises back from offices to residential. Old Telephone Exchange ideal for flats (keep facade).	English Heritage rather than Hertsmere Borough Council is responsible for listing. Conversion of premises to residential would be acceptable subject to compliance with all other policies and design guidance. <b>No change.</b>
<b>Policy SADM26 Heritage Assets</b>					
01239/1/001GL Hearn for Abbeyfield Society	✓			Policy of no support for demolition of locally listed building too restrictive. NPPF (129 & 131) advice re assessing significance needs to be taken into account. Balanced judgement required (para 135). Amend wording re Buildings of Local Interest to "Development proposals affecting a building included on this list will be assessed on: the desirability of sustaining or enhancing the building and its setting; the significance of contribution that the asset makes; economic viability; and the desirability of the proposed development and contribution to local character and distinctiveness."	Policy SADM 30 Heritage Assets states that applications will be considered in accordance with the NPPF and that the Council will have regard to the significance of the heritage asset and potential harm to it when assessing proposals. Locally listed buildings make an important contribution to the environment and heritage of the Borough and their protection is therefore important – were it not so they would not have been placed on the list. Buildings are assessed prior to inclusion; the list has recently been reviewed. The Council will therefore not normally support their demolition. <b>No change.</b>
01140/1/001 Hertfordshire Gardens Trust & Garden History Society	✓			Must show EH Registered and Locally Important Parks and Gardens. NPPF (section 12) requires ALL heritage assets to be included. Flag in same way as open spaces and Conservation Areas and show on Policies Maps. Herts Gardens Trust lists over 20 Locally Important sites – these should be mentioned. Policy for Historic Parks and Gardens doesn't afford them sufficient protection - should be same wording as for Listed Buildings ie "The Council will not support development proposals which would materially harm the setting of, or endanger the fabric of.. "	EH registered Parks and Gardens are shown on the Proposals Maps (check they are all shown); <b>reference to list of locally important sites added to text.</b> SADM30 Heritage Assets and supporting text protects all heritage assets. <b>No change to policy wording.</b>
01223/1/003 Herts County Council Historic Environment Unit		✓		Re informal pre-application advice: Historic Environment Unit should be consulted, particularly for major applications (NPPF says consult Historic Environment Record as a minimum). Archaeology section of policy - change to "The Council expects features of known or potential	The advice is noted. <b>Proposed wording added to Policy SADM30 Heritage Assets.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				archaeological interest to be identified, assessed and appropriately surveyed, recorded and wherever possible retained"	
01283/1/017 English Heritage		✓		<p>SADM26 English Heritage welcomes the inclusion of a policy on the borough's heritage assets.</p> <p>For consistency, the fifth paragraph should read: The development proposal should protect, conserve and where possible enhance the significance, character and appearance of the <b>heritage</b> asset and its setting. English Heritage welcomes the inclusion of Scheduled ancient monuments in the Appendix A: Site Allocations Map. There are four scheduled ancient monuments in Hertsmere. Three are included in Appendix A. For completeness, all should be included in the Appendix and be listed under their List entry name as well as their location as per below.- Penne's Place moated site, Aldenham at Haberdasher's Aske School, Elstree &amp; Borehamwood- Moated site at Bushey Hall Farm, Bushey - South Mimms motte and bailey castle, Castle Quarry, Potters Bar- Roman remains S of Hansteads House, Netherwyld Farm, Aldenham</p>	<p>The support is noted.</p> <p><b>The wording in SADM 30 Heritage Assets has been amended for consistency.</b></p> <p><b>All monuments are shown on the Policy Map.</b></p>

# Site Allocations and Development Management Policies DPD: Consultation March/April 2014

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Summaries of Representations and Council responses.

Chapters 5-7

July 2015

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
<b>Chapter 5 Building Sustainable Communities</b>					
01237/1/005 Hertfordshire County Council (Landscape)		✓		Lack of distinction between the content of chapters 4 and 5. eg SADM27 design principles could be addressed in a policy promoting good quality urban design in chapter 4. Chapter 5 could then focus on the delivery of sustainable community facilities and services.	Comments are noted, however the chapter headings in the Draft SADM have been carried across from the Core Strategy 2013 in order to aid clarity when reading between between the two documents.
<b>Design Principles</b>					
01240/1/003 Herts County Council Environmental Resource Planning		✓		<b>Para 5.3 or 5.5:</b> Refer to the Building Futures Sustainable Design Toolkit as guidance and a material consideration by incorporating the following text into sections 5.3 and/or 5.5 of the SADM: 'Applicants should refer to and make use of the Building Futures Sustainable Design Toolkit and online resource at the early design concept and pre-application stages of their proposal(s). All applications for new development will be required to explain how the design principles set out in policy SADM27 have been implemented in the proposal, using the Building Futures Sustainable Design Toolkit to structure and inform this statement.' Doing so would also provide applicants with a robust mechanism for demonstrating compliance with HBC's adopted Core Strategy policies CS12, CS16, CS17 and CS22.	<b>A reference to the toolkit has been added to the supporting text.</b>
01125/2/003 HBC Councillor		✓		Where appropriate modern or traditional designs should be allowed, but in all cases, and especially where infilling, important that buildings fit in with the street scene eg dormer windows on a front elevation should not be permitted if this conflicts with adjacent structures. Conversion of garages to habitable rooms should be discouraged – parking space permanently lost.	Noted. Policy makes clear the requirement for new development to achieve a high quality design and to comply with the Planning and Design guide. The <b>Policy now additionally requires development to recognise and complement the particular local character of the area.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01229/1/013 Natural England, Sustainable Land Use and Regulation		✓		Whilst we generally support SADM27 and its aspiration for development to contribute positively to the natural environment, it could go further in encouraging developers to ensure that proposals contribute to climate change and adaptation. Policies should contribute to an overall strategy of adapting to climate change, recognising the role of Green Infrastructure and protection and enhancement of nature conservation.	Core Strategy Policies CS12 The Enhancement of the Natural Environment, CS16 Environmental Impact of Development and CS17 Energy and Climate Change are already in use which require development to contribute to improving the natural environment and mitigate against climate change. CS12 requires development proposals to contribute to the objectives of the Hertsmere Green Infrastructure Plan. CS16 requires that development incorporates measures that will mitigate against future environmental risks. It is not the function of SADM to replicate these policies. <b>No change.</b>
<b>Policy SADM27 Design Principles</b>					
00994/2/003 resident			✓	Support policy. Council should be more aware of the quality of all new buildings not just housing. 96 Shenley Road is unrelated to neighbours.	Noted. Policy makes clear the requirement for all new development to achieve a high quality design and to comply with Planning and Design guide. <b>Policy now additionally requires development to recognise and complement the particular local character of the area.</b>
01240/1/004 Herts County Council Environmental Resource Planning		✓		<p>1. Suggest that definition of good design &amp; scope of design principles SADM27 &amp; supporting text be expanded to include principles of:</p> <ul style="list-style-type: none"> <li>▪ safety and inclusivity;</li> <li>▪ continuity and enclosure;</li> <li>▪ connectivity, accessibility and permeability of streets;</li> <li>▪ open space and blue/green infrastructure;</li> <li>▪ diversity of uses; and</li> <li>▪ adaptability and resilience of new development to change and future environmental risks.</li> </ul> <p>This would ensure consistency with policies CS22 and CS16, paragraphs 52-62 of the NPPF, and reflect best practice approach.</p>	<p>1. As HCC will be aware, the Site Allocations and Development Management Policies DPD, once adopted, will be a DPD with as much weight as the Core Strategy. Policies in the Core Strategy set out some of the points raised in detail. Policy CS22 addresses safety and inclusivity and the adaptability and resilience of new development to change, and CS16 requires that development incorporates measures that will mitigate against future environmental risks. It is not the function of SADM to replicate these policies. Separate policies exist within the SADM relating to open space (SADM33 New and Improved Public Open Spaces) and blue/green infrastructure (SADM12 Landscape</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				2. The beginning of Chapter 5 <i>Building Sustainable Communities'</i> cites NPPF paragraph 69 and the role of planning policies and decisions in creating healthy and inclusive communities. CS22) requires all residential units in developments of 15 units or more to be designed to Lifetime Homes Standards, the CS & SADM do not fully carry forward the NPPF's intent. Suggested that SADM27 recognises and outlines role of good design in fostering active lifestyles, physical and mental wellbeing, and inclusive communities, e.g. creating safe and welcoming open space for walking, cycling and social interaction, connectivity with green open space and recreation, or the appropriate provision and design cycle infrastructure. A closer consideration of policy wording and how policies within the development plan will work together to achieve healthy and inclusive communities is needed.	Character). 2. The other themes are incorporated within the National Planning Policy Framework and other policies in the Core Strategy and SADM.
<b>Special Character Area</b>					
<b>Policy SADM28 Bushey Heath MOD Housing Area</b>					
00965/1/001 Hartsbourne Manor Residents Association			✓	Support conserving the character and environment of MOD Housing area (represent householders in Harstbourne Rd and Ave, Prouse Ave, and adjoining streets including MOD estate).	Noted.
01275/1/002 Warren Estate Residents			✓	Support designation as a "Special Character Area".	Noted.
01283/1/018 English Heritage			✓	Welcomes the reference to and policy for, the Special Character Area. This character area forms a non designated heritage asset.	Noted.
<b>Key Community Facilities</b>					
01220/1/001 NHS England		✓		NHS England would be looking for CIL / S106 contributions in respect of additional dwellings in Borehamwood. Housing proposals in addition to site allocations for Potters Bar will require a S106 contribution. NHS England would be looking for a CIL or	Noted. The Council's approach to CIL and S106 is set out in the Developer Contributions Framework referred to in the text (Chapter 8).

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				S106 contribution for all future dwellings in Bushey, Aldenham and Patchetts Green Elstree, Shenley and Radlett.	
00234/2/004 Elstree and Borehamwood Town Council		✓		Concern that there should be no loss of sporting facilities in Elstree and Borehamwood, especially the rugby pitch.	Noted. Core Strategy Policy CS19 protects existing key community facilities from loss, reduction or displacement. Sports pitches are identified as a key community facility.
00238/2/005 Herts CC Development Services		✓		Para 5.14 Designation of land within former Sunnybank School housing allocation (H9) as public open space not justified, should be deleted. See associated rep under SADM1 H9.	The area is currently playing field and makes an important contribution to the openness of the Green Belt here; it is also in an area of open space/outdoor sports facilities deficiency according to the Open Space Study and more recent work undertaken by HBC Parks department. This is already a densely developed area with few if any other opportunities to increase open space provision. HCC originally put forward half the site of the former school for development, roughly approximating to the area of PDL and it was never intended that the whole of the site should be open to being developed. The suggested Green Belt boundary in SADM reflects what would be an appropriate boundary after the redevelopment of the school site for housing. The retention of a significant area for public open space remains a priority wherever the Green Belt boundary is drawn and HBC would not support development of the whole site for housing. The retention of a community use on the site is also desirable. <b>No change.</b>
01290/1/005 Hertswood Academy		✓		Para 5.16 Siting a new primary school within the Hertswood School northern site is not feasible. Amend to say there may be an opportunity adjacent. SHLAA Site S52 adjacent to northern site identified as potentially developable for housing but not allocated in the SADM. Possible opportunity here to develop a mixed scheme for a new primary school, extra playing fields for Hertswood Academy and new dwellings?	The response is noted and Hertfordshire County Council are understood to have explored options for the siting of a primary school on land adjacent to Hertswood School with the landowner. <b>The text in paragraph 5.16 (now 5.21) has been amended to reflect the comments made.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
00238/2/006 Herts CC Development Services		✓		Disappointing that site for a new primary school not allocated, given that HBC's preference is for an alternative site to the Maxwell Park reserve site allocated in the EWCAAP. Any allocation should be solely for Education uses, to assist the deliverability of the site. Hertsmere Borough Council has a critical role in ensuring the identification and allocation of appropriate supply of education land through its development plan documents.	The Council continues to seek alternative options other than Maxwell Park to accommodate additional primary school capacity in Borehamwood and has facilitated a dialogue between Hertfordshire County Council and the owner of land adjoining Hertswood School. Clarification has also been sought from the County Council as to whether existing 1FE primary schools in the town have scope for expansion and the extent to which the proposed free school(s) for Borehamwood, with 50% of admissions based on catchment, might address the projected need for school places.
<b>Policy SADM29 Key Community Facilities</b>					
01074/2/006 Sport England			✓	Policy is broadly supported as it takes a positive approach in principle to the provision or enhancement of community facilities which would include sports facilities.	Noted.
01167/1/001 Theatres Trust			✓	Support including theatres and community arts venues in para 5.13 . Please consult us on any planning applications (and any pre-apps) re re-location of the Ark Theatre. Bullet point under 'Building sustainable communities' at para 1.29 states "Protection" of community facilities. The word 'protection' must be included in the policy. Also add for the protection of "existing" facilities and criteria for their loss as the policy only provides criteria for "future" facilities.	Support noted. Request for consultation re Ark Theatre noted (passed to Development Management). CS19 and para 6.4 of the Core Strategy already provide protection for existing community facilities including theatres and community arts venues; for clarity, <b>Policy CS19 referenced in SADM33 Key Community Facilities site C2. Also add 'Provision' to para 1.29 for consistency.</b>
01222/1/020 HBC Parks		✓		H9 is the only proposal for new open space - this is inconsistent.	HBC Parks, in consultation with Planning, are commissioning a study to enable the production of a Sport and Recreation Strategy, including an updated playing pitch strategy. Work is also being undertaken to update existing information on levels of open space provision and shortfalls which will inform Parks Improvement and Development Schemes Programme. Opportunities for a contribution towards the



