

## Christine Whyte

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**From:** CPRE Hertfordshire <office@cpreherts.org.uk>  
**Sent:** 11 September 2015 13:50  
**To:** Local Plan  
**Cc:** 'Steve Baker'; Kevin FitzGerald  
**Subject:** Hertsmere Site Allocations & DMP Plan Consultation  
**Attachments:** Hertsmere SADM Pre-sub 2015 CPRE Comments Affordable Homes.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Change of Use to Res.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Employment Site Allocns.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Employment to Res.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Green Belt SADM 25.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Hsg Supply.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Hsg Table 1.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Monitoring Table 4.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Redevelopment for Flats SADM 3.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments SADM 10.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments SADM 28.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Safeguarded Land.doc; Hertsmere SADM Pre-sub 2015 CPRE Comments Safeguarding Policy SADM 2.doc

To: Policy and Transport Team, Hertsmere Borough Council

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

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

Steve Baker  
Planning Manager

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CPRE Hertfordshire is a registered charity no. 211299, address: 31a Church Street, Welwyn, AL6 9LW, tel 01438 717587. For more information on our work visit [www.cpreherts.org.uk](http://www.cpreherts.org.uk). We are the county branch of the Campaign to Protect Rural England.

This email is confidential and may also be legally privileged. If you have received it in error, please notify us immediately by reply email and delete this message from your system. Views expressed in this message are those of the sender and may not necessarily reflect the views of CPRE Herts. This email and its attachments have been virus-checked by NOD Anti-Virus. No virus is believed to be resident but it is your responsibility to satisfy yourself that your systems will not be harmed by any of its contents.



**Site Allocations and Development Management Policies Plan (SADM)**  
**Publication Stage Representation Form**

For office use only  
 Reference No:  
 Date received:

**Please use this form to make Representations**

**Please return to Hertsmere Borough Council by 5pm on Monday 14 September**

**2015**

**By post:** Policy and Transport Team, Planning and Building Control, Hertsmere Borough Council, Civic Offices, Elstree Way, Borehamwood, Herts, WD6 1WA.

**By email:** local.plan@hertsmere.gov.uk

This form has three parts:

**Part A** – Personal details (only needed once).

**Part B** – Your representation(s). Please complete a separate sheet (Part B) for **every** representation you wish to make, remembering to insert your or your organisation’s name at the top of the page.

**Part C** – What information you want the Council to provide you with about future progress of SADM (only needed once).

**Please read the guidance notes at the end before completing this form. They explain the terms used and will help you make your representation(s).**

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



\*If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2.

Please note that all representations received will be made publicly available and cannot be treated as confidential. This means that the names of all those making representations will be publicly available. Other personal information relating to private individuals, including Contact details, will not however be made publicly available.

<b>Part B</b>		<b>CPRE Hertfordshire</b>	<u>For office use only</u>
<b>Name or organisation:</b>			Ref No:
			support:
			object:
			change:

**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph	<input type="text"/>	Policy	SADM 10	Policies Map	<input type="text"/>	Other part of Plan (specify)	<input type="text"/>
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**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(b) Compliant with the Duty to Co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(c) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>

If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared	<input type="checkbox"/>	Please tick which box(es) apply
5(b) Justified	<input type="checkbox"/>	
5(c) Effective	<input type="checkbox"/>	
5(d) Consistent with national policy	<input type="checkbox"/>	

**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible.**  
**If you wish to comment in support of the Plan's legal compliance, compliance with the Duty to Co-operate or soundness or wish to make any other comment, please also use this box.**

The wording of Draft Policy SADM 10 does not provide sufficient clarity in terms of the meaning of development that would be 'inappropriate' pending a decision on their long term future. CPRE Hertfordshire suggests that the final sentence be edited to provide such clarification, as set out below, to avoid misinterpretation.

