

Appendix J: Summary of Pre-submission representations and Council's responses

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Whole Document and Chapter One: Introduction

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Whole Plan	017a 021a 037a	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say the Plan is not based on a strategy to meet 'objectively assessed development and infrastructure', not based on 'proportionate evidence', not deliverable and won't enable delivery of sustainable development in accordance with NPPF and is therefore unsound.	<u>No change required</u> The purpose of SADM is to set out how the development targets in the adopted Core Strategy will be delivered, not to reassess what these targets should be. SADM is in-effect a 'daughter document' to the Core Strategy and as such does not require a new assessment of objectively assessed needs (OAN) to be carried out. The Core Strategy was independently examined in the light of the NPPF and found sound. It is the Council's view that SADM meets the tests of soundness. Both the Core Strategy and SADM (at Consultation Draft and Submission stages) have been subject to Sustainability Appraisal. The SA at pre submission stage concluded that 'the Plan is building appropriately on the Core Strategy. It also identifies a number of changes made subsequent to the publication of the Consultation Draft that strengthen specific policies. No significant adverse impacts have been identified arising out of the draft policies or allocations.'

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Whole Plan	017a 021a 037a	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say the Core Strategy was only found sound on the basis of the Council's commitment to its early review within 3 years of adoption. Adoption of revised CS not expected until at least 2018/19. Premature to bring forward SADM in absence of up to date wider strategy.	<u>No change required</u> The Core Strategy was independently examined in the light of the NPPF and subsequently adopted. The review process has begun with the commissioning, at the beginning of 2015, of technical studies to contribute to the evidence base for the review. This process will continue beyond the anticipated adoption date of SADM. The completion of SADM in accordance with Hertsmere's Local Development Scheme is necessary for the delivery of the adopted Core Strategy.
Whole Plan	017e 021g 037f	<u>Objection on the grounds of legal compliance</u> Shire Consulting for 3 private education providers say the Consultation has been during the summer holidays – this has precluded 'a significant element of public engagement' especially in the education sector.	<u>No change required</u> The period for representations was open until Monday 16 September. This provided ample opportunity for representations to be duly made.
Whole Plan	017f 021h 037g	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say the Plan should be shorter and should not duplicate policies made elsewhere eg Core Strategy or NPPF unless they add a specific local dimension.	<u>No change required</u> It is not considered that SADM policies duplicate policies in these other documents. The detailed proposals and policies in SADM are those by which the Council sees the strategic aims and objectives of the Core Strategy, which is itself NPPF compliant, being best

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			achieved. SADM is to be read alongside the adopted Core Strategy and Elstree Way Corridor Area Action Plan. Together these documents constitute Hertsmere's Local Plan, replacing the previous Local Plan (2003).
Whole Plan	017y 021aa 037u	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say the Plan doesn't provide certainty to investors, developers and public about the location and type of development that will take place over the Plan period, which it should do.	<u>No change required</u> SADM contains Site Allocations which indicate specific land use proposals in relation to identified sites, and Development Management Policies which guide development and form the basis for the assessment of planning applications. It therefore sets out the opportunities for development and clear policies on what will or will not be permitted and where, as required by the NPPF (para 154)
Whole Plan	017b 021b 037b	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers says the schools must be able to develop and maintain high quality facilities. The Plan must not inhibit further development. The sites are within the Green Belt but additional development is possible without compromising Green Belt objectives. The schools' development needs should be recognised in Plan.	<u>No change required</u> No change required in response to this particular representations but amendments to the supporting text for SADM25 Key Green Belt Sites has been proposed to include recognition of the value of private schools in the Borough, and the possible need to review infill boundaries in the light of future development needs (please see section 4 below). The Council's support for the

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			provision or enhancement of school facilities where they are consistent with the policies in the Plan is clear.
	021c	<u>Objection on the grounds of soundness</u> Shire Consulting for St Hilda's School say the school must be able to develop and maintain high quality facilities. DM policies in Plan must not inhibit further development. The school's development needs should be recognised in Plan.	<u>No change required</u> The Council's support for the provision or enhancement of school facilities where they are consistent with the policies in the Plan is clear e.g. Policy SADM 33 Key Community Facilities.
Whole Plan	018o	<u>General Comment</u> Elstree and Borehamwood Town Council sought assurances at Consultation Draft stage that impact of conversions from Borough owned sites such as garages would not cause undue negative impact with loss of storage and parking.	<u>No change required</u> 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. This criterion is included in policy SADM1 under Site Specific Requirements for H1 - The Director's Arms proposed housing site.
Whole Plan	036a	<u>General Comment</u> Thames Water says water and wastewater infrastructure is essential to any development. Thames Water seeks to co-operate and maintain a	<u>Comment noted</u>

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		good working relationship with the local authority and to provide the support they need with regards to the provision of water and wastewater infrastructure. It is vital that Thames Water is consulted at the earliest possible stage in the planning process.	
Whole Plan	054b	<u>General Comment</u> Individual representation from landowner requesting the allocation of land at Wilton End cottage for housing in review of Core Strategy.	<u>Comment noted</u> The review of the Core Strategy is the appropriate time to consider housing and employment (and other) development needs and whether they constitute exceptional circumstances to warrant changing the Green Belt. The Council will also be reassessing the value and significance of all Green Belt land in this context. This includes the landowner's site, without prejudice to the outcome of course.
Whole Plan	058v	<u>General Comment</u> Elstree and Borehamwood Green Belt Society are concerned about the expansion of schools into the Green Belt. Haberdashers' expansion. Hindu faith school proposed. Harperbury free school in Green Belt.	<u>Comment noted</u> Any proposals for school development within the Green Belt in Hertsmere would be subject to normal Green Belt policy as set out in the Core Strategy and SADM Plan as well as the NPPF. The site for the proposed Harperbury Free School is within the administrative area of St Albans City and District Council so is subject to the plans and policies covering that area.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Whole Plan	042a	<u>Supports the Plan</u> CC Town Planning for Liberty Aldenham Ltd generally supports the Plan and policies (with some caveats).	<u>Comment noted</u>
Whole Plan	042g	<u>Objection on the grounds of soundness</u> CC Town Planning for Liberty Aldenham Ltd request acknowledgement within the DPD of the important role that the Aldenham Dam will play in securing the future of Aldenham Reservoir as a continuing popular destination for sport and recreation and its role in achieving the spatial planning aims and objectives of HBC.	<u>No change required</u> Aldenham Country park is listed as a gateway site to Watling Chase Community Forest and is included within the Forest Plan which is referred to in Policy SADM29. Retention of the reservoir would be desirable for recreational, aesthetic and landscape reasons but not necessary.
Whole Plan	048a	<u>Objection on the grounds of soundness</u> The Woodland Trust would like to see their publication <i>Residential Development and Trees</i> (July 2015) used to inform the design principles within any future DPDs.	<u>No change required</u> The document will be a consideration in the review of the Core Strategy and any other future Local Plan documents.
Whole Plan	048b	<u>Objection on the grounds of soundness</u> The Woodland Trust would like to see the use of 'Space for People' Woodland Access Standard guidance to inform SADM and other DPDs.	<u>No change required</u> The Council will consider this guidance during the review of the Core Strategy and other future Local Plan documents, however amended text/policy has not been suggested, and it is not considered appropriate to amend the SADM Plan at this time.
Whole Plan	048d	<u>Objection on the grounds of soundness</u> The Woodland Trust would like to see the TDAG guidance <i>Trees in the Townscape</i> and <i>Trees in the</i>	<u>No change required</u> The Council will consider this guidance during the review of the Core Strategy and

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		<i>Hard Landscape</i> considered in developing SADM and other Local Plan documents.	other future Local Plan documents, however amended text/policy has not been suggested, and it is not considered appropriate to amend the SADM Plan at this time.
Whole Plan	018c	<u>General Comment</u> Elstree and Borehamwood Town Council sought assurances at Consultation Draft stage that impact on wildlife is considered (especially inhabiting railway banks and gardens which are potentially lost to development).	<u>Comment noted</u> Policy SADM11 Biodiversity and Habitats requires development proposals to take their impacts on biodiversity and the natural environment into account. The Biodiversity, Trees and Landscape SPD provides further detail.
Whole Plan	018r	<u>General Comment</u> Elstree and Borehamwood Town Council sought clarity at Consultation Draft stage on the responsibility for services (lighting & drainage) on new roads in estates.	<u>Comment noted</u> Where new estate roads are adopted by the County Council as Highway Authority, the responsibility for their maintenance transfers to the County Council. Where roads are not adopted the responsibility for their maintenance rests legally with the owners of properties fronting the road, although usually a street management company is set up to deal with this, and the Highway Authority can take action if they pose a danger to traffic, and a local authority can install lighting if required, and is then responsible for its maintenance. Further information can be obtained from Hertfordshire County

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			Council as Highway Authority.
Whole Plan	018m	<u>General Comment</u> Elstree and Borehamwood Town Council sought assurances at Consultation Draft stage that the cycle track and bus network is sufficiently structured to afford realistic alternatives to car use.	<u>Comment noted</u> SADM policy 41 sets out the Council's highway and access criteria for new development. It should be noted that the responsibilities for transport infrastructure lie largely beyond the control of the local planning authority. Monies collected through the Community Infrastructure Levy (CIL) can be spent on such infrastructure if it is considered to be a priority for the area. These decisions are made through a process separate to the Local Plan process, and decisions are taken by Members within consultation with officers and other interested parties including infrastructure providers and town and parish councils. There are many complex factors in persuading people to use alternatives to the private car, and the provision of appropriate infrastructure is just one in a range of measures which are required to encourage behavioural change.
Whole Plan	030d	<u>Objection on the grounds of Duty to Cooperate</u> Welwyn and Hatfield Borough Council welcome the 'oversupply' of housing against the Core Strategy target but it is noted the supply is significantly below	<u>Change required</u> SADM seeks to deliver the housing target set out in the Core Strategy and so it is not a matter for this document to consider

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		household projections and therefore there is potential for there to be a significant shortfall in supply once the new Core Strategy housing target is adopted. Should review whole Local Plan, not separate CS and SADM reviews. Concern about how HBC will address meeting of unmet development need from adjoining authorities, including Welwyn Hatfield. Need set out timetable for this. <u>Following the preparation of a Statement of Common Ground, this objection has been withdrawn.</u>	household projections subsequently published, which will be a matter for the Core Strategy review. The decision to progress a separate Core Strategy and SADM plan is a decision for Hertsmer BC and has itself been accepted through the adoption of the Core Strategy. Nevertheless, a change is proposed to paragraph 8.9 of Chapter 8 (Implementation and Monitoring Framework) clarifying that <u>“In addition and as part of the review of the Core Strategy (2013), the Council will consider individual land allocations and identify the need for new allocations, arising from that review. Further details of the process will be set out in the Council’s Local Development Scheme.”</u>

Chapter Two: Housing

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
General	018b	<u>General Comment</u> Elstree and Borehamwood Town Council is concerned about the ability of the local infrastructure to be able to meet the requirements of the scale of envisaged development.	<u>Comment noted</u> The co-ordination of infrastructure with development is a continuing issue and continually addressed with the relevant providers. SADM delivers the Core Strategy, for which an Infrastructure Topic Paper was part of the evidence base: this was updated to support the Community Infrastructure Levy. The Area Action Plan for the Elstree Way Corridor, part of Borehamwood, takes into account infrastructure issues, such as transport and schools. The Elstree Way Corridor is providing a substantial proportion of housing in Borehamwood. SADM contains relevant policies in support of infrastructure – e.g. drainage and transport.
General	058a	<u>General Comment</u> Elstree and Borehamwood Green Belt Society welcome provision of housing on brownfield sites but concern about ability of Borehamwood's infrastructure to cope with proposed development.	<u>Comment noted</u> As above. The co-ordination of infrastructure with development is a continuing issue and continually addressed with the relevant providers.
General	018p	<u>General Comment</u> Elstree and Borehamwood Town Council Sought	<u>Comment noted</u> The level of development is realistic. 43

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		assurances at Consultation Draft stage that any proposed building on railway banks was realistic and did not pose a significant nuisance to local residents (reference to H3 assumed)	dwellings have been approved (which was less than the estimated capacity in the Consultation Draft). The potential effects of the development, including various issues raised by residents of adjoining development, have been taken into account and have been addressed, both directly and through planning conditions.
General	0421	<u>Objection on the grounds of soundness</u> CC Town Planning on behalf of a landowner support residential development to enable works to Aldenham Dam and retention of reservoir and request that this is referred to in the Plan.	<u>No change required</u> New residential development is generally inappropriate in the Green Belt, and it is not needed to meet the Core Strategy housing target. The area proposed for up to 150 dwellings lies between a local wildlife site and Centennial Park, a designated employment area. The wildlife site separates the proposed residential area from Elstree village. Whether the land should continue to be designated as Green Belt, or should be removed and allocated for either housing or employment use is more appropriately addressed through the forthcoming review of the Core Strategy: this is the point when the Council will be weighing up housing and employment needs (for which the studies are almost complete) and reassessing the Green Belt.

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			Maintenance of the dam at the adjoining reservoir is a matter for the landowner: whether there is an immediate threat to the dam's stability is questionable. However the Council is able to consider whether there are exceptional circumstances warranting any enabling development in the Green Belt through a planning application for remedial works. This would be different to considering this as a residential (or employment) development opportunity.
Para 2.4	024f	<u>Objection on the grounds of soundness</u> CPRE says the figure of 4,465 for dwelling supply is an underestimate of likely completions between 2012 and 2027. Plan's Housing Target would be exceeded by 475 dwellings (12% of Housing Target) but there is no reference to this oversupply being used to meet the needs of adjoining authorities which may be unable to meet their own needs outside the Green Belt. Amend paragraph and Table1 to include a higher revised figure and indicate that the Plan would contribute to meeting the housing needs of adjacent areas as a result of the excess of Housing Supply over Housing Target. (see also 024g Table 1)	<u>No change required</u> The estimate is a realistic assessment of what may be delivered. The estimate is reviewed annually. The apparent oversupply is an oversupply in relation to the Core Strategy target, which itself must be reviewed. The review of the Core Strategy will start by estimating objectively assessed housing need. If DCLG forecasts are taken as a proxy for that, it is self-evident that more housing would be required, and that any notional oversupply would be contributing to needs arising in Hertsmere, not to any other authority. Any target is of course a minimum and can be exceeded.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Table 1 Site Allocations in relation to the Housing Supply 2012 - 2027	018d	<u>General Comment</u> Elstree and Borehamwood Town Council say the number of dwelling units in Table 1 for the Elstree Way Corridor is lower than expected. They understood it to be around 1800 units.	<u>Comment noted</u> The estimate of dwellings coming forward in the Corridor is taken from evidence to the Examination into the Area Action Plan. It is listed in Table 1 SADM – i.e. the entry for the Corridor and Note 4: the total, excluding any completions, is 1,174 (2012/13-2026/27).
Table 1 Site Allocations in relation to the Housing Supply 2012 - 2027	024g	<u>Objection on the grounds of soundness</u> CPRE says table 1 does not correctly reflect the likely scale of new residential development, in particular under ‘Windfall’ development. The information used to calculate windfalls is out of date and fails to take into account current Government Planning Policy and recent changes too. Table 1 doesn’t reflect increased supply from windfalls from redevelopment of Green Belt PDL, the change of use of sites and buildings to residential, continuation of prior approval for change of use from office to residential, or for other changes of use to residential now permitted. The Council’s assumptions about the duration of windfall supply are unrealistic given proximity to London and the Green Belt. The methodology used to create Table 1 should be reconsidered and Table 1 revised.	<u>No change required</u> The estimate of windfall development is a realistic assessment of what may be delivered. The estimate is reviewed annually. It takes account of all sources. It is accepted that completions from different sources will fluctuate. However the Council considers the overall estimate and explanation provided in the Background paper to SADM Table 1 SADM are reasonable.
Housing allocations	029a	<u>General Comment</u> Heronslea notes the proposed housing sites	<u>Comment noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Policy SADM1	036b	<u>Supports the Policy</u> Savills for Thames Water supports the addition of references to the need to assess waste water infrastructure capacity within the site specific requirements for sites.	<u>Supports noted</u>
Policy SADM1	018e	<u>Objection on the grounds of soundness</u> Elstree and Borehamwood Town Council have concerns that restrictions on H9 are not applied to Borehamwood sites (i.e. semi-detached, 2-storey dwellings)	<u>No change required</u> All sites have been considered in terms of their local character and future potential. The former Sunnybank School (H9) site is no different. What is different is its particular circumstances. The relationship between housing and the proposed open space, site accessibility and the character of the surrounding area (including the presence of a Conservation Area) have affected the requirements imposed on Housing Proposal H9.
Policy SADM1	058k	<u>Objection on the grounds of soundness</u> Elstree and Borehamwood Green Belt Society says Sunny Bank School site (H9) includes caveat on dwelling types & spaciousness. No developments in Borehamwood have similar restrictions.	<u>No change required</u> All sites have been considered in terms of their local character and future potential. Also see response above.
SADM1 - Site H1 Directors Arm, Borehamwood	036c	<u>Objection on the grounds of soundness</u> Savills for Thames Water request the addition of updated waste water comments to Site Specific Requirements.	<u>No change required</u> Although Proposal H1 and Policy SADM18 sufficiently cover the matter for the plan, the extra information is noted.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
SADM1 - Site H1 Directors Arm, Borehamwood	058i	<u>Objection on the grounds of soundness</u> Elstree and Borehamwood Green Belt Society say the site could also provide a GP surgery.	<u>No change required</u> In theory this is true. But there is no particular reason why the proposed housing use should not be pursued, and no known demand from GP practitioners to use this land.
SADM1 - Site H2 Gas Holders site, Station Road, Borehamwood	036d	<u>Objection on the grounds of soundness</u> Savills for Thames Water request the addition of updated waste water comments to Site Specific Requirements.	<u>No change required</u> Although Proposal H1 and Policy SADM18 sufficiently cover the matter for the plan, the extra information is noted.
SADM1 - Site H2 Gas Holders site, Station Road, Borehamwood	058j	<u>General Comment</u> Elstree and Borehamwood Green Belt Society say traffic problems are expected.	<u>Comment noted</u>
SADM1 - Site H2 Gas Holders site, Station Road, Borehamwood	009a	<u>Objection on the grounds of soundness</u> The Environment Agency requires evidence of flooding. Sequential test required for housing sites. <u>Following the further discussions this objection has been withdrawn.</u>	<u>No change required</u> A report explaining the sequential and exceptions tests for site H2 has been prepared and agreed by the EA. A revised representation has been received from the EA (see ref 009I).
SADM1 - Site H2 Gas Holders site, Station Road, Borehamwood	009I	<u>Supports the Policy</u> The Environment Agency has received evidence that the flood risk Sequential Test has been applied and passed. All development is to be located within Flood Zone 1 on this site and we can now fully support this site allocation.	<u>Supports noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
SADM1 - Site H3 Land south of Elstree and Borehamwood Station	036e	<u>Objection on the grounds of soundness</u> Savills for Thames Water request the addition of updated waste water comments to Site Specific Requirements.	<u>No change required</u> Although Proposal H3 and Policy SADM18 sufficiently cover the matter for the plan, the extra information is noted. This site now has planning approval (HBC ref. 14/1111/FUL).
SADM1 - Site H3 Land south of Elstree and Borehamwood Station	058h	<u>General Comment</u> Elstree and Borehamwood Green Belt Society say Taylor Wimpey have submitted proposal to Network Rail to ensure homes do not slip onto track. S106 from development will be spent on WHVG (Woodcock Hill Village Green) around £35k.	<u>Comment noted</u>
SADM1 - Site H4 Land at Bushey Hall Golf Club, Bushey	036f	<u>Objection on the grounds of soundness</u> Savills for Thames Water request the addition of updated waste water comments to Site Specific Requirements.	<u>No change required</u> Although Proposal H4 and Policy SADM18 sufficiently cover the matter for the plan, the extra information is noted.
SADM1 - Site H5 Land at Rossway Drive, Bushey	011a	<u>Supports the Policy</u> Historic England welcome the criteria and support the reference to Appendix F.	<u>Support noted</u>
SADM1 - Site H5 Land at Rossway Drive, Bushey	036o	<u>General Comment</u> Savills for Thames Water say on the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	<u>Comment noted</u>
SADM1 - Site H6 Hertswood Upper School, Thrift Farm Lane,	013a	<u>Supports the Policy</u> Sport England welcomes the changes made.	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Borehamwood			
SADM1 - Site H6 Hertswood Upper School, Thrift Farm Lane, Borehamwood	022a	<u>Objection on the grounds of soundness</u> Hertswood Academy Headteacher says site capacity should be increased to 310.	<u>No change required</u> 276 is a capacity estimate, a policy guideline, rather than a precise figure. It is there to be tested in relation to the present application or any subsequent one. The present application has been approved subject to conditions and planning obligations, and is a departure from the development plan.
SADM1 - Site H6 Hertswood Upper School, Thrift Farm Lane, Borehamwood	022b	<u>Objection on the grounds of soundness</u> Hertswood Academy Headteacher says provision of sheltered units has never been part of development discussions. Would be 'grave implications' for overall viability of the scheme and enabling delivery of the new academy.	<u>No change required</u> This criterion follows Core Strategy Policy CS7 on the housing mix. It is there to be tested in relation to the present application or any subsequent one. The present application has been approved subject to conditions and planning obligations, and is a departure from the development plan.
SADM1 - Site H6 Hertswood Upper School, Thrift Farm Lane, Borehamwood	022c	<u>Objection on the grounds of soundness</u> Hertswood Academy Headteacher says the Studio Way access is not deliverable. Scheme proposes 2 accesses from Shenley Road and an internal loop road – Highway Authority supports this.	<u>No change required</u> This is a preference rather than a requirement. It is therefore optional in relation to the present application or any subsequent one.
SADM1 - Site H6 Hertswood Upper School,	022d	<u>Objection on the grounds of soundness</u> Hertswood Academy Headteacher says deculverting is not possible without significant implications for	<u>No change required</u> This criterion follows Environment Agency advice and Policy SADM14. It is there to be

