



Historic England

East of England

Mr Mark Silverman  
Policy and Transport Manager  
Hertsmere Borough Council

Our ref: HD/P 5254  
Your ref: SADM 2015  
Telephone: 01223582746

Sent via email only to local.plan@hertsmere.gov.uk

1<sup>st</sup> September 2015

Dear Mr Mark Silverman

**Re: Site Allocations and Development Management Policies Plan- Town and Country Planning (Local Planning) (England) Regulations 2012- Representations on the Published Plan**

Thank you for your letter dated 3<sup>rd</sup> August 2015 regarding the above consultation. I can advise that we have considered the consultation and can offer the following.

The sections we have previously commented on have been titled below for ease of reference and our comments updated according to the amendments made. I can advise that Historic England find all sections outlined below legally compliant, compliant with the Duty to Cooperate, and sound in relation to the Historic Environment, with the exception of Policy SADM43. Policy SADM43 is considered to be unsound as it has not been positively prepared and is not consistent with National Policy and we have offered recommendations to ensure soundness below.

**General comments regarding potential development sites**

We welcome the reference to locally valued heritage assets added to supporting text of the 'Historic Environment' and acknowledge consultation with conservation and archaeology staff at both County and Borough level.

We welcome that the site specific requirements (SSR) for relevant sites (as highlighted previously by us) have been modified to reference heritage assets.

**Housing**

**Housing Allocations**

**Policy SADM1: Site H5, Land at Rossway Drive, Bushey**

We welcome the inclusion of the sentence relating to Tyler's Farm House (Grade II).

**Policy SADM1: Site H9, Former Sunny Bank School, Potters Bar**

We welcome the inclusion of the sentence relating to Royds Conservation Area.



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## **Employment and Economy**

### **Key Employment Sites**

#### **Locally Significant Employment Sites**

##### **Policy SADM8 (was previously Policy SADM7): Wrotham Business Park, Potters Bar**

We welcome the reference added to the supporting text, and a list of currently known assets added at Appendix E.

##### **Policy SADM8 (was previously Policy SADM7): Hollies Way Business Park, Potters Bar**

We welcome the reference added to the supporting text, and a list of currently known assets added at Appendix E.

##### **Policy SADM8 (was previously Policy SADM7): Beaumont Gate**

We welcome the reference added to the supporting text, and a list of currently known assets added at Appendix E.

##### **Policy SADM8 (was previously Policy SADM7): Farm Close sites, Shenley**

We welcome the reference added to the supporting text, and a list of currently known assets added at Appendix E.

## **Open Land and the Environment**

### **Key Green Belt Sites**

##### **Policy SADM25 (was previously Policy SADM21): Aldenham School, Letchmore Heath**

We support the added criterion relating to heritage assets. We particularly support the reference to Appendix F showing listing of known heritage assets and how they are to be taken into account.

##### **Policy SADM25 (was previously Policy SADM21): Bushey Academy, Bushey**

We support the added criterion relating to heritage assets. We particularly support the reference to Appendix F showing listing of known heritage assets and how they are to be taken into account.

##### **Policy SADM25 (was previously Policy SADM21): Elstree Aerodrome, Elstree**

We support the added criterion relating to heritage assets. We particularly support the reference to Appendix F showing listing of known heritage assets and how they are to be taken into account.

##### **Policy SADM25 (was previously Policy SADM21): Haberdashers' Aske School (Boys) Elstree**

We support the added criterion relating to heritage assets. We particularly support the reference to Appendix F showing listing of known heritage assets and how they are to be taken into account.

##### **Policy SADM25 (was previously Policy SADM21): Haberdashers' Aske School (Girls) Elstree**

We support the added criterion relating to heritage assets. We particularly support the reference to Appendix F showing listing of known heritage assets and how they are to be taken into account.

##### **Policy SADM25 (was previously Policy SADM21): Cancer Research UK, Potters Bar**

We support the added criterion relating to heritage assets. We particularly support the reference to Appendix F showing listing of known heritage assets and how they are to be taken into account.

##### **Policy SADM25 (was previously Policy SADM21): National Institute for Biological Standards & Control, Potters Bar**

We support the added criterion relating to heritage assets. We particularly support the reference to Appendix F showing listing of known heritage assets and how they are to be taken into account.



**Policy SADM25 (was previously Policy SADM21): St. Margaret’s School, Bushey**

We support the added criterion relating to heritage assets. We particularly support the reference to Appendix F showing listing of known heritage assets and how they are to be taken into account.

**Policy SADM25 (was previously Policy SADM21): Willows Farm, London Colney**

We support the added criterion relating to heritage assets. We particularly support the reference to Appendix F showing listing of known heritage assets and how they are to be taken into account.

**Historic Environment**

**Policy SADM30 (was Policy SADM26): Heritage Assets**

We welcome the amended policy wording for consistency and acknowledge that all monuments are shown on the Policy Map.

**Building Sustainable Communities**

**Policy SADM32 (was Policy SADM28): Bushey Heath MOD Housing Area**

No further comment.

**Town Centres and Shopping**

**Town Centre and District Centres**

**Policy SADM43 (was Policy SADM36): TC2, Radlett**

It is considered that the above policy is currently unsound as it has not been positively prepared and is not consistent with National Policy. Para 154 of the NPPF outlines that ‘only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan’. Currently it is considered that the policy has not been positively prepared with regard to the impact development proposals could have on the Historic Environment. It is not considered consistent with National Policy as it is unclear how the decision maker should react to development proposals. To ensure the plan is positively prepared and consistent with National Policy, in relation to assessing the impact of development proposals on the Historic Environment, for clarity and to strengthen the policy, we would advise that the word ‘Design’ is amended to ‘Development’ to ensure that all development ‘... should respect the character and enhance the setting of the adjacent Conservation Area’.

**Implementation and Monitoring Framework**

**Table 4: Monitoring Framework**

No further comments

Please note that any reference to ‘English Heritage’ within the document should be changed to ‘Historic England’. The organisation has been divided into two, English Heritage being responsible for the charity’s properties and Historic England being responsible for government advice on the Historic Environment.



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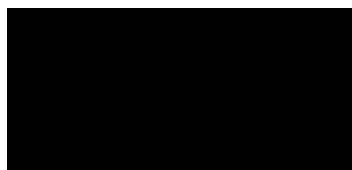
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For information and for further policy consultation please note our new consultation email address for the East of England, [eastplanningpolicy@HistoricEngland.org.uk](mailto:eastplanningpolicy@HistoricEngland.org.uk). If you would like any clarification or would like to discuss the above please do not hesitate to contact me on my direct dial 01223 582746 or email me at [kayleigh.wood@HistoricEngland.org.uk](mailto:kayleigh.wood@HistoricEngland.org.uk).

Yours sincerely,



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