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					implementation of these schemes to be secured through new development proposals will be pursued. <b>Reference to this work added to Key Community Facilities and Green Spaces sections.</b>
01242/1/009 Shire Consulting for Radlett Preparatory School	✓			Some schools serve wider than local community (term not defined anyway), not available to all, not served by public transport. Should still receive Council's fullest support when seeking to enhance quality of provision. Policy is unsound.	Policy SADM29 (now SADM33) Key Community Facilities is consistent with national policy, guidance and best practice. Planning applications are determined on a case by case basis and the onus is on the applicant to demonstrate that the criteria are met. The policy states '... principally serve the local community or meet a wider, unmet need which cannot be accommodated elsewhere'. As the representation outlines, the term local community has not been defined. In relation to demonstrating that the site can be reached by walking, cycling and public transport, this is an entirely reasonable requirement as part of applying for planning permission for the enhancement of an existing facility. <b>No change.</b>
01243/1/010 Shire Consulting for Aldenham School	✓			Some schools serve wider than local community (term not defined anyway), not available to all, not served by public transport. Should still receive Council's fullest support when seeking to enhance quality of provision. Policy is unsound.	Policy SADM29 (now SADM33) Key Community Facilities is consistent with national policy, guidance and best practice. Planning applications are determined on a case by case basis and the onus is on the applicant to demonstrate that the criteria are met. The policy states '... principally serve the local community or meet a wider, unmet need which cannot be accommodated elsewhere'. As the representation outlines, the term local community has not been defined. In relation to demonstrating that the site can be reached by walking, cycling and public transport, this is an entirely reasonable requirement as part of applying for planning permission for the enhancement of an existing facility. <b>No</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					change.
01382/1/001 Savills for Hartsbourne Golf and Country Club			✓	Club serves wide area, appropriately located, consistent with CS policies and NPPF. Council should guard against unnecessary loss of valued facilities. SADM29 based on CS19 seeks to provide or enhance community facilities. This includes sports clubs. This is a valued facility within the District. Support SADM29.	Support noted.
<b>Site C1: Former Paddock Depot Site, Oxhey</b>					
00577/1/001 resident	✓			It concerns me that a notice has been put through my door re the cemetery.	The suggested use of the site as a green cemetery is one put forward by Watford Council. Whilst the site lies within Hertsmere Borough it is not a proposal being promoted by this Council and Hertsmere has not been provided with any information by Watford Council other than what is contained within the SADM consultation draft. Hertsmere has concerns about the proposal although it could be acceptable if access, car parking and the level an any ancillary development are satisfactorily resolved and the design respects and enhances the character and openness of the Green Belt. In the light of concerns over the proposal, Watford have identified two preferred sites within their boundary – extension to North Watford Cemetery and Russell Lane - which are contained within their most recent Site Allocations and Development Management Policies consultation. <b>The proposal site is therefore deleted from SADM</b> ; any future proposals put forward for the site can be assessed under the usual development management policies.
00827/1/001 resident		✓		No objections to cemetery but concerned about access. Is any access proposed via Oxhey Lane / Elm Avenue? Is the access road through the allotments to be used? Is this narrow road with	The suggested use of the site as a green cemetery is one put forward by Watford Council. Whilst the site lies within Hertsmere Borough it is not a proposal being promoted by

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				humps to be widened?	this Council and Hertsmere has not been provided with any information by Watford Council other than what is contained within the SADM consultation draft. Hertsmere has concerns about the proposal although it could be acceptable if access, car parking and the level an any ancillary development are satisfactorily resolved and the design respects and enhances the character and openness of the Green Belt. In the light of concerns over the proposal, Watford have identified two preferred sites within their boundary – extension to North Watford Cemetery and Russell Lane - which are contained within their most recent Site Allocations and Development Management Policies consultation. <b>The proposal site is therefore deleted from SADM</b> ; any future proposals put forward for the site can be assessed under the usual development management policies.
00832/1/001 resident		✓		Would like to know proposed access road route.	The suggested use of the site as a green cemetery is one put forward by Watford Council. Whilst the site lies within Hertsmere Borough it is not a proposal being promoted by this Council and Hertsmere has not been provided with any information by Watford Council other than what is contained within the SADM consultation draft. Hertsmere has concerns about the proposed use and potential access to it although it could be acceptable if access, car parking and the level an any ancillary development are satisfactorily resolved and the design respects and enhances the character and openness of the Green Belt. In the light of concerns over the proposal, Watford have identified two preferred sites within their boundary – extension to North Watford Cemetery and Russell Lane - which are contained within their most recent

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					Site Allocations and Development Management Policies consultation. <b>The proposal site is therefore deleted from SADM</b> ; any future proposals put forward for the site can be assessed under the usual development management policies.
00833/1/001 resident	✓			Has been no local communication to residents in Talbot Avenue or allotment holders from Watford Council. Object due to lack of detail re access to the proposed site.	The suggested use of the site as a green cemetery is one put forward by Watford Council. Whilst the site lies within Hertsmere Borough it is not a proposal being promoted by this Council and Hertsmere has not been provided with any information by Watford Council other than what is contained within the SADM consultation draft. Hertsmere has concerns about the proposed use and potential access to it although it could be acceptable if access, car parking and the level an any ancillary development are satisfactorily resolved and the design respects and enhances the character and openness of the Green Belt. In the light of concerns over the proposal, Watford have identified two preferred sites within their boundary – extension to North Watford Cemetery and Russell Lane - which are contained within their most recent Site Allocations and Development Management Policies consultation. <b>The proposal site has therefore been deleted from SADM</b> ; any future proposals put forward for the site can be assessed under the usual development management policies.
00836/1/001 resident		✓		1. What is a green cemetery? 2. What access will be provided? 3. Is there potential for the site to expand? Information provided to Hertsmere from Watford appears inadequate.	The suggested use of the site as a green cemetery is one put forward by Watford Council. Whilst the site lies within Hertsmere Borough it is not a proposal being promoted by this Council and Hertsmere has not been provided with any information by Watford Council other than what is contained within the SADM consultation draft. Hertsmere has concerns

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<p>about the proposed use and potential access to it although it could be acceptable if access, car parking and the level an any ancillary development are satisfactorily resolved and the design respects and enhances the character and openness of the Green Belt. In the light of concerns over the proposal, Watford have identified two preferred sites within their boundary – extension to North Watford Cemetery and Russell Lane - which are contained within their most recent Site Allocations and Development Management Policies consultation. <b>The proposal site has therefore been deleted from SADM</b>; any future proposals put forward for the site can be assessed under the usual development management policies.</p>
01138/1/001 resident	✓			<p>Site is in Hertsmere green belt land. Concerned re traffic congestion and parking in the village. Request detailed information about the scope of the proposed scheme, access and parking.</p>	<p>The suggested use of the site as a green cemetery is one put forward by Watford Council. Whilst the site lies within Hertsmere Borough it is not a proposal being promoted by this Council and Hertsmere has not been provided with any information by Watford Council other than what is contained within the SADM consultation draft. Hertsmere has concerns about the proposed use and potential access to it although it could be acceptable if access, car parking and the level an any ancillary development are satisfactorily resolved and the design respects and enhances the character and openness of the Green Belt. In the light of concerns over the proposal, Watford have identified two preferred sites within their boundary – extension to North Watford Cemetery and Russell Lane - which are contained within their most recent Site Allocations and Development Management Policies consultation. <b>The proposal site has therefore been deleted</b></p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					<b>from SADM</b> ; any future proposals put forward for the site can be assessed under the usual development management policies.
01210/1/005 Watford Council			✓	WBC are supportive. WBC has identified a need for additional cemetery capacity, with Vicarage Road cemetery already being full and North Watford Cemetery having limited space remaining. Consulted on site allocations Nov/Dec 2013. The consultation highlighted the site as a potential location to meet some of our need for cemetery space, and also asked for alternative suggestions. No alternative locations have so far been identified . We will continue to look for other potential locations.	The suggested use of the site as a green cemetery is one put forward by Watford Council. Whilst the site lies within Hertsmere Borough it is not a proposal being promoted by this Council and Hertsmere has not been provided with any information by Watford Council other than what is contained within the SADM consultation draft. Hertsmere has concerns about the proposed use and potential access to it although it could be acceptable if access, car parking and the level an any ancillary development are satisfactorily resolved and the design respects and enhances the character and openness of the Green Belt. In the light of concerns over the proposal, Watford have identified two preferred sites within their boundary – extension to North Watford Cemetery and Russell Lane - which are contained within their most recent Site Allocations and Development Management Policies consultation. <b>The proposal site has therefore been deleted from SADM</b> ; any future proposals put forward for the site can be assessed under the usual development management policies.
01222/1/012 HBC Parks		✓		No discussions with Hertsmere Cemetery officer. Problems: Poor location relative to population; too small to be economically viable as a Cemetery; too small to create a sustainable woodland. Our intention is to expand Allum Lane Cemetery, reusing the facilities and infrastructure there by providing a central service for the residents of the borough for the short-medium term rather than creating a new Cemetery. We charge non-residents of the borough	The suggested use of the site as a green cemetery is one put forward by Watford Council. Whilst the site lies within Hertsmere Borough it is not a proposal being promoted by this Council and Hertsmere has not been provided with any information by Watford Council other than what is contained within the SADM consultation draft. Hertsmere has concerns about the proposed use and potential access to it although it

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				additional fees to be buried within our Cemetery; if this Cemetery is to be operated by a neighbouring authority, our residents need to have the opportunity to be buried within Hertsmere for no additional charge.	could be acceptable if access, car parking and the level an any ancillary development are satisfactorily resolved and the design respects and enhances the character and openness of the Green Belt. In the light of concerns over the proposal, Watford have identified two preferred sites within their boundary – extension to North Watford Cemetery and Russell Lane - which are contained within their most recent Site Allocations and Development Management Policies consultation. <b>The proposal site has therefore been deleted from SADM</b> ; any future proposals put forward for the site can be assessed under the usual development management policies.
01370/1/018 HCC Highways		✓		Any development of the site will require appropriate access arrangements, to be agreed with the highway authority.	The suggested use of the site as a green cemetery is one put forward by Watford Council. Whilst the site lies within Hertsmere Borough it is not a proposal being promoted by this Council and Hertsmere has not been provided with any information by Watford Council other than what is contained within the SADM consultation draft. Hertsmere has concerns about the proposed use and potential access to it although it could be acceptable if access, car parking and the level an any ancillary development are satisfactorily resolved and the design respects and enhances the character and openness of the Green Belt. In the light of concerns over the proposal, Watford have identified two preferred sites within their boundary – extension to North Watford Cemetery and Russell Lane - which are contained within their most recent Site Allocations and Development Management Policies consultation. <b>The proposal site has therefore been deleted from SADM</b> ; any future proposals put forward for the site

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					can be assessed under the usual development management policies.
<b>Site C2: Hertswood Lower School, Borehamwood</b>					
01074/2/007 Sport England	✓			Need to provide clarity over the approach to consolidating the Academy on this site in terms of playing field impact. Explicit reference should be made to the need to avoid or minimise impact on the Academy's playing field - potential loss of part of the playing fields on the Lower School site which would be compounded by the loss of the entire playing fields on the Upper School site. (See separate representations on policy SADM1). Request that the reference in the site specific requirements for allocation C2 is amended along the following lines:"Buildings should be concentrated in one part of the site and the impact on the existing playing fields should be minimised. Open space and landscaping should provide a soft edge with and visual links to the wider Green Belt."	It is not appropriate to pre-judge the layout of development as suggested in the representation, but the principle of the point being made is accepted. Discussions concerning Sport England's concerns in relation to the planning applications for this and the Upper School site, and the opportunities for mitigation measures to compensate for any possible overall reduction in amount of playing field space have been ongoing. <b>SADM33 Key Community Facilities and H6 are amended to include 'Proposals should seek to minimise any reduction in the overall quantity of playing field provision and its effect; improvements to the quality and accessibility of playing field and sports provision will be required as part of any agreed mitigation strategy. Programme of development on the two sites to be considered against Policy CS19 (Key Community Facilities) and agreed, in particular, to ensure that (i) the proper level of school facilities, including playing fields, is available throughout the development period...' Sentence in H6 also amended as follows: 'Residential development is linked to and must enable the development of new school and key community facilities in line with Core Strategy Policy CS19 on the Hertswood Lower School site.'</b>
01290/1/008 Hertswood Academy		✓		SADM29 mentions the relocation of the playing fields from southern to northern Hertswood school site. Northern site is not getting any bigger so not possible. This reference to relocating the playing fields should therefore be taken out. However more open	Re-provision of the Upper school's playing field requirement will need to be made on the Lower school / amalgamated site so it is not appropriate to remove reference to this. The overall provision of playing fields on the northern site should



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				space than currently exists on northern site will be created. Can say the plans will have to ensure that we meet Government guidelines on the amount of playing field space.	be maximised. An acceptable solution taking into account both quantity and quality of playing field provision to the satisfaction of Sport England will be necessary if the proposals are to avoid being called in. <b>H6 and SADM33 Key Community Facilities amended to include 'Proposals should seek to minimise any reduction in the overall quantity of playing field provision and its effect; improvements to the quality and accessibility of playing field and sports provision will be required as part of any agreed mitigation strategy.'</b>
01222/1/013 HBC Parks		✓		Parks are in discussion with Planning re sports provision here.	Noted.
01263/1/007 resident		✓		Term 'immediate' is misused.	It is accepted that it may not be possible for the Ark building to be immediately replaced; <b>wording changed to 'Programme of development on the two sites to be considered against Policy CS19 (Key Community Facilities) and agreed, in particular, to ensure that (i) the proper level of school facilities, including playing fields is available throughout the development period, (ii) there are local facilities to enable the satisfactory operation of theatre-related activities throughout the development period, and (iii) the provision of the replacement theatre premises is made at the earliest possible opportunity.'</b>
01370/1/019 HCC Highways		✓		The Highway Authority are currently engaged in pre application discussions. There are concerns about the possible impact on the wider highway network. These issues will be considered as part of the planning application process. In principle, this is a suitable site for the development proposed.	<b>The need for a Transport Statement to accompany a planning application has been added to the Site Specific Requirements.</b>
<b>Proposed new Key Community Facility: primary school, Land adj Hertswood Lower school</b>					