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

**7. Please set out as precisely as possibly what change(s) you consider necessary to make the Plan**

- **legally compliant or**
  - **sound (having regard to the criteria you ticked at 5 above relating to soundness).**
- You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

CPRE Hertfordshire suggests that the wording of the final sentence of the second main paragraph of draft Policy SADM 10 be amended to state '*...there will be a presumption against development that would be treated as inappropriate under the terms of the policies set out in part 9 of the NPPF*' for the reason set out above.

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

***Please note*** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity for further submissions based on the representation you are currently making. ***After this current publication stage, further submissions will only be able to be made at the Inspector's request, based on the matters and issues he/she identifies for Examination.***

**8. If you do not consider the Plan to be sound and the Council is prepared to make changes to the Plan which reflect your suggested change, would you be prepared to enter into a 'Statement of Common Ground' with this Council?**

Yes  No

**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**

**No**, I do not wish to participate at the oral Examination

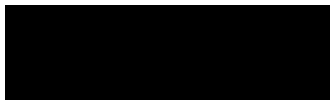
**Yes**, I wish to participate at the oral Examination

**10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:**

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

***Please note:** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the Examination.*

Signature:



**Steve Baker, Planning Manager**

**Date: 11<sup>th</sup> September 2015**

**Part C**

**(Only needed once)**

**Name (Print): Steve Baker, CPRE Hertfordshire.**

**If you wish to be informed of the date of the submission of the Plan to the Secretary of State, please tick this box.**

**If you wish to be informed of the recommendations of the Inspector appointed by the Secretary of State to carry out the independent Examination of the Plan, please tick this box.**

**If you wish to be informed of the adoption of the Plan by Hertsmere Borough Council please tick this box.**

**If you no longer wish to receive communications from the Council on SADM please tick this box.**



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Last name	Baker	
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Organisation (where relevant)	CPRE Hertfordshire	
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<b>Part B</b>	<b>Name or organisation:</b> CPRE Hertfordshire	<u>For office use only</u> Ref No: support: object: change:
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**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph	3.2	Policy		Policies Map		Other part of Plan (specify)	
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**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes		No		no comment to make	
4(b) Compliant with the Duty to Co-operate	Yes		No		no comment to make	
4(c) Sound	Yes		No		no comment to make	

*If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.*

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared		Please tick which box(es) apply
5(b) Justified		
5(c) Effective		
5(d) Consistent with national policy		

**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible.**  
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Paragraph 3.2 states that current policy to encourage change of use of various categories of land use to residential is temporary, and that its consequences should not be allowed for in the Plan. The effect of this policy will also need to be considered by the review of the Core Strategy, but its consequences need to influence decisions on planning applications.

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

**7. Please set out as precisely as possibly what change(s) you consider necessary to make the Plan**

- **legally compliant or**
  - **sound (having regard to the criteria you ticked at 5 above relating to soundness).**
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The phrase on the change of use provisions being temporary in comparison with the timescale of the Plan should be amended to reflect the changes to Planning Regulations, including those that are permanent, and their intention to facilitate changes of use to residential.

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

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**8. If you do not consider the Plan to be sound and the Council is prepared to make changes to the Plan which reflect your suggested change, would you be prepared to enter into a ‘Statement of Common Ground’ with this Council?**

Yes  No





**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**

**No**, I do not wish to participate at the oral Examination

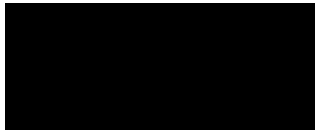
**Yes**, I wish to participate at the oral Examination

**10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:**

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Signature:



**Steve Baker, Planning Manager**

**Date:** 11<sup>th</sup> September 2015

**Part C**

**(Only needed once)**

**Name (Print):** Steve Baker, CPRE Hertfordshire.

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Name or organisation:	<b>CPRE Hertfordshire</b>	Ref No:
		support:
		object:
		change:

**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph	<input type="text"/>	Policy	SADM 2	Policies Map	<input type="text"/>	Other part of Plan (specify)	<input type="text"/>
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**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(b) Compliant with the Duty to Co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(c) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>