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Thrift Farm Lane, Borehamwood		viability of the overall project. Watercourse will remain in a culvert.	tested in relation to the present application or any subsequent one. The present application has been approved subject to conditions and planning obligations, and is a departure from the development plan.
SADM1 - Site H6 Hertswood Upper School, Thrift Farm Lane, Borehamwood	026b	<u>Objection on the grounds of soundness</u> HCC Development Services say need to see proposals for H6 in context of increasing need for primary places. Failure to identify alternative site for primary school means Maxwell Park site will need to be relied upon for primary school provision. Although HBC would prefer another site it would be hard to argue Very Special Circumstances for a Green Belt site (adjoining Hertswood Academy northern site) when there is reserve site in Maxwell Park and this (H6) education land is being proposed for housing. Site for school should be identified through the local plan process.	<u>No change required</u> The comment is noted. The Council does not consider the case for the allocation of an additional site for a new primary school to be clear but will continue to work with HCC to investigate options other than Maxwell Park to accommodate additional primary school requirements in Borehamwood. HCC (the Local Education Authority) has been encouraged to investigate the possibility of the Green Belt site referred to being made available for a primary school but little progress appears to have been made. In the absence of any agreement between the County Council and the landowner, Hertsmer Borough Council would not want to allocate the site. Were it to be established by HCC that the site could be made available for education purposes, the planning application, and hence whether the case for very special

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			circumstances had, if required, been demonstrated, would be determined by the appropriate local planning authority, taking all relevant factors into consideration.
SADM1 - Site H6 Hertswood Upper School, Thrift Farm Lane, Borehamwood	036g	<u>Objection on the grounds of soundness</u> Savills for Thames Water request the addition of updated waste water comments to Site Specific Requirements.	<u>No change required</u> Although Proposal H6 and Policy SADM18 sufficiently cover the matter for the plan, the extra information is noted. This site now has planning approval.
SADM1 - Site H7 Land at Lincolnsfield, Bushey	009b	<u>Objection on the grounds of soundness</u> The Environment Agency require evidence of flooding Sequential test required for housing sites <u>Following the further correspondence with the EA this objection has been withdrawn.</u>	<u>No change required</u> A report explaining the sequential and exceptions tests for site H7 has been prepared and agreed by the EA. A revised representation has been received from the EA (see ref 009m)
SADM1 - Site H7 Land at Lincolnsfield, Bushey	009m	<u>Supports the Policy</u> The Environment Agency has received evidence that the flood risk Sequential Test has been applied and passed. All development is to be located within Flood Zone 1 on this site and we can now fully support this site allocation.	<u>Support noted.</u>
SADM1 - Site H7 Land at Lincolnsfield, Bushey	036h	<u>Objection on the grounds of soundness</u> Savills for Thames Water request the addition of updated waste water comments to Site Specific Requirements.	<u>No change required</u> Although Proposal H7 and Policy SADM18 sufficiently cover the matter for the plan, the extra information is noted. This site now has planning approval.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
SADM1 - Site H7 Land at Lincolnsfield, Bushey	040a	<u>Supports the Policy</u> Planning Works for Rachel Charitable Trust support the allocation for housing (but see 040b below)	<u>Support noted.</u>
SADM1 - Site H7 Land at Lincolnsfield, Bushey	040b	<u>Objection on the grounds of soundness</u> Planning Works for Rachel Charitable Trust want an increase in the site area and capacity (from 23 to 30). Flooding constraint not as significant as previously thought.	<u>No change required</u> This is a sensitive Green Belt site. The planning permission is for 23 units (an increase on the site's estimated capacity in the Consultation Draft). There is no good reason to extend the site area or increase the site's capacity, irrespective of the flood risk.
SADM1 - Site H8 Europcar House, Aldenharn Road, Bushey	020a	<u>Objection on the grounds of soundness</u> Nathaniel Lichfield & Partners for Locksbridge Estates want the capacity indicated in the Site Specific Requirements increased. PD would give 40 units, DM have viewed 60/70 units positively.	<u>Change required</u> The capacity of the site will vary according to: a) whether the site is cleared and redeveloped in a manner consistent with the adjoining residential area – hence 19 is an appropriate net capacity; or b) whether buildings are converted, mainly into flats - a net capacity of 40 reflecting a prior approval (permitted development) determination might be considered a reasonable guide. For the calculation of net capacity and contribution to achievement of the Core

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			strategy housing target, the more conservative figure of 19 has been selected. However in the circumstances, it would be appropriate to add the following text to the end of the site specific requirements: <u>“A prior approval notice has been given for conversion of the existing offices into 40 flats, suggesting that the estimated number of dwellings could be substantially exceeded.”</u>
SADM1 - Site H8 Europcar House, Aldenham Road, Bushey	036i	<u>Objection on the grounds of soundness</u> Savills for Thames Water request the addition of updated waste water comments to Site Specific Requirements.	<u>No change required</u> Although Proposal H8 and Policy SADM18 sufficiently cover the matter for the plan, the extra information is noted. The site also has a prior approval for conversion of the offices to residential.
SADM1 - Site H9 former Sunny Bank School, Potters Bar	011b	<u>Supports the Policy</u> Historic England welcome the criteria and support the reference to Appendix F.	<u>Support noted</u>
SADM1 - Site H9 former Sunny Bank School,	013b	<u>Supports the Policy</u> Sport England welcomes the changes made.	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Potters Bar			
SADM1 - Site H9 former Sunny Bank School, Potters Bar	015a	<u>General Comment</u> Individual representation encouraged that primary access to be via Field View Road	<u>Comment noted</u> Primary access to the site is likely to be from Field View Road.
SADM1 - Site H9 former Sunny Bank School, Potters Bar	015b	<u>General Comment</u> Individual representation asking if the large oak tree will have a TPO placed on it (categorised grade A1 by Arboricultural Survey in relation to planning application for work at adjoining Education Support Centre). This would be consistent with Policy SADM13.	<u>Comment noted</u>
SADM1 - Site H9 former Sunny Bank School, Potters Bar	015c	<u>General Comment</u> Individual representation asking that very careful consideration is given to the problem of water run-off from the site. (photos of recent flooding submitted)	<u>Comment noted</u> Run-off is acknowledged as an issue and needs to be addressed through the development proposal. SADM policy 15 and 16 provide sufficient policy cover over this matter.
SADM1 - Site H9 former Sunny Bank School, Potters Bar	026d	<u>Objection on the grounds of soundness</u> HCC Development Services objects to open space requirement and for developer to make a contribution to its cost. Full reps considered under SADM33 C1 (See 026e, g, h, l, j for further details) (allocation for residential development is welcomed – see 026f under para 4.76).	<u>No change required</u> The provision of open space is a part of a balanced proposal, following which the Council considers it reasonable to realign the Green Belt boundary. An alternative approach would be to retain the playing field within the Green Belt. Also see responses to 026e, g, h, l, j (SADM33 Proposal Site C1).

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
SADM1 - Site H9 former Sunny Bank School, Potters Bar	036p	<u>General Comment</u> Savills for Thames Water say on the information available to date they do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	<u>Comment noted</u>
SADM1 - Site H9 former Sunny Bank School, Potters Bar	050a	<u>Objection on the grounds of soundness</u> Individual representation re-submitting Consultation Draft stage objection (which was submitted on behalf of 54 Residents). Further commented that HBC response at Consultation Draft stage was inadequate, failed to answer all issues raised (particular examples include impact of construction traffic, compensation for disruption). Incorrect info re doctor surgery and bus stop still relied upon. Support retention of open space but concerned that this is only a temporary measure.	<u>No change required</u> The Council's proposal effectively allows reuse and redevelopment of the developed part of the site, and retention of the open space. This is considered completely reasonable. The issues raised at Consultation Draft stage were all answered insofar as possible at that time. The highway authority has advised on the access and the effect of traffic, and raises no objection in principle. There would be a period of some inconvenience inevitable with any development construction: this should be kept to a minimum with the co-operation of the builder, and it is difficult to see where any issue of compensation could arise. It would not be a planning matter. The critical point is the support for the retention of the open space, the effect of which limits the impact of residential development.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
SADM1 - Site H9 former Sunny Bank School, Potters Bar	053a	<u>Objection on the grounds of soundness</u> Individual representation objecting to development - main concern is traffic and impact of construction.	<u>No change required</u> The highway authority has advised on the access and the effect of traffic, and raises no objection in principle. There will however need to be a more detailed r transport assessment with any planning application.
SADM1 - Site H10 Birchville Court and haulage yard, Heathbourne Road, Bushey Heath	031a	<u>Supports the Policy</u> AKT Planning for Mr Donal McCarthy supports the allocation for housing (but object to capacity figure – see 031b below).	<u>Support noted</u>
SADM1 - Site H10 Birchville Court and haulage yard, Heathbourne Road, Bushey Heath	031b	<u>Objection on the grounds of soundness</u> AKT Planning for Mr Donal McCarthy say increase site capacity to 31 dwellings.	<u>Change required</u> The dwellings estimate relates to the character of the built development, whether a flatted scheme as originally contemplated by the Council in the Consultation Draft, or the permitted scheme of 17 houses. For the calculation of net capacity and contribution to achievement of the Core Strategy housing target, the more conservative figure of 17 has been selected. It may however be reasonable to add, to the follow text in the Site specific

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			requirements: <u>“The estimated number of dwellings for the site is based on an existing planning permission: any appropriate scheme comprising a large proportion of flats is likely to increase that number.”</u>
SADM1 - Site H10 Birchville Court and haulage yard, Heathbourne Road, Bushey Heath	031c	<u>Objection on the grounds of soundness</u> AKT Planning for Mr Donal McCarthy say enlarge site to include Birchville Cottage (currently Safeguarded) and further increase capacity to 38 dwellings. However a housing proposal is identified at Birchville Court Nursing Home (and adjoining haulage yard). If this is supported the area of land safeguarded should be reduced in extent.	<u>No change required</u> Where existing local plans are being revised and updated, existing Green Belt boundaries should not be changed unless exceptional circumstances exist which necessitate such revision. This also applies to the release of safeguarded land. The Council has reviewed the safeguarded land along Heathbourne Road. It concludes that development of Proposal Site H11 is on balance reasonable by removing a haulage yard and taking account of the owner’s intention to replace/ redevelop Birchville Court residential nursing home. As no further land is needed to meet the Core Strategy housing target, the remaining safeguarded land designation north of Birchville Court should remain. There is no obvious reason why Birchville Cottage should be included

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			in H11. In fact its exclusion may actually help to break up what could become a major block of development along Heathbourne Road.
SADM1 - Site H10 Birchville Court and haulage yard, Heathbourne Road, Bushey Heath	036m	<u>General Comment</u> Savills for Thames Water say on the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	<u>Comment noted</u>
SADM1 - Site H10 Birchville Court and haulage yard, Heathbourne Road, Bushey Heath	974c	<u>General Comment</u> Individual representation (LATE REP) from neighbour opposite. No objection in principle but see 974d below.	<u>Comment noted</u>
SADM1 - Site H10 Birchville Court and haulage yard, Heathbourne Road, Bushey Heath	974d	<u>Objection on the grounds of soundness</u> Individual representation (LATE REP) from neighbour opposite. Don't think site can take 39 dwellings whilst allowing for open views. Out of character with area. Concerned about tenure – this area should 'retain its sense of character.'	<u>No change required</u> The concerns are to some extent shared – see above responses to 031b and 031c. Affordable housing is quite widely defined. The design of buildings should be 'tenure-blind', so it is difficult to see why affordable homes should be out of character.
SADM1 - Site H11 Elton House,	036j	<u>Objection on the grounds of soundness</u> Individual Savills for Thames Water say there are	<u>Change required</u> Although Policy SADM18 sufficiently

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Elton Way, Bushey		concerns in relation to waste water network capacity for site H11 and as such text on the need for assessment of waste water capacity should be added to the site specific requirements for this site.	covers the matter for the plan, the extra information is noted. The site has planning approval for demolition and redevelopment of 102 homes (HBC ref. 14/0911/FUL). The following text should be added to the site specific requirements for consistency: <u>The adequacy of waste water capacity is to be assessed: adequate capacity should be made available before development is occupied.</u>
SADM1 - H12 First Place Nurseries, Falconer Road, Bushey	036n	<u>General Comment</u> Savills for Thames Water say on the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	<u>Comment noted</u>
SADM1 - H12 First Place Nurseries, Falconer Road, Bushey	043a	<u>Supports the Policy</u> DLA Town Planning for Inland Homes supports the allocation for housing (but changes to detail needed – see 043 b-e below).	<u>Support noted</u>
SADM1 - H12 First Place Nurseries, Falconer Road, Bushey	043c	<u>Objection on the grounds of soundness</u> DLA Town Planning for Inland Homes says it must be clear that development on the hardstanding area is allowed. Remove ‘and associated hardstanding’ from Site Specific Requirements.	<u>Change required</u> It is agreed that some development must be expected on the hardstanding in order to achieve around 10 dwelling. Delete the text specified from the first sentence of

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			the Site specific requirements. Removal of former swimming pool building (currently used by the Nursery) and associated hardstanding.
SADM1 - H12 First Place Nurseries, Falconer Road, Bushey	043d	<u>Objection on the grounds of soundness</u> DLA Town Planning for Inland Homes says site capacity requirement should be amended to ‘The capacity estimate of 10 dwellings is given as a round figure and may increase through the design process, subject to Green Belt openness considerations.’	<u>No change required</u> 10 is a reasonable estimate of capacity and is a guideline.
SADM1 - H12 First Place Nurseries, Falconer Road, Bushey	043e	<u>Objection on the grounds of soundness</u> DLA Town Planning for Inland Homes says CS19 position needs resolving – requirements of CS19 conflict with Council’s aim to deliver housing on the site (removing the former swimming pool building currently occupied by the nursery). Amend Site Specific Requirements to “In order to deliver housing on this site and secure the removal of the former swimming pool building, the Council will work with the nursery operator and promoter of this site to secure appropriate alternative premises for the nursery use.”	<u>No change required</u> The nursery is a well-established concern and the Council does not wish to see it lost. This is entirely consistent with Core Strategy Policy CS19. The site specific requirement limits the application of the principle to the nursery use (and not any community use).
Additional site proposed -	019a	<u>Objection on the grounds of soundness</u> Phillips Planning Services on behalf of the site	<u>No change required</u> The purpose of the SADM Plan is to deliver