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01290/1/006 Hertswood Academy		✓		Should include proposal for a primary school on land adjacent to Hertswood school northern site (S52) in para 5.17 and as a specific proposal in SADM29. This would be preferable to the inclusion of the Maxwell Park Community Centre as a possible site for a primary school. (Consideration should also be given to Site S52 being included in SADM1 as a potential residential site – see rep 01290/1/004.)	Hertfordshire County Council are understood to have explored options for the siting of a primary school on land adjacent to Hertswood School with the landowner <b>and the text in paragraph 5.16 (now 5.21) has been amended to reflect the potential location for this.</b> However, in the absence of any agreement between the County Council and the landowner, Hertsmere Borough Council would not want to allocate the site. The Council is also awaiting clarification from the County Council in relation to whether existing 1FE primary schools in Borehamwood have scope for expansion and the extent to which the proposed free school(s), with 50% of admissions based on catchment, might address the projected need for school places.
<b>Proposed new Key Community Facility: Aldenham Reservoir</b>					
01212/1/002 Preston Bennett on behalf of Safari Developments Ltd		✓		Request designation as Key Community Facility provided land to the south is designated as Safeguarded for housing. HCC lease on reservoir will not be renewed 2015. Proposal to retain, repair and restore the reservoir, which will be managed by a Trust, and provide public access and ecological benefit, provided funds can be raised via enabling development. Detailed submission filed	This area is in the Green Belt. The current boundary is clear and defensible. Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. In weighing up future options, the possible

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					benefits of public access, habitat protection and maintenance of the reservoir can be considered. Allocating land to the south of Watford Road would entail a major Green Belt release, whether as safeguarded land or not. Such an allocation is not needed to deliver the Core Strategy housing target or provide a necessary contingency now, and is therefore inappropriate. <b>No change.</b>
<b>Green Spaces</b>					
01214/1/009 Flood Management Team, Herts County Council		✓		Would like to see SuDS (Sustainable Drainage Systems) promoted within other polices that relate to biodiversity, amenity, <b>green spaces</b> and water quality/ pollution. SuDS are not just about flood risk management. These policies must stand on their own without the involvement of the SAB which will only be assessing sites classified as 'Major Developments' for first 3 years from commencement. Anything below this threshold and anything between now and the date of commencement for major developments will be for LPA to assess.	<b>Policy SADM16 sustainable Drainage Systems has been expanded to reference other aspects of SuDS and to enable its use as a standalone policy given that the SAB will now not be implemented. SADM38 New and Improved Public Open Space has been updated to include a reference to SuDS.</b>  All the policies within development plan are to be used together. It is not the role of individual policies to replicate other policies within the plan.
01237/1/006 Hertfordshire County Council (Landscape)		✓		Do all local and major green spaces perform a community function Don't have to do so to be important - can be important eg for habitat connectivity and wildlife corridors because they are not accessible to people. Green spaces have important function of contributing to local character and 'sense of place,' and the provision of GI/ecosystem services/connectivity etc.	It is acknowledged that green spaces perform an important function as wildlife corridors whether or not they also perform a commmunity function. However, Hertsmere's Green Spaces policies only relate to spaces within the urban areas of the borough. All green spaces in the rural areas are protected by the Green Belt designation. Some of the green spaces included in Policies SADM35 (Major Green Space) and SADM36 Local Green space are inaccessible to people as they are privately owned. The contribution to local character and ecology were considerations in the Open Space study

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					which underpins policies SADM35-SADM37. <b>No change.</b>
01074/2/001 Sport England		✓		As the Council's current evidence base for open space does not include an up-to-date playing pitch strategy for informing the community's outdoor sports needs, please make reference to the Council's commitment (made through the Core Strategy preparation process) to prepare an up-to-date playing pitch strategy. The evidence base referred to in paragraph 5.19 does not currently cover outdoor sport and such a reference would provide clarity on the Council's current position on this matter.	HBC Parks, in consultation with Planning, are commissioning a study to enable the production of a Sport and Recreation Strategy, including an updated playing pitch strategy. Work is also being undertaken to update existing information on levels of open space provision and shortfalls which will inform Parks Improvement and Development Schemes Programme. Opportunities for a contribution towards the implementation of these schemes to be secured through new development proposals will be pursued. <b>Reference to this work added to Green Spaces section as requested and also within Community Facilities section.</b>
01186/1/003 Aldenham Parish Council			✓	Support 5.24 - where proven need for additional local education provision exists that cannot be met in a better way, it may exceptionally override Major and Local Green Spaces protection.	Noted. <b>No change.</b>
01304/1/001 resident		✓		Green spaces (including the Paddock) should not be built on. Given free rein developers would cover everything with concrete.	Noted. The policies in SADM, in particular SADM35 (Major Green Space) to SADM37 (Minor Amenity Land), afford various levels of protection to identified green spaces. <b>No change</b>
01222/1/018 HBC Parks		✓		No reference anywhere to our levels of protection to certain sites, such King George V Playing Fields, covenants etc.	Not considered appropriate/necessary in SADM. <b>No change.</b>
01229/1/014 Natural England, Sustainable Land Use and Regulation			✓	1. Natural England fully supports the Green Spaces section of the Plan and policies SADM30 to SADM33 which seek to ensure development will protect and enhance green space across through Borough. We particularly welcome Policy SADM33 although we would prefer to see smaller residential developments also incorporate open space. Green Infrastructure (GI) should be an integral part of the creation of sustainable communities and its provision, in line with the	1. Noted. It is not often practical for smaller developments to provide an element of open space within the development. The NPPF allows developers to put forward a case relating to the viability of development. Additionally very small green spaces can also be difficult to manage so would be unlikely to be adopted by the HBC. 2. Noted.

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				<p>objectives and aspirations of the local Green Infrastructure Strategy, should be inherent within all relevant site allocations and policies.</p> <p>2. Natural England's Accessible Natural Greenspace Standards (ANGSt) provides a set of benchmarks for ensuring adequate access to natural and semi-natural greenspace near to where people live. The ANGSt methodology provides a powerful tool in assessing current levels of accessible natural greenspace and planning for better provision. Natural England's most recent wording of the standard is:</p> <ul style="list-style-type: none"> <li>• No person should live more than 300m from their nearest area of accessible natural green space of at least 2ha in size;</li> <li>• There should be at least one 20ha accessible natural green space within 2km from home;</li> <li>• There should be one 100ha accessible green space site within 5km;</li> <li>• There should be one 500ha accessible natural green space site within 10km;</li> <li>• At least 1ha of statutory Local Nature reserve should be provided per 1000 population.</li> </ul> <p>3. We welcome that Policy SADM33 requires public open space provision to maximise biodiversity benefits and complement and support the Hertfordshire BAP and are satisfied that this policy seeks to encourage the delivery of net biodiversity gain as required through the NPPF. Developers should be encouraged to deliver green infrastructure which contributes to the objectives and targets of the local Green Infrastructure Strategy. Allocations and supporting policies should seek to</p>	<p>3. The supporting text to Core Strategy Policy CS15 encourages measures which improve connectivity between green spaces and promotes recreational access to open spaces and the countryside. It is not the purpose of the Site Allocations and Development Management Policies DPD to replicate policies in the Core Strategy.</p>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				increase access to the countryside and nature wherever possible. This could be integrated with the GI networks.	
<b>Policy SADM30 Major Green Space</b>					
01186/1/008 Aldenham Parish Council			✓	Support policy	Noted. <b>No change.</b>
01186/1/009 Aldenham Parish Council		✓		Remove Scrubbitts Wood from 'Major Green Space'. The area concerned is that area bordering on to Gills Hill, which is partly covered by an old air raid shelter (and scrubby trees) and an open area which is seemingly not used, other than by local youth at night.	The Council took a rigorous criteria-based approach to identifying areas to be defined as green spaces and this document was subject to public consultation prior to being finalised. Scrubbitts Wood has been defined as a Local, not Major Green Space so Policy SADM36 Local Green Space will apply. <b>No change.</b>
01217/1/002 URS for Old Habs and Barratt Homes	✓			Remove Croxdale Road Sports Pitches from Major Green Space. Not publicly accessible. Releasing land for housing would enable provision of open space for residents as part of development. Sports pitches to be provided elsewhere to a higher standard than existing. Detailed report filed. Linked to objection to non-inclusion of site as housing site under SADM1	see response to 01217/1/001 under SADM1. <b>No change.</b>
01275/1/003 Warren Estate Residents Association		✓		Particularly support the retention of the Water Board site off Windmill Lane as a Major Green Space.	Noted.
00238/2/007 Herts CC Development Services		✓		The Major Green Space map for North Bushey is likely to need amendment following the redevelopment of Highwood School.	The site has been redeveloped; a substantial part of the site remains as open space but the configuration has changed. <b>The Major Green Space boundary is adjusted accordingly.</b>
<b>Policy SADM31 Local Green Space</b>					
01225/1/001 Banner Homes	✓			Unreasonable to give local green spaces so much protection - comparable to green belt. Unreasonable burden of proof on applicants seeking to justify residential proposals relative to housing supply, choice, addressing local needs. Should use similar	The NPPF makes specific reference to Local Green Spaces which are demonstrably special to a local community and hold a particular local significance; new development on them is to be ruled out other than in very special

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				wording to SADM32 which allows for loss where it can be demonstrated that benefits of development clearly outweigh loss.	circumstances. The Council took a rigorous criteria-based approach to identifying areas to be defined as Local Green Spaces and this document was subject to public consultation prior to being finalised. <b>No change.</b>
00987/2/008 Resident	✓			Campions open space (off Stapleton Road), the open spaces adjoining Thirsk Road, Cowley Hill, Organ Hall Road and Stilton Path, and the Composers Park (off Sullivan Way) have been omitted. Should be included.	The Council took a rigorous criteria-based approach to identifying areas to be defined as Green Spaces and this document was subject to public consultation prior to being finalised. These sites were identified as Minor Amenity land and will therefore be covered by Policy SADM37 Minor Amenity Land. <b>No change.</b>
<b>The Paddock, Bushey Heath</b>					
01221/1/001 Bushey Heath Residents Association			✓	Locally significant, improves area's visual amenity, last remaining part of original Heath, was bequeathed with Reveley Lodge to community by Eila Chewett who requested that it not be built on. Adds to semi-rural feel, attractive entrance to residential area, complements character of area. Grazed by horses and painted by artists. Designation will conserve and protect space, local wildlife and trees.	Support for designating site as Local Green Space under Policy SADM36 Local Green Space noted. <b>No change.</b>
01225/1/002 Banner Homes	✓			Unmaintained, private open space making no contribution to character and appearance of area or setting of Reveley Lodge and unsuitable for some types of wildlife. Oak tree (roosting bats) would be retained. Sustainable site for development to meet housing needs.	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development. This site was assessed as having a level

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					of social, amenity or environmental benefit worthy of protection as a Local Green Space . There is significant local support for retention as open space. <b>No change.</b>
01275/1/004 Warren Estate Residents			✓	Support retention as a Local Green Space.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01276/1/001 resident			✓	Last remaining part of original Heath in otherwise built up area. Historical significance. Grazed by horses for years, wildlife haven.	Support for designating site as Local Green Space under Policy SADM31(now SADM36) noted. <b>No change.</b>
01277/1/001 resident			✓	Support conservation and protection of site. Makes significant contribution to the semi-rural, leafy feel of Bushey Heath and helps form the unique local character and identity; valuable contribution to visual amenity. Last remaining part of original Heath. Wildlife and significant trees. Was bequeathed with provision that it should not be built upon.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01278/1/001 resident			✓	Support retention - only remaining green space in Bushey Heath. Wildlife site. Bequeathed on basis that it wasn't developed.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01279/1/001 resident			✓	Last remaining part of Heath. Important for greenery and wildlife in increasingly built up area. Was bequeathed on basis to be left for enjoyment of local people.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01280/1/001 resident			✓	Last remaining part of Heath. Local and historical significance. Condition of bequest that it shouldn't be developed. Enhances rural feel of the area (being threatened by large developments). Space defines identity and character of area.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01281/1/001 resident			✓	Locally significant, improves area's visual amenity, last remaining part of original Heath, was bequeathed with Reveley Lodge to community by Eila Chewett who requested that it not be built on. Adds to semi-rural feel, attractive entrance to residential area, complements character of area. Grazed by horses and painted by artists. Designation will conserve and protect space, local wildlife and trees. Space defines identity and character of area.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01284/1/001 resident			✓	Bushey Heath pleasant semi-rural environment – this is one of last remaining green areas of greenery. Bequeathed by Eila Chewett along with Reveley House. Local residents resisted development proposals - have been refused. Must protect this precious green space for both current and future generations.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01285/1/001 resident			✓	Improves the visual amenities of the area and has historical significance. Policy SADM 31 would protect the wildlife and trees.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01286/1/001 resident			✓	Green sites of this nature, that define the identity and character of an area, should be conserved and protected from planning proposals	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01287/1/001 resident			✓	Essential to maintain the character of this area –site is part of it. Beautiful view. Petition of over 1,000 signatures to save site from development. Home for foxes, bats and even badgers.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01288/1/001 resident			✓	Last remaining piece of Heath. Wildlife and trees. Was bequeathed by Eila Chewitt with Reveley Lodge to be used for the people of Bushey with restriction on selling for development (subsequently removed against her wishes). Environmentally, socially and historically important. Protect as soon as possible to prevent development.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01289/1/001 Caldecote Neighbourhood Association			✓	Improves visual amenities of the area. Historical significance. Valued by residents. Including it in Policy SADM 31, would protect the local wildlife and the established trees. Adds to semi rural feel of the local area, fits character of the area and the local listed buildings. Green space which defines identity and character of area - should be conserved and protected.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01291/1/001 resident			✓	Keep The Paddock as it is. Important to retain green spaces.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01292/1/001 resident			✓	Support retention as green space. Losing too many. Lovely views. Already development in the area has increased traffic congestion -	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				don't want more. Space for families, wildlife, wild flowers.	
01293/1/001 resident		✓		If The Paddock is kept as a green space who will maintain it and clear it if it becomes a tip?	This is not a matter for the SADM. <b>No change.</b>
01294/1/001 resident			✓	Locally significant, important for visual amenity and historical reasons. Last bit of original Heath. Horses grazed, local artists painted. Bequeathed by Eila Chewett (didn't want it built on). Rolling landform, semi-rural feel. Wildlife and trees also should be protected. Green space which defines identity and character of area - should be conserved and protected.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01295/1/001 resident			✓	Support	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01296/1/001 resident				Site identified but no comment made	<b>No change.</b>
01298/1/001 resident			✓	Built up area - keep last piece of green, especially as gifted for local community. Mature trees and wildlife. Don't let it be built on.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01299/1/001 resident			✓	Last remaining piece of old Bushey. Protect from building for the benefit of residents and future generations - important as area becoming so built up.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01300/1/001 resident			✓	Building is destroying the once village atmosphere of Bushey Heath. Only remaining space on north facing slope - lovely views across to St Albans. Accessible to elderly etc who can't get to open amenities on other side of the Heath. Wildlife and mature trees. Should be retained in line with late owner's wishes.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01301/1/001 resident			✓	Effect on local community, effect on motoring conditions, means of entry to The Paddock, natural water flow from the field into part of Caldecote Gardens.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01302/1/001 resident			✓	Delighted with proposed designation. Don't let it be developed. Bushey getting very overcrowded. Eila Chewett bequeathed it - didn't want it developed. Historical significance.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01303/1/001 resident			✓	Support keeping the remaining small piece of Heath. Reminds	Support for designating site as Local Green Space under