If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared	<input type="checkbox"/>	Please tick which box(es) apply
5(b) Justified	<input type="checkbox"/>	
5(c) Effective	<input type="checkbox"/>	
5(d) Consistent with national policy	<input type="checkbox"/>	

**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible.**

**If you wish to comment in support of the Plan's legal compliance, compliance with the Duty to Co-operate or soundness or wish to make any other comment, please also use this box.**

The wording of Draft Policy SADM 2 does not provide sufficient clarity in terms of the meaning of development that would be 'inappropriate' pending a decision on their long term future. CPRE Hertfordshire suggests that the final sentence be edited to provide such clarification, as set out below, to avoid misinterpretation.

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

**7. Please set out as precisely as possibly what change(s) you consider necessary to make the Plan**

- **legally compliant or**
  - **sound (having regard to the criteria you ticked at 5 above relating to soundness).**
- You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

CPRE Hertfordshire suggests that the wording of the final sentence on draft Policy SADM 2 be amended to state '...there will be a presumption against development that would be treated as inappropriate under the terms of the policies set out in part 9 of the NPPF.'

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

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**8. If you do not consider the Plan to be sound and the Council is prepared to make changes to the Plan which reflect your suggested change, would you be prepared to enter into a 'Statement of Common Ground' with this Council?**

Yes

No

**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**

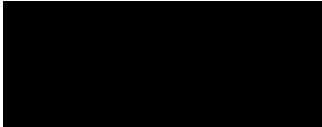
No, I do not wish to participate at the oral Examination

Yes, I wish to participate at the oral Examination

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

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Signature: 

Steve Baker, Planning Manager

Date: 11<sup>th</sup> September 2015

**Part C** (Only needed once)

Name (Print): Steve Baker, CPRE Hertfordshire,  
31a Church Street, Welwyn, Herts AL6 9LW.

If you wish to be informed of the date of the submission of the Plan to the Secretary of State, please tick this box.

If you wish to be informed of the recommendations of the Inspector appointed by the Secretary of State to carry out the independent Examination of the Plan, please tick this box.

If you wish to be informed of the adoption of the Plan by Hertsmere Borough Council please tick this box.

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**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph <input style="width: 50px; height: 20px;" type="text"/>	Policy <input style="width: 100px; height: 20px; text-align: center;" type="text" value="SADM 3"/>	Policies Map <input style="width: 50px; height: 20px;" type="text"/>	Other part of Plan (specify) <input style="width: 100px; height: 40px;" type="text"/>
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**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes <input style="width: 40px; height: 20px;" type="checkbox"/>	No <input style="width: 40px; height: 20px;" type="checkbox"/>	no comment to make <input style="width: 60px; height: 20px;" type="checkbox"/>
4(b) Compliant with the Duty to Co-operate	Yes <input style="width: 40px; height: 20px;" type="checkbox"/>	No <input style="width: 40px; height: 20px;" type="checkbox"/>	no comment to make <input style="width: 60px; height: 20px;" type="checkbox"/>
4(c) Sound	Yes <input style="width: 40px; height: 20px;" type="checkbox"/>	No <input style="width: 40px; height: 20px;" type="checkbox"/>	no comment to make <input style="width: 60px; height: 20px;" type="checkbox"/>

*If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.*

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared	<input style="width: 50px; height: 20px;" type="checkbox"/>	Please tick which box(es) apply
5(b) Justified	<input style="width: 50px; height: 20px;" type="checkbox"/>	
5(c) Effective	<input style="width: 50px; height: 20px;" type="checkbox"/>	
5(d) Consistent with national policy	<input style="width: 50px; height: 20px;" type="checkbox"/>	

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

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

**7. Please set out as precisely as possibly what change(s) you consider necessary to make the Plan**

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In order to address the omission of a reference to where redevelopment with flats will not normally be acceptable in principle, CPRE Hertfordshire suggests that the following sentence be included in draft Policy SADM 3, as a new first criterion after the line that states '*For any development that provides a new flats or flats, the following principles will apply*', as follows:

*'(i) redevelopment for flats will not normally be permitted outside existing urban areas as defined in the Plan.'*

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

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Yes  No

**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**

No, I do not wish to participate at the oral Examination  Yes, I wish to participate at the oral Examination

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Signature:  Steve Baker, Planning Manager

Date: 11<sup>th</sup> September 2015

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**By post:** Policy and Transport Team, Planning and Building Control, Hertsmere Borough Council, Civic Offices, Elstree Way, Borehamwood, Herts, WD6 1WA.