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Starveacres, 16 Watford Road, Radlett		owners want the Council to allocate SADM2 safeguarded site Starveacres for 55 dwellings	the housing target set in the Core Strategy, and as shown in Table 1 in SADM the Council has an adequate supply of housing against this target. Where existing local plans are being revised and updated, existing Green Belt boundaries should not be changed unless exceptional circumstances exist which necessitate such revision. This also applies to the release of safeguarded land. The Council has reviewed the safeguarded land. As this land is not needed to meet the Core Strategy housing target, there is no need to remove it from its safeguarded status. The designation should therefore remain. Whether the land should continue to be safeguarded or brought forward for housing development is more appropriately addressed through the forthcoming review of the Core Strategy: this is the point when the Council will be weighing up housing (and employment) needs for which the latest studies are almost complete, and reassessing the Green Belt.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Additional site proposed - Blackhorse Lane South Mimms	027b	<u>Objection on the grounds of soundness</u> Aylward Town Planning for King and Co request site be allocated for residential (affordable led – at least 50%). SADM and Core Strategy highlight pressing need for affordable housing. Previous assessment failed to properly assess site and give weight to the need to deliver affordable housing. Site Specific Requirements can include development being affordable led. (see also request for village infill boundary to be extended - representation 027a)	<u>No change required</u> The purpose of the SADM Plan is to deliver the housing target set in the Core Strategy, and as shown in Table 1 in SADM the Council has an adequate supply of housing against this target. The proposal does not in the Council's view represent a rural exceptions site, and the proposition that half the housing would be affordable does not warrant its release from the Green Belt. See also the fuller response given to Objection 027b under Policy SADM24 South Mimms Village Envelope.
Additional site proposed - Adj Wilton End Cottage, Shenley	054a	<u>Objection on the grounds of soundness</u> Owners of Wilton End Cottage want their land allocated for housing. The land is available. It could readily accommodate 36 dwellings, fulfilling the need for housing for older people, general needs and with some affordable housing. Sustainable location.	<u>No change required</u> The purpose of the SADM Plan is to deliver the housing target set in the Core Strategy, and as shown in Table 1 in SADM the Council has an adequate supply of housing against this target. The area lies within the Green Belt. The present Green Belt boundary is clear and defensible as it is. 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.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			Also see response to Objection 054b at paragraph 1.6: this acknowledges that the appropriate time to review the Green Belt is when the Core Strategy is itself reviewed. Initial evidence covering housing and employment needs is in preparation.
Additional site proposed - r/o Spinneys, Hillside Cottage Loom Lane and The Ridgeway	055a	<u>Objection on the grounds of soundness</u> Maze Planning for Relic Homes says the site should be included in a future assessment of potential new residential sites. This site could alternatively be allocated for housing now. It could deliver 15-20 small units, which would enable some affordable housing provision to be delivered elsewhere.	<u>No change required</u> The purpose of the SADM Plan is to deliver the housing target set in the Core Strategy, and as shown in Table 1 in SADM the Council has an adequate supply of housing against this target. The area lies within the Green Belt. Developing this site would entail a significant Green Belt release. It is not needed to deliver the Core Strategy housing target and is therefore inappropriate. However it is not unreasonable to consider the future of the site in the context of the Core Strategy review – i.e. in the context of a reassessment of housing and employment development needs and the contribution that different parts of the Green Belt make to the Metropolitan Green Belt.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Additional site proposed - Croxdale Road, Borehamwood	056a	<u>Objection on the grounds of soundness</u> Barratt David Wilson North Thames want Croxdale Road allocated for housing in order to enable the provision of a new sports ground and facilities at Home Farm. Current sports facilities don't meet Sport England's minimum standards. The Strategic Housing Land Availability Assessment (SHLAA) considered Croxdale Road site suitable; it is available, achievable, deliverable, and developable. Help meet shortage of Affordable homes.	<u>No change required</u> It is acknowledged that the demand for housing is strong and there is a high need for affordable housing; however the site is not needed to meet the Core Strategy housing target as Table 1 in SADM outlines. The inclusion of land in a SHLAA allows for a technical assessment, and conveys no support by the Council for its development. The Council gave full consideration to a similar representation at Consultation Draft stage. This included consideration of competing needs and the character of the local area. The Council concluded in July 2015 (Report of Consultation for the draft SADM document) 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

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			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 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.”
Additional site proposed - Land north of Barnet Lane	056b	<u>Objection on the grounds of soundness</u> Barratt David Wilson North Thames wants the site allocated for housing development: the vision is of a retirement village offering care home places and separate apartments. The site has previously been	<u>No change required</u> The purpose of the SADM Plan is to deliver the housing target set in the Core Strategy, and as shown in Table 1 in SADM the Council has an adequate supply of

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		promoted for residential with part being reserved for a school. Sustainable location. Site is suitable, available and achievable within 5 years.	housing against this target. New housing and care homes may be provided and can be accommodated within the urban area. The proposed site lies within the Green Belt. Developing this site would entail a significant Green Belt release and would bring into question the future of a much wider area of Green Belt. It would be inappropriate development and contrary to the Core Strategy. The Council acknowledges that it would be more appropriate to consider the future of the site in the context of the Core Strategy review – i.e. in the context of a reassessment of housing and employment development needs and the contribution that different parts of the Green Belt make to the Metropolitan Green Belt. That consideration, of course, would be without prejudice to the outcome.
Additional site proposed - Manor Way sites	044a	<u>Objection on the grounds of soundness</u> Two sites, Elstree Way WD6 1RN and Manor Point, Manor Way WD6 1EU should be allocated for housing and removed from the current employment use designation. Hertsmere Council agree the sites are suitable for residential or residential-led mixed use development and the site is deliverable.	<u>No change required</u> Following the call for sites, the sites were assessed for their suitability but these particular sites do not make up any of the supply which makes up Table 1 in SADM. To do so, would require further changes to the boundary of the employment area and

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			at present, there is no need to release designated employment land which remains in use, in order to meet the housing target set out in the Core Strategy. That is regardless of whether that land is potentially suitable for residential use. An economy study being prepared to inform the Core Strategy will identify whether there is justification for reviewing the overall quantum and location of designated employment land in the borough.
Para 2.10	024l	<u>Objection on the grounds of soundness</u> CPRE says the current wording does not make it clear that safeguarded land will continue to be subject to Green Belt policies, to be reviewed in a future Development Plan. Amend wording therefore.	<u>No change required</u> The policy is quite clear that safeguarded land will only be released in the event that a review of this plan indicates the land is needed. It does not need to be repeated in the reasoned justification.
Para 2.11 (e)	018f	<u>Supports the Policy</u> Elstree and Borehamwood Town Council welcomes the village green at Byron Ave/Vale Avenue being designated Green Belt.	<u>Support noted</u>
	058l	<u>Supports the Policy</u> The Elstree and Borehamwood Green Belt Society acknowledges the village green status of Byron Ave/Vale Avenue.	<u>Support noted</u>
Policy SADM2 Safeguarded	024m	<u>Objection on the grounds of soundness</u> CPRE says there is insufficient clarity in terms of	<u>No change required</u> The policy is quite clear that safeguarded

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Land for Housing		what would be 'inappropriate' development pending a decision on their long term future. Amend wording of the final sentence on Policy SADM 2 to '...there will be a presumption against development that would be treated as inappropriate under the terms of the policies set out in part 9 of the NPPF.'	land will be treated as if it is in the Green Belt. It does not need to be repeated in the reasoned justification.
SADM2 - b) Land bounded by Heathbourne Road, Windmill Lane and Clay Lane, Bushey	974a	<u>General Comment</u> Individual representation (LATE REP) from neighbour opposite. Concern about type of development and whether it will be in character with the area. Implications for traffic and siting of existing mast of concern.	<u>Comment noted</u> There are three proposals on the western side of Heathbourne Road (from south to north): ▪ The removal of Proposal H10 from safeguarded land status and allowing redevelopment. Site specific requirements will help assimilate development – detailed assessments are made at planning application stage. Permission has already been given for 17 units, though the number could increase were a scheme to be brought forward with more flats. ▪ The retention of the remaining safeguarded land from Birchville Cottage to Greenacres House as is – the Council is <u>not</u> proposing any

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			development or change here. However, should a planning application be submitted it would be assessed on the basis of current policy. The local highway authority would advise on highway issues and access: the character of the road and its status as a main (distributor) road would be important considerations. ▪ The exclusion of the already developed Spire Hospital site from the Green Belt.
SADM2 - c) Starveacres, 16 Watford Road, Radlett	019b	<u>Objection on the grounds of soundness</u> Phillips Planning Services on behalf of the site owners want the Council to allocate SADM2 safeguarded site Starveacres for 55 dwellings	<u>No change required</u> The purpose of the SADM Plan is to deliver the housing target set in the Core Strategy, and as shown in Table 1 in SADM the Council has an adequate supply of housing against this target. As this land is not needed to meet the Core Strategy housing target, there is no need to remove it from its safeguarded status. The designation should therefore remain. Also see response to 019a in relation to 'Other Sites Proposed' above.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Additional site proposed - Adj. Wilton End Cottage, Shenley	054c	<u>Objection on the grounds of soundness</u> Owners of Wilton End Cottage want their land identified as Safeguarded for housing. Some Safeguarded land has been removed from SADM2, some may not be available. Risk that insufficient safeguarded land identified in Plan. This site has no constraints, could accommodate 36 dwellings. Fulfil need for housing for older people, or general needs, some Affordable Housing. Sustainable location.	<u>No change required</u> The purpose of the SADM Plan is to deliver the housing target set in the Core Strategy, and as shown in Table 1 in SADM the Council has an adequate supply of housing against this target, without using any safeguarded land. Safeguarded land is effectively treated as Green Belt until it is needed and is part of a long term reservoir of potential development land for beyond the plan period. Safeguarded land should itself be identified, where appropriate, upon review of a local plan. Its release for development should also be upon review of the local plan, according to Government advice (para 85, National Planning Policy Framework). The Core Strategy would be the first such review. Also see response to Objection 054b at paragraph 1.6.
Para 2.17	024b	<u>Objection on the grounds of soundness</u> CPRE says Paragraph 2.17 states that current policy to encourage change of use of various categories of land use to residential is temporary, and that its consequences should not be allowed for in the Plan. Delete 'temporary' reference and reconsider consequential housing supply figures (Government	<u>No change required</u> The purpose of the SADM Plan is to deliver the housing target set in the Core Strategy, and as shown in Table 1 in SADM the Council has an adequate supply of housing against this target, without using any safeguarded land. Safeguarded land is

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		policy shift will continue to facilitate the provision of many new dwellings in locations not previously envisaged by the Council). A similar change should be made to the final sentence of paragraph 3.2 (rep 024d).	effectively treated as Green Belt until it is needed and is part of a long term reservoir of potential development land for beyond the plan period. Safeguarded land should itself be identified, where appropriate, upon review of a local plan. Its release for development should also be upon review of the local plan, according to Government advice (para 85, National Planning Policy Framework). The Core Strategy would be the first such review. Also see response to Objection 054b at paragraph 1.6.
Para 2.18	018g	<u>Objection on the grounds of soundness</u> Elstree and Borehamwood Town council supports more family sized dwellings rather than smaller units (to reflect local need).	<u>No change required</u> Core Strategy Policy CS7 addresses housing mix. All types of housing are considered to be needed. The size and character of property that is suitable on any given site inevitably varies.
Para 2.18	035a	<u>Objection on the grounds of soundness</u> Aldenham Parish Council says Radlett needs smaller not larger homes.	<u>No change required</u> Core Strategy Policy CS7 addresses housing mix. The size and character of property that is suitable on any given site inevitably varies. The statement in paragraph 2.18 is factually correct and relates to the borough as a whole. However, it is acknowledged that needs

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			do vary across the borough and that the strongest need is for 1 and 2 bedroom property.
Para 2.18	058c	<u>Objection on the grounds of soundness</u> Elstree and Borehamwood Green Belt Society say there are not enough family homes coming forward.	<u>No change required</u> Core Strategy Policy CS7 addresses housing mix. All types of housing are considered to be needed. The size and character of property that is suitable on any given site inevitably varies.
Policy SADM3 Residential Developments	024i	<u>Objection on the grounds of soundness</u> CPRE says para 2.16 states that redevelopment of sites to create flats may be acceptable in 'existing urban areas', implying that this would not be the case in other residential areas including in villages and smaller settlements in the Green Belt. What are 'existing urban areas'? Amend Policy to include a caveat that redevelopment for flats will not normally be permitted outside existing urban areas as defined in the Plan.	<u>No change required</u> The Core Strategy directs residential development to urban areas, i.e. not in the Green Belt. SAD3 is a positive policy supporting residential development in urban areas. Para 2.16 explains that conversion of buildings to residential and the redevelopment of sites are normally acceptable in urban areas (subject to certain conditions). These are precisely the messages the Council wishes to promote. Policies CS13 and SADM27 guide development in the Green Belt. They recognise that residential development is, subject to exceptions, inappropriate development. The local plan should be

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			read as a whole, and no change is warranted to the subsection on Housing Development.
Affordable Housing	029b	<u>General Comment</u> Heronslea welcome the opportunity to pay financial contributions on schemes between 5-10 units, however, these financial contributions must be based on viability evidence to make sure they are proportionate to the development.	<u>Comment noted</u>
Affordable Housing	058b	<u>General Comment</u> Elstree and Borehamwood Green Belt Society say developers will argue to build less than 35% Affordable Housing.	<u>Comment noted</u> This is why it is so important for the Council to require and check viability assessments, should a development propose less than the desired level of affordable housing.
Para 2.25	024a	<u>Objection on the grounds of soundness</u> CPRE says paragraph 2.25 is now incorrect following the removal from the NPPG of the restriction on scale of housing development to which the requirement for affordable homes can apply. Delete paragraph.	<u>Change required</u> The policy change which was consequential upon the Ministerial statement of November 2014 has been quashed, following a High Court judgement. The objector is correct. Delete paragraph 2.24 to 2.27 and SADM4.
Para 2.28-2.32	030a	<u>Objection on the grounds of soundness</u> Welwyn Hatfield Council say Council should identify sites to ensure delivery of 5 year supply and 10 years developable sites to meet tests of soundness.	<u>No change required</u> The Council has provided for the sites required under Core Strategy Policy CS6, and further provision will be supported in

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		<u>Following the preparation of a Statement of Common Ground, this objection has been withdrawn.</u>	appropriate places – ref Policies CS6 and SADM5. The Council is preparing a statement of common ground with this objector, in which the Council reaffirms its commitment to meeting the objectively assessed need for Gypsies and travellers wholly within its administrative boundary: the Council will review all the relevant planning policies and allocations as stated in paragraph 2.31; and longer term provision will be considered as part of the forthcoming Core Strategy review, including the potential to allocate land through any Green Belt assessment. Technical work on the Core Strategy review, which is programmed to be adopted by 2018, is now underway. Also see response to 030b below.
Para 2.31	006a	<u>General Comment</u> Hertfordshire Constabulary Crime Prevention Design Advisor supports smaller Gypsy sites rather than adding pitches to larger ones.	<u>Comment noted</u> On the whole this is a reasonable point. However most residential sites in Herts mere are small and all proposed increases, even at Sandy Lane (the largest site), would be small and within the sites' capacity. Where opportunity exists to consolidate the use of sites, it is

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			reasonable that is allowed to happen. Outward expansion may well be a different issue.
Para 2.32	030b	<u>Objection on the grounds of soundness</u> Welwyn Hatfield Council say Council should clarify approach to transit provision and provide evidence for none being required. <u>Following the preparation of a Statement of Common Ground, this objection has been withdrawn.</u>	<u>No change required</u> There is a transit site in the borough and no evidence of additional need for transit pitches according to the Gypsy and Traveller accommodation assessment, which the Council has commissioned and referred to in paragraph 2.31, but not yet published because of concerns of under-occupation by Gypsies and travellers at one large site distorting the conclusions. The draft assessment has been shared with Welwyn Hatfield Council on a confidential basis in order to prepare the statement of common ground.

Chapter Three: Employment and Economy

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
General	26k	<u>General Comment</u> Herts County Council Development Services have no comments to make.	<u>Comment noted</u>
Paragraph 3.2	24d	<u>Objection on the grounds of soundness</u> CPRE say the phrase on the change of use provisions being temporary in comparison with the timescale of the Plan should be amended to reflect the changes to Planning Regulations, including those that are permanent, and their intention to facilitate changes of use to residential.	<u>No change required</u> The Government announced, through a Ministerial Statement in October 2015, that the temporary provisions on permitted development were to be made permanent. However further details, including potential exemptions, have not yet been published. As such it is not considered appropriate to make any further changes at this stage and probably until the required regulatory changes are introduced by the Government. The Council will put forward any necessary changes to the Inspector at the examination hearing when circumstances are clearer.
Policy SADM7 Key Employment Sites	42j	<u>Supports the Policy</u> Support flexible approach to future expansion of Centennial Park in Green Belt which borders Aldenham reservoir.	<u>Support noted</u>
Policy SADM8 – Locally	011c	<u>Supports the Policy</u> Historic Environment welcomes the policy.	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Significant Employment Sites			
Policy SADM8 – Locally Significant Employment Sites	011d	<u>Supports the Policy</u> Historic Environment welcomes the policy.	<u>Support noted</u>
Policy SADM8 – Locally Significant Employment Sites	011e	<u>Supports the Policy</u> Historic Environment welcomes the policy.	<u>Support noted</u>
Policy SADM8 – Locally Significant Employment Sites	011f	<u>Supports the Policy</u> Historic Environment welcomes the policy.	<u>Support noted</u>
Policy SADM9 Strategically Important Business Locations and Loss of Office Accommodation	29c	<u>Objection on the grounds of soundness</u> Heronslea say justification is required for the protection of B1(a) office space that exceeds 500 sqm as important office space would be protected under SADM6, SADM7 and SADM8 whilst the residential redevelopment of the Elstree Way Corridor would also conflict with this requirement. Redevelopment of office space is encouraged by the Government, for example, with the permitted development rights.	<u>No change required</u> Offices exceeding 500 sq m outside of designated areas are considered by the Council to be of importance given that there are a number of important, individual office buildings outside of designated areas in the borough e.g. Canada Life in Potters Bar, Imperial Place in Borehamwood.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			The areas identified in SADM6, SADM7 and SADM8 are those which have been identified, through the adopted Core Strategy, of being of particular significance in the borough but these policies provide little protection against Class O of the GPDO as currently worded. However, the government has indicated that any permanent introduction of permitted development rights for office to residential will include scope for valid exemptions to be applied (as is the case currently for changes of use from retail or B8) and so it is considered reasonable to include such provisions within SADM. It should be noted that the policy emphasises that its provisions only apply where planning permission or prior approval is required.
Policy SADM10 Safeguarded Land for Employment Development	058m	<u>General Comment</u> Elstree and Borehamwood Green Belt Society welcome the safeguarding policy (SADM) but want HBC to keep an eye on the project. Number of buildings, size of the community facility promised & access for the community are a cause for concern. Light pollution, noise pollution & flow of traffic must be carefully monitored.	<u>Comment noted</u> The Planning Committee (on 23 March 2015 (resolved to approve an outline application (14/1735/OUT) for a proposed sporting centre of excellence on the site, which agrees the principle of the development along with the access, with all other matters reserved. The issues

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			raised as causes for concern are matters which did not form part of the outline application so are 'reserved' for a future detailed application. This means that development of the site cannot go ahead without a reserved matters planning application being approved which will consider all the issues raised in the representation; layout, design, community facility, light, noise and traffic generation.
SADM10 - b) Land on Rowley Lane adj Elstree Way Employment Area	13c	<u>Objection on the grounds of soundness</u> Sport England say this potential loss of part of the site were it to come forward for employment development, without any mitigation, would result in the loss of land last used as playing fields. The fact that part of the site has not been used for playing fields for more than 5 years is not considered to be a material consideration. To address this it is requested that policy SADC10 (b) be amended to recognise that the land last used as 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 employment development was implemented and there is an identified need for new or improved playing field provision to meet current or future needs.	<u>Change required</u> It is recognised that the five year period relates to when Sport England are statutorily consulted but equally, there will eventually be a period of time, after which the use would have to be regarded as having been abandoned and it would be unreasonable to expect the retention or reprovision of playing fields. However, it is recognised that should the site be developed for employment purposes, following a review of the plan, that could occur prior to abandonment of the former use and so a change to paragraph 3.10 reflecting the views of Sport England is recommended. Suggested additional text to end of

