

Hertsmere Local Plan

Site Allocations and Development Management Policies

(Volumes 1 and 2)

July 2015



Volume 1: April 2013 Call for Sites and Topics

Preface

This document outlines how Hertsmere Borough Council has engaged stakeholders and the local community in the preparation of the Site Allocations and Development Management Development Plan Document (DPD).

It explains:

- who was consulted and how;
- the issues raised by the community and stakeholders
- the sites that have been identified; and
- how the results have been taken into account.

The Report of Consultation is set out in separate volumes:

Volume 1: Call for Sites and Topics

Volume 2: Consultation Draft

This is Volume 1.

Notes:

Edited 17 May 2014: correction to Council response to Rep 4 in Appendix B. The Council supports the open use proposed in the Consultation Draft of the Site Allocations and Development Management Policies.

Edited 11 June 2015: correction to Council response to Rep 19 in Appendix B. Delete reference to Green Belt in 'Existing Site Use' column. The site is safeguarded land.

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1. Introduction

- 1.1 This document outlines how Hertsmere Borough Council has engaged stakeholders and the local community in the preparation of the Site Allocations and Development Management Policies Development Plan Document (DPD). The Site Allocations and Development Management Policies DPD forms the second part of the new Local Plan, following the adoption of the Local Plan Core Strategy in January 2013: it must complement the Core Strategy and should assist its delivery.
- 1.2 The Council began the task of replacing the 2003 Local Plan in 2005. The Core Strategy was prepared over several years and was the subject of an ongoing process of consultation. Comments and representations on the Core Strategy (and the Council's response) are recorded in a series of documents:
 - Statement of Consultation March 2009
 - Statement of Representations March 2009 [i.e. on the first Submission Draft of the Core Strategy]
 - Statement of Consultation February 2012 [i.e. consultation on a revised Core Strategy after March 2009]
 - Statement of Representations February 2012 [i.e. on the revised Submission Draft of the Core Strategy].
- 1.3 The Council undertook a consultation exercise in 2006: 'Looking ahead to 2021: Hertsmere Local Development Framework Issues and Options' (2006). This consultation included correspondence with 1,500 consultees and other stakeholder involvement. The results of the consultation are reported in the Core Strategy Statement of Consultation March 2009. The consultation not only provided an important input to the Core Strategy, but also was relevant to site allocations and development management issues.
- 1.4 Relevant issues arising from that consultation were taken into account when formulating the Consultation Draft Site Allocations and Development Management Policies DPD. Key points were:
 - the desire for continued protection of the Green Belt;
 - concern over traffic and parking provision;
 - the visual impact of new buildings in a local context;
 - implications for infrastructure; and
 - the protection of trees.
- 1.5 The purpose of the April 2013 call for sites and topics was to refresh the information collected in the 2006 'Issues and Options' results. The new round of consultation updated the status of various sites and the importance of particular topics.
- 1.6 This Report of Consultation effectively begins with the Call for Sites and Topics consultation in 2013. It has been prepared in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as a record of the continuous and extensive community and stakeholder involvement that was undertaken throughout the development of the Site Allocations and Development Management Policies.

1.7 The Report of Consultation covers:

- who was consulted and how;
- the issues raised by the community and stakeholders
- the sites that have been identified; and
- how the results of consultation have been taken into account.

2. Hertsmere's Statement of Community Involvement

- 2.1 The Council recognises the benefits of effective community and stakeholder participation and has sought to pro-actively engage the wider community from the outset in the preparation of its Local Plan. This approach is reflected in the main objectives of its Statement of Community Involvement (SCI) which are to:
- set out how the Council will involve the community and stakeholders in the development of each DPD and the Local Plan;
 - outline who should be involved in the Local Plan and particularly the Site Allocations and Development Management Policies DPD at each stage, including a list of the statutory and non-statutory consultees who make up the Council's database;
 - provide information on the range of documents that the Council would be consulting on.
- 2.2 The SCI is important in providing an overall framework, ideas and measures that can be used to reach the community, so that consultation can be effective for the entire process. The Council intends that consultation on the Site Allocations and Development Policies DPD should accord with its policy on public consultation and engagement.
- 2.3 The Council adopted a Statement of Community Involvement (SCI) in 2006, following independent examination. That SCI has been reviewed by the Council. The review was consulted on in early 2013, and a revised version is programmed to be adopted by the Council in January 2014.