**By email:** local.plan@hertsmere.gov.uk

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**Part C** – What information you want the Council to provide you with about future progress of SADM (only needed once).

**Please read the guidance notes at the end before completing this form. They explain the terms used and will help you make your representation(s).**

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



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<b>Part B</b>	<b>Name or organisation:</b> CPRE Hertfordshire	<u>For office use only</u> Ref No: support: object: change:
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**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph <input style="width: 50px; height: 20px;" type="text"/>	Policy SADM 10	Policies Map <input style="width: 50px; height: 20px;" type="text"/>	Other part of Plan (specify) <input style="width: 100px; height: 40px;" type="text"/>
---	----------------	--	---

**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes <input style="width: 50px; height: 20px;" type="checkbox"/>	No <input style="width: 50px; height: 20px;" type="checkbox"/>	no comment to make <input style="width: 50px; height: 20px;" type="checkbox"/>
4(b) Compliant with the Duty to Co-operate	Yes <input style="width: 50px; height: 20px;" type="checkbox"/>	No <input style="width: 50px; height: 20px;" type="checkbox"/>	no comment to make <input style="width: 50px; height: 20px;" type="checkbox"/>
4(c) Sound	Yes <input style="width: 50px; height: 20px;" type="checkbox"/>	No <input style="width: 50px; height: 20px;" type="checkbox"/>	no comment to make <input style="width: 50px; height: 20px;" type="checkbox"/>

If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared	<input style="width: 50px; height: 20px;" type="checkbox"/>	Please tick which box(es) apply
5(b) Justified	<input style="width: 50px; height: 20px;" type="checkbox"/>	
5(c) Effective	<input style="width: 50px; height: 20px;" type="checkbox"/>	
5(d) Consistent with national policy	<input style="width: 50px; height: 20px;" type="checkbox"/>	

**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible.**

**If you wish to comment in support of the Plan's legal compliance, compliance with the Duty to Co-operate or soundness or wish to make any other comment, please also use this box.**

The final paragraph of SADM 10 would allow part of the Safeguarded Rowley Lane site to be developed earlier than the rest of the site because it is already, in part, previously-developed land. CPRE Hertfordshire does not object to it being treated as such a site, but while it is part of a safeguarded site it should still be subject to Green Belt policy, to which the remainder of the Rowley Lane site applies.

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

**7. Please set out as precisely as possible what change(s) you consider necessary to make the Plan**

- **legally compliant or**
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- You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

The wording of the final paragraph of Policy SADM 10 should be amended to make it clear that permission would be granted at an earlier stage subject to the proposal having no greater impact on the openness of the Green Belt and the purpose of including land within it, than the existing hotel development.

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

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**8. If you do not consider the Plan to be sound and the Council is prepared to make changes to the Plan which reflect your suggested change, would you be prepared to enter into a 'Statement of Common Ground' with this Council?**

Yes

No

**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**

**No**, I do not wish to participate at the oral Examination

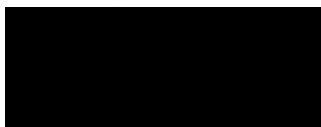
**Yes**, I wish to participate at the oral Examination

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Signature:



**Steve Baker, Planning Manager**

**Date:** 11<sup>th</sup> September 2015

**Part C**

**(Only needed once)**

**Name (Print):** Steve Baker, CPRE Hertfordshire.

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**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph <input style="width: 50px; height: 20px;" type="text"/>	Policy <input style="width: 100px; height: 20px; text-align: center;" type="text" value="SADM 25"/>	Policies Map <input style="width: 50px; height: 20px;" type="text"/>	Other part of Plan (specify) <input style="width: 100px; height: 40px;" type="text"/>
---	---	--	---

**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes <input style="width: 40px; height: 20px;" type="checkbox"/>	No <input style="width: 40px; height: 20px;" type="checkbox"/>	no comment to make <input style="width: 60px; height: 20px;" type="checkbox"/>
4(b) Compliant with the Duty to Co-operate	Yes <input style="width: 40px; height: 20px;" type="checkbox"/>	No <input style="width: 40px; height: 20px;" type="checkbox"/>	no comment to make <input style="width: 60px; height: 20px;" type="checkbox"/>
4(c) Sound	Yes <input style="width: 40px; height: 20px;" type="checkbox"/>	No <input style="width: 40px; height: 20px;" type="checkbox"/>	no comment to make <input style="width: 60px; height: 20px;" type="checkbox"/>

*If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.*

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared	<input style="width: 50px; height: 20px;" type="checkbox"/>	Please tick which box(es) apply
5(b) Justified	<input style="width: 50px; height: 20px;" type="checkbox"/>	
5(c) Effective	<input style="width: 50px; height: 20px;" type="checkbox"/>	
5(d) Consistent with national policy	<input style="width: 50px; height: 20px;" type="checkbox"/>	

**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible.**  
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Draft Policy SADM 25 includes a short sentence stating that infilling may be 'appropriate' in certain defined areas. The word 'appropriate' in relation to Green Belt locations has a specific meaning, that should not be confused with what might be considered as acceptable development under the terms of a local plan policy.

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

**7. Please set out as precisely as possible what change(s) you consider necessary to make the Plan**

- **legally compliant or**
  - **sound (having regard to the criteria you ticked at 5 above relating to soundness).**
- You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

CPRE Hertfordshire suggests that the word 'appropriate' in the third paragraph of draft Policy SADM 25, be replaced with the word 'acceptable', for the reasons set out above.

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

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**8. If you do not consider the Plan to be sound and the Council is prepared to make changes to the Plan which reflect your suggested change, would you be prepared to enter into a 'Statement of Common Ground' with this Council?**

Yes  No



**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**

**No**, I do not wish to participate at the oral Examination

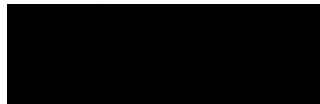
**Yes**, I wish to participate at the oral Examination

**10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:**

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

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Signature:



**Steve Baker, Planning Manager**

**Date:** 11<sup>th</sup> September 2015

**Part C**

**(Only needed once)**

**Name (Print):** Steve Baker, CPRE Hertfordshire.

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<b>Name or organisation:</b>			Ref No:
			support:
			object:
			change:

**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph	<input type="text"/>	Policy	SADM 28	Policies Map	<input type="text"/>	Other part of Plan (specify)	<input type="text"/>
-----------	----------------------	--------	---------	--------------	----------------------	------------------------------	----------------------

**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(b) Compliant with the Duty to Co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(c) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>

If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared	<input type="checkbox"/>	Please tick which box(es) apply
5(b) Justified	<input type="checkbox"/>	
5(c) Effective	<input type="checkbox"/>	
5(d) Consistent with national policy	<input type="checkbox"/>	

**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible.**  
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There have recently been several planning applications for redevelopment of equestrian sites to housing in Hertsmere, taking advantage of the relaxed NPPF policy treating such development as appropriate in the Green Belt. In order to avoid facilitating otherwise inappropriate development for housing in current Greenfield Green Belt locations, Policy SADM 28 should include a specific provision that precludes subsequent redevelopment for a land use that would be considered inappropriate in the Green Belt.