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			paragraph 3.10 as follows: <u>Any future employment development would be expected to consider whether there is a need for new or improved playing field provision, in light of the previous use of the site and any current or future community playing fields needs.</u>
Policy SADM10 Safeguarded Land for Employment Development	24c	<u>Objection on the grounds of soundness</u> CPRE say the wording of Draft Policy SADM 10 does not provide sufficient clarity in terms of the meaning of development that would be ‘inappropriate’ pending a decision on their long term future. Suggest final sentence be edited to provide such clarification, as set out below, to avoid misinterpretation.	<u>No change required</u> The final paragraph of the previous paragraph in Policy SADM10 clarifies that the entirety of the land at Rowley Lane will be treated as if it were in the Green Belt and that inappropriate will not be approved unless in very special circumstances. However, the southern end of the site does contain a considerable amount of PDL and buildings where redevelopment (within the context of the NPPF) is capable of constituting appropriate development although it is not considered necessary to repeat what the NPPF states in terms of development having no greater impact on the openness of the Green Belt. As such, there is not considered to be a need for a further change in respect of the representation

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			received.
Policy SADM10 Safeguarded Land for Employment Development	24i	<u>Objection on the grounds of soundness</u> CPRE say the final paragraph of SADM 10 would allow part of the safeguarded land to be developed earlier than the rest of the site because it is already, in part, previously-developed land. There is no objection to this but while it is part of a safeguarded site it should still be subject to Green Belt policy, to which the remainder of the Rowley Lane site applies.	<u>No change required</u> The final paragraph of the previous paragraph in Policy SADM10 clarifies that the entirety of the land at Rowley Lane will be treated as if it were in the Green Belt and that inappropriate will not be approved unless in very special circumstances. However, the southern end of the site does contain a considerable amount of PDL and buildings where redevelopment (within the context of the NPPF) is capable of constituting appropriate development although it is not considered necessary to repeat what the NPPF states in terms of development having no greater impact on the openness of the Green Belt. As such, there is not considered to be a need for a further change in respect of the representation received.
Policy SADM10 Safeguarded Land for Employment Development	047a	<u>Supports the Policy</u> NLP for Legal and General supports reference to Centre of Sports Excellence	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Policy SADM10 Safeguarded Land for Employment Development	047b	<u>Objection on the grounds of soundness</u> To reflect the site's removal from the Green Belt and to ensure consistency of approach throughout the document, suggest that Policy SADM10 is amended as this reference to the Green Belt in the policy is unnecessary, unjustified, and inconsistent with the site's removal from the Green Belt.	<u>No change required</u> Notwithstanding the removal of this land from the Green Belt, its formal status as safeguarded land requires it to be treated as if it was in the Green Belt; the NPPF emphasises that such land should not be allocated for development at the present time. Therefore, until any formal review releases the land for B class employment development, permission for development should not be given <i>except in very special circumstances</i>. The resolution to grant permission for the Centre of Sports Excellence demonstrated very special circumstances and it is noted that the Secretary of State has chosen not to call in the application. As such, there is not considered to be a need to change the wording of the policy.

Chapter Four: Open Land and the Environment

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
General	042b	<u>Supports the Policy</u> CC Town Planning on behalf of Liberty Aldenham Ltd Commend approach to natural environment.	<u>Support noted</u>
General	042c	<u>Objection on the grounds of soundness</u> CC Town Planning on behalf of Liberty Aldenham Ltd say the Plan should be flexible in allowing development which will help achieve natural environment goals. Housing proposal would have long-term ecological benefits.	<u>No change required</u> It is considered that the natural environment policies contribute towards meeting Core Strategy objective 13 of protecting and enhancing local biodiversity and the NPPF objective that development should result in no net loss to biodiversity and where possible net gains. They are supported by Natural England. The Plan provides the scope for development to be permitted where it contributes towards these objectives. By its nature housing development on previously undeveloped sites is unlikely to contribute towards ecological improvements, particularly a proposal of the scale put forward (150 homes). It is for the applicants to put forward a strong argument for the ecological benefits of the proposal through the planning application process. Policy SADM11 allows for proposals on sensitive sites to employ mitigation measures to outweigh harm

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			caused, or to demonstrate that adequate compensatory measures will be provided and that the development will provide benefits which clearly outweigh the harm. It is considered that SADM11 provides sufficient scope to enable a case to be put forward through the planning application process.
General	042d	<u>Objection on the grounds of soundness</u> CC Town Planning on behalf of Liberty Aldenham Ltd say unique development scenarios, such as their Clients, could be catered for through and would benefit from, a reference within the DPD.	<u>No change required</u> Every planning application and development scenario is unique, so it is not possible to refer to one scenario specifically in the Plan when it is not a site that the Council is minded to allocate for development through the Plan. The Aldenham Reservoir site is not presently required to meet the housing target set in the Core Strategy 2013, and due to its location on undeveloped land in the Green Belt it is not compliant with current Local Plan policy or the NPPF. It is considered that it is not the place of the SADM Plan to provide a case of very special circumstances for selected unallocated Green Belt sites over others, and to do so would undermine the Green Belt policies in SADM, the Core Strategy

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			and the NPPF, particularly in light of the recent withdrawal of an outline planning application for up to 150 homes following a recommendation for refusal. The Council does not intend for the SADM Plan to cater for inappropriate development in the Green Belt which is not needed to deliver the Core Strategy housing target. All development scenarios are unique, and it is not the intention of the Plan to cater for or reference these, but to provide policies which can be applied to any development scenario.
Policy SADM11 Biodiversity and Habitats	003a	<u>Objection on the grounds of soundness</u> Herts and Middlesex Wildlife Trust say that the NPPF requires development should result in no net loss to biodiversity and where possible net gains. The text should also refer to the existence of biodiversity outside of designated sites and the Biodiversity Impact Assessment Calculator (BIAC) should be used by developers to quantify impacts on biodiversity and assess adequate mitigation/compensation measures in order to remove subjective judgements. Supporting text and SADM11 should reference this.	<u>Change required</u> To make sure the policy is in compliance with national guidance, the follow text should be added at the beginning of Policy SADM11: <u>There should be no net loss of biodiversity in terms of quantity, quality and connectivity as a result of any development proposals; wherever possible develop proposal should achieve net gains.</u> The Council will consider using the BIAC where appropriate.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Policy SADM11 Biodiversity and Habitats	010b	<u>Supports the Policy</u> Natural England support the policy	<u>Support noted</u>
Policy SADM11 Biodiversity and Habitats	017h 021j 037i	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say the policy duplicates national policy without adding anything local. Removing this policy will reduce the chances of the Plan being found unsound.	<u>No change required</u> Representor has not suggested any amended wording and the policy is supported by Natural England and is considered appropriate as it stands. The policy provides additional detail over the NPPF which, although it may apply elsewhere as well as in Hertsmere, is still applicable in the borough. The Natural Environment chapter of the PPG encourages LPAs to work collaboratively with partners including Local Nature Partnerships to deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence. This policy has been produced in consultation with Natural England and the Herts and Middlesex Wildlife Trust who form part of the Local Nature Partnership for Hertfordshire.
Policy SADM12 Landscape Character	010c	<u>Supports the Policy</u> Natural England support the policy	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Policy SADM13 Trees, Landscaping and Development	010d 035b	<u>Supports the Policy</u> Natural England and Aldenham Parish Council support this policy	<u>Support noted</u>
Policy SADM13 Trees, Landscaping and Development	017u 021w	<u>Objection on the grounds of soundness</u> Shire Consulting for 2 private education providers say remove this policy; it is not justified by evidence	<u>No change required</u> It is considered that policy SADM13 Trees, Landscaping and Development is necessary and expands on national policy. It is supported by statutory consultees.
Policy SADM14 The Water Environment	042e	<u>General Comment</u> CC Town Planning on behalf of Liberty Aldenham Ltd say that the proposed housing scheme would help achieve SADM14 and paras 4.14-4.49	<u>Comment noted</u> If the reservoir's original purpose of maintaining water levels in the Colne valley still applies, its retention would meet policy SADM14. However it is unclear how the proposed housing development would help achieve the objectives of SADM14 as a large-scale housing development on the site would lead to a larger amount of hardstanding and impermeable surfaces, more pollution and need for water supply and waste water infrastructure.
Policy SADM14 The Water Environment	009c 010e	<u>Supports the Policy</u> The Environment Agency (EA) and Natural England support this policy	<u>Support noted</u>
Policy SADM14 The Water	017i 021k	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers	<u>No change required</u> The policy is supported by statutory

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Environment	037j	say the policy duplicates national policy without adding anything local. Removing this policy will reduce the chances of the Plan being found unsound.	bodies and is considered appropriate.
Para 4.37	036k	<u>Objection on the grounds of soundness</u> Savills on behalf of Thames Water say para 4.37 is ambiguous and a change is suggested.	<u>Change required</u> Amendment made to supporting text at para 4.37 based on Thames Water suggested text as follow: Sewer flooding can arise due to lack of capacity within the existing sewer network. The Council will work with Thames Water <u>and developers</u> in order to ensure that the strategic wastewater infrastructure required to support growth will be delivered alongside development. However it <u>It is also important for developers to consult Thames Water at an early stage to discuss waste water infrastructure requirements for development</u>
Flood Risk and Drainage	048c	<u>Objection on the grounds of soundness</u> The Woodland Trust would like to see trees and woodland, which have been proven to have a significant effect on flood amelioration, acknowledged accordingly in the SADM and other new development plan documents.	<u>No change required</u> Trees are acknowledged within the supporting text to policy SADM13, 27 and 33, as well as the Council's adopted Biodiversity, Trees and Landscape SPD. That acknowledgement includes their role

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			in flood amelioration. It is considered that detail on their role in SuDS may be better placed within the SuDS guidance produced by HCC as Lead Local Flood Authority. The role of trees and woodland in enriching the Watling Chase Community Forest is acknowledged within policy SADM27. SADM33 (alongside Core Strategy policy CS19) include woodland and green infrastructure in the list of key community facilities which the policies seek to protect.
Para 4.21	038i	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Environment Department say Paragraph 4.21 only refers to Flood Zones in relation to the SFRA. The SFRA also contains information on surface water and ground water flooding.	<u>No change required</u> This paragraph is specifically referring to the use of the SFRA in selecting housing sites, and paragraph 4.23 refers to other kinds of flooding, and paragraph 4.25 and SADM15 refer to risk from any form of flooding, so this is covered later in the section.
Para 4.27	038j	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Environment Department says that it might be helpful if some clarity were provided on how the LPA would expect developers to use the EA National Surface Water Flood Maps.	<u>No change required</u> It is considered that most developers are probably aware of the maps and if not they can be directed to them.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Para 4.31	038k	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Environment Department suggest change to para 4.31. Needs correction to say "watercourses too minor to be classed as Main Rivers" rather than "ordinary watercourses".	<u>Change required</u> The suggested change is considered to be appropriate. Some small watercourses may be too minor to be classed as 'Ordinary Watercourses' 'Main Rivers' and therefore will not be shown within the Environment Agency flood zones, and may not be included in the Hertsmere SFRA.
Para 4.34	038b	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Environment Department say recently made changes (March 2015) to the NPPG to require all developments to implement SuDS. Major applications should be referred to the LLFA and undertake surface water drainage assessment.	<u>Change required</u> National policy on SuDS is quite clear, as set out in The House of Commons Written Statement (ref. HCWS161) dated 18 December 2014, which is referenced from the main NPPF web page (http://planningguidance.planningportal.gov.uk/), that the intention is that SuDS are expected only on major developments unless shown to be inappropriate. SADM16 says that new development should include SuDS, not just major development.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Policy SADM15 Flood Risk	009d 010f	<u>Supports the Policy</u> The Environment Agency (EA) and Natural England support this policy	<u>Support noted</u>
Policy SADM15 Flood Risk	017j 021l 037k	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say the policy duplicates national policy without adding anything local. Removing this policy will reduce the chances of the Plan being found unsound.	<u>No change required</u> Policy has been developed with and is supported by statutory bodies, and is considered appropriate.
Policy SADM16 Sustainable Drainage Systems	009e 010g	<u>Supports the Policy</u> The Environment Agency (EA) and Natural England support this policy	<u>Support noted</u>
Policy SADM16 Sustainable Drainage Systems	017z 021bb 037v	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say the policy is overly onerous and should be deleted	<u>No change required</u> The requirement for sustainable drainage systems (SuDS) to be included on all major schemes unless inappropriate is a national policy requirement introduced in April 2015. SADM16 Sustainable Drainage Systems has been strengthened since the Consultation Draft SADM in collaboration with the Environment Agency and Hertfordshire County Council as Lead Local Flood Authority. The requirement for developers to put arrangements in place for their ongoing maintenance is outlined in the PPG and

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			SADM16. The NPPF allows substantial weight to be given to viability in the consideration of planning applications, so there is ample scope for the viability of SuDS on individual schemes to be taken into consideration.
Policy SADM16 Sustainable Drainage Systems	038l	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Environment Department suggest Policy SADM16 refers to adopted County Council 'Policies' on SuDS.	<u>Change required</u> The suggested change is considered to be appropriate. Major proposals should also comply with the principles and standards policies set out by the Lead Local Flood Authority for SuDS.
Policy SADM17 Watercourses	009f	<u>General Comment</u> The Environment Agency (EA) are generally happy with the emphasis on protecting and restoring watercourses and their corridors, and the need for a Water Framework Directive assessment where appropriate. Policy could be improved by including the need to deculvert watercourses and referencing the Thames River Basin Management Plan, but acknowledge these are referred to in the supporting text.	<u>Comment noted</u> As noted this is referred to in the supporting text. SADM17 (iv) references that the opportunities should be provided to enhance and restore rivers.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Policy SADM17 Watercourses	010h	<u>Supports the Policy</u> Natural England support the policy.	<u>Support noted</u>
Policy SADM18 Water Supply and Waste Water	009g	<u>Objection on the grounds of Duty to Cooperate</u> The Environment Agency (EA) say the policy does not comply with the duty to co-operate due to issues across the catchment with waste water capacity. <u>Following the further discussions this objection has been withdrawn. Please EA's revised representation below (009k).</u>	<u>No change required</u> The concerns have been addressed through a paper titled The Duty to Co-operate: The Water Environment which demonstrates the co-operation with Thames Water throughout the development of the SADM Plan (response 009k is an updated response from the EA following the production of this paper).
Policy SADM18 Water Supply and Waste Water	009k	<u>Supports the Policy</u> The Environment Agency (EA) support SADM18 - happy with evidence of Duty to Co-operate with Thames Water provided during the consultation period.	<u>Support noted</u>
Policy SADM18 Water Supply and Waste Water	017m 021o	<u>Objection on the grounds of soundness</u> Shire Consulting for 2 private education providers recommend not enshrining changeable standards into policies as these go out of date.	<u>No change required</u> The policy has been developed with and is supported by the Environment Agency and Thames Water so it is not considered appropriate to alter or remove the policy. The policy has been worded to take into account the fact that such standards will go out of date (the words 'or equivalent' in the last line of the policy should be noted).

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Policy SADM18 Water Supply and Waste Water	017n 021p	<u>Objection on the grounds of soundness</u> Shire Consulting for 2 private education providers say requirement to meet BREEAM excellent rating too onerous - impact on viability	<u>No change required</u> The policy has been developed with and is supported by the Environment Agency and Thames Water. This requirement was added at the advice of the Environment Agency due to Hertfordshire being in an area of serious water stress, where current levels of consumption cannot be sustained. The NPPF provides ample opportunities for developers to make arguments on viability grounds at the planning application stage, but also has as its 'golden thread' the presumption in favour of sustainable development which includes environmental sustainability, and development which is sustainable should be approved without delay. This policy is very locally relevant due to the pressures on water supply in the County and current level of consumption which is far above the national average. It is a key part of determining whether a development is sustainable, and so proposals which do not comply with this policy may be found to be unsustainable and therefore refused permission.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Policy SADM18 Water Supply and Waste Water	036l	<u>Supports the Policy</u> Savills on behalf of Thames Water support this policy and paragraphs 4.44-9	<u>Support noted</u>
Para 4.50	038a	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Environment Department want to clarify responsibilities for minerals and waste. Amended text suggested.	<u>Change required</u> The following suggested change is considered to be appropriate. Planning for minerals and waste underlies the prudent use of natural resources and the reduction of pollution. The County Council is responsible for the Minerals and Waste Development Framework Planning and is the Waste Disposal Authority and sets out policies for future mineral extraction and waste development for all types of waste. The County Council is also the Waste Disposal Authority with responsibility for the disposal of Local Authority Collected Waste'
Para 4.51	038e	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Environment Department want to clarify responsibilities for minerals and waste. Amended text suggested.	<u>Change required</u> The following suggested change is considered to be appropriate. The Minerals Local Plan guides mineral extraction and associated development.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			Tyttenhanger Quarry at Colney Heath is identified as a major source of sand and gravel up to 2032: the site is being progressively extracted and infilled with inert waste as the landscape is restored. Mineral reserves, particularly sand and gravel, will be safeguarded from the sterilising effect of new development (i.e. new building, engineering works and land cover). Minerals Policy 5: Mineral Sterilisation encourages the extraction of minerals <u>in circumstances where any significant mineral resource would be sterilised before by any other development is considered appropriate.</u> Minerals Policy 10 Railheads and Wharves safeguards existing and disused railheads and wharves where they have <u>potential for the exportation and importation of minerals and secondary/recycled aggregates.</u> The County Council has defined Mineral Consultation Areas <u>(MCAs) within its Mineral Consultation Areas Supplementary Planning Document (MCASPD) to support this these policy policies.</u> Councils and developers are expected to consider the effect of