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				people it's a semi-rural area, not just houses.	Policy SADM31 (now SADM36) noted. <b>No change.</b>
01305/1/001 resident			✓	Historically significant - last remaining green space of original Heath. Bequeathed by Eila Chewett who didn't want it developed. Identity and character of the area should be conserved.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01306/1/001 resident			✓	Horses, views, wildlife all important. Should protect character and wildlife. Also it is a very congested area with traffic.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01307/1/001 resident			✓	One of the last green spaces in Bushey, a remnant of the original Heath, and must be preserved.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01308/1/001 resident			✓	Infilling and flats in last 45 years turned semi-rural Bushey Heath into built up area. Very important to retain green space.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01309/1/001 resident			✓	Green space in area that has become built up. Adds to semi-rural feel. On a hill so fine views to north west.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01310/1/001 resident			✓	Must preserve wildlife and nature. Mrs Chewett didn't want area developed. Roads, drainage couldn't take extra demand if developed. Bushey being overdeveloped - rural atmosphere being lost. Valued by local community. Views.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01311/1/001 resident			✓	Last remaining piece of original Heath. Part of heritage of area. Vital it should be kept as open green space. Bequeathed to community by Eila Chewett - didn't want it developed.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01312/1/001 resident			✓	One of few remaining green spaces in Bushey. Bequeathed by Eila Chewett who didn't want it developed. Adds to semi-rural feel - low density dwellings and rolling landform. Historical significance - horses grazed, local artists painted. Development would completely change character of area. Status as local green space would protect wildlife and trees and preserve important (visually and historically) site.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01313/1/001 resident			✓	Unique, local and historical significance. Last bit of original Heath. Complements character of the local area. Established trees, wild flowers, local wildlife. View of Caldecote Tower. Improves visual	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				amenity of area. Loss would be harmful to character and appearance of area. Defines identity and character of area, should be conserved and protected.	
01314/1/001 resident			✓	Complements character of local area, piece of countryside on doorstep. Bushey Heath has become very developed, lots of flat blocks and large houses. Should be conserved and protected from development. Historical significance - last bit of original Heath. Loss would impact identity and character of area. Education value. Established trees, wild flowers, wildlife. Important for well-being.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01315/1/001 resident			✓	Last remaining bit of original Heath. Defines identity and character of area, should be conserved and protected. Important for visual amenity, sense of well-being. Adds to semi-rural feel of local area. Trees and wildlife. Education resource. Helps prevent flooding. Over-whelming local opposition to development. Eila Chewett didn't want it developed. Loss would be harmful to identity, character and appearance of area.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01316/1/001 resident			✓	Area has lost a lot of its charm and character due to development. Keep this small oasis of quiet refreshment.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01317/1/001 resident			✓	Local Green space - would it be available for general public, not fenced off? It could be generally used with access to all	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. Future access not a matter for SADM. <b>No change.</b>
01318/1/001 resident			✓	Bequeathed by Eila Chewett as an open space for enjoyment of local people - didn't want it built on. Such green spaces that define the identity and character of an area should be protected.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01319/1/001 resident			✓	Eila Chewett didn't want development on The Paddock.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01320/1/001 resident			✓	Beautiful in own right but also unique view across Herts. Only remaining part of original Heath. Bequeathed on basis it wasn't built on. Fauna and flora must be protected - adds greatly to local	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				amenity. Wildlife. Development would add to traffic problems - so dangerous and unwelcome. Historical significance. Used by horses, artists, birdwatchers.	
01321/1/001 resident			✓	Spring bluebells, horses, birds, trees, wildlife. Beautiful open space, last bit of the Heath. Mrs Chewett's legacy to the community, wanted it to be enjoyed, not built on. Significant focal point that complements the semi-rural feel of the area - needs to be protected.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01322/1/001 resident			✓	Support policy that says spaces that define character and identity of an area should be conserved and protected – like The Paddock.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01323/1/001 resident			✓	Delightful views, sense of country, historic value.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01324/1/001 resident			✓	Highly regarded as green space of local significance. Historic - remaining part of the heath. Horses, wildlife, trees all important.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01325/1/001 resident			✓	Seen gardens disappear to development over 1st 30 years. Important to keep the little green space left.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01326/1/001 resident			✓	Lovely green space, part of Heath. Left to community, not to be built on. Pleasure of seeing horses grazing there. SADM31 will protect trees and wildlife.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01327/1/001 resident			✓	Last small part of Bushey Heath. Keep it for people to enjoy the view and wildlife. Would be nice to see horses here again.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01328/1/001 resident			✓	Improves visual amenity. Historical significance - last part of the Heath. Gives semi-rural feel and compliments character of local area. Conserve and protect it.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01329/1/001 resident			✓	Historical significance - last bit of the Heath. Used by many. Sentimental attachment. Important for biodiversity. Trees, bats, possibly badgers. Imperative to preserve piece of urban green space.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01330/1/001 resident			✓	Lots of gardens gone to development, houses to flats or bigger	Support for designating site as Local Green Space under

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				houses. Rural feeling disappearing. Paddock remains natural open green space with wild flowers and trees. Preserve it for us and future generations and local wildlife.	Policy SADM31 (now SADM36) noted. <b>No change.</b>
01331/1/001 resident			✓	Very little open space locally. Keep it as local green space - last part of original Heath. Wildlife, mature trees. Eila Chewett bequeathed it to area with a wish that it should never be built on.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01332/1/001 resident			✓	Important green site. Historical importance, last part of Heath. Never been built on, horses have grazed. Attractive rolling appearance - gives rural feel. Defines identity and character of area and should be conserved and protected. Wildlife will benefit.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01333/1/001 resident			✓	Very valuable piece of green space, last bit of original Heath. Horses grazed. Eila Chewett said she never wanted it built on. Gives semi rural feel to area. Should be conserved and protected against development. Trees and wildlife. Please keep this space.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01334/1/001 resident			✓	Mrs Chewett bequeathed it - didn't want it to be developed. Should remain undeveloped so Bushey Heath maintains its character. Need to protect wildlife and trees.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01335/1/001 resident			✓	Adds to visual amenity, semi-rural feel of area. Horses grazed. Wildlife would be harmed if the space was developed.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01336/1/001 resident			✓	Otherwise overdeveloped area. Was Eila Chewett's intention that it should remain undeveloped. Last remaining part of the Heath. Would be nice to see return of grazing horses.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01337/1/001 resident			✓	Bequeathed by Eila Chewett. Local green space designation can ensure local wildlife, trees, and hedgerow are protected. Stunning views. Artists, school children have used it. Reveley Lodge and the Paddock is one unit and shouldn't be split up. Historical significance to all local residents.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01338/1/001 resident			✓	Part of history of Bushey Heath. Beautiful green space.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>

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01339/1/001 resident			✓	Small spaces like this important to character of community.View well worth retaining for Bushey people.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01340/1/001 resident			✓	Eila Chewett bequeathed on basis that no development would occur. Only remaining bit of the Heath, thus defining the identity and character of the area. Should be conserved and protected. This will also protect the abundance of wildlife and flora.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01341/1/001 resident			✓	Eila Chewett bequeathed with Revely Lodge - didn't want development to occur. SADM31 will also protect local wildlife and trees. Site adds to semi-rural feel of area. Important historically and vaulable to community. Last bit of original Heath.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01342/1/001 resident			✓	Last original piece of Bushey Heath. Eila Chewett left it on understanding that it wouldn't be developed. Adds to semi-rural character of local area.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01343/1/001 resident			✓	One of last remaining green spaces in Bushey Heath. Complements Reveley Lodge bequest of Eila Chewett. Development would greatly diminish value of bequest to local community. Conservation of area would add much to maintenance of a green open area to benefit all residents.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01344/1/001 resident			✓	Mrs Chewett bequeathed with Reveley Lodge. One of few remaining green spaces. Adds to residents' amenity.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01345/1/001 resident			✓	Green space of local significance - improves visual amenity. Historical significance (last bit of original Heath). Important and valuable to community. Never been built on. Horses grazed, artists painted. Bequeathed by Eila Chewett - didn't want any development on it. Rolling landform - adds to semi-rural feel of area. Complements character of local area. Green space sites like this that define identity and character of area should be conserved and protected. Protect wildlife and trees.	Support for designating site as Local Green Space under Policy SADM31 (now SADM36) noted. <b>No change.</b>
01355/1/001 resident			✓	Space improves visual amenities. Historical significance, valued by	Support for designating site as Local Green Space under

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				residents. Protect local wildlife and trees. Adds to semi rural feel. Fits character of area and local listed buildings. Policy says green sites defining identity and character of area should be conserved and protected. Horses grazed. Local artists painted. Was supposed to be bequeathed to be protected for community.	Policy SADM31 (now SADM36) noted. <b>No change.</b>
01375/1/001 Councillor		✓		<p><i>"A Local Green Space does not need to be in public ownership. However, the local planning authority ...should contact landowners at an early stage about proposals to designate any part of their . . . land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</i></p> <ul style="list-style-type: none"> <li><i>· where the green space is in reasonably close proximity to the community it serves;</i></li> <li><i>· where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i></li> <li><i>· where the green area concerned is local in character and is not an extensive tract of land."</i></li> </ul> <p>Landowners should be contacted at an early stage: The Chairman of the Bushey Museum Property Trust does not appear to have received any such contact. Has it been done and if so to whom was it sent?</p> <p>Looking at the criteria for consideration for designation as a LGS, it seems to me that this proposal does not qualify on points 2 and 3. Point 2. It is not special to a local community, it is a private field</p>	<p>This proposal was included in the SADM consultation draft as a result of the Green Spaces Study (2012) which identified, through a rigorous criteria based process, spaces to be identified as Local Green Spaces, Major Green Spaces, and Minor Amenity Land in the forthcoming SADM document. The results of the study were subject to consultation in early 2013 (when local members were also invited to input to the findings). Bushey Museum was consulted on the findings of the Study (by letter, February 2013); according to our records therefore the Museum was made aware of the proposal and did have an opportunity to input into the way in which the study findings would be carried forward into the Site Allocations draft. We have no record of any response from the Museum at that time. We also consulted the Museum Trust on the SADM consultation draft in February 2014 and there was considerable local publicity about the Plan including two drop-in sessions for the local community in Bushey. Again no response was received. The Bushey Museum Property Trust has subsequently advised that they did not receive any of the previous correspondence and have now supplied an email address for the Bushey Museum Property Trust which can be used in future correspondence with them. The text referred to comes from the National Planning Practice Guidance which was only issued by the</p>



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				with locked gates, and has not been used by the public for many years now It was used once a year as a car park for the Bushey Museum's Garden Parties, which were discontinued a long time ago. It is not particularly beautiful, it has neither historic significance nor recreational value. Point 3. What does "local in character" mean? It is just a field! Please advise Mr Taylor how he can respond to the consultation.	government in March 2014, after we completed the study and just after we had published the draft Site Allocations and Development Management Plan for consultation.  The weight of responses from the local community in favour of retaining the open space and protecting it as a Local Green Space suggests that it is held in very high regard locally and is of considerable historic significance. <b>No change.</b>
01381/1/001 Bushey Museum Property Trust	✓			<p>Field unused apart from parking of cars at Mrs Chewett's annual garden party and occasional Bushey Museum events. Reveley Lodge is demonstrably special to the local community because of its historical significance.</p> <p>Bushey Museum Property Trust need to sell field to finance repair, renovation and enhancement of Reveley Lodge, and to secure the long-term future of the house and garden. Likely will otherwise have to close in the next few years - loss of amenity to the community in terms of heritage, local history and education, (hundreds of schoolchildren enjoy educational events at the house each year to support the delivery of the national curriculum). The 2-acre garden of Reveley Lodge is open to the public, without charge, Monday to Friday all through the year, and alternate Sundays in the summer.</p> <p>Hertsmere methodology tests all types of open space against common set of value assessment criteria. Government Planning Practice Guidance is that 'Local Green Space designation will not be appropriate for most green areas or open spaces. The designation should only be used...where the green area is demonstrably special to the local community and holds a</p>	<p>NPPF says space should be demonstrably special to the local community. Strength of support for protecting it has been demonstrated in the number of responses to SADM. 67 reps in support received. This demonstrates it is special to the local community.</p> <p>NPPF also says it should hold a particular local significance eg because of beauty, historical significance, recreational value, tranquillity or richness of wildlife. These are examples, not an exhaustive list. Responses received indicate why local people feel the area is of local significance:</p> <ul style="list-style-type: none"> <li>• improves area's visual amenity,</li> <li>• was bequeathed with Reveley Lodge to community by Eila Chewett who requested that it not be built on – historical importance – for community to enjoy</li> <li>• last remaining part of original Heath – part of local heritage of area,</li> <li>• only remaining green space in Bushey Heath</li> <li>• green space/oasis in increasingly built up area</li> <li>• Adds to semi-rural feel,</li> <li>• attractive entrance to residential area,</li> </ul>