3. Summary of Consultation

- 3.1 The notification inviting representations on sites and topics was sent on 17 April 2013 (see Appendix A). This was extended to statutory and general consultees in line with the requirements of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and for a period of more than six weeks.
- 3.2 Overall 27 representations were received, 19 were in relation to a site allocation and 13 referenced topics that should appear in the document. Where there was an overlap, the topics suggested were linked to the site. Some of the topics and sites had been previously suggested in earlier consultation responses.
- 3.3 The sites and topics mentioned related to housing, employment, Green Belt, water supply, sports provision and flood risk. Some of the sites mentioned were new, and for some additional information was received. This has helped to update the Council's knowledge on the status of sites, particularly on availability.
- 3.4 Before drafting, an audit of the adopted Local Plan 2003 was carried out with Development Management colleagues within the Council to assess the effectiveness of its policies. The following questions were considered:
 1. Was there a policy that was saved?
 2. Is there a relevant replacement in the Core Strategy policy and does that replacement policy have direct development management application?
 3. Are there other policies in the Core Strategy that complement a saved Local Plan policy?
 4. Are there any relevant national planning policy changes since 2003?
 5. How often was the Local Plan policy used in decisions?
 6. Has the policy been known to cause conflict for officers, for example on appeal?
 7. Is there an equivalent policy necessary as a development management policy? Does the policy need to be changed or improved?
- 3.5 A working draft Site Allocations and Development Management Policies DPD was sent to the Development Team Managers and the Highway Authority for their input and comment. The views of Chief Officers and the Council's Management Board were sought in July 2013, when changes to the proposed wording and particular allocations were considered.

4. Summary of Site Representations

4.1 The following sites were submitted to the Council following the call for sites in April 2013. Some are sites (or needs) which have been presented previously, and there are a number of new sites that have been brought to the Council's attention.

1. Elstree Distribution Park, Borehamwood
2. Potters Bar Delivery Office, 123-5 Darkes Lane, Potters Bar
3. Borehamwood Delivery Office, 23 Shenley Road, Borehamwood
4. Need identified for sports provision – no specific site
5. Old Haberdashers Sports Ground, Borehamwood
6. Land at Birchville Court, Heathbourne Road, Bushey Heath
7. Land at Fortune Oaks, Fortune Lane, Elstree
8. Bushey Hall School Former Swimming Pool and Land at First Place Nurseries, Falconer Road, Bushey
9. Charleston Paddocks, South Mimms
10. Radlett Preparatory School, Radlett
11. Aldenham School, Letchmore Heath
12. Land south of Potters Bar
13. Land adjacent to Bryon Avenue and south of Elstree and Borehamwood Station
14. Starveacres, 16 Watford Road, Radlett
15. Land east of Theobald Street, Borehamwood
16. Land at High Cross, Aldenham
17. Garden Centre Group, Dancers Hill, Bentley Heath,
18. Land at Lincoln Field, Bushey
19. Former Sunny Bank School, Potters Bar

4.2 For potential housing sites, a comparable assessment to the Strategic Housing Land Availability Assessment (SHLAA) has been undertaken. In addition, sites have been considered in the relevant technical report, e.g. the Green Belt Sites Report.