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			prospective development on mineral resources in these areas at an early stage. This excludes the small-scale developments, listed in the County Council's MCASPD, Supplementary Planning Document on Mineral Consultation Areas which would have little effect (e.g. householder development). <u>A significant proportion of the Borough is identified in the MCASPD as a MCA for sand and gravel, including the Mineral Consultation Area Harper Lane Rail Depot MCA which extends into Hertsmere (and is shown on the Policies Map).</u>
Policy SADM19 Mineral Consultation Area	038f	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Environment say that policy SADM19 goes further than Policy 5 of the MLP in seemingly seeking to prevent absolutely development that would sterilise minerals resources. MP5 actually sets out circumstances where sterilisation might be appropriate/necessary. Policy SADM19 only proposes that the County Council be consulted on 'significant' proposals that affect the minerals resource, whereas the MCA SPD requires consultation with the County Council with only the certain exemptions (listed in the rep).	<u>Change required</u> The following suggested change is considered to be appropriate. Within the Mineral Consultation Area shown on the Policies Map, building or other development will not be permitted to sterilise or prevent the future extraction of the mineral resource. In order to prevent unnecessary sterilisation of mineral resources <u>The the</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			Council will seek the advice of Hertfordshire County Council as the Mineral Planning Authority <u>in accordance with the Minerals Consultation Area SPD (and any future revisions/successor documents)</u> on any significant proposal which may affect the resource.
Policy SADM19 Mineral Consultation Area	010i	<u>Supports the Policy</u> Natural England support the policy	<u>Support noted</u>
Para 4.52	038g	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Environment says the Waste Local Plan should be used by all local planning authorities in the determination of planning applications. Section 8 of the National Planning Policy for Waste (NPPW) published in October 2014 is also applicable to all local planning authorities when determining planning applications for non-waste development and sets out specific waste related considerations.	<u>No change required</u> The Waste Local Plan forms part of the development plan for Hertsmere and will be used in the determination of relevant planning applications.
Para 4.54	038h	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Environment say the encouragement of Site Waste Management Plans is welcomed and should cover both demolition (when	<u>Change required</u> The following suggested change is considered to be appropriate.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		applicable) and construction (wording suggested).	<u>Waste prevention and reduction measures are important in all construction and demolition projects to prevent waste generation and encourage the re-use of materials on site as much as possible. This should be considered throughout the design and implementation phases.</u> The Council can assist with waste management <u>through the use of site waste management plans during construction and through control of development.</u> to improve materials resource efficiency in the demolition and construction phases by identifying methods (including re-use, recycling or recovery) to minimise waste produced on site and to capture data relating to construction, demolition and excavation waste. Waste storage provision is an important consideration which should be integrated into all new developments at the design stage to ensure that bins are stored within the development site in a fashion which allows easy access for occupiers and collection and does not block the public highway. Households, in particular, are issued with a number of bins and boxes which are required to be

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			stored within new developments in order to facilitate the sorting of waste and recyclable products.
Policy SADM21 Environmental Pollution and Development	009h 010j	<u>Supports the Policy</u> The Environment Agency (EA) and Natural England support the policy.	<u>Support noted</u>
Policy SADM21 Environmental Pollution and Development	009i	<u>Objection on the grounds of soundness</u> The Environment Agency (EA) requests a change to SADM21 to add a reference to the risks of pollution to the water environment as well as to human health.	<u>No change required</u> The current policy wordings sufficiently cover risks of pollution to the environment as well as to human health.
Policy SADM21 Environmental Pollution and Development	058w	<u>General Comment</u> Elstree and Borehamwood Green Belt Society say particulates caused by motorised traffic will harm people, in particular older people and children.	<u>Comment noted</u> Policy SADM21 seeks to restrict development in Air Quality Management Areas. Other policies in the Core Strategy (in particular CS24 Development and Accessibility to Services and Employment and CS26 Promoting Alternatives to the Car) along with SADM40 Transport Development Areas seek to reduce reliance on the private car by locating development in locations accessible by public transport and promoting alternatives. Beyond this there is little the Plan can do to address this because it is a wider (Europe-wide) issue which requires Government intervention at a national or

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			European level as well as an acceptance of the personal and corporate responsibility of all private individuals and businesses who use motorised vehicles for the movement of people and goods to reduce that use, particularly in built-up areas.
Policy SADM22 Hazardous Substances	017k 021m 037l	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say the policy duplicates national policy without adding anything local. Removing this policy will reduce the chances of the Plan being found unsound.	<u>No change required</u> Representor has not suggested any amended wording and the policy is considered necessary to clearly set out the criteria that applications for development involving hazardous substances will be assessed against to provide clarity for developers and to aid in the development management process.
Green Belt	017o 021q 037n	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say there is no need for more Green Belt Policy over and above NPPF and Core Strategy	<u>No change required</u> Policy 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. SADM23 Green Belt Boundary reviews the Green Belt boundary in accordance with Core Strategy policy CS13.
Green Belt	042f	<u>General Comment</u> CC Town Planning on behalf of Liberty Aldenham Ltd say it is clear that Green Belt land is still needed to meet development needs of the borough.	<u>Comment noted</u> Green Belt land may be required in order to meet the development needs of the Borough going forward, however this is a

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			matter for the Core Strategy Review (which is underway) as the SADM Plan delivers the targets set in the Core Strategy. Table 1 in SADM indicates a potential delivery of 4,465 dwellings in the plan period, significantly above the 15 year target of 3,990 net additional dwellings. Therefore additional Green Belt housing sites are not required to meet current housing targets.
Green Belt	042h	<u>Supports the Policy</u> CC Town Planning on behalf of Liberty Aldenham Ltd say that the approach to the Green Belt is positively prepared and provides sufficient signposting to the NPPF.	<u>Support noted</u>
Green Belt	030c	<u>Objection on the grounds of soundness</u> Welwyn Hatfield Council say the Gypsy and Traveller proposed sites GT1, GT2 and GT3 should be removed from the Green Belt. <u>Following the preparation of a Statement of Common Ground, this objection has been withdrawn.</u>	<u>No change required</u> 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 considered appropriate to re-draw the Green Belt boundary around these existing sites.
Para 4.76 b)	026f	<u>Supports the Policy</u> Hertfordshire County Council Development Services support the allocation of H9 former Sunny Bank School site for housing and the removal of the site	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		from the Green Belt (but object to the Open space requirement – see other reps under SADM1 - H9 and SADM33).	
Land in Heathbourne Road	974b	<u>Objection on the grounds of soundness</u> Individual representation (LATE REP) from neighbour opposite. Include land opposite safeguarded land and H10 in area removed from Green Belt.	<u>No change required</u> See response to 975a below.
Policy SADM23 Green Belt Boundary	017q 021s	<u>Objection on the grounds of soundness</u> Shire Consulting for 2 private education providers say this is not a policy and if it were a policy it would be found unsound.	<u>No change required</u> SADM23 Green Belt Boundary reviews the Green Belt boundary in accordance with Core Strategy policy CS13.
Policy SADM24 Village Envelopes	043f	<u>Objection on the grounds of soundness</u> DLA Town Planning for Inland Homes say that SADM24 should be clearer that limited infilling in villages but outside of village envelope would not be inappropriate according to	<u>No change required</u> This policy sets out how point 5 of paragraph 89 of the NPPF should be interpreted in the borough. Developments within the greenbelt will be assessed against all national and local policies.
Para 4.82 & 4.85	017p 021r 037o	Shire Consulting for 3 private education providers say the method of dealing with Green Belt review is muddled, with two large previously developed sites being returned to the Green Belt for unstated reasons (paragraph 4.82), whilst further on paragraph 4.85 acknowledges that some of the infilling envelope boundaries will have to be amended in future. This ad hoc manner is not the approach expected by the NPPF to the delineation of Green Belt boundaries.	<u>No change required</u> The designation of Key Green Belt sites does not form part of a review of Green Belt boundaries as the sites remain within the Green Belt, so it is not clear what is meant by this comment regarding an “ad hoc... approach... to the delineation of Green Belt boundaries”. The two large Previously Developed Sites (PDS) are being returned to the Green Belt

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			because the designation as PDS or Key Green Belt Sites in Hertsmere applies only to sites which have educational, research and development, utility service and leisure uses. As the Core Strategy states (Para 4.80) they are “established sites with important uses, which should be maintained and supported”. Housing development in the Green Belt does not fall within this definition, so naturally once a large site has been redeveloped for housing, it can no longer be designated as a PDS or Key Green Belt Site.
4.85	045b	<u>Objection on the grounds of soundness</u> Crispin Wride for Bio Products Laboratory wants additional supporting text referencing further future adjustment to boundary (see also 045a below under Policy SADM25). REVISED SUBMISSION	<u>Change required</u> The Council agrees that a new paragraph (as follow) should be added prior to 4.86 to account for the proposed future development at BPL. <u>Adjustments have been made to the Bio Products Ltd infill site boundary to reflect known development proposals. Further proposals for expansion within the site may come forward in future. The infill envelopes for these and other Key Green Belt sites may be amended through any future review of this document once the extent of development needs has been</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			<u>established and an appropriate form of development agreed.</u> This proposed amendment is also linked to ref.021e and 026p below
Policy SADM25 Key Green Belt Sites	011g	<u>Supports the Policy</u> Historic England support the added criteria relating to heritage assets and reference to the list in Appendix F	<u>Support noted</u>
Policy SADM25 Key Green Belt Sites	013d	<u>Supports the Policy</u> Sport England welcome the additional criterion in the policy relating to the assessment of infilling/redevelopment within the defined envelope area of each Key Green Belt Site as this will allow the impact on playing fields to be considered appropriately like the other factors listed.	<u>Support noted</u>
Policy SADM25 Key Green Belt Sites	017s 021u 037q	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers and say there is no need for the policy and it is contrary to the NPPF	<u>No change required</u> 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, and follows up on the commitment in Para. 5.5 of the adopted Core Strategy 2013.
Policy SADM25 Key Green Belt Sites	017c 021d 037c 043g	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers and DLA Town Planning for Inland Homes say that Para 89 of the NPPF refers to any PDL, not just Major	<u>No change required</u> The Council agrees that Paragraph 89 of the NPPF refers to all previously developed land (PDL). The Key Green Belt

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		Developed Sites in the Green Belt.	Site designation applies to large sites used for education, research, leisure or other uses which the Council is keen to see continued in the Borough. SADM25 provides a degree of certainty that the current site functions will be able to continue in their current locations if expansion is required, while at the same time giving the Council a level of control over where that development goes in order to minimise its impact on the Green Belt setting.
Policy SADM25 Key Green Belt Sites	043h	<u>Objection on the grounds of soundness</u> DLA Town Planning say that SADM25 should be clearer that it sets out the Council's view on where limited infilling/redevelopment of previously developed sites is most appropriate, but that each application should be considered on its merits in accordance with Para 89 of the NPPF. Proposed wording suggested: "The defined "envelope" area in each site is where the Council considers limited infilling or the partial or complete redevelopment of previously developed sites to be most appropriate, taking account of the following factors: ..."	<u>No change required</u> The Council does not consider that the proposed wording will help achieve the aim of Policy SADM25, which is to clarify areas of the sites within which it is most appropriate for the existing establishments to expand.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Policy SADM25 Key Green Belt Sites	024e	<u>Objection on the grounds of soundness</u> Planning Manager on behalf of the Campaign to Protect Rural England say the word 'appropriate' in 3 rd para should be changed to 'acceptable'	<u>No change required</u> The policy refers to the 'appropriateness' of development in the Green Belt in the context of the NPPF.
SADM25 - a) Aldenham School, Letchmore Heath;	011k	<u>Supports the Policy</u> Historic England support the added criteria relating to heritage assets and reference to the list in Appendix F	<u>Support noted</u>
SADM25 - a) Aldenham School, Letchmore Heath;	021e	<u>Objection on the grounds of soundness</u> Shire Consulting for Aldenham School say that the development envelope is too tightly drawn. Site can accommodate further development without compromising openness of Green Belt. Boundary is arbitrary and excludes many elements of the Campus.	<u>Change required</u> A clarification in the text recognising that infill boundaries may change in future (through any review of this document) as a result of agreed expansion and /or improvement proposals has however been drafted. [new paragraph to be inserted prior to 4.86] <u>The private education sector is also well represented in Hertsmere's Green Belt; the schools perform valuable educational, economic and community functions and in some cases safeguard the future of important heritage assets. Some of these establishments may need to undertake improvement and expansion in the future. St Margaret's School in Bushey is promoting</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			<u>redevelopment together with some school buildings on the south side of Merry Hill Road. Proposals may also come forward for others, including Haberdashers' Aske's schools and the Aldenham School.</u> (See also ref.045b)
SADM25 - d) The Bushey Academy, formerly Bushey Hall School, London Road, Bushey;	011l	<u>Supports the Policy</u> Historic England support the added criteria relating to heritage assets and reference to the list in Appendix F	<u>Support noted</u>
SADM25- d) The Bushey Academy, formerly Bushey Hall School, London Road, Bushey;	026o	<u>Objection on the grounds of soundness</u> HCC Development Services welcomes the identification of Bushey Academy as a KGBS but considers that site infill boundary as drawn would not support expansion potential of the school. Boundary drawn tightly around buildings (whereas elsewhere the boundary allows more flexibility). Seek re-drawing of boundary, including hardstanding areas.	<u>Change required</u> See representation reference 026p
SADM25 - e) Bushey Meads School, Coldharbour Lane, Bushey;	026p	<u>Objection on the grounds of soundness</u> HCC Development Services welcomes the identification of Bushey Meads as a KGBS but considers that site infill boundary as drawn would not support expansion potential of the school.	<u>Change required</u> Support for identification as a KGBS noted. The boundary at Bushey Meads has been amended (from the Consultation Draft proposal) to incorporate expansion

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		Boundary drawn tightly around buildings (whereas elsewhere the boundary allows more flexibility). Seek re-drawing of boundary, including hardstanding areas. Why is the area in front of the school not included.	proposals submitted for planning approval. The majority of the area in front of the school is not included as Hertsmere Borough Council objected to this element of the proposals. Boundaries are drawn tightly around the edge of the built areas of the KGBSs in order that any harm that may be caused to the Green Belt by development elsewhere within the overall sites can be properly assessed. Acknowledge that future expansion proposals may come forward which require development outside current infill boundary which may be assessed to be acceptable in Green Belt terms. A clarification in the text recognising that infill boundaries may change in future (through any review of this document) as a result of agreed expansion and /or improvement proposals has been agreed with HCC as follow: [To replace existing paragraph 4.85] <u>4.85 A number of existing publicly</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			<u>funded secondary schools are within the Green Belt; the important role these facilities play in supporting the needs of the community is recognized. In several cases there are known development needs which have been taken into account in defining current infill boundaries. The Bushey Academy has been redeveloped, and plans put forward for expansion at Bushey Meads School; the infilling envelope boundaries have been re-drawn accordingly. Proposals to provide new (redeveloped) school premises on a single site for Hertswood Academy are being developed; the infilling envelope has been amended to reflect the anticipated requirements of the Academy arising from any future expansion to 10 forms of entry should an enlarged building footprint be sought. The Academy has confirmed that (subject to funding and ministerial approvals) they would seek to expand the school to meet any increased local demand.</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			(Also see 045b)
SADM25 - f) Dame Alice Owen's School, Sawyers Lane, Potters Bar;	026q	<u>Objection on the grounds of soundness</u> HCC Development Services welcomes the identification of Dame Alice Owen's School as a KGBS but considers that site infill boundary as drawn would not support expansion potential of the school. Boundary drawn tightly around buildings (whereas elsewhere the boundary allows more flexibility). Seek re-drawing of boundary, including hardstanding areas.	<u>Change required</u> See representation reference 026p
SADM25 - h) Elstree Aerodrome, Hogg Lane, Elstree;	011m	<u>Supports the Policy</u> Historic England support the added criteria relating to heritage assets and reference to the list in Appendix F	<u>Support noted</u>
SADM25 - h) Elstree Aerodrome, Hogg Lane, Elstree;	018h 030e 058n	<u>Supports the Policy</u> Elstree and Borehamwood Town Council, Welwyn Hatfield Borough Council and Elstree and Borehamwood Green Belt Society support this designation	<u>Support noted</u>
SADM25 - i) Haberdashers' Aske's School (Boys), Aldenham Road, Elstree;	011n	<u>Supports the Policy</u> Historic England support the added criteria relating to heritage assets and reference to the list in Appendix F	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
SADM25 - i) Haberdashers’ Aske’s School (Boys), Aldenham Road, Elstree	037d	<u>Objection on the grounds of soundness</u> Shire Consulting for Haberdashers’ Aske’s Schools say the development envelope is too tightly drawn. Site can accommodate further development without compromising openness of Green Belt. Boundary is arbitrary and excludes many operational areas of the site.	<u>Change required</u> See Council’s response to representation ref. 021e above.
SADM25 - j) Haberdashers’ Aske’s School (Girls), Aldenham Road, Elstree;	011o	<u>Supports the Policy</u> Historic England support the added criteria relating to heritage assets and reference to the list in Appendix F	<u>Support noted</u>
SADM25 - j) Haberdashers’ Aske’s School (Girls), Aldenham Road, Elstree;	037w	<u>Objection on the grounds of soundness</u> Shire Consulting for Haberdashers’ Aske’s Schools say the development envelope is too tightly drawn. Site can accommodate further development without compromising openness of Green Belt. Boundary is arbitrary and excludes many operational areas of the site.	<u>Change required</u> See Council’s response to representation ref. 021e above.
SADM25 - k) Cancer Research UK, formerly Imperial Cancer Research Fund, Clare Hall, Blanche Lane,	011p	<u>Supports the Policy</u> Historic England support the added criteria relating to heritage assets and reference to the list in Appendix F	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Potters Bar;			
SADM25 - k) Cancer Research UK, formerly Imperial Cancer Research Fund, Clare Hall, Blanche Lane, Potters Bar;	025a	<u>Supports the Policy</u> CGMS Consultants for Clare Hall Laboratories support the designation	<u>Support noted</u>
SADM25 - l) National Institute for Biological Standards and Control (NIBSC), Blanche Lane, Potters Bar;	011q	<u>Supports the Policy</u> Historic England support the added criteria relating to heritage assets and reference to the list in Appendix F	<u>Support noted</u>
SADM25 - m) Hertswood Lower School and Sports Centre, Cowley Hill, Borehamwood;	026r	<u>Objection on the grounds of soundness</u> HCC Development Services welcomes the identification of Hertswood Lower School as a KGBS but considers that site infill boundary as drawn would not support expansion potential of the school. Seek re-drawing of boundary.	<u>Change required</u> See representation reference 026p and 026a