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				<p>particular local significance, for example because of its beauty, historical significance, recreational value, tranquillity or richness of its wildlife'.</p> <p>Any proposed designation as a Local Green Space should test against the Government criteria rather than a generalised set of values applicable to a wide range of site types. The two tests, both of which would need to be met, should be:</p> <ol style="list-style-type: none"> <li>1. Demonstrably special; and</li> <li>2. Holds a particular local significance.</li> </ol> <p>No evidence that demonstrates the field is special - never been accessible to the public so has never had a special use; it has not been the site of any local activity, never mind anything special, significant or historical. No evidence that it holds a particular local significance. No more or less beautiful than other fields in the locality; no historical significance in itself (as opposed to Reveley Lodge) - nothing has happened on the field or been associated with any historical event or person; no recreational value as it has never been so used; not tranquil - on a busy main road; no particular wildlife (see ecological appraisal). Local residents objecting to our planning application raised a petition - no different to almost any application for building on almost any plot of land - not special or particular. Field can neither be demonstrated to be special nor to have a particular local significance. As it fails both tests should not be designated a Local Green Space.</p> <p>Looking at Value Assessment Criteria (HBC score 1 for each of these criteria on scale 0-2):</p>	<ul style="list-style-type: none"> <li>• complements character of area.</li> <li>• Green space which defines identity and character of area</li> <li>• Designation will conserve and protect space,</li> <li>• Protect precious green space for current and future generations</li> <li>• Important for well-being</li> <li>• Foxes bats and badgers</li> <li>• Grazed by horses</li> <li>• painted by artists. Artist have used it</li> <li>• school children have used it for education purposes</li> <li>• local wildlife, birds</li> <li>• trees, wild flowers.</li> <li>• Petition of 1000 signatures to save site from development</li> <li>• Only remaining space on north facing slope – views across to St Albans</li> <li>• Traffic congestion – don't build on it</li> </ul> <p>Spaces do not have to be open to the public to have value. Far from undermining its value, its location on a busy main road provides some valuable relief from the busyness and the built up nature of the area.</p> <p><b>Context:</b> score acknowledges its local value in terms both of its contribution to the current character of the area, and also its historical significance. Not accessible but significant visually, and there are no other open spaces in the immediate area, certainly not that are visible from the public</p>

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				<p><b>Context:</b> not accessible (fenced off private land). High quality parks and spaces are very close (there are 4 Local Nature Reserves within 840m and the garden of Reveley Lodge itself is directly opposite). Not part of the historic environment (as opposed to Reveley Lodge). Should be zero.</p> <p><b>Structural and landscape benefits:</b> is empty plot completely surrounded by houses, part way along Elstree Road. It does not mark, link or separate any part of Bushey. Even the factor 'buffer between roads and houses' does not apply as the field separates only one house - on Caldecote Gardens - from Elstree Road. Should be zero.</p> <p><b>Ecological benefits:</b> no SSSI status, rich habitats, ponds etc, and has never been used for biodiversity studies. No evidence that it has demonstrably more wildlife than the land at the rear of 2-44 Richfield Road (also a proposed Local Green Space but scored as zero). Ecological appraisal of the site by Ethos Environmental Planning (Sept 2014) shows the site to have no particular or significant ecological merit. Should be scored as zero. In contrast, Reveley Lodge garden has a pond and bee colony, and habitats for wildlife are actively managed.</p> <p><b>Cultural and heritage benefits:</b> (as opposed to Reveley Lodge) no historical value, is not a symbol of the area and has no monument or memorial on it. It is not a setting for a listed building as the field is separated from Reveley Lodge by a busy road. It does not frame or enhance views of Reveley Lodge. Should be zero.</p>	<p>area. Other privately owned sites have been given Local Open Space designation.</p> <p><b>Structural and landscape benefits:</b> Site is significant in the local landscape. Creates a break in built up area, separating housing in Caldecote Gardens from Elstree Road, and Immanuel College from the start of the residential development on Elstree Road to the west - all of differing character and the open space helps both to separate these areas and define their character. Forms a welcome open area on an otherwise built frontage to Elstree Road. Retention of the open area is important for protecting the character of the area.</p> <p><b>Ecological benefits:</b> Comments received from local residents include reference to local wildlife, birds, trees, wild flowers, foxes, bats and badgers. The Ecological study concludes that the hedgerows around the site have value as ecological corridors which is especially beneficial for bats, and offer some potential foraging and nesting opportunities for birds, reptiles, amphibians, invertebrates and small mammals. The mature oak tree in the north east corner of the site provides nesting and foraging opportunities for a number of bird species such as great spotted woodpecker, and habitat for a wide range of invertebrates. It is also classified as category 1* for bats. There are a number of TPOs on the site. This is scored 1 (not 2) – appropriate given the ecological value.</p>

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				<p><b>Amenity benefits and sense of place:</b> We accept that the field, in common with most other fields, is visually attractive. But not special or particular. Doesn't delineate a specific neighbourhood, it is not a landmark or very visible, but it does soften the urban texture. Therefore, we would accept a score of 1.</p> <p>The total score against Hertsmere's criteria should be therefore 4 (below the cut-off score which we understand to be 11).</p> <p>'The Paddocks' does not meet the threshold for designation as a Local Green Space when tested against either the Government criteria or the Hertsmere criteria and it should be removed from the list.</p>	<p><b>Cultural and heritage benefits:</b> Many respondents to the SADM consultation cited the historical significance of the field - the remaining piece of the original Heath, its links with Eila Chewitt, and its use in the past by local artists.</p> <p>Directly opposite Reveley Lodge and therefore does contribute to the setting of this listed building. Is also linked historically and in the minds of local people with Reveley Lodge.</p> <p>The listed Immanuel College is close to the site's eastern boundary, and locally listed cottages on Elstree Road to the west. Failure to protect the site would lead to irrevocable change in character of this part of Bushey Heath.</p> <p>Responses to planning applications and SADM have shown the site to be demonstrably special to the local community and holding particular significance. Re-visiting the assessment undertaken under the Green Spaces Study has confirmed the scoring attributed to the site when the original study, which was subject to public consultation, was undertaken.</p> <p><b>No change.</b></p>
<b>SADM32 Minor Amenity Land</b>					
00994/2/005 resident		✓		Road side grass verges and small amenity greens are very important to the visual amenity of an urban area. Always consider using materials such as 'grass cell' paving in preference to tarmac/concrete. The construction of crossovers and parking areas in front gardens should always be permeable.	Amenity Open Land is protected under Policy SADM37 Minor Amenity Land. Planning permission is not required for a front driveway provided permeable or porous surfacing is used. For areas in excess of 5 square metres where the use of traditional non porous materials is proposed, planning

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					permission is required. The Planning and Design Guide SPD encourages the use of porous or open block paving for parking areas. <b>No change</b>
<b>SADM33 New and Improved Public Open Spaces</b>					
01222/1/015 HBC Parks		✓		Clarify if SADM33 is a replacement or complimentary to an updated version of the SPG Recreation Provision (2003).	SADM38 New and Improved Public Open Spaces, together with the published Developer Contributions Framework, supercedes the SPG.
<b>6 Transport and Parking</b>					
<b>Access and Movement</b>					
01349/1/002 resident		✓		Elstree Way highways suggestions: remove pedestrian subways in front of Gemini House and Oak Trees (unused, hang out area for teenagers, unattractive). Will be large increase in traffic as a result of increased housing in Elstree Way Corridor. Introduce speed cameras to control speed especially at night. Suggest alternative routes to A1 and M25.	Comments are noted; these issues are being dealt with under the Elstree Way Corridor Action Area Plan.
01186/1/010 Aldenham Parish Council		✓		Para 3.5 - Centennial Park, Elstree is described as well located and increasingly serviced by public transport. The Committee would like to see the Centennial Park public transport network extended to include Radlett.	These comments are matters for the Passenger Transport Authority (HCC).
00234/2/003 Elstree and Borehamwood Town Council		✓		Concern that cycling track and bus network should be sufficiently structured to afford realistic alternatives to car use. Concern that there should be sufficient car parking spaces in view of the number of households with 2 or more cars	HCC's Borehamwood and Elstree Urban Transport Plan set out a framework to focus transport improvements within the area for the next 15 to 20 years and addresses many of these issues. The objectives for the UTP include to improve connectivity between transport modes to allow for greater travel flexibility, to improve public transport provision and accessibility, to improve connectivity across Elstree, Borehamwood and Well End through a cohesive and attractive network of walking and cycling facilities and to promote active travel modes to encourage active and healthy

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					<p>lifestyles. The UTP identifies a number of initiatives to meet these objectives. Hertsmere's adopted Parking Standards SPD, which also aims to assist the delivery of the UTP, sets out Parking Standards in respect of proposed new development. Overall the minimum requirement for residential accommodation is 1.5 space per unit, with the number of spaces rising as bed spaces and other habitable rooms increase. The approach to defining parking standards is in line with the NPPF. The SPD also defines Accessibility Zones in the main towns. These are areas within the Borough where less stringent car parking standards can be applied in appropriate circumstances, in recognition of the greater accessibility, concentration of public transport opportunities, and consequent lower levels of car ownership. In line with the Council's Parking Management Strategy residents in new properties in Accessibility Zones are not eligible for residential parking permits in the existing Controlled Parking Zones. This is made clear at the time of any grant of planning permission and those considering purchasing properties will be aware of this limitation. <b>Policy SADM41 Highway and Access Criteria for New Development has been re-drafted to clarify the importance of provision for non-motorised users, routes and networks.</b></p>
01125/2/004 Councillor		✓		Trying to achieve modal shift private to public is an ineffective aspiration. Many can't or won't use bikes, and cycle routes inadequate anyway. Bus services inadequate. Congestion reduces reliability.	HCC has produced Urban Transport Plans which set out a framework to focus transport improvements within each of the main settlements for the next 15 to 20 years. The UTPs address many of these issues. The objectives for the Borehamwood and Elstree UTP for example include: to improve connectivity between transport modes to allow for

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					greater travel flexibility, to improve public transport provision and accessibility, to improve connectivity across Elstree, Borehamwood and Well End through a cohesive and attractive network of walking and cycling facilities, to encourage reliability of travel through sustainable travel alternatives and to reduce congestion at key traffic hotspots throughout the study area. A key objective of the adopted Core Strategy is 'to raise levels of access by seeking development in locations not dependent on access by car and by requiring the provision of physically accessible transport interchanges and other buildings'. Core Strategy para 7.6 recognises that the active promotion of Travel Plans is a key means of reducing car dependency; these are required for all major trip generating development proposals (Policy CS24). For emphasis, <b>requirement for Travel Plans for major development added to text supporting Policy SADM41 Highway and Access Criteria for New Development, and Policy re-drafted to clarify importance of provision for non-motorised users, routes and networks.</b>
<b>Policy SADM34 Transport Development Areas</b>					
01282/1/001 Transport for London		✓		Thameslink upgrade 2018 will improve capacity, connectivity and frequency of train services to Borehamwood and Potters Bar. Crossrail 1 will provide a direct interchange with Thameslink at Farringdon post 2019. This, together with good bus services, makes Borehamwood and Potters Bar appropriate as 'transport development areas'. Radlett will have similar higher frequency Thameslink service so could it also be TDA? Want to work with HBC to investigate possible improvements to TfL bus services eg increasing service capacity, identifying and	Planned improvement of rail services and the offer to work with HBC in relation to future bus services are welcomed. Transport Development Areas are identified in the Core Strategy 2013. Policy CS24 indicates that they are locations to which major trip generating developments should be directed. In the context of the adopted Core Strategy (para 2.39) Radlett has limited scope and capacity for significant further growth. The TDA boundaries reflect the higher accessibility zones in these areas. Radlett currently scores

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				safeguarding land that supports existing provision and identifying potential locations for supporting infrastructure such as additional bus standing, as TDAs develop.	lower in accessibility terms than both Borehamwood and Potters Bar (and also than Bushey). It would therefore be more appropriate to consider this as part of the review of the Core Strategy. <b>No change.</b>
01370/1/021 HCC Highways		✓		In response to TfL representation, suggest reference to TDAs unnecessary. Accessibility Zones (in parking standards SPD) are more relevant. TDA is not a designation that is used by Highways Authority, and the boundaries are not completely consistent with Accessibility Zones anyway.	Transport Development Areas are identified in the Core Strategy 2013. Policy CS24 indicates that they are locations to which major trip generating developments should be directed. They reflect the higher accessibility zones set out in the Parking Standards SPD where the opportunity to secure well designed higher density development around good public transport nodes and access to a wide range of facilities and services exists. <b>The boundaries are consistent with Accessibility Zones 1 and 2 as defined in the Parking Standards SPD, with the addition of the Elstree Way Corridor area defined as Accessibility Zone 3. Clarification of boundaries and definition added, designation retained.</b>
<b>Policy SADM35 Access and Movement</b>					
01363/1/002 Highways Agency		✓		Policy captures the requirement for major schemes to undertake a transport assessment where it is deemed to be large enough to impact on the transport networks. DfT "Guidance on Transport Assessments" (2007) should be consulted in relation to the development size triggering transport assessment requirements. We would also strongly recommend the need for a travel plan to be compiled for all developments required to submit a transport assessment.	HCC Highways advise use of the term 'Local highway authority design guidance' in order to avoid use of references which will become out of date. HCC design guidance is consistent with national policy and guidance and is regularly updated. <b>Reference to 'Local highway authority design guidance' added.</b> Core Strategy para 7.6 recognises that the active promotion of Travel Plans is a key means of reducing car dependency; Policy CS24 already requires Travel Plans for major development. For emphasis, <b>requirement for Travel Plans for major development added to text supporting Policy SADM41 Highway and Access Criteria for New</b>