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

**7. Please set out as precisely as possible what change(s) you consider necessary to make the Plan**

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SADM 28 should include a sentence that states that any permission granted for a new equestrian or rural business use in the Green Belt under the terms of the Policy would include a restriction preventing the subsequent redevelopment of the site for an otherwise inappropriate land use.

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

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Yes

No

**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**

**No**, I do not wish to participate at the oral Examination

**Yes**, I wish to participate at the oral Examination

**10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:**

CPRE Hertfordshire wishes to explain to the Inspector the context and wider implications for the Green Belt of facilitating equestrian development in the Green Belt without adequate provisions to prevent subsequent inappropriate development.

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

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Signature:



**Steve Baker, Planning Manager**

Date: 11<sup>th</sup> September 2015

**Part C**

**(Only needed once)**

Name (Print): Steve Baker, CPRE Hertfordshire.

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		change:

**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph	<b>2.4</b>	Policy		Policies Map		Other part of Plan (specify)	
-----------	------------	--------	--	--------------	--	------------------------------	--

**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input checked="" type="checkbox"/>
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5(a) Positively prepared	<input type="checkbox"/>	Please tick which box(es) apply
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The figure of 4,465 for dwelling supply is an underestimate of likely completions between 2012 and 2027. Our criticisms of this figure are set out in our comments on Table 1, but the matter of principle is relevant to paragraph 2.4 which indicates that the Plan's Housing Target would be exceeded by 475 dwellings, or 12 percent of the Housing Target. There is no reference however to this oversupply being used to meet the needs of the wider Housing Market Area or other local planning authorities which may not be able to meet their own needs without removing land from the Green Belt.

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

**7. Please set out as precisely as possibly what change(s) you consider necessary to make the Plan**

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Paragraph 2.4 should be amended to include a higher revised figure to reflect a revised Table1, and include a short sentence to indicate that the Plan would contribute to meeting the housing needs of adjacent areas as a result of the excess of Housing Supply over Housing Target.

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

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Yes

No



**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**

**No**, I do not wish to participate at the oral Examination

**Yes**, I wish to participate at the oral Examination

**10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:**

The issue of Housing Supply is of fundamental importance in decision making on planning applications and site allocations for residential development, and CPRE Hertfordshire wishes to be able to fully explain its views on this matter to the Inspector.

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

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Signature:



**Steve Baker, Planning Manager**

Date: 11<sup>th</sup> September 2015

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**(Only needed once)**

Name (Print): **Steve Baker, CPRE Hertfordshire.**

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<b>Part B</b>	<b>Name or organisation:</b> <input type="text" value="CPRE Hertfordshire"/>	<b>For office use only</b> Ref No: support: object: change:
---------------	--	---

**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph <input type="text"/>	Policy <input type="text"/>	Policies Map <input type="text"/>	Other part of Plan (specify)	<b>Table 1</b>
--------------------------------	-----------------------------	-----------------------------------	------------------------------	----------------

**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes <input type="checkbox"/>	No <input type="checkbox"/>	no comment to make <input type="checkbox"/>
4(b) Compliant with the Duty to Co-operate	Yes <input type="checkbox"/>	No <input type="checkbox"/>	no comment to make <input type="checkbox"/>
4(c) Sound	Yes <input type="checkbox"/>	No <input type="checkbox"/>	no comment to make <input type="checkbox"/>

If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared	<input type="checkbox"/>	Please tick which box(es) apply
5(b) Justified	<input type="checkbox"/>	
5(c) Effective	<input type="checkbox"/>	
5(d) Consistent with national policy	<input type="checkbox"/>	

**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible.**

**If you wish to comment in support of the Plan's legal compliance, compliance with the Duty to Co-operate or soundness or wish to make any other comment, please also use this box.**

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

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

**7. Please set out as precisely as possible what change(s) you consider necessary to make the Plan**

- **legally compliant or**
  - **sound (having regard to the criteria you ticked at 5 above relating to soundness).**
- You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

The methodology and assumptions used to create Table 1, as set out in the Background Paper to Table 1, dated July 2015, should be reconsidered, leading to the preparation of a revised Table in the Plan.