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
SADM25 - n) Queen's School, Aldenham Road, Bushey;	026s	<u>Objection on the grounds of soundness</u> HCC Development Services welcomes the identification of Queen's School as a KGBS but considers that site infill boundary as drawn would not support expansion potential of the school. Boundary drawn tightly around buildings (whereas elsewhere the boundary allows more flexibility). Seek re-drawing of boundary, including hardstanding areas.	<u>Change required</u> See representation reference 026p
SADM25 - o) Purcell School, Aldenham Road, Bushey;	011r	<u>Supports the Policy</u> Historic England support the added criteria relating to heritage assets and reference to the list in Appendix F	<u>Support noted</u>
SADM25 - q) Willows Farm Village, London Colney.	011s	<u>Supports the Policy</u> Historic England support the added criteria relating to heritage assets and reference to the list in Appendix F	<u>Support noted</u>
Policy SADM26 South Mimms Special Policy Area	008a	<u>Objection on the grounds of soundness</u> Highways England are concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN). Request amendment of Policy SADM26 to include the existing or expanded Highways England and Connect Plus facilities, to ensure that activity relating to the management, operations and	<u>Change required</u> The requested additional wording (se below)) is agreed by the Council and a Statement of Common Ground has been agreed with the Highways Agency. ii) have an adverse impact on the safe and effective operation of the <u>existing or</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		maintenance of the adjacent motorway network are not compromised. These operations are essential to the safety and movement of road users on the high speed network but do not provide facilities for the travelling public. <u>Following the preparation of a Statement of Common Ground, this objection has been withdrawn.</u>	<u>expanded Highways England and Connect Plus facilities and the strategic road network.</u>
Policy SADM27 Development Standards in the Green Belt	017r 021t 037p	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say this duplicates/re-interprets NPPF. Confusing. No specifically local relevance. Development at school should be considered against NPPF.	<u>No change required</u> 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. The NPPF will remain an important material consideration in the determination of planning applications.
Policy SADM27 Development Standards in the Green Belt	029d	<u>Objection on the grounds of soundness</u> Heronslea Group say this policy is too prescriptive and the policy fails to provide clear guidance to users and the wording is not consistent with local and national GB policies. In particular the approach does not allow enough flexibility in terms of the design and layout of development in the Green Belt.	<u>No change required</u> The NPPF provides the criteria against which <i>types</i> of development are assessed to determine whether they are appropriate in the Green Belt. SADM27 builds on this by adding criteria against which the <i>form</i> of proposed development will be assessed.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			SADM27 applies to extensions to existing uses as well as newly-developed or redeveloped sites in the Green Belt.
Policy SADM27 Development Standards in the Green Belt	042i	<u>Objection on the grounds of soundness</u> CC Town Planning on behalf of Liberty Aldenham Ltd say this policy is too prescriptive. They consider that the NPPF provides ample guidance on the determination of planning applications in Green Belt locations.	<u>No change required</u> The NPPF provides the criteria against which <i>types</i> of development are assessed to determine whether they are appropriate in the Green Belt. SADM27 builds on this by adding criteria against which the <i>form</i> of proposed development will be assessed. The guidance in the NPPF only talks about whether development is appropriate or not in the Green Belt. SADM27 sets out the criteria that the Council will use when assessing applications for development in the Green Belt. Many of these criteria are implied by the NPPF and so SADM27 provides additional clarity for applicants and officers.
SADM28 Diversification and Development supporting the Rural Economy	010k	<u>Supports the Policy</u> Natural England support the policy	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
SADM28 Diversification and Development supporting the Rural Economy	017t 021v	<u>Objection on the grounds of soundness</u> Shire Consulting for 2 private education providers say this could be overtaken by changes to PD (c/u agricultural buildings).	<u>No change required</u> The permitted development rights allow certain to changes of use to existing agricultural buildings (including some changes to the buildings required to facilitate residential conversion), but not new buildings, while SADM28 refer to <i>“Proposals for the diversification of farm enterprises or for forestry, equestrianism or other rural business, which involve new building and/or works...”</i> Additionally, the permitted development rights do not apply to agricultural buildings over a certain size threshold (cumulative) so SADM28 will apply where the conversion of larger agricultural buildings or sites is proposed.
SADM28 Diversification and Development supporting the Rural Economy	017aa 021cc	<u>Objection on the grounds of soundness</u> Shire Consulting for 2 private education providers say it is difficult to differentiate between 3a and 3b agricultural land.	<u>No change required</u> Policy SADM28 expands on paragraph 112 of the NPPF (“Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary,

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”) by specifying the classes of agricultural land on which building may be acceptable in line with the Planning Practice Guidance (PPG) (Paragraph: 024Reference ID: 8-024-20140306) and Natural England guidance. It is considered that sufficient information and guidance on the classification of agricultural land is provided by DEFRA and Natural England. Mapping showing the most recent (1988) land classifications is freely available at http://magic.defra.gov.uk/, and detailed guidance for classifying land can be found in: <i>Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land</i> (MAFF, 1988).
SADM28 Diversification and Development supporting the Rural Economy	024k	<u>Objection on the grounds of soundness</u> The Campaign to Protect Rural England say “SADM 28 should include a sentence that states that any permission granted for a new equestrian or rural business use in the Green Belt under the terms of the Policy would include a restriction preventing the subsequent redevelopment of the site for an otherwise inappropriate land use”.	<u>No change required</u> The NPPF states that: “Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.”

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			Individual planning applications will have to be decided on its own merits and on a case by case basis. A blanket restriction is not considered to be appropriate or reasonable through planning policies.
Watling Chase Community Forest	042k	<u>General Comment</u> CC Town Planning on behalf of Liberty Aldenham Ltd say (on para 4.95) Aldenham Reservoir is a key contributor to the WCCF. References to WCCF welcomed.	<u>Comment noted</u>
Policy SADM30 Heritage Assets	011i 012a 018i	<u>Supports the Policy</u> Historic England, Hertfordshire Gardens Trust and Elstree and Borehamwood Town Council support the policy	<u>Support noted</u>
Policy SADM30 Heritage Assets	017g 021i 037h	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say the policy duplicates national policy without adding anything local. Removing this policy will reduce the chances of the Plan being found unsound.	<u>No change required</u> It is considered that the policy provides additional detail which builds on Core Strategy policy CS14 and the NPPF and PPG guidance and will assist in development management. The policy is supported by a statutory consultee (Historic England) and is considered to be appropriate.
Policy SADM30 Heritage Assets	018j 058o	<u>Objection on the grounds of soundness</u> Elstree and Borehamwood Town Council and Elstree and Borehamwood Green Belt Society would like to	<u>No change required</u> Conservation Areas and other heritage sites are not allocated through the SADM

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		see a list of sites in the appendix. Special attention should be paid to Elstree Village conservation document.	Plan so should not be listed there. The only sites listed in appendices to SADM are those which are either allocated through SADM (Green Spaces) or are directly affected by allocations in the Plan (e.g. heritage assets on Employment and Key Green Belt sites).
Policy SADM30 Heritage Assets	058g	<u>Objection on the grounds of soundness</u> Elstree and Borehamwood Green Belt Society would like to see a list of buildings in this document that HBC will protect if they are neglected. Lack of oversight of neglected buildings.	<u>No change required</u> Heritage England produce and maintain the list of buildings which should be protected for their special architectural or historic importance. In certain cases of deliberate neglect or long term vacancy, a listed building is put on the register of buildings at risk which is kept by the Council (Heritage England maintain a list of Grade I and II* buildings at risk). Therefore any listed building is eligible to be placed on the 'at risk' register should the situation arise. It is not considered to be appropriate to list all statutory listed buildings on Hertsmere within the plan as they are subject to change outside the Council's control. In relation to non-listed buildings the Council has powers under Section 215 of the Town and Country Planning Act 1990

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			to deal with such derelict sites and buildings through enforcement action. It is not appropriate to include a list of these sites in the plan because this will constantly change, and the situation would arise in which sites that have been improved would remain on the list throughout the life of the Plan.

Chapter Five: Building Sustainable Communities

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Whole Chapter	006b	<u>Objection on the grounds of soundness</u> Crime Prevention Design Advisor says building to physical security of Secured by Design (Police approved minimum) reduces potential for burglary by 50%-75%. Would like to see promotion of the Secured by Design award for physical security of dwellings promoted in the Plan.	<u>No change required</u> SADM is to be read alongside the adopted Core Strategy and it is not appropriate to repeat the provisions of the Core Strategy in SADM. Core Strategy Policy CS22 <i>Securing a high quality and accessible environment</i> and supporting text: • set out clearly that development should be planned with the principles of crime prevention and community safety integrated; • advise developers to ensure that Secured by Design principles are incorporated within all schemes.
Para 5.8		<u>Objection on the grounds of soundness</u> Mobile Operators Association says that due to the unique nature of telecommunications developments, they should not be required to fully comply with policies which are aimed at more general forms of development. NPPF recognises importance of advanced high quality communications infrastructure. SADM31 is overly restrictive and therefore contrary to NPPF eg telecommunications equipment can't make a	<u>No change required</u> The NPPF provides the general framework within which local planning authorities must assess telecommunications infrastructure proposals. The NPPF indicates that where new sites are required equipment should be sympathetically designed and camouflaged where appropriate. Policy SADM31 sets out the design principles

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		<i>'positive' contribution to the built and natural environment or compliment the particular local character of an area as required by the policy.</i> Request removal of para 5.8 and addition of specific policy: <i>"Proposals for telecommunications development will be permitted provided that the following criteria are met: -</i> <i>(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</i> <i>(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</i> <i>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</i> <i>(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</i>	which Hertsmere BC will seek to apply when considering specific applications within the context provided by the NPPF.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		<i>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology."</i>	
Policy SADM31 Design Principles	006e	<u>Objection on the grounds of soundness</u> Crime Prevention Design Advisor says SADM31 addresses Design Principles and high quality design yet no measurements are proposed.	<u>No change required</u> Measurements related to levels of crime are not appropriate for inclusion in SADM.
Policy SADM31 Design Principles	014a	<u>General comment</u> Three Rivers Council identifies a typographical error in third bullet point (ii). Change 'though' to 'through'.	<u>Change required</u> Correct typographical error. (ii) enhance legibility though through the spatial pattern of development
Policy SADM31 Design Principles	016a	<u>Supports the policy</u> Mobile Operators Association supports Policy (but not its use in respect of telecommunications equipment – see 016b above).	<u>Support noted</u>
Policy SADM31 Design Principles	017l 021n 037m	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say Policy SADM31 duplicates national policy without adding anything local to existing national policy and should be removed.	<u>No change required</u> The NPPF requires local plans to develop robust and comprehensive policies that set out the quality of development that will be expected for the area. SADM31 and the Hertsmere Planning and Design Guide to which the Policy refers fulfil this requirement.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Neighbourhood Planning	018k	<u>General comment</u> Elstree and Borehamwood Town Council is considering undertaking a Neighbourhood Plan. Wants to emphasise they are community led initiatives, intended to focus on the needs of the neighbourhood.	<u>Comment noted</u> EBTC's comment is noted. Para 5.14 indicates that the Council will support groups wishing to prepare a neighbourhood plan within the framework of national and local planning policies.
Neighbourhood Planning	058p	<u>Supports the policy</u> Elstree and Borehamwood Green Belt Society support neighbourhood planning.	<u>Support noted</u>
Key Community Facilities	018n	<u>General comment</u> Elstree and Borehamwood Town Council sought assurances at Consultation Draft Stage that there would be no loss of sporting facilities in Elstree and Borehamwood.	<u>Comment noted</u> Core Strategy Policy CS19 protects existing key community facilities from loss, reduction or displacement. Sports facilities are identified as a key community facility.
Key Community Facilities	046a	<u>General comment</u> Herts Valleys CCG wish to stress the current pressures on health services (not requesting changes). Welcome references to need to promote safe and healthy communities. Healthcare capacity needs to be considered when planning future residential developments (in particular care homes). Emerging view is that more care will be provided closer to people's own homes – will mean moving services from acute hospital settings to community.	<u>Comment noted</u> Comments noted. The co-ordination of infrastructure with development is an on-going issue and is continually addressed with the relevant providers. The CCG and NHS England are consulted on planning applications for Care Homes and any residential proposal for more than 10 dwellings. They are also represented on Hertsmere's CIL Reference Group. The Council's approach to CIL and S106 is set out in the Developer Contributions Framework referred to in Chapter 8.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Para 5.21	058f	<u>Supports the policy</u> Elstree and Borehamwood Green Belt Society welcome the statement that there may be an opportunity to provide a new primary school on land adjacent to the development envelope at Hertswood Academy (Lower School site) but where?	<u>Support noted</u> Hertfordshire County Council (the Local Education Authority) has been encouraged to investigate the possibility of land in the adjoining Green Belt being made available for a primary school. In the absence of any agreement between the County Council and the landowner, however, Hertsmere Borough Council would not want to allocate the site.
Para 5.21	058x	<u>General Comment</u> Elstree and Borehamwood Green Belt Society concerned about potential loss of Maxwell Community Centre.	<u>Comment noted</u> The reservation of a site for a primary school at Maxwell Park is included in the adopted Elstree Way Corridor Area Action Plan. Should the education authority wish to progress use of the community centre site for a new primary school this will be subject to safeguards in respect of existing community use. The Council is committed to continuing to work with HCC to identify alternative site.
Para 5.21	018l	<u>General comment</u> Elstree and Borehamwood Town Council comment on the statement that there may be an opportunity to provide a new primary school on land adjacent to the development envelope at Hertswood Academy (Lower School site). EBTC could support this if it protects the existing Maxwell Community Centre	<u>Comment noted</u> Hertfordshire County Council (the Local Education Authority) has been encouraged to investigate the possibility of land in the adjoining Green Belt being made available for a primary school. In the absence of any agreement between the County Council

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		site.	and the landowner, however, Hertsmere Borough Council would not want to allocate the site.
Para 5.21	026v	<u>General comment</u> HCC Development Services say it is likely that Maxwell Park site will need to be relied upon and made available for school provision as SADM does not allocate a site for this. Maxwell Park may be needed if site for primary school not allocated. Potential primary school site adjoining Hertswood School not allocated through SADM (Green Belt site). Difficult to demonstrate very special circumstances for primary school in Green Belt adjoining site C2 when Maxwell Park identified as reserve site in EWCAAP.	<u>Comment noted</u> The Elstree Way Corridor Area Action Plan reserves the Maxwell Park site for a primary school. It is recognised that HCC (the Local Education Authority) would seek to progress the provision of a 2fe school there (subject to caveats set out in the EWCAAP) in the event that alternative primary provision is not made elsewhere in Borehamwood or there is an unmet need. The Council does not consider the case for the allocation of an additional site for a new primary school to be clear but will continue to work with HCC to investigate options other than Maxwell Park to accommodate additional primary school requirements in Borehamwood. HCC (the Local Education Authority) has been encouraged to investigate the possibility of the Green Belt site referred to being made available for a primary school but little progress appears to have been made. In the absence of any agreement between the County Council

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			and the landowner, Hertsmere Borough Council would not want to allocate the site. Were it to be established by HCC that the site could be made available for education purposes, a planning application, and whether the case for very special circumstances had, if required, been demonstrated, would be determined by the appropriate local planning authority, taking all relevant factors into consideration.
Para 5.22	026t	<u>Objection on the grounds of soundness</u> HCC Development Services say that SADM and EWCAAP recognise the need for new provision for 2 forms of entry at primary school level in Borehamwood. The Core Strategy established a need for new primary school <u>site</u> in Borehamwood but SADM does not allocate a site. SADM says case for new site is unclear as there is potential capacity elsewhere. To ensure conformity with Core Strategy, para 5.22 must recognise that the need is in the form of a new primary school <u>site</u>. Reliance on existing 1fe schools to deliver additional capacity presents risk to delivery of development in Borehamwood.	<u>No change required</u> The Core Strategy was adopted in 2013. Since then Government approval has been given to a new 2fe primary section at Yavneh College in Borehamwood. Additional capacity to expand exists in other local primary schools. The Council does not consider the case for a further new primary school site in Borehamwood to be clear but will continue to work with HCC to investigate options other than Maxwell Park to accommodate additional primary school requirements in Borehamwood.
Bushey Primary school needs	026w	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Development Services	<u>No change required</u> No detailed evidence has been provided.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		say it would be prudent to identify a site for a primary school in Bushey as likely that potential future demand may not be able to be met by enlargement of existing schools.	HCC are to undertake feasibility work. SADM is delivering the adopted Core Strategy which does not envisage a need for a new primary school in Bushey. It will be appropriate to consider the need for and opportunities to provide a new primary school in consultation with HCC as part of the Core Strategy Review (technical work for which has already begun), and in the light of further detailed work to be undertaken by HCC.
Bushey Secondary school needs	026x	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Development Services say it may be necessary to identify a site for a secondary school in Bushey as enlargement of existing schools is unlikely to meet forecast demand.	<u>No change required</u> No detailed evidence has been provided. HCC are undertaking feasibility work. SADM is delivering the adopted Core Strategy which does not envisage a need for a new secondary school in Bushey. It will be appropriate to consider the need for and opportunities to provide a new secondary school in consultation with HCC as part of the Core Strategy Review (technical work for which has already begun), and in the light of further detailed work to be undertaken by HCC.
Policy SADM33 Key Community Facilities	013e	<u>Supports the policy</u> Sport England supports Policy SADM33	<u>Support noted</u>
Policy SADM33	017v	<u>Objection on the grounds of soundness</u>	<u>No change required</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Key Community Facilities	021x 037r	Shire Consulting for 3 private education providers say NPPF gives great weight to need to create, expand or alter schools but SADM33 is heavily qualified – criteria (i), (iii) and (iv) cited. No evidence is provided for these additional caveats being needed in Hertsmere. Some terms need to be explained.	SADM33 is not intended to be read in isolation from the rest of the Plan. The caveats relate to a wide range of key community facilities and are considered necessary to ensure the delivery of high quality accessible inclusive facilities in appropriate locations in order to meet local needs. The Council's support for the provision or enhancement of schools in this context is clear. Amendments to the supporting text for SADM25 Key Green Belt Sites including recognition of the value of private schools in the Borough are proposed. Where certain criteria cannot be fully met for historic or other reasons the significance of this would be taken into account when assessing any planning application.
Policy SADM33 Key Community Facilities	017w 021y 037s	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers say for historical reasons community facilities can be used by non-locals, and may be in locations where private vehicles are the only feasible transport. Such facilities should still have the Council's fullest support when seeking to enhance quality of provision and where relevant retain heritage assets in use and alleviate local traffic difficulties. Policy unsound.	<u>Change required</u> The Council acknowledges the value of the private schools in the Borough, some of which are in Green Belt locations and occupy heritage assets. See Council's response to representation ref. 021e above.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Policy SADM33 Key Community Facilities	026u	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Development Services say criterion (v) conflicts with Core Strategy policy CS19 and should be deleted. Unclear why requirement introduced. Not effective or consistent with national policy. LEA cannot require Academies and Free Schools to accommodate growth.	<u>No change required</u> This is a legitimate criterion; the Council will support proposals for new schools where there is a need for additional capacity which cannot be met through the expansion of existing schools.
Site C1: Former Sunny Bank School, Potters Bar	013f	<u>Supports the policy</u> Sport England supports C1	<u>Support noted</u>
Site C1: Former Sunny Bank School, Potters Bar	026e	<u>Objection on the grounds of soundness</u> (Representation also made in relation to SADM1 site H9 – rep 026d). HCC Development Services welcomes allocation for residential development but objects to open space requirement and for developer to make a contribution to its cost. Say requirement for 1.4ha of the site to be public open space is disproportionate, excessive, arbitrary and unjustified. No special circumstances justifying it. Education use staying on site so open space requirement disproportionate. Deliverability of site for residential development compromised. If HBC can demonstrate a robust justification for POS here HCC will continue discussions over an appropriate level of open space.	<u>No change required</u> The provision of open space is a part of a balanced proposal, following which the Council considers it reasonable to realign the Green Belt boundary. An alternative approach would be to retain the playing field within the Green Belt. HCC's 2009 submission for the vacant site (the school closed in 2008) to be included in Hertsmere's SHLAA requested only 1.8ha of the total 2.84 ha site area be allocated for housing. No reference was made to how the remaining 1ha was to be treated. Hertsmere's Open Space Study 2011 identified Potters Bar as having a deficiency in outdoor sport facilities, parks and natural green spaces. The