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					<b>Development.</b>
01370/1/020 HCC Highways		✓		Concern that there is some lack of clarity about the focus of the policy – needs some work in order to be consistent, and for the different elements to ‘flow’ – eg internal site considerations need to be distinct from consideration of connections into the wider area. The Policy and supporting text could be re-drafted to more clearly address three broad areas of concern – sustainability, safety and capacity. (e) could be moved to supporting text. Consider whether Parking should be a separate section / policy (check what is covered in the Core Strategy).	It is acknowledged that parts of Policy SADM41 and supporting text could be clarified. The approach taken to drafting the policy is to identify the outcomes required when sites are developed by addressing context, design requirements for all sites, then additional requirements for major sites. The Policy needs to be read in conjunction with the adopted Core Strategy policies. <b>Changes made to text and policy.</b>  The Core Strategy contains Policy CS25 Accessibility and Parking. SADM41 Highway and Access Criteria for New Development makes reference to the need to comply with CS25 so a separate section/policy on parking in SADM is not considered necessary.
01222/1/016 HBC Parks		✓		Contents of para 6.6 and the links/networks such as Greenways need to be included in the Policy.	<b>Policy SADM41 Highway and Access Criteria for New Development and supporting text have been re-drafted to clarify the importance of provision for non-motorised users, routes and networks.</b>
01229/1/015 Natural England		✓		Support SADM35 requirement for development to maximise cycle, pedestrian and greenway provision through its layout and routes to existing services. We recommend that additional text is included to encourage green linkages to the strategic green infrastructure network and wider countryside.	The response is welcomed. Core Strategy Policies CS15 and CS26 encourage the provision and enhancement of greenways and green infrastructure for recreation and transport purposes. <b>Policy SADM41 Highway and Access Criteria for New Development and supporting text have been re-drafted to clarify the importance of provision for non-motorised users, routes and networks.</b> <b>‘Greenways’ added to glossary.</b>
01240/1/005 HCC Environmental		✓		SADM35 appears to overwhelmingly adopt and reinforce an outdated movement hierarchy, giving primacy to vehicular modes	<b>Policy SADM41 Highway and Access Criteria for New Development and supporting text has been re-drafted to</b>

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Resource Planning				of travel over walking and cycling, and fails to convey a clear policy intent for supporting and achieving modal shift through the design of the built environment. Suggested that policy SADM35 (or alternatively policy SADM27) be amended to further support the objective of modal shift set out in the NPPF and adopted Core Strategy policy CS26.	<b>clarify the importance of provision for non-motorised users, routes and networks.</b>
<b>Chapter 7 Town Centres and Shopping</b>					
<b>Town Centres and District Centres</b>					
01151/1/003 resident		✓		Shop frontages and signage in Potters Bar are currently bland and each shop just seems to run into another. Many signs are too big and bright. Especially in Darkes Lane, the frontages and signage are out of character with the mock Tudor design of some of the buildings. The amenity of the town would be enhanced if frontages and signage had more character. E.g. rather than a straight shop front made from glass top to bottom, have recesses and use brick for part of it.	Policy SADM51 Shopfronts requires that new shopfronts comply with the Planning and Design Guide SPD Part F which provides guidance on good shopfront design. <b>No change.</b>
<b>Policy SADM36 Town and District Centres</b>					
<b>TC1 29-59, 61-71 Shenley Road, Borehamwood</b>					
00994/2/002 resident			✓	Willingness to consider CPOs is welcome. Encourage shopping curtilage to contract around the pivotal centre, perhaps the area of the Church and the shops opposite and adjacent to 71 Shenley Road. Any further 'opening up' of this stretch of Shenley Road to the Shopping Precinct would also be welcome as would more trees and some green space.	Support and comments noted.
00234/2/006 Elstree and Borehamwood Town Council		✓		Concern about empty shops especially near railway station end of Shenley Road - compulsory purchase should be considered	Comments noted. Recent surveys indicate low levels of vacancy in the town centre, which do not appear to be any worse than in previous years.
<b>TC2 Radlett Service Station/Regency House, Former Fire Station and Burrell &amp; Co</b>					
00994/2/001	✓			Master plan to ensure the comprehensive development of this site	Noted. Planning consents have already been granted for the

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resident				is <b>essential</b> not just desirable or to be preferred.	redevelopment of two of the three sites within TC2. Permission for the demolition of existing buildings at the Radlett Fire Station site and erection of 18 residential units (16 x 2 bed and 2 x 1 bed), a ground floor community use facility, basement parking & associated amenity space was granted on appeal. Permission has also been granted for the demolition of the former builders merchants on the Burrell and Co site and erection of 2 x retail units, 8 x 2 bed flats, 7 x 1 bed flats and associated parking, taking into account both the overall and site specific requirements of the adopted Radlett District Centre Key Locations SPD (which is referred to in para 7.5), as well as the pre-existing consent for the adjoining former Fire Station site. <b>Further supporting text has been added: 'the opportunity may still exist to bring the three adjacent sites together as part of a single development scheme, an approach which would be preferred by the Council..</b>
01125/2/005 resident		✓		Site is unsuitable for any major development given the existing traffic and proximity to a busy Aldenham Road junction. Adequate off-road parking must be provided.	Noted. The principle of development of TC2 together with appropriate uses was established in the Radlett District Centre Key Locations SPD (adopted March 2011). Parking provision in line with the standards adopted through the Parking Standards SPD, and justified through the submission of a Transport Assessment, are to be provided for proposed flats within the former Burrell and Co site, for which planning permission has recently been granted (2 x retail units, 8 x 2 bed flats, 7 x 1 bed flats and associated parking). Residents in these new properties will not be eligible for residential parking permits in the existing Controlled Parking Zones, in line with the Council's Parking Management Strategy. The

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					location is close to Radlett Rail Way Station and is in residential and non-residential accessibility zones 3 which promotes the use of walking, cycling and public transport. It is recognised that in this location reduced on-site parking would have advantages in terms of limiting the impact on the junction and local road network. <b>No change.</b>
01142/1/001 resident		✓		Support proposal to develop site subject to explicit requirement within each development to provide adequate parking for the residents.	Noted. The principle of development of TC2 together with appropriate uses was established in the Radlett District Centre Key Locations SPD (adopted March 2011). Parking provision in line with the standards adopted through the Parking Standards SPD, and justified through the submission of a Transport Assessment, are to be provided for proposed flats within the former Burrell and Co site, for which planning permission has recently been granted (2 x retail units, 8 x 2 bed flats, 7 x 1 bed flats and associated parking). Residents in these new properties will not be eligible for residential parking permits in the existing Controlled Parking Zones, in line with the Council's Parking Management Strategy. The location is close to Radlett Rail Way Station and is in residential and non-residential accessibility zones 3 which promotes the use of walking, cycling and public transport. It is recognised that in this location reduced on-site parking would have advantages in terms of limiting the impact on the junction and local road network. <b>No change.</b>
01283/1/019 English Heritage		✓		Site is within and adjoins the Radlett Conservation Area. Reference to the Conservation Area is welcomed and should be strengthened to read:"Development proposals should protect and enhance the setting of the adjacent conservation area."	It is recognised that the site is prominent and an important one in both heritage and townscape terms. The adopted Radlett District Centre Key Locations SPD (which is referred to in para 7.5) envisages "a distinctive development that would take architectural cues from nearby

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					buildings and preserve or enhance the character and appearance of the Radlett (North) Conservation Area." Planning requirements already include to respect the character and enhance the setting of the adjacent Conservation Area. <b>No change.</b>
01356/1/003 resident		✓		Building flats all along the stretch from Burrells to petrol station. Major traffic problems of flows of traffic, very narrow. Converting to small industrial units or a service office block.	Noted. The principle of development of TC2 together with appropriate uses was established in the Radlett District Centre Key Locations SPD (adopted March 2011). <b>No change.</b>
<b>Table 3 Shopping Hierarchy</b>					
01186/1/007 Aldenham Parish Council		✓		Battlers Green Farm Rural Shopping Centre, Radlett, which has more than twelve shops, should be classified as secondary shopping area.	Expansion of this out of centre development which contains mainly specialist outlets would not be supported in view of the potential impact on Radlett town centre. Core Strategy Policy CS28 indicates that in order to protect the role of town centres, further retail development here will not be sought. Battlers Green Farm is not classed as a centre within the shopping hierarchy. (Similar to Willows Farm retail outlets). <b>No change.</b>

# Site Allocations and Development Management Policies DPD: Consultation March/April 2014

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Summaries of Representations and Council responses.

Chapter 8, Appendices and  
Miscellaneous comments

July 2015

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
<b>8 Implementation and Monitoring Framework</b>					
<b>Delivery</b>					
01356/1/004 resident		✓		More money from developers for infrastructure – pay for extra doctors and teachers and repair the roads they damage. Payment to neighbours for inconvenience.	Chapter 8 sets out the Council’s approach to ensuring that where development creates the need for investment in infrastructure, the costs for that infrastructure should be offset. Contributions to infrastructure will be secured through planning obligations and CIL as appropriate. Developers are expected to make good any damage to roads etc that they may cause. Payment to neighbours for inconvenience is not considered to be a practical or enforceable issue for the SADM to address. <b>No change.</b>
01290/1/009 Hertswood Academy		✓		Much of development will be in Borehamwood - can there therefore be a policy that Borehamwood should have large proportion of CIL Proceeds.	The distribution of CIL receipts will be a matter for the Council’s CIL Investment Committee. <b>No change.</b>
Review					
<b>Table 4 Monitoring Framework</b>					
01222/1/017 HBC Parks		✓		Current shortfall of publically accessible open space - will escalate with proposed development. Should be a target to increase the provision with reference to SADM33 to address the shortfall.	<b>Monitoring of open space provision in new development added to Monitoring Framework.</b>
01283/1/020 English Heritage			✓	English Heritage welcomes the target within the Monitoring Framework that there should be no loss of locally important buildings through the grant of planning permission.	Support noted
<b>Appendices</b>					
<b>Appendix A Site Allocation maps</b>					
<b>Policy SADM5 maps – Employment Areas – Elstree Way, page 28</b>					
01184/1/003	✓			The Elstree Distribution Park should be included in the Housing Site	The site is not considered suitable for residential use

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
CGMS Consulting (for HSBC)				Allocations and excluded from the Elstree Way Employment Area (page 28).	because it would result in a significant loss of B8 floorspace for the borough, and would undermine the integrity of the employment area as a whole. See response to 01184/1 under SADM1. <b>No change</b>
<b>Policy SADM8 map – Rowley Lane, page 42</b>					
01166/1/003 David Lander for RRHE LLP	✓			Consequential upon our objection to Policy SADM8. Plan showing Policy SADM8 (Land on Rowley Lane) on page 42 should distinguish between the curtilage of the Holiday Inn site and the safeguarded area as a whole. Plan submitted.	It is recognised that the Council agreed that any proposals for the Holiday Inn site, due to it containing significant previously developed land and buildings, would need to be considered on their individual merits. Policy SADM10 Safeguarded Land for Employment has been amended to reflect this but it is not considered appropriate or necessary to identify it separately on the Policies Map because the Core Strategy has identified the entire area to the east of Rowley Lane for safeguarding, rather than excluding any specific sites within the safeguarded area. <b>No Change.</b>
<b>Policy SADM21 Key Green Belt Sites</b>					
01226/1/003 RPS Planning and Development Ltd for Bowmans Leisure Ltd		✓		Willows Farm Site boundary outlined in 'blue' does not reflect the correct ownership boundary of the estate. Request site boundary corresponds with the entire Willows Farm Village (WFV) site. Infill/envelope boundary missing. Proposed boundary submitted - includes the main built development, hard surfaced car parks and main operational areas of the farm park that contain various structures.	<b>Minor amendment to Willows Farm Key Green Belt Site made to reflect ownership.</b> This is a logical and more defensible boundary. <b>The Infill envelope boundary was omitted from the draft document and is now shown on the Site Allocation maps.</b> This boundary was identified through a 2013 comprehensive review of Key Green Belt sites, their boundaries, and infill envelope boundaries. This envelope boundary covers the main built up part of the site, but excludes large areas currently used for parking, and areas which although forming part of the farm park are largely open in nature. Definition of a wider envelope is not



SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					considered appropriate in advance of detailed information on possible forms of development coming forward and being assessed.
<b>SADM25 Watling Chase Community Forest</b>					
01226/1/005 RPS Planning and Development Ltd for Bowmans Leisure Ltd		✓		The Watling Chase Community Forest and its gateway sites missing from Policies maps. (We support the continued identification of Willows Farm Village as a 'gateway site' in Hertsmere, falling under Policy CS15 of the Core Strategy.)	<b>Boundary added to Policies Maps</b>
<b>Policy SADM 30 Major Green Spaces</b>					
01186/1/004 Aldenham Parish Council		✓		Greater clarity in map presentation required.	<b>Map presentation improved.</b>
00987/2/006 resident		✓		page 72 - wrongly titled. Shows Bushey, not Borehamwood.	<b>Title corrected</b>
<b>Policy SADM 30 Major Green Spaces and Policy SADM 31 Local Green Spaces</b>					
01222/1/014 HBC Parks		✓		Clarifications and corrections to Open Spaces Policies maps	<b>Potters Bar War Memorial added to Major Green Space site Oakmere Park. Organ Hall Open space added to Major Green Space map. Walshford Green added to Local Green Space map. Minor corrections and amendments to other site boundaries. List of Major and Local Green Spaces and amendments to site boundaries indicated in Green Spaces report added as appendix.</b>
<b>Policy SADM37 and 38 Primary and Secondary frontages</b>					
01210/1/004 Watford Borough Council			✓	The primary and secondary retail frontage maps are clear, helpful and reflect HBC and WBC Duty to Cooperate meetings.	Noted.
01186/1/006 Aldenham Parish	✓			Oakway shops along Watling Street, Radlett should be shown as "secondary", not "primary" frontage.	The Town Centres and Shopping Study 2008 forms part of the evidence base for the SADM consultation draft. Part of