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

***Please note*** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity for further submissions based on the representation you are currently making. ***After this current publication stage, further submissions will only be able to be made at the Inspector's request, based on the matters and issues he/she identifies for Examination.***

**8. If you do not consider the Plan to be sound and the Council is prepared to make changes to the Plan which reflect your suggested change, would you be prepared to enter into a 'Statement of Common Ground' with this Council?**

Yes  No

**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**

**No**, I do not wish to participate at the oral Examination

**Yes**, I wish to participate at the oral Examination

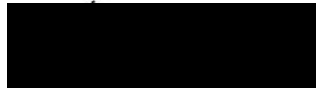
**10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:**

The issue of Housing Supply is of fundamental importance in decision making on planning applications and site allocations for residential development, and CPRE Hertfordshire wishes to be able to fully explain its understanding of the consequences of recent changes to Planning Regulations and Policy for housing supply in Hertsmere , to the Inspector.

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

***Please note:** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the Examination.*

Signature:



**Steve Baker, Planning Manager**

Date: 11<sup>th</sup> September 2015

Part C

(Only needed once)

Name (Print): Steve Baker, CPRE Hertfordshire

If you wish to be informed of the date of the submission of the Plan to the Secretary of State, please tick this box.

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**Site Allocations and Development Management Policies Plan (SADM)**  
**Publication Stage Representation Form**

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 Date received:

**Please use this form to make Representations**

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**2015**

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**Part C** – What information you want the Council to provide you with about future progress of SADM (only needed once).

**Please read the guidance notes at the end before completing this form. They explain the terms used and will help you make your representation(s).**

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



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**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph <input style="width: 50px; height: 25px;" type="text"/>	Policy <input style="width: 100px; height: 25px;" type="text"/>	Policies Map <input style="width: 50px; height: 25px;" type="text"/>	Other part of Plan (specify)	<b>Table 4</b>
---	---	--	------------------------------	----------------

**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes <input style="width: 50px; height: 25px;" type="text"/>	No <input style="width: 50px; height: 25px;" type="text"/>	no comment to make <input style="width: 50px; height: 25px;" type="text"/>
4(b) Compliant with the Duty to Co-operate	Yes <input style="width: 50px; height: 25px;" type="text"/>	No <input style="width: 50px; height: 25px;" type="text"/>	no comment to make <input style="width: 50px; height: 25px;" type="text"/>
4(c) Sound	Yes <input style="width: 50px; height: 25px;" type="text"/>	No <input style="width: 50px; height: 25px;" type="text"/>	no comment to make <input style="width: 50px; height: 25px;" type="text"/>

*If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.*

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared	<input style="width: 50px; height: 25px;" type="text"/>	Please tick which box(es) apply
5(b) Justified	<input style="width: 50px; height: 25px;" type="text"/>	
5(c) Effective	<input style="width: 50px; height: 25px;" type="text"/>	
5(d) Consistent with national policy	<input style="width: 50px; height: 25px;" type="text"/>	

**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible.**  
**If you wish to comment in support of the Plan's legal compliance, compliance with the Duty to Co-operate or soundness or wish to make any other comment, please also use this box.**

Monitoring Table 4 includes at SADM 1 and SADM 36 a proposed Plan 'Target', 'To complete 100% of the total dwelling capacity by 2027'. CPRE Hertfordshire strongly objects to such a 'target' which would encourage development in excess of Housing Need and what is defined in the Core Strategy as the Housing Target for the Plan. The Plan's monitoring target for Housing should therefore be to 'complete 100% of the Local Plan's target for Housing.

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

**7. Please set out as precisely as possibly what change(s) you consider necessary to make the Plan**

- **legally compliant or**
- **sound (having regard to the criteria you ticked at 5 above relating to soundness).**

**You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

The entries for SADM 1 and SADM 36 in the 'Target' column, should be amended to read 'To complete 100% of the Housing Target in the Core Strategy by 2027', for the reason set out above.