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			Consultation Draft SADM identified the PDL proportion of the then Green Belt site (roughly 1.4ha, or 50% of the site) for development, with the remaining 1.4ha to be retained as open space. The retention of part of the site for education use does not reduce the requirement for public open space provision (the Site Specific Requirements recognise that this part of the site may also eventually come forward for residential development). It is not assumed that all the costs of the open space delivery would have to be met by the developer.
Site C1: Former Sunny Bank School, Potters Bar	026g	<u>Objection on the grounds of soundness</u> (Representation also made in relation to SADM1 site H9). HCC Development Services say site wasn't assessed in Green Spaces and Amenity Land Report which informed SADM, or designated as a Green Space under SADM35 or SADM36.	<u>No change required</u> The site was not included in the Green Spaces and Amenity Land Report as that study was concerned with urban open space. At the time of the Study this site was not in the urban area.
Site C1: Former Sunny Bank School, Potters Bar	026h	<u>Objection on the grounds of soundness</u> (Representation also made in relation to SADM1 site H9). HCC Development Services say requirement for 1.4ha open space conflicts with SADM38 as fewer than 50 dwellings.	<u>No change required</u> SADM38 refers to open space requirements in developments in excess of 50 dwellings <i>or where a specific need has been identified by the Council</i> . The Council has identified a need for additional public open space in this area and consequently requires the retention

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			of 1.4ha of the site as open space.
Site C1: Former Sunny Bank School, Potters Bar	026i	<u>Objection on the grounds of soundness</u> (Representation also made in relation to SADM1 site H9). HCC Development Services say there is no proven need for additional open space that this site will satisfy.	<u>No change required</u> Hertsmere's Open Space Study 2011 identifies Potters Bar as having a deficiency in outdoor sport facilities, parks and natural green spaces. Sport England supports Proposal C1.
Site C1: Former Sunny Bank School, Potters Bar	026j	<u>Objection on the grounds of soundness</u> (Representation also made in relation to SADM1 site H9). HCC Development Services say there is no requirement for POS on any other housing site, including H6.	<u>No change required</u> Requirements for individual sites are assessed according to the specific factors relating to each site. H9 is a formerly Green Belt site, adjacent to a Conservation Area, in a densely developed area of open space deficiency with few if any other opportunities to increase open space provision. The Council considers that the provision of a significant open space on the site is necessary for the proper planning of the area.
Site C2: Hertswood Lower School, Cowley Hill, Borehamwood	013g	<u>Supports the policy</u> Sport England supports changes to C2 requirements made from Consultation Draft version (but see 013h which seeks further change).	<u>Support noted</u>
Site C2: Hertswood Lower School, Cowley Hill,	013h	<u>Objection on the grounds of soundness</u> Sport England says C2 Site Specific requirements do not require indoor sports facilities to be available for community throughout development period or	<u>Change required</u> The following suggested wordings are considered to be appropriate to be incorporated into the requirements for

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Borehamwood		replacement to be made asap. Hertswood Leisure Centre is dual use leisure centre helping to meet indoor sports needs of wider community as well as school. Explicit provision in relation to programming and delivery of theatre and playing fields included, but not the indoor sports facilities. Making explicit reference would allow consistency with NPPF para 74.	proposal C2 under Policy SADM33. 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 <u>and indoor sports facilities</u>, is available throughout the development period, (ii) there are local facilities available to allow the satisfactory operation of theatre <u>activities and indoor sports facilities</u> throughout the development period, and (iii) the provision of the replacement theatre premises <u>and indoor sports facilities</u> is made at the earliest possible opportunity. The playing fields <u>and indoor sports facilities</u> are to be made available for community use on a basis to be agreed with the Council.
Site C2: Hertswood Lower School, Cowley Hill, Borehamwood	058e	<u>General comment</u> Elstree and Borehamwood Green Belt Society believe development for Hertswood Academy will mean the loss of The Ark as a community amenity. Most people believe the proposed theatre (C2) will just be a school theatre with some community use.	<u>Comment noted</u> H6 and C2 require safeguards for the community theatre and its users. A Community Use Agreement relating to use of the Ark Theatre, including transitional arrangements for the period between

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			demolition and the new facility being available is required by a S106 Agreement.
Site C2: Hertswood Lower School, Cowley Hill, Borehamwood	018q	<u>General comment</u> Elstree and Borehamwood Town Council sought assurances at Consultation Draft stage that attention had been paid to impact of temporary closure of Ark Theatre and shared Sports Centre.	<u>Comment noted</u> H6 and C2 require safeguards for the community theatre and its users. A Community Use Agreement relating to use of the Ark Theatre, including transitional arrangements for the period between demolition and the new facility being available is required by a S106 Agreement.
Para 5.25	006d	<u>Supports the policy</u> Crime Prevention Design Advisor pleased to see the Council is open to all faith groups and their needs	<u>Support noted</u>
Para 5.26	006c	<u>Objection on the grounds of soundness</u> Crime Prevention Design Advisor says some uses involve large numbers of people attending site by car which can cause problems for local residents. Transport plan and provision for extra parking required. This should be referred to in the Plan.	<u>No change required</u> These matters would be dealt with as part of the normal consideration of any planning application. Core Strategy Policy CS24 <i>Development and accessibility to services and employment</i> requires major trip generating schemes to be accompanied by a Travel Plan. Policy SADM41 <i>Highway and Access Criteria for New Development</i> also requires major trip generating schemes to provide a Transport Statement or Transport Assessment in line with Council and local highway authority guidance.
The Paddock,	004a	<u>Objection on the grounds of soundness</u>	<u>No change required</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Bushey Heath: individual objection letters		Individual representation. Drop the proposal. It is private land, fulfils no public function and is not visually prominent. Only beneficiaries are immediate neighbours. More important to secure long term future of Reveley Lodge – local history, asset to community, valuable educational tool.	The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a Local Green Space.
The Paddock, Bushey Heath: individual objection letters	032a	<u>Objection on the grounds of soundness</u> CALA Management Ltd says the site doesn't meet the NPPF criteria for Local Green Space (detailed analysis of compliance with NPPF criteria submitted). Designation constrains development on a sustainable site and affects the interests and assets of Bushey Museum Property Trust.	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a Local Green Space.
The Paddock, Bushey Heath: individual objection letters	033a	<u>Objection on the grounds of soundness</u> Individual representation. Paddock doesn't have historical local or cultural significance and designation jeopardises Reveley Lodge, which does. Doesn't meet NPPF criteria. Designate Reveley Lodge garden as a LGS and allow development on Paddock or make designation conditional upon HBC or others buying Paddock from Bushey Museum Property Trust.	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a Local Green Space.
The Paddock, Bushey Heath: individual objection letters	057a	<u>Objection on the grounds of soundness</u> Local Councillor says Paddock should be removed from list of Local Green Spaces. Designation is contrary to NPPF and to Council's own criteria for Local Green Spaces. Designation would adversely affect the financial viability of Reveley Lodge.	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a Local Green Space.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		<u>Detailed report submitted.</u>	
The Paddock, Bushey Heath: individual objection letters	061a	<u>Objection on the grounds of soundness</u> LATE REPRESENTATION. Individual objection to allocation as Local Green Space. Bushey Museum Property Trust needs the income from the site to support Reveley Lodge which is run by volunteers and in need of significant expenditure.	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a Local Green Space.
The Paddock, Bushey Heath: Main representation from Bushey Museum Property Trust	052a	<u>Objection on the grounds of soundness</u> Granville Taylor for the Bushey Museum Property Trust <u>Detailed representation</u> objecting to the designation of the Paddocks as a Local Green Space. Plus 528 signatures (437a-964a) in support of the representation objecting to the designation. The site does not meet criteria in NPPF and Hertsmere's scoring of the site in its Green Spaces report is incorrect (too high). The site should not be designated as a Local Green Space. Land was left to the Trust and must be sold to enable restoration of Reveley Lodge, outbuildings and cottages and to secure long term future of house and garden. Would enable continuation of Bushey Museum and Reveley Lodge charitable work which benefit local community and general public. If land designated as LGS and funds from sale of land not secured Reveley Lodge could have to close in next few years. Designation of LGS must not prevent identified development needs being met (NPPF).	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a Local Green Space.
The Paddock,	437a to 444a	<u>Objection on the grounds of soundness</u>	<u>No change required</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Bushey Heath: individuals supporting Main representation from Bushey Museum Property Trust and also adding their own comments		A total of 8 individuals (437a- 444a) signed slips saying: 'I wish to make a representation to Hertsmere Council's Site Allocations and Development Management Plan published on 31 st July 2015 that 'The Paddocks' Elstree Road, Bushey (Reference BH007) is not designated a Local Green Space and that my representation is in common with that of the Bushey Museum Property Trust' and added their own comments as set out below.	The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a Local Green Space.
The Paddock, Bushey Heath: individuals supporting Main representation from Bushey Museum Property Trust and also adding their own comments	437a	<u>Objection on the grounds of soundness</u> Individual representation. Reveley Lodge and gardens and the Museum are a joy for people to visit. Would prefer that they remain.	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a Local Green Space.
The Paddock, Bushey Heath: individuals	438a	<u>Objection on the grounds of soundness</u> Individual representation. Reveley Lodge is important to Bushey Heath's history. School children	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
supporting Main representation from Bushey Museum Property Trust and also adding their own comments		use Reveley Lodge to learn Victorian history. Sale of Paddocks required for maintenance of Lodge. Would be a great loss to Bushey if Reveley Lodge fell into disrepair as a result of Paddocks being designated Local Green Space. Paddocks serves no purpose when Stanmore and Harrow Weald Commons and other local open spaces are close. Reveley Lodge garden is beautiful - it is a local green space in its own right.	Council's criteria based approach to identifying sites worthy of designation as a Local Green Space.
The Paddock, Bushey Heath: individuals supporting Main representation from Bushey Museum Property Trust and also adding their own comments	439a	<u>Objection on the grounds of soundness</u> Individual representation. Important that future of museum is secured.	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a Local Green Space.
The Paddock, Bushey Heath: individuals supporting Main	440a	<u>Objection on the grounds of soundness</u> Individual representation. As a past secretary to the Trust I am enthusiastic to give further support in any way possible.	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
representation from Bushey Museum Property Trust and also adding their own comments			Local Green Space.
The Paddock, Bushey Heath: individuals supporting Main representation from Bushey Museum Property Trust and also adding their own comments	441a	<u>Objection on the grounds of soundness</u> Individual representation. Plenty of local green space 100 yards away.	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a Local Green Space.
The Paddock, Bushey Heath: individuals supporting Main	442a	<u>Objection on the grounds of soundness</u> Individual representation. Only doubt is that the Trust has the final approval of what is built on the land so that goes with to area (sic). Lived in the area until 2006.	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
representation from Bushey Museum Property Trust and also adding their own comments			Local Green Space.
The Paddock, Bushey Heath: individuals supporting Main representation from Bushey Museum Property Trust and also adding their own comments	443a 444a	<u>Objection on the grounds of soundness</u> Individual representation. It is a wonderful restful visit.	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a Local Green Space.
The Paddock, Bushey Heath: individuals supporting Main	445a to 964a	<u>Objection on the grounds of soundness</u> A total of 520 further individuals (445a-964a) signed slips saying: 'I wish to make a representation to Hertsmere Council's Site Allocations and Development	<u>No change required</u> The designation is considered to be consistent with the NPPF and with the Council's criteria based approach to identifying sites worthy of designation as a

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
representation from Bushey Museum Property Trust (no additional comments)		Management Plan published on 31 st July 2015 that 'The Paddocks' Elstree Road, Bushey (Reference BH007) is not designated a Local Green Space and that my representation is in common with that of the Bushey Museum Property Trust.' No further comments were added to these slips. Two additional names were listed by BMPT but there were no signed slips for these 2 objectors.	Local Green Space.
The Paddock, Bushey Heath: individual support letters	051a	<u>Supports the policy</u> Individual representation. Supports designation as Local Green Space. Land was left in good faith to the Bushey Museum Trust. All green spaces are important in overdeveloped Hertsmere.	<u>Support noted</u>
The Paddock, Bushey Heath: individual support letters	060a	<u>Supports the policy</u> Oliver Dowden MP supports the allocation of the Paddock as a Local Green Space.	<u>Support noted</u>
The Paddock, Bushey Heath: Main representation from Bushey Heath Residents Association	059a	<u>Supports the policy</u> Elaine Sin-Hidge for the Bushey Heath Residents Association submits a <u>detailed representation</u> supporting the designation of the Paddocks as a Local Green Space. Plus 373 signatures (062a-434a) in support of the designation as Local Green Space. BHRA represent many local residents; wholeheartedly support SADM proposals in full.	<u>Support noted</u>

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		Council's evaluation of green spaces is clear and significant, site fulfils NPPF criteria, BMPT's financial issues are not a significant factor (and they don't appear to have tried other fundraising). 2 planning applications have already been refused planning permission (first refusal upheld on appeal). Have already been petitions to 'Save our Green Space' of over 1500 and 1400 signatures). Site not required in order to meet Borough's housing target. Important to preserve village feel of Bushey in face of London ripple effect. Signed slips now submitted are all from local residents.	
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents Association main representation with additional comments added	062a-090a	<u>Supports the policy</u> A total of 29 individuals signed slips saying: 'I As a local resident of Bushey, wish to make a representation fully supporting Hertsmere Council's SADM Plan and that it should include The Paddock, Elstree Road, Bushey (reference BH007) as a designated Local Green Space. We agree with Hertsmere council's inclusion of this site in their SADM Local Plan.' and added their own comments as set out below.	<u>Support noted</u>
The Paddock, Bushey Heath: individual	062a	<u>Supports the policy</u> Individual representation. No more building in Bushey. Leave greenery alone. More people will	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
signed slips accompanying Bushey Heath Residents Association main representation with additional comments added		affect schools & doctors.	
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents Association main representation with additional comments added	063a	<u>Supports the policy</u> Individual representation. Land should be included in SADM. It's a beautiful peaceful setting. Residents enjoy sitting the on benches and enjoying rural setting.	<u>Support noted</u>
The Paddock, Bushey Heath: individual signed slips accompanying	064a	<u>Supports the policy</u> Individual representation. Developing Paddock would contravene original condition that is was left to the Museum.	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Bushey Heath Residents Association main representation with additional comments added			
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents Association main representation with additional comments added	065a	<u>Supports the policy</u> Individual representation. There is already too much development in this area.	<u>Support noted</u>
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents	066a	<u>Supports the policy</u> Individual representation. This is one of the last green spaces in Bushey Heath.	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Association main representation with additional comments added			
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents Association main representation with additional comments added	067a	<u>Supports the policy</u> Individual representation. Right to protect this precious green space against inappropriate development.	<u>Support noted</u>
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents	068a	<u>Supports the policy</u> Individual representation. Flats would impact traffic & road safety. This land is the last remaining piece of 'Bushey Heath'.	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Association main representation with additional comments added			
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents Association main representation with additional comments added	069a	<u>Supports the policy</u> Individual representation. This has one of the best views over Hertfordshire. Don't destroy view	<u>Support noted</u>
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents	070a	<u>Supports the policy</u> Individual representation. Additional building in this area not suitable. Infrastructure is at breaking point. Too many developments in the area.	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Association main representation with additional comments added			
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents Association main representation with additional comments added	071a	<u>Supports the policy</u> Individual representation. Residential development would mean more traffic. Traffic has already increased due to opening of nursery school at Immanuel College. Enough is enough.	<u>Support noted</u>
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents	072a	<u>Supports the policy</u> Individual representation. One of few green spaces in Bushey Heath.	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Association main representation with additional comments added			
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents Association main representation with additional comments added	073a	<u>Supports the policy</u> Individual representation. More homes, more traffic, no consideration for widening Elstree Road and making it a danger to the environment.	<u>Support noted</u>
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents	074a	<u>Supports the policy</u> Individual representation. Don't want more building in Bushey. Ruining our environment & adding pollution and traffic.	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Association main representation with additional comments added			
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents Association main representation with additional comments added	075a	<u>Supports the policy</u> Individual representation. Leave green spaces alone. Feel of Bushey has changed with more and more building and erosion of our spaces.	<u>Support noted</u>
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents	076a	<u>Supports the policy</u> Individual representation. Stop the rape of Bushey.	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Association main representation with additional comments added			
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents Association main representation with additional comments added	077a	<u>Supports the policy</u> Individual representation. Must protect urban green spaces for future generations.	<u>Support noted</u>
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents	078a to 089a	<u>Supports the policy</u> 12 Individual representations. say Paddock important part of Bushey Heath history & in eyes of local community forms a significant part of local landscape. Last remaining part of original heath. Used for Bushey Summer Fair every year – social importance as well as sentimental, historic and	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Association main representation with additional comments added		visual. Loss of space would harm community, atmosphere, character & appearance of Bushey. 1400 people signed a petition urging council to save the Green Space.	
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents Association main representation with additional comments added	090a	<u>Supports the policy</u> Individual representation. Fully complies with criteria set down by HBC for Local Green Space and should be confirmed as an integral part of SADM.	<u>Support noted</u>
The Paddock, Bushey Heath: individual signed slips accompanying Bushey Heath Residents	091a to 434a	<u>Supports the policy</u> A total of 344 further individuals signed slips saying: 'I As a local resident of Bushey, wish to make a representation fully supporting Hertsmere Council's SADM Plan and that it should include The Paddock, Elstree Road, Bushey (reference BH007) as a designated Local Green Space. We agree with	<u>Support noted</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Association main representation (no additional comments)		Hertsmere council's inclusion of this site in their SADM Local Plan.' No further comments were added to these slips.	
SADM38 New and Improved Public Open Spaces	010I	<u>Supports the policy</u> Natural England support the policy	<u>Support noted</u>

Chapter Six: Transport and parking

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Whole chapter	007a	<u>Supports the policy</u> Transport for London (TfL) welcome policies in Chapter 6	<u>Support noted</u>
Whole chapter	026y	<u>General comment</u> HCC Property have no comments to make on this chapter.	<u>Comment noted</u>
Whole chapter	058d	<u>General comment</u> Parking will not be sufficient	<u>Comment noted</u> Core Strategy Policy CS25 and the Parking Standards SPD 2014 set out the amount of off-street parking that new development is expected to provide. The level of parking required for new development is determined on a case by case basis to ensure that it is sufficient to meet the needs of each development.
Whole chapter	058s	<u>General comment</u> Elstree and Borehamwood Green Belt Society are concerned that HCC will only adopt access roads in new developments. Unclear how roads within developments will be managed.	<u>Comment noted</u> SADM does not set out policy on the adoption of roads by the County Council as Highway Authority. Para 6.10 requires new development to comply with local highway design guidance.
Modal Shift	058t	<u>General comment</u> Elstree and Borehamwood Green Belt Society say that public transport struggles to cope with pressure points during the day, particularly the rail service.	<u>Comment noted</u> The provision of transport infrastructure is not within the scope of the Local Plan.