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Council					this work involved a health check on each centre; following on from this primary and secondary frontages have been identified based on a variety of factors including existing use classes, footfall levels, the types of retailers present and vacancies. Radlett is generally a high performing centre. The Oakway shops are primarily A1 with some A3 uses. The parade is characterised by specialist shops, generally occupied by local or individual owners and it is considered important to help promote the level of A1 uses here to support local speciality businesses and shops in the area. A primary frontage designation is considered appropriate. <b>No change.</b>
00987/2/007 resident		✓		Title page 118 should be Shenley Road. Why "North" Borehamwood?	<b>Title corrected</b>
<b>All Policies Maps</b>					
01168/1/004 Hertfordshire Ecology		✓		All 3 Hertsmere RIGS are missing from the Policy maps. NB latest GIS boundaries of RIGS available from Herts Environmental Records Centre. Policies Map A: Radlett Field; Radlett Plantation. Policies Map C: Shenley Chalk Mine	<b>Maps corrected</b>
<b>Policies Map legend</b>					
01222/1/019 HBC Parks		✓		Legend shows a different style for Local Nature Reserves than on maps.	<b>Legend corrected</b>
01209/1/001 Herts County council - Minerals and Waste		✓		Key representing Mineral Consultation Area is different to boundary shown on Policies maps A, C & D. Could cause confusion between Mineral Consultation Areas and Transport Development Areas.	<b>Map corrected to match the legend.</b>
<b>Policy Map A</b>					
01186/1/005 Aldenham Parish		✓		Map of Radlett should now show the designated Neighbourhood Plan Area.	<b>The Neighbourhood Plan, and the designation of the Radlett Neighbourhood boundary are now referred to in</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Council					<b>the text.</b> The boundary of the Neighbourhood Area is available on the Council's website.
01231/1/004 Radlett Society & Green Belt Association		✓		Identify landscape conservation area and Regionally Important Geological sites east of Radlett on Map A. Plans attached.	Landscape Conservation Areas are no longer referred to, however a <b>policy on Landscape Character Areas has been added to the plan, and all RIGS have been added to the Policies Map.</b>
01168/1/003 Hertfordshire Ecology		✓		Policies Map A Radlett and North Bushey Wildlife Site boundaries: Copse by Watford Road (WS ref 85/020) garden on east side has been removed.N.B. latest GIS boundaries of WS available from Herts Environmental Records Centre.	<b>Map updated using latest HERC data.</b>
01228/1/002 Capita for owner	✓			Rear of The Warren is identified on Proposals Map A as a 'Wildlife Site', to which Policy SADM9 'Biodiversity and Habitat Sites' relates (this is incorrectly labelled as Policy SADM29 on Proposals Map A). May not be a long term status. Improvements to ecology could be integrated into development of site for housing. Amend map to remove the 'Wildlife Site' designation from land to the rear of The Warren, Radlett.	Release of the site for housing purposes is not needed to deliver the Core Strategy housing target and is therefore inappropriate (see response to 01228/1/001). Removal of the 'Wildlife Site' designation from land (site ref 77/054: Meadow East of The Warren) is not appropriate. <b>No change (but key on Proposals Maps corrected)</b>
<b>Policy Map B</b>					
01222/1/011 HBC Parks		✓		Show Bushey Rose Garden as a Park and Garden of Special Historic Interest Grade II as well as local green space.	<b>Map amended.</b>
01227/1/001 RPS Planning and Development for Bluemark Projects Ltd	✓			Object to the alignment of the village envelope for Elstree - excludes land off Watford Road, Elstree. Amend to include land off Watford Road to enable its development for residential use (reasons in objections 01227/1/003 to Policy SADM1).	This area is in the Green Belt. The current boundary is clear and defensible. Any major review of the Green Belt will accompany the review of the Core Strategy. This requires a reassessment of objectively assessed needs for housing and employment development and a comprehensive Green Belt Study. It would be wrong to assume the Green Belt boundary in Hertsmere should automatically be changed (ref NPPF para 14), but solutions accommodating major development could have major consequences for the Green Belt and a

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
					number of existing communities. The Council intends to conduct such consultations sensitively and transparently with the appropriate evidence available. A Green Belt Study will be commissioned in 2015 to reassess the contribution of land to the Green Belt. Allocating other land adjoining Watford Road would entail a major Green Belt release, whether as safeguarded land or not. Such an allocation is not needed to deliver the Core Strategy housing target or provide a necessary contingency now, and is therefore inappropriate. <b>No change.</b>
<b>Policy Map D</b>					
01166/1/004 David Lander for RRHE LLP	✓			Consequential upon objection to Policy SADM8. Inset Map D (Borehamwood) needs to distinguish between the curtilage of the Holiday Inn site and the Safeguarded Land for Employment Area designation as a whole. (plan submitted)	It is recognised that the Council agreed that any proposals for the Holiday Inn site, due to it containing significant previously developed land and buildings, would need to be considered on their individual merits. Policy SADM8 has been amended to reflect this but it is not considered appropriate or necessary to identify it separately on the Policies Map because the Core Strategy has identified the entire area to the east of Rowley Lane for safeguarding, rather than excluding any specific sites within the safeguarded area. <b>No Change.</b>
01184/1/004 CGMS Consulting (for HSBC)	✓			The Elstree Distribution Park should be included in the Housing Site Allocations and excluded from the Elstree Way Employment Area (page 28).	The site is not considered suitable for residential use because it would result in a significant loss of B8 floorspace for the borough, and would undermine the integrity of the employment area as a whole. See response to 01184/1 under SADM1. <b>No change</b>
<b>Policy Map E</b>					
01151/1/004 resident		✓		Darkes Lane Conservation Area missing from Map E	<b>Map corrected.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
01165/1/002 resident		✓		Darkes Lane Conservation Area Boundary missing from Proposals Map	<b>Map corrected.</b>
01222/1/009 HBC Parks		✓		Kimpton Mead Allotments should be shown on Policies Maps C&E as Wildlife site.	Parks have advised site no longer included in HMWT list of wildlife sites. <b>No change.</b>
00662/2/001 owner	✓			In essence this objection is to a specific site being scheduled 'Wildlife Site' when it does not conform to the specific criteria. Furthermore it is believed the area in question, an agricultural yard, has been amalgamated with an adjoining long established Wildlife site, known as the Fenny Slade Wildlife Site 87/005. By proximity my site has been wrongly scheduled. It should be noted that my site, the agricultural yard and barn, was not scheduled as a Wildlife under the 2003 Local Plan Proposal Maps. Please see the attached Plan 1 and 3. Site address: land behind Stagg Ridge Flat, Staff Hill, Potters Bar, Herts, EN6 5QS Hertsmere Ref: 87/005. Hertsmere Tile Ref: TQ269999. The Wildlife site known as 'The Fenny Slade Hill Local Wildlife Site 87/005' has been extended under Hertsmere's 2013 Core Strategy and accompanying Policy maps to cover an area it did not previously cover. According to the 2003 proposal maps the Fenny Slade wildlife scheduling did not cover the North West corner of the area NOW covered by the 2013 Policies Maps. Please see the attached plans labelled Plan 1, Plan 2 and Plan 3. The area in question is a farm yard, please see attached images, and is incapable of fulfilling the Wildlife Site criteria, furthermore the area was not included in the original assessment and should not be included without proper assessment and consultation with the landowner etc. The Fenny Slade Wildlife Site was, at the time of scheduling, scrub land, it is now a well maintained private garden. The area I own, which was never included in the Fenny Slade Wildlife site, is a farm yard consisting of a 4000 sq ft agricultural building and 25 000 sq ft of outdoor yard used in association with the shed and the adjoining	There has been no change to the designation of Fenny Slade since the Hertsmere Local Plan 2003 was adopted. The site boundary is the same on the proposals map for the Hertsmere Local Plan 2003 as it is in the Site Allocations Development Management Policies map. <b>No change.</b>

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				stopped up road. The area was developed with planning permission, and neither the case officer or the planning inspectorate made reference to the site forming part of the Fenny Slade Wildlife site. I propose the area I own, that which consists of the shed and outdoor hardstanding / yard, is removed from the area which is scheduled 'Wildlife Site' in Hertsmere 2013 Policies Maps. The following maps and images should demonstrate that the area in question, my agricultural yard, was never included in the Fenny Slade Wildlife Site nor should the area be scheduled Wildlife Site now in any event. If it is decided that the area should be included in the Fenny Slade Wildlife Site allocation, then I demand a re-assessment of the whole site. Plan 1 - Hertsmere's 2013 Policies Map, Map E. Site identified by two red ovals. Plan 2 - Hertsmere's 2013 Policies Map, Map E. Specific part of site identified. Plan 3 - Hertsmere's 2003 Local Plan Proposal Map, Potters Bar. original Map which excludes yard from Fenny Slade Wildlife site. Image Doc 1 - images of farm yard and agricultural barn	
<b>Miscellaneous</b>					
00837/1/001 resident	✓			Objection to Elstree Way proposals	This representation has been considered as part of the Examination of the Elstree Way Corridor Area Action Plan. <b>No change to SADM.</b>
01230/1/001 Mono Consultants (for Mobile Operators Assoc)		✓		In line with NPPF paras 42, 43 should be policy for telecommunications equipment proposals. Model policy and preamble submitted. Background information, such as electromagnetic fields (EMFs) and public health, should be in a separate Supplementary Planning Document. This could then be read with the guidance in NPPF and the Code of Best Practice to Mobile Phone Network Development to give a comprehensive background to any proposed development.	The NPPF provides adequate guidance in terms of planning policy for communications infrastructure. A standalone policy in SADM is not considered necessary but for clarity <b>the text supporting Policy SADM 31 Design Principles now indicates that when considering applications for electronic communications apparatus, the principles contained in Policy SADM31 will be applied in conjunction with the NPPF.</b>
00234/2/007		✓		Want clarity over responsibility for street lighting, drainage etc on new	The normal approach is that only the main 'spine' road is

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
Elstree and Borehamwood Town Council				roads in estates.	adopted by the Highway Authority. Responsibility for the remaining roads, lighting etc remains with the developer.
01127/1/001 Heathrow Airport Safeguarding		✓		No safeguarding concerns. Advice re Wind turbine developments within safeguarding zone.	<b>Policy SADM42 Aviation Safeguarding indicating consultation will take place on wind turbine applications within the safeguarding zone added.</b>
00662/4/001 owner	✓			Core Strategy objection submitted - re affordable housing requirements.	The affordable housing requirements are not a subject of the Site Allocations and Development Management Policies Development Plan Document. The affordable housing requirement is set in the Core Strategy Development Plan Document, adopted January 2013. <b>No change.</b>
00973/3/001 Phillips Planning Services Ltd for owner		✓		Starveacres: Council's comments in Report of Consultation (no 19) - unclear to what comments refer. All land is part of residential hereditament - gardens and recreation facilities ancillary to house. Question about defensible GB boundary. Current GB boundary is more defensible in terms of physical features and land use than the previous boundary. Green Belt topic paper to LPI 1999 says site logically forms part of the built up area of Radlett and moving boundary outwards would follow generally well defined line of trees and hedges. No change since then. Inspector's conclusions need to be taken into account in current SADM assessment of site.	The comment in the Report of Consultation is incorrect as the site is not within the Green Belt. It is safeguarded and treated as if it was in the Green Belt until required in order to meet the housing target. The report has been corrected. See response to 00973/1/002 under SADM1 and 00973/1/001 under SADM2.
<b>Sustainability appraisal</b>					
01229/1/016 Natural England, Sustainable Land Use and Regulation		✓		We are satisfied that the draft report includes an assessment of the likely effects of the plan on relevant environmental issues within Natural England's remit. However, we would advise that the report could include a more detailed consideration of how the following issues have been considered, in line with NPPF requirements, through policies and site allocations: Protection and enhancement of soils, including Best and Most Versatile land; Protection and enhancement of locally	Noted. The comments have been passed on to the Council's consultants for consideration in the sustainability appraisal on the revised draft.

SADM Consultation Draft reference and Representation reference	Objection	Comment	Support	Issues	Response
				important geological sites;Brownfield sites of high environmental value;Public rights of way and other access routes.	



# Site Allocations and Development Management Policies DPD: Consultation March/April 2014

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Summaries of Representations and Draft Council responses.

Late Representations in relation to  
The Paddock, Bushey

July 2015

**Late Objections to designation of The Paddock as Local Green Space.**

	<b>Date received</b>	<b>Comment</b>	<b>Response</b>
01400-1-001 resident	06/07/2015	It's private land – legally you can't designate it.	The ownership of the land does not preclude it from being designated as Local Open Space. The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail) . <b>No change.</b>
01401-1-001 resident	06/07/2015	It's private land – legally you can't designate it.	The ownership of the land does not preclude it from being designated as Local Open Space. The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future

			development, Local Green Spaces being one of these categories (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01402-1-001 resident	05/07/2015	Needs funds for Reveley – unique community asset. No funds = risk Reveley being sold for development. Paddock = useless scrub. Trust can't afford to maintain it. No benefit to local community	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01403-1-001 resident	05/07/2015	Spending money on maintaining Paddock = waste of money. Trust can't afford it. If Paddock not sold there is high risk of losing Reveley Lodge and gardens – local history will disappear, site likely to be redeveloped. Reveley Lodge is asset – educational and social - run by dedicated volunteers. Funds from sale will allow	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of

		<p>maintenance and refurbishment and Lodge and cottages (in turn generating income).</p>	<p>support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b></p>
01404-1-001 resident	05/07/2015	<p>Classifying Paddock as LGS based on incorrect application of superseded Government criteria. Will result in Reveley closure. Losses will include Victorian education sessions and gardens. Paddock not used, no historical, ecological or recreational value.</p>	<p>The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the</p>

			<p>designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b></p>
01405-1-001 resident	05/07/2015	<p>Housing need and lack of purpose of Paddock signal carefully considered development = best option. Doesn't meet NPPF criteria for LGS. Private, busy road, barely notice it. Reveley Lodge much greater priority. If only way of maintaining it is to sell the Paddock then should do so.</p>	<p>The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from</p>

			Bushey Museum Property Trust for further detail). <b>No change.</b>
01251-1-001 resident	05/07/2015	Inadequate consultation. Should sacrifice poor scrubland in exchange for long term preservation of beautiful and established house and garden. Benefits to National Gardens charity and many other causes.	The NPPF makes specific reference to Local Green Spaces which are ‘demonstrably special to a local community and hold a particular local significance’ and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens; it was however agreed that the proposed designation for Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01406-1-001 Bushey Museum Property Trustee	05/07/2015	The Paddock was bought by Chewetts to safeguard view from Reveley. It’s scrubland. TPO oak would be retained in Cala development. Doesn’t fulfil LGS criteria. Not beautiful or peaceful, no historical recreational value, and little wildlife. Reveley Lodge Garden – had fallen into decay but has slowly been turned around (Kew trained Head Gardener). Rare plants, wildlife, veg garden, bees. Open free of charge. Visited by hundreds of school children, garden groups and other visitors. Part of National Gardens scheme. Other charities also benefitted from events. Funding from Paddock	The NPPF makes specific reference to Local Green Spaces which are ‘demonstrably special to a local community and hold a particular local significance’ and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces

		<p>– enable improved accessibility (paths, toilets) small visitor centre, parking, machinery. If no funds from sale, gardens will return to derelict state and could be built on.</p>	<p>and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b></p>
<p>01407-1-001 Learning Officer, Bushey Museum and Art Gallery</p>	<p>04/07/2015</p>	<p>Paddock unattractive scrubby grass and trees on busy road. Neither functional nor beautiful. Designation LGS will deny opportunity to secure future of Reveley house and garden. Would severely compromise teaching programme. Teach history – Victorian, WWII life through diaries of residents. Art sessions use garden, science taught through plants and seeds. Schools from Borehamwood and Stanmore as well as Bushey come.</p>	<p>The NPPF makes specific reference to Local Green Spaces which are ‘demonstrably special to a local community and hold a particular local significance’ and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The</p>

			Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01408-1-001 resident	04/07/2015	Save Reveley Lodge. Tireless and dedicated volunteers work to further the legacy of Art in Bushey.	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01408-1-002 resident	04/07/2015	What would be the purpose of the open space if retained?	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local



			<p>community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b></p>
01409-1-001 resident	04/07/2015	Paddock scruffy, not used by public. Paddock not noticed by public. No significant plants.	<p>The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected</p>

			<p>from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b></p>
01410-1-001 resident	03/07/2015	<p>Government criteria for designating LGS not agreed by members of Hertsmere and therefore has no validity. Must allow sale of Paddock to bring funds for Reveley Lodge and Bushey Museum – the ‘here and now’ heritage of Bushey. Paddock is inaccessible scrubland has no historical environmental or recreational merit. Reveley - significant benefits to local community, especially schools. Victorian workshops, learning about nature through seasons in gardens. Beautiful mature gardens, wildlife, free of charge entry. Unusual Victorian/Edwardian building. Protect Reveley from future closure and resultant educational loss.</p>	<p>The NPPF makes specific reference to Local Green Spaces which are ‘demonstrably special to a local community and hold a particular local significance’ and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was</p>

			agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01411-1-001 resident	03/07/2015	Misguided NIMBYish attempts to prevent sale of Paddock. No aesthetic or practical value. Sale will help preserve unique Reveley Lodge – ‘a wonderful Edwardian time capsule and a unique piece of the history of Bushey Heath’. Many volunteers. Memorabilia, concerts, fetes, wonderful gardens. If have to choose, choose Reveley Lodge to survive.	The NPPF makes specific reference to Local Green Spaces which are ‘demonstrably special to a local community and hold a particular local significance’ and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01412-1-001 resident	03/07/2015	Reveley Lodge needs funds to maintain and secure future of Lodge and garden for ALL Bushey residents now and in future. Sale of Paddock needed. Reveley Lodge part of National Garden scheme. Local history days for school children. Open free of charge. Part of	The NPPF makes specific reference to Local Green Spaces which are ‘demonstrably special to a local community and hold a particular local significance’ and indicates that development here should be ruled out

		Bushey's heritage.	other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01413-1-001 user	03/07/2015	Sale of Paddock needed to fund urgent repairs to house out-buildings and garden walls and provide on-going maintenance programme for Lodge and Bushey Museum. Gardens have been upgraded (part of National Garden scheme). Range of activities at Lodge continually expanding. Medicinal plants walk. Events contribute to Bushey Festival. Encourage youngsters to consider careers in horticulture, botany etc. Bees, local produce. Without funds from Paddock won't be able to restore buildings and maintain garden. Will decline and become potential development site – would be tragedy.	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015)

			<p>considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b></p>
01414-1-001 teacher	03/07/2015	Use house as a learning resource. Sale of Paddock will allow excellent work of volunteers from Bushey Museum to continue.	<p>The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan</p>

			(see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01381-2-001 Chairman BMPT	03/07/2015	Council has not applied NPPF criteria for designation of LGS. Paddock isn't demonstrably special to local community or hold particular local significance. Compelling evidence needed for designation – not demonstrated. Should lose unremarkable private green space in favour of housing and Bushey's heritage and publicly accessible garden. Without capital from the sale Reveley Lodge will have to close – loss of heritage, local history and education. BMPT strenuous objection to proposed designation. Designation doesn't take account of loss of social amenity and environmental benefit if Reveley Lodge and garden is closed. Paddock doesn't meet NPPF criteria of beauty, historic significance, recreational value, tranquillity or richness of wildlife. Inspector said must be compelling evidence, and be able to demonstrate that requirements for allocation of LGS are met in full. Impact on Bushey's heritage will be catastrophic.	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01415-1-001 resident	03/07/2015	Object to designation as it will mean the closure of Reveley Lodge – have enjoyed visiting during childhood	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green

			<p>Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b></p>
01416-1-001 resident	03/07/2015	<p>How is designation going to provide any public amenity? It's a green field in private ownership. No-one has ever been able to use it. Need to sell it to fund maintenance of house and garden. Garden is publicly accessible. Better to leave Reveley Lodge and garden in capable hands of BMPT than be forced to sell for development. If that happened who would look after the LGS?</p>	<p>The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the</p>

			grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01417-1-001 resident	02/07/2015	Designation would make development unlikely. If no funds from sale of Paddock will have to consider selling Reveley Lodge (listed building with superb garden). Will go into private ownership and likely that permission to build will be sought. Unlikely public would have access to gardens. Residents would lose access to superb 2 acre garden in exchange for retaining derelict 2 acre field with no scientific or aesthetic value. Could get travellers on it.	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No</b>



			<b>change.</b>
01418-1-001 resident	02/07/2015	BMPT have sold land to Cala STPP (planning application to be considered 16 July). Appalled by lack of homes for local community and affordable homes for younger generation. Site should be used to provide for the housing needs of Bushey. See Say Yes to Homes campaign. Don't be fooled by local self-interest. This is sneaky attempt to block housing development.	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01419-1-001 resident	02/07/2015	Hidden treasure. Can't allow Reveley Lodge to disappear or fall into disrepair. Hard working volunteers. Mrs Chewett would be in favour of selling Paddock to ensure house remained intact. New homes will enhance the area.	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category.

			<p>HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b></p>
01420-1-001 resident	02/07/2015	<p>Object to designation, lack of consultation. Paddock doesn't meet criteria for designation – not beautiful, historically significant or used for recreation. Reveley Lodge garden is far more important. Trust needs to sell the Paddock to fund improvements and ensure long term survival of house and gardens. Change status of Paddock is an attempt to deny the Trust the ability to properly manage their resources in the interests of the wider Bushey community. Without sale likely Reveley Lodge and garden will have to be sold for development – significant loss of local heritage site.</p>	<p>The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and</p>

			development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01421-1-001 resident	02/07/2015	Gardens open to public. Activities also open to public. Real amenity to people of area. How compare to tatty field which has never been available to public. Money from sale urgently needed for repairs etc – without this will fall into disrepair –leading to dereliction and closure.	The NPPF makes specific reference to Local Green Spaces which are ‘demonstrably special to a local community and hold a particular local significance’ and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01422-1-001	02/07/2015	Paddock doesn’t meet criteria for designation – not beautiful,	The NPPF makes specific reference to Local Green

resident		historically significant or used for recreation. Little local wildlife. Reveley Lodge Garden much more important for wildlife, recreation, historical significance. Open to public. Interesting and varied spaces plants and animals. Sale of Paddock needed to fund improvements and ensure long term survival as amenity for Bushey residents. Allow Paddock to be sold so that infinitely richer space of Reveley lodge and garden can continue to enrich lives of local residents.	Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01423-1-001 resident	02/07/2015	Mrs Chewett wanted house and garden to be cared for by Bushey Museum for the benefit of the people of Bushey. BMPT decided only way to secure future of Reveley Lodge was to sell Paddock. Without it Lodge will have to close. Will be loss in terms of heritage, local history, education, beautiful and peaceful garden. Land sold to Cala STPP. Designation prevents any development and puts future of part Bushey's heritage at risk. BMPT strenuous objection to proposed designation. Designation doesn't take account of loss of social amenity and environmental benefit if Reveley Lodge and garden is closed. Paddock doesn't meet NPPF	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to

		<p>criteria of beauty, historic significance, recreational value, tranquillity or richness of wildlife. Inspector said must be compelling evidence, and be able to demonstrate that requirements for allocation of LGS are met in full. Impact on Bushey's heritage will be catastrophic.</p>	<p>determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b></p>
01424-1-001 resident	02/07/2015	<p>Mrs Chewett wanted house and garden to be cared for by Bushey Museum for the benefit of the people of Bushey. BMPT decided only way to secure future of Reveley Lodge was to sell Paddock. Without it Lodge will have to close. Will be loss in terms of heritage, local history, education, beautiful and peaceful garden. Land sold to Cala STPP. Designation prevents any development and puts future of part Bushey's heritage at risk. BMPT strenuous objection to proposed designation. Designation doesn't take account of loss of social amenity and environmental benefit if Reveley Lodge and garden is closed. Paddock doesn't meet NPPF criteria of beauty, historic significance, recreational value, tranquillity or richness of wildlife. Inspector said must be compelling evidence, and be able to demonstrate that requirements for allocation of LGS are met in full. Impact on Bushey's heritage will be catastrophic.</p>	<p>The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley</p>

			Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01425-1-001 resident	02/07/2015	Mrs Chewett wanted house and garden to be cared for by Bushey Museum for the benefit of the people of Bushey. BMPT decided only way to secure future of Reveley Lodge was to sell Paddock. Without it Lodge will have to close. Will be loss in terms of heritage, local history, education, beautiful and peaceful garden. Land sold to Cala STPP. Designation prevents any development and puts future of part Bushey's heritage at risk. BMPT strenuous objection to proposed designation. Designation doesn't take account of loss of social amenity and environmental benefit if Reveley Lodge and garden is closed. Paddock doesn't meet NPPF criteria of beauty, historic significance, recreational value, tranquillity or richness of wildlife. Inspector said must be compelling evidence, and be able to demonstrate that requirements for allocation of LGS are met in full. Impact on Bushey's heritage will be catastrophic.	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01426-1-001 resident	02/07/2015	Mrs Chewett wanted house and garden to be cared for by Bushey Museum for the benefit of the people of Bushey. BMPT decided only way to secure future of Reveley Lodge was to sell Paddock.	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and

		<p>Without it Lodge will have to close. Will be loss in terms of heritage, local history, education, beautiful and peaceful garden. Land sold to Cala STPP. Designation prevents any development and puts future of part Bushey's heritage at risk. BMPT strenuous objection to proposed designation. Designation doesn't take account of loss of social amenity and environmental benefit if Reveley Lodge and garden is closed. Paddock doesn't meet NPPF criteria of beauty, historic significance, recreational value, tranquillity or richness of wildlife. Inspector said must be compelling evidence, and be able to demonstrate that requirements for allocation of LGS are met in full. Impact on Bushey's heritage will be catastrophic.</p>	<p>indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b></p>
<p>01427-1-001 Resident. BMPT and BMT Trustee</p>	<p>02/07/2015</p>	<p>Reveley Lodge in desperate need of fundamental renovation-without it will further deteriorate. Trust has been maintaining Lodge as best it can but little funds. Also developed programme of educational and other visits. Hundreds of children visit. Garden maintained by professional gardener supported by volunteers. Open to public. Mrs Chewett didn't leave funds to pay for upkeep. Trustees relying on sale of Paddock for repairs and renovations and to provide income to appoint full time manager and develop programme of activities. If can't develop Paddock will lose potential source of substantial revenue. Bushey Museum doesn't have space or facilities to host visits by school children.</p>	<p>The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being</p>

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01428-1-001 resident	02/07/2015	<p>Field was used for car parking for many years for visitors to Reveley Lodge. Only feasible source of capital for maintaining and repairing Reveley Lodge. Shouldn't preserve Paddock (owned by Charity) for benefit of neighbouring properties which would have been built on open space. Loss of Reveley Lodge and gardens would be far more serious loss to neighbourhood than building on part of the Paddock.</p>	<p>The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock</p>



			as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01429-1-001 resident	07/07/2015	Object to LGS allocation - looks like it's just been brought forward to stop the proposed development on the site. Need more affordable housing. Development of land crucial to financial support and survival of Reveley Lodge and garden. Garden - setting for public events and concerts, and house once restored has potential as an arts and educational resource.	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b>
01397-1-001 Learning Officer, Bushey Museum and Art Gallery	14/07/2015 Received after Council meeting.	Reveley Lodge needs considerable money spent on it for its upkeep and the only source of that income is from money from the sale of the field. Without this, the house will quickly fall into disrepair and have to be knocked down. Reveley Lodge is an enormous asset, particularly as an educational resource for school children.	The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of

		<p>The garden maintained as originally planned, is also, not just an excellent source of learning , but delightful venue for picnics for local school children. Groups of adults from the community enjoy guided tours of the house and garden, which provide a limited source of income. The garden is open to the general public and the stable block is used for exhibitions.</p>	<p>support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from Bushey Museum Property Trust for further detail). <b>No change.</b></p>
01398-1-001 resident	03/07/2015	<p>Privately owned, Not local beauty spot, overgrown wasteland used occasionally for parking. Not demonstrably special to local community. Major road alongside. Not part of Heath. Bushey needs homes. If designated will lead to sale of Reveley Lodge and garden. Community will lose asset.</p>	<p>The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the</p>

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01399-1-001 resident	07/07/2015	<p>Designation would present any development now or in future. No historical nor ecological value. Privately owned, not used for recreation. Bushey residents should remember their houses are built on what used to be open land.</p>	<p>The NPPF makes specific reference to Local Green Spaces which are 'demonstrably special to a local community and hold a particular local significance' and indicates that development here should be ruled out other than in very special circumstances. As the level of support for designating The Paddock as a Local Green Space under Policy SADM36 Local Green Space demonstrates, the site clearly falls within this category. HBC undertook a rigorous criteria-based Green Spaces and Amenity Land Assessment (December 2012) to determine which green spaces should be protected from future development, Local Green Spaces being one of these categories. Council members (8 July 2015) considered the submissions objecting to the designation of this site as Local Green Space on the grounds that monies could potentially be raised from its development to fund the maintenance and development of Reveley House and gardens. The Council is supportive of Bushey Museum and Reveley Lodge and the facilities provided there but it was agreed that the proposed designation of The Paddock as Local Green Space be retained in the Submission Plan (see response to representation 01381/1/001 from</p>

			Bushey Museum Property Trust for further detail). <b>No change.</b>
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