5. Summary of Key Issues

- 5.1 A number of issues was raised in the representations received. Some were new issues – i.e. they had not been included in the Core Strategy or in existing studies. A summary of the issues and comments follows:
- a. The relocation of essential services and specific commercial facilities should be acceptable in order to enable the redevelopment of sites for housing development;
 - b. Policy was suggested for the protection of playing fields and outdoor sports facilities;
 - c. Policy was suggested in order to protect existing community facilities (giving a description of 'community facilities' and a set of parking standards for these uses), to deliver infrastructure requirements, and to address community infrastructure levy and planning obligations;
 - d. Wind farms should not be located within the primary surveillance radar for Heathrow Airport;
 - e. The policy for Key Green Belt Sites (KGBS) should be more flexible to allow for expansion of schools in the Green Belt: a similar representation suggests that 'envelopes' at KGBSs are not necessary and applications should be determined on their own merits;
 - f. Natural England recommend an evidence based approach on promoting biodiversity, identification of key ecological networks, and going beyond conserving and enhancing by identifying on-site opportunities, recognising the different status of sites, considering green infrastructure, open and green spaces, climate changes, renewable energy, access and rights of way, landscape assessment, and allocating land for development with the least environmental value;
 - g. Policy suggestions covering flood risk and Sustainable Urban Drainage systems were provided by the Lead Local Flood Authority;
 - h. Encourage economic growth in rural areas;
 - i. Previously developed land in the Green Belt will need to be redeveloped in the future; and
 - j. Text and policy for the provision of waste water and water supply services for new development was suggested.
- 5.2 Comments were addressed with reference to the NPPF and the Core Strategy, and through supporting technical studies and reports as appropriate.
- 5.3 Some of the matters listed above, such as the relocation of essential services to enable housing development and the redevelopment of previously developed land in the Green Belt, would be consistent with existing planning policy. It was therefore not necessary for a specific policy to address the point or designate a site for particular uses.
- 5.4 Specific advice from stakeholders was integral in informing replacement planning policies for the proposed replacement policies, particularly on playing pitches, the natural environment, waste water, water supply, flood risk and SUDS.

6. Conclusions

- 6.1 The call for sites and topics undertaken in April 2013 complemented the results of the Issues and Options Consultation in 2006 (see 1. Introduction above). It updated the information gained on sites over the last seven years and has provided more recent information on statutory obligations on the local planning authority, such as protecting wildlife sites and managing flood risk.
- 6.2 The sites and topics raised through the 'Call for Sites and Topics' consultation period were used to inform the Consultation Draft Site Allocations and Development Management Policies DPD. This DPD will in due course replace all extant Local Plan 2003 policies (i.e. those existing after the adoption of the Core Strategy in January 2013).

Appendix A: Notification text sent 17 April 2013

Dear Sir/Madam

As you will be aware, the Hertsmere Local Plan Core Strategy was adopted by the Council in January 2013. Work is underway on the forthcoming Site Allocations and Development Management Policies Development Plan Document (DPD). The Council seeks to consult on the DPD over Summer 2013. The document will be produced in line with the adopted Core Strategy.

The Council is seeking suggestions for topics or sites that you wish to be considered for production of the Plan. Many sites suggested previously as part of the SHLAA, Core Strategy representations and call for sites or other topic reports will be considered for a proposed designation or policy.

The Council will shortly be publishing an updated Local Development Scheme on its website which will illustrate the production timetable for this DPDs, the Elstree Way Corridor Area Action Plan, CIL and future Local Plan Review.