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Modal Shift	007b	<u>Supports the policy</u> TfL support location of new development in established settlements.	<u>Support noted</u>
Modal Shift	058r	<u>General comment</u> Elstree and Borehamwood Green Belt Society say roads in Borehamwood will not be able to cope with extra traffic generated by development.	<u>Comment noted</u> It is gathered from the representation that this comment also refers to the housing allocations in the Elstree Way Corridor Area Action Plan (adopted July 2015) as well as those in the SADM Plan.
Modal Shift	007c	<u>Supports the policy</u> TfL support requirement for a transport assessment/statement for major developments and mitigation of any impacts at the developer's expense	<u>Support noted</u>
Modal Shift	017x 021z 037t	<u>Objection on the grounds of soundness</u> Shire Consulting for 3 private education providers find the policy unsound. The historic location of some community facilities means they are not accessible by sustainable modes transport but should still be supported by council when seeking to enhance provision.	<u>No change required</u> The enhancement of key facilities in inaccessible locations must be balanced against the need to promote sustainable travel where reasonable to do so, to accord with Para. 30 of the NPPF. The Council supports the enhancement of such facilities through SADM25 Key Green Belt Sites, but traffic generation is a key consideration and Green Travel Plans will be required for larger developments.

Chapter Seven: Town Centres and Shopping

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
SADM43 TC2 Radlett Service Station/Regency House, Former Fire Station and Burrell & Co	011j	<u>Objection on the grounds of soundness</u> Historic England object to the word 'Design' in this policy (line 6) and request it is changed to 'Development' to read: <i><u>Development</u> should respect the character and enhance the setting of the adjacent Conservation Area.</i>	<u>No change required</u> The principle of a mixed-use type development is already set out in the adopted Radlett District Centre Key Locations Planning Brief. Therefore it SADM43 is concerned with the design and appearance of the development, and ensuring that this respects the character and enhances the setting of the adjacent Conservation Area.
SADM43 TC2 Radlett Service Station/Regency House, Former Fire Station and Burrell & Co	026z	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Property Services say the requirement to replace former community use should be deleted. Fire Station is not a community use. Refers to appeal decision on Radlett Fire Station site.	<u>Change required</u> The quoted appeal decision does not state that the Fire Station was not a community facility. The Radlett District Centre Key Locations Planning Brief (KLPB) includes a requirement for the replacement of the community use at ground floor level. This document has been the subject of public consultation and is adopted Council policy and the Inspector does not dispute the validity of this document in her decision. The proposal put forward and which was granted permission on appeal included a

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			community facility. In fact para 13 of the inspector's decision letter says, "I conclude that the proposed development, with the frontage community facility space indicated, would broadly accord with the KLPB....". The issue actually under consideration at the Appeal was whether the proposed development made adequate provision for a community facility, not whether one was required at all or whether the Fire Station was considered to be a community facility. The point the Inspector did make in her decision letter was that it was not a community building to which the general public routinely had access. The Fire Station clearly falls within this definition of key community facilities, and we cannot see anything in the Inspector's decision letter that contradicts that view. HBC has, however, listened to HCC's argument, raised in subsequent discussions, that local circumstances in relation to the need for community uses locally can change over time, and that it

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			would be helpful for it to be clear in SADM that the provisions of CS19 Key Community Facilities apply to the site. HCC is clear that in line with this policy, robust evidence would need to be provided should future applicants wish to demonstrate that the site is surplus to the needs of the community and that there is no scope or need for alternative community uses to be provided. It is the case that the Core Strategy and SADM are to be read together. Nevertheless, whilst HBC remains clear that a community use is required on the site it acknowledges that an amendment to the wording of this requirement so as to explicitly link it to the provisions of Policy CS19 could be made in order to enable HCC to withdraw their objection. The following additional text to SADM is therefore considered appropriate: Community uses required on part of the site to replace former community use, <u>subject to the provisions of Core Strategy Policy CS19 Key Community Facilities.</u>

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Policy SADM44 Primary Frontages	039a	<u>Objection on the grounds of soundness</u> SSA Planning on behalf of Kentucky Fried Chicken say there is no evidence supporting ban on A5 in primary frontage. Should establish an overall acceptable proportion based on evidence	<u>No change required</u> The function of primary retail frontages in the Borough is clearly set out in para 7.8 and it is reasonable to minimise the loss of A1 use (in ground floor units) to any other use along the designated primary retail frontages
Policy SADM48 (v) proximity of hot food takeaways to secondary schools	039b	<u>Objection on the grounds of soundness</u> SSA Planning on behalf of a hot food takeaway chain say that restricting choice for members of public without good evidence is unlawful. No evidence base. No good reason for including at this stage. Detailed paper. Delete point (v).	<u>No change required</u> A high court ruling in 2010 <i>Regina (Copeland) v London Borough of Tower Hamlet</i> clearly indicated that health issue i.e. proximity of a school to an application site for fast food takeaway should be a material consideration.
Policy SADM48 (v) proximity of hot food takeaways to secondary schools	023a	<u>Objection on the grounds of soundness</u> Planware Ltd say the Plan should remove restriction on A5 uses relative to schools. (Detailed paper submitted).	<u>No change required</u> A high court ruling in 2010 <i>Regina (Copeland) v London Borough of Tower Hamlet</i> clearly indicated that health issue i.e. proximity of a school to an application site for fast food takeaway should be a material consideration.

Chapter Eight: Implementation and Monitoring Framework

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Whole Chapter	026c	<u>General comment</u> Hertfordshire County Council Development Services has no comment on this chapter.	<u>Comment noted</u>
Delivery	058q	<u>General comment</u> Elstree and Borehamwood Green Belt Society say infrastructure delivery will lag behind development due to s106 and CIL process.	<u>Comment noted</u> The co-ordination of infrastructure with development is a continuing issue and continually addressed with the relevant providers. The nature of the s106 and CIL process means that some infrastructure provision will follow development. However the link between infrastructure and development is a complex one depending on the type of infrastructure and level of development individually and cumulatively. In some cases development cannot proceed without a constraint being addressed, in many other cases there is either sufficient spare capacity or no significant breach of a threshold.
Table 4 Monitoring Framework	024h	<u>Objection on the grounds of soundness</u> CPRE strongly objects to 'target' being to complete 100% of dwelling capacity - this would encourage development in excess of Housing Need and Core Strategy Housing Target. Monitoring target for Housing should therefore be to 'complete 100% of the Local Plan's target for Housing.	<u>No change required</u> These are fair statistical measures of the degree to which the Council has been successful in delivering new homes on the proposal sites listed in Policies SADM1 and SADM36. The targets are statistical targets for monitoring purposes: they are

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			neither policies nor requirements. The objector appears to be confusing these measures with the overall housing target, which as Core Strategy Policy CS1 indicates is a minimum..

Appendices and Policies Map

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Policies Map – General	038c	<u>Correction of error</u> The HCC's Minerals Consultation Area is wrongly represented on the pre-submission Policies Map. HCC will provide the correct information which will be included in the SADM Policies Map once received.	<u>Change required</u> Changes to Policies Map to include latest information on Mineral Consultation Areas (Data to be provided by HCC)
SADM11 Local Nature Reserve (LNR) maps (p.125-126)	001a 010m	<u>Correction of error</u> Natural England and a resident note that the titles of the LNR maps on p.125 (Furzefield Wood) and p.126 (Fishers Field) have been transposed.	<u>Change required</u> The map titles will be corrected.
Policies Map – SADM25 Key Green Belt Sites b) Bio Products Laboratory, Dagger Lane, Aldenham	045a	<u>Objection on the grounds of soundness</u> Crispin Wride for Bio Products Laboratory would like the infill boundary revised. (See also 045b).	<u>Change required</u> The Council agrees that an amended infill boundary to reflect known future development on the site would be appropriate.
Policies Map – SADM25 Key Green Belt Sites m) Hertswood Lower School	026a	<u>Objection on the grounds of soundness</u> HCC Development Services concerned about loss of education land and failure to provide mitigation. Need to see proposals for H6 in context of increasing need for secondary places. Latest secondary education forecasts indicate a peak requirement in 2023/4 of an additional 2.6fe in Borehamwood. Yavneh College (5fe) is the only other local secondary school and as a faith school has its own admissions criteria. Future of Harperbury Free	<u>Change required</u> Hertswood Academy has confirmed that it is happy to work with HCC and this Council to achieve a future additional 2.6fe at the Lower School Site (C2). This is referred to in proposed amended text supporting Policy SADM25 Key Green Belt Sites. The Council has also proposed a revised Infill envelope in order to provide

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
		School (new proposal) and its ability to meet need in Borehamwood uncertain. Hertswood Academy will have to meet this extra need. Concerned that consolidated Hertswood Academy site will not be able to do so. Assurances required that school can accommodate future secondary school needs or additional education land is required to mitigate the loss of land at H6.	flexibility for future expansion on the site, which has been agreed by the Academy. HCC working with Academy, Schools, and Highways to establish that site has capacity to meet additional requirements. Hopeful that this will confirmed and can form basis of agreement.
Policies Map – Map B Bushey and North Bushey	012b	<u>Objection on the grounds of soundness</u> Hertfordshire Gardens Trust want us to show Bushey Rose Garden as Historic Park as well as Local Green Space.	<u>Change required</u> The map will be updated to reflect the proposed amendment
Policies Map – Map D Radlett, Letchmore Heath, Aldenham and Round Bush	019c	<u>Objection on the grounds of soundness</u> Phillips Planning Services on behalf of the site owners want the Council to allocate SADM2 safeguarded site Starveacres for 55 dwellings	<u>No change required.</u> The purpose of the SADM Plan is to deliver the housing target set in the Core Strategy, and as shown in Table 1 in SADM the Council has an adequate supply of housing against this target. As this land is not needed to meet the Core Strategy housing target, there is no need to remove it from its safeguarded status. The designation should therefore remain as it is on the Policies Map. Also see response to 019a in relation to 'Other Sites Proposed' above.
Policies Map – SADM1 - H12	043b	<u>Objection on the grounds of soundness</u> DLA Town Planning for Inland Homes says take the	<u>No change required</u> The site is previously developed land in

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
First Place Nurseries, Falconer Road, Bushey		site out of Green Belt or clarify the acceptability of development outside envelope (ref 3 Rivers SADM Examination). Taking site out of Green Belt would aid delivery of site and remove necessity to designate Bushey Academy as a Key Green Belt Site. (suggested amendment to Green Belt Boundary submitted).	the Green Belt. The Council acknowledges that the use being promoted by the landowner could contribute to housing supply and have no worse effect on the Green Belt overall. On the other hand the existing nursery is an important community asset. The site is in some ways windfall in the Green Belt. In terms of the Green Belt boundary, there is no clear reason to change, certainly not in terms of the exaggerated extent of change recommended by DLA Town Planning which affects Bushey Academy. This is located in a particularly significant, sensitive and narrow part of the Green Belt separating Bushey from Oxhey/North Bushey. A more consolidated form of development on Proposal Site H12 nearer Falconer Road, which secures an open area where the swimming pool currently is, is considered to be a reasonable and balanced approach.
Policies Map – Land in Heathbourne Road	975a	<u>Objection on the grounds of soundness</u> Robert Young for neighbour opposite (974b above) (LATE REP). Should consider Green Belt status of land opposite safeguarded land and H10 and include it in the area removed from the Green Belt.	<u>No change required</u> The Green Belt boundary, including the proposed exclusion of Spire Hospital, Bushey, runs along Heathbourne Road. The road is a very clear and defensible boundary, and accords with advice in para

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			85 of the National Planning Policy Framework. The exclusion of land from the Green Belt on the opposite (eastern) side of Heathbourne Road Is not appropriate: ▪ The purpose of the SADM Plan is to deliver the housing target set in the Core Strategy, and as shown in Table 1 in SADM the Council has an adequate supply of housing against this target. As this land is not needed to meet the Core Strategy housing target, there is no need to remove it from the Green Belt. ▪ The proposed change is not minor and would not make the Green Belt boundary more defensible. ▪ The character of the area on the eastern side is more rural and may more readily be described as countryside; existing housing is very well separated; and there are no major developments like Spire Hospital or The Calenders. There are therefore no exceptional circumstances to warrant any change now. The review of the Core Strategy would be the appropriate time to consider whether

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			any such change to the Green Belt might be reasonable. This is when the Council will be weighing up housing (and employment) needs, which might constitute exceptional circumstances for change, and reassessing the Green Belt.
Policies Map – Policy SADM23 Green Belt Boundary	028a	<u>Objection on the grounds of soundness</u> The owners of 29 Heath Road request a change to the GB boundary to 9 Green Meadow (is shown changed on policies map), 29,31 and 37 Heath Road (as was proposed in the Consultation Draft SADM 2014)	<u>No change required</u> The current boundary is considered to be defensible and there is no justification for it to be altered at this time. Green belt boundary will be reviewed as part of the forthcoming Core Strategy Review.
Policies Map – SADM24- Shenley Village Envelope	034a	<u>Objection on the grounds of soundness</u> The owner of Shenley Grange has requested the Shenley village boundary be amended to include part of his property. <u>Following the preparation of a Statement of Common Ground, this objection has been withdrawn.</u>	<u>Change required</u> The Council agrees that an amendment to the Shenley village boundary would be appropriate and has agreed a Statement of Comment Ground with the objector.
Policies Map – SADM24- Shenley Village Envelope	026n	<u>Supports the Policy</u> Hertfordshire County Council Development Services support inclusion of Shenley Primary School within village envelope.	<u>Support noted</u>
Policies Map – SADM24- Elstree Village	026l	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Development Services say GB is a constraint to enhancement of	<u>No change required</u> The existing village envelope includes the hard play areas of Elstree Primary School

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
Envelope		educational facilities. Include St Nicholas Elstree primary school playing fields in village envelope.	and excludes the playing fields only. This approach allows limited infilling (e.g. temporary school buildings) within the hard-surfaced areas while ensuring that any harm caused to the Green Belt by development outside of the built-up part of the village can be properly assessed using normal Green Belt policies.
Policies Map – SADM24- South Mimms Village Envelope	026m	<u>Objection on the grounds of soundness</u> Hertfordshire County Council Development Services say GB is a constraint to enhancement of educational facilities. Include St Giles primary school in village envelope.	<u>Change required</u> The Council agrees that an amendment to the South Mimms Village Envelope to include the hard play areas of the school would be appropriate, and is consistent with the approach taken at Elstree (see comment to 026l above).
Policies Map – SADM24- South Mimms Village Envelope	027a	<u>Objection on the grounds of soundness</u> Aylward Town Planning for King and Co request extension of village envelope to include Site A at Blackhorse Road. In their view there was inadequate assessment of this request at consultation Draft stage. Case for additional housing provision made under 027b (additional housing site).	<u>No change required</u> This proposal was carefully considered at Consultation Draft stage. Essentially it would be a small estate on a field (ref. the objector's site plan), which as a matter of fact is in the middle of the Green Belt. The adjoining small village, South Mimms, is washed over by Green Belt. Core Strategy Policy CS13 indicates that for the first time an area for limited infilling should be delineated at South Mimms. As a matter of approach, village envelope boundaries are drawn reasonably tightly around the

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			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. However the size of the proposal is substantially beyond the scale of limited infilling (which is defined in SADM paras 4.77-4.79). It also represents an extension of the village along the B556. It would therefore be inappropriate to adjust the boundary of the village envelope to accommodate the proposal. The proposal is not needed to deliver the Core Strategy housing target and represents a significant area of development and change to the Green Belt. The proposal does not in the Council's view represent a rural exceptions site. That it may include 50% affordable housing is a factor to consider, but that does not warrant its release from the Green Belt. The review of the Core Strategy would be the appropriate time to consider any such change to the Green Belt. This is when the Council will be weighing up housing (and

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			employment) needs for which the studies are almost complete, and reassessing the Green Belt.
Appendix F – SADM25 Key Green Belt Sites	011h	<u>Supports the plan</u> Historic England welcome the criteria in SADM25 and support the list of heritage assets on Key Green Belt Sites in Appendix F	<u>Support noted</u>

Miscellaneous

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
MOD statutory consultation	002a	<u>General comment</u> MOD notification of statutory consultation zones for RAF Northolt and Chénies.	<u>Comment noted</u> The details have been passed to our Development Management team who undertake the required consultation on planning applications.
ORR no comment	005a	<u>General comment</u> ORR advise they have no comments and do not wish to be informed further in respect of SADM.	<u>Comment noted.</u>
TfL land ownership	041a	<u>General comment</u> TfL have indicated that although they do not own land affected by Site Allocations they own land adjoining some of them. They request that any proposals for these sites should take the adjacent TfL land uses / operations into consideration and TfL should be consulted on any applications for development.	<u>Comment noted</u> The details have been passed to our Development Management team who undertake the consultations on planning applications.
GLA request	049a	<u>General comment</u> GLA have no comments on SADM. They wish to be consulted on the draft SHMA, which will inform partial review of Core Strategy.	<u>Comment noted</u> The GLA was invited to join the Project Advisory Group (PAG) for the SHMA. They indicated that they would not attend meetings but wished to be kept informed and they have accordingly been advised of forthcoming meetings and provided with minutes. It is intended that the draft SHMA will be available to the GLA to

SADM section ref.	Representation ref.	Summary of representation	Action required and justification
			comment prior to it being signed off by the commissioning authorities.
GP Surgeries	058u	<u>General comment</u> Elstree and Borehamwood Green Belt Society say even though a health facility is planned (in Borehamwood) there is a national shortage of GPs and health professionals and funding for staffing.	<u>Comment noted</u> Staffing is not an issue for SADM. The Council's planning policies support the provision of appropriate new health facilities: Core Strategy Policy CS19 <i>Key Community Facilities</i> and Policy SADM33 <i>Key Community Facilities</i> support the provision or enhancement of community facilities subject to specific criteria being met. Core Strategy Policy CS20 <i>Securing Mixed use development</i> indicates that the Council will work in partnership with local service providers and others to identify the need for additional services and facilities where major development sites come forward.
Deposit points	018a	<u>General comment</u> Elstree and Borehamwood Town council wish to be a deposit point for documents in future consultations.	<u>Comment noted</u> This is welcomed and agreed.