Please send your policy and site suggestions to local.plan@hertsmere.gov.uk

Yours faithfully

Simon Warner

Interim Local Plan Team Leader

Appendix B: Summary of Representations made during the Call for Sites and Topics

Rep no.	Name	Organisation	Site representation	Existing site use	Proposed site use	DM representation	Council response
1	Kevin Goodwin	CGMS	Elstree Distribution Park	Employment	Residential	-	In the centre of an established employment area, contrary to the CS. Not recommended for housing allocation
2	Claire Davies	DTZ	Potters Bar Delivery Office, 123-5 Darkes lane, Potters Bar	Employment	Residential, potentially mixed use	Redevelopment subject to the relocation of essential services	The CS would support the approach of relocating essential services for the redevelopment of the sites for housing in existing urban areas - neither site would contribute greatly to housing supply and therefore not included. (NB Response links to Rep. 3)
3	Claire Davies	DTZ	Borehamwood Delivery Office, 23 Shenley Road, Borehamwood	Employment	Residential, potentially mixed use	Redevelopment subject to the relocation of essential services	The CS would support the approach of relocating essential services for the redevelopment of the sites for housing in existing urban areas - neither site would contribute greatly to housing supply and therefore not included.
4	Jessica Mehigan	URS Global	Old Haberdashers sports ground	Sport facilities	Residential and sports facilities	-	The Council supports the open use of this site, effectively maintaining its policy on urban open land.
5	Roy Warren	Sport England	Suggested allocation of sports facilities as key community facilities; Consideration given to the need for new/expanded sports facilities	-	-	Suggested policy for the protection of playing fields and outdoor sports facilities	Commitment to review open spaces study as resources permit; consideration of allocations - limited availability of land, although outdoor sports use is in principle compatible with the Green Belt, subject to the scale and essential nature of any new buildings. Policies will protect green space and important community/leisure facilities.

Rep no.	Name	Organisation	Site representation	Existing site use	Proposed site use	DM representation	Council response
6	Rose Freeman	Theatres Trust	-	-	-	Suggestions include: a policy to protect existing community facilities; a description for the term 'community facilities'; a chart for parking standards; infrastructure delivery details relating to the Infrastructure Delivery Plan; and details of the community infrastructure levy and planning obligations	Policy CS18 already provides protection for community uses with a list of facilities that are considered as a community facility. CIL considered separately
7	Simon Vince	Heathrow Airport Limited	-	-	-	Suggest wind farms are not located within the Primary Surveillance Radar for Heathrow	Acknowledged. Little interest to date in wind farms in Hertsmere
8	Sarah King	AKT Planning and Architecture	Land at Birchville Court, Heathbourne Road, Bushey Heath	Care home, haulage yard	Residential	-	Review of safeguarded land to take place. Site benefits from PDL, SHLAA assessment to be undertaken
9	Graeme Free	DLA Town Planning	Land at Fortune Oaks, Fortune Lane, Elstree	Green field	Residential	-	Green field and Green Belt, with no PDL. Not suitable as beyond existing urban areas.
10	Graeme Free	DLA Town Planning	Bushey Hall School, former swimming pool, Falconer Road	Closed swimming pool, residential and grounds	Residential	-	Review of the Green Belt; note previous planning history and ability of the site to accommodate a level of housing. Site would not contribute an additional defensible boundary. Occupied by nursery (school). Also see Rep. 25.
11	William Shearer	Bidwell's	Charleston Paddocks, South Mimms	Field, small building	Proposed to be retained in existing policy for South Mimms Special Policy Area	-	Review undertaken of existing policies and sites in the Green Belt
12	Michael Fearn	Shire Consulting	Radlett Preparatory School	Primary School	Proposed as a Key Green Belt Site		Review undertaken of sites in the GB, including primary schools.

Rep no.	Name	Organisation	Site representation	Existing site use	Proposed site use	DM representation	Council response
13	Michael Fearn	Shire Consulting	Aldenham School Charity	Secondary School	Retention of KGBS status	More flexibility in the KGBS policy to allow for expansion of schools in the Green Belt	Review undertaken of key sites in the GB and of the DM aspects of the existing policy
14	Paul Bloomfield	Shire Consulting	-	-	-	Does not consider that envelopes for appropriate infilling are necessary or acceptable under the NPPF and applications at large sites in the Green Belt should be determined on their own merits	Review of MDS / KGBS undertaken. The identification of infilling areas helps to manage sites in accordance with the purposes of the Green Belt
15	Steve Baker	CPRE	-	-	-	DM policies linked to Core Strategy and NPPF Green Belt policies - in particular criteria for assessing planning applications and making a distinction between green field and PDL	Inclusion of principles in the forthcoming DM policies and future site allocations
16	Matt Claxton	Knight Frank	Land south of Potters Bar on behalf of Enfield Borough Council	Greenfield / Green Belt	Residential	-	Land is green field, agricultural and Green Belt, not suitable at present for housing development
17	Jamie Wallace	Rapleys	Land adjacent to Byron Avenue and south of E&B Station	Vacant	Residential	-	Existing urban area, SHLAA assessment, significant vegetation on site, consider inclusion as housing allocation

Rep no.	Name	Organisation	Site representation	Existing site use	Proposed site use	DM representation	Council response
18	John King	Natural England	-	-	-	Broad comments provided on delivering sustainable development, promoting biodiversity, identification of key ecological networks, and going beyond conserving and enhancing by identifying on-site opportunities; Identify and distinguish between status of different sites; be in accordance with Para 118 of the NPPF; with additional consideration given to the Green Infrastructure plan; open and green spaces, climate change, renewable energy, access and rights of way, landscape character assessments; allocating land with the least environmental value; and be evidence based.	Inclusion of principles in the forthcoming DM policies
19	Dilys Pryor	Philips Planning	16 Watford Road, Radlett	Two dwellings; Safeguarded land	Residential redevelopment	-	Review of safeguarded land to take place. Site is primarily green field with little PDL and does not benefit from having a boundary which would be any more defensible than it is at present
20	Jon Dowty	Edwards Covell Architecture and Planning	Land east of Theobald Street, Borehamwood	Green field; Green Belt	Green Burial grounds / Cemetery	-	Such a proposed use is compatible with the Green Belt, subject to the scale of new buildings
21	Kim Harding	Hertfordshire County Council - Strategic Planning and Land Use	-	-	-	Flood risk recommendations on a draft policy	Inclusion of a policy for flood risk and SUDs management
22	Nick Stafford	Preston Bennett	Land at High Cross, Aldenham	Green field; Green Belt	Residential	-	No allocation. Proposed site would be contrary to the NPPF and the Core Strategy, and there is sufficient land supply in existing urban areas

Rep no.	Name	Organisation	Site representation	Existing site use	Proposed site use	DM representation	Council response
23	Joanna Male	GGA Planning Policy	Garden Centre Group, Dancers Hill, Bentley Heath	Garden Centre	Tourism / leisure / business	Policy to encourage economic growth in rural areas, in line with the NPPF	The Core Strategy Policy CS15 contains principles to promote recreational access to open spaces and the countryside. The proposals are not clear enough to understand the particular use. There is some PDL at the site, and applications for such use should be considered in light of the CS and the NPPF. It is likely there will be a policy to protect rural character and its economy.
24	Gary Thomas	Planning Works	Land at Lincoln Field	Previously Developed Land; Green Belt	Key Green Belt Site	Need for the site to be developed in the future	Previous permission for school and boarding at the site due to amount of PDL at the site - buildings currently vacant, and the redevelopment for housing would not be inconsistent with the NPPF. Undertake SHLAA assessment and consideration of the site as a housing allocation
25	Graeme Free	DLA Town Planning	First Place Nurseries, Falconer Road	Green field; hard standing	Housing site	-	No significant PDL at the site, would not create a boundary that is any more defensible, and would also conflict with the purpose of including land within the Green Belt - very narrow gap between Watford/Bushey
26	Russell Monck	HCC Development Services	Former Sunny Bank School	Former school with playing pitches, part used for education support centre	Housing site	-	PDL in the Green Belt has scope to be allocated for housing in line with the SHLAA assessment, subject to the re-provision of community/education facilities currently provided at the school.
27	Christopher Colloff	Thames Water	-	-	-	Waste water and supply policy recommendations	Inclusion of a policy for waste water and supply