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

***Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity for further submissions based on the representation you are currently making. After this current publication stage, further submissions will only be able to be made at the Inspector's request, based on the matters and issues he/she identifies for Examination.***

**8. If you do not consider the Plan to be sound and the Council is prepared to make changes to the Plan which reflect your suggested change, would you be prepared to enter into a 'Statement of Common Ground' with this Council?**

Yes  No



**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**

**No**, I do not wish to participate at the oral Examination

**Yes**, I wish to participate at the oral Examination

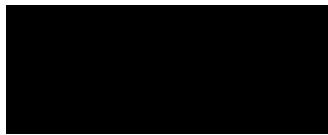
**10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:**

CPRE Hertfordshire wishes to take part in order to explain the wider implications, in particular for the Green Belt, of encouraging housing development in excess of a Housing Target that takes into account both Housing Need and the constraints to development, including the Green Belt, that apply under Government Planning Policy, to Hertsme.

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

**Please note:** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the Examination.

Signature:



Steve Baker, Planning Manager

Date: 11<sup>th</sup> September 2015

Part C

(Only needed once)

Name (Print): Steve Baker, CPRE Hertfordshire.

If you wish to be informed of the date of the submission of the Plan to the Secretary of State, please tick this box.

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If you wish to be informed of the adoption of the Plan by Hertsme Borough Council please tick this box.

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Title	Mr	
First name	Steve	
Last name	Baker	
Job title (where relevant)	Planning Manager	
Organisation (where relevant)	CPRE Hertfordshire	
Address	31a Church Street Welwyn Herts	
Post Code	AL6 9LW	
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<b>Part B</b>	<b>CPRE Hertfordshire</b>	<u>For office use only</u>
Name or organisation:		Ref No:
		support:
		object:
		change:

**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph	2.10	Policy		Policies Map		Other part of Plan (specify)	
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**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(b) Compliant with the Duty to Co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(c) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>

If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared	<input type="checkbox"/>	Please tick which box(es) apply
5(b) Justified	<input type="checkbox"/>	
5(c) Effective	<input type="checkbox"/>	
5(d) Consistent with national policy	<input type="checkbox"/>	

**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible.**  
**If you wish to comment in support of the Plan's legal compliance, compliance with the Duty to Co-operate or soundness or wish to make any other comment, please also use this box.**

The current wording of the paragraph on land which is to remain undeveloped until there is a future shortage of suitable development land, does not make it clear that this land will continue to be subject to Green Belt policies, to be reviewed in a future Development Plan.

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

**7. Please set out as precisely as possibly what change(s) you consider necessary to make the Plan**

- **legally compliant or**
  - **sound (having regard to the criteria you ticked at 5 above relating to soundness).**
- You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

The text of paragraph 2.10 should be amended as suggested above to provide a fuller context for Policy SADM 2

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

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Yes  No

**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**

**No**, I do not wish to participate at the oral Examination

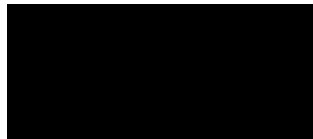
**Yes**, I wish to participate at the oral Examination

**10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:**

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

***Please note:** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the Examination.*

Signature:



**Steve Baker, Planning Manager**

**Date:** 11<sup>th</sup> September 2015

**Part C**

**(Only needed once)**

**Name (Print):** Steve Baker, CPRE Hertfordshire,  
31a Church Street, Welwyn, Herts AL6 9LW.

**If you wish to be informed of the date of the submission of the Plan to the Secretary of State, please tick this box.**

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Title	Mr	
First name	Steve	
Last name	Baker	
Job title (where relevant)	Planning Manager	
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**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph	2.25	Policy		Policies Map		Other part of Plan (specify)	
-----------	------	--------	--	--------------	--	------------------------------	--

**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(b) Compliant with the Duty to Co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(c) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>

If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared	<input type="checkbox"/>	Please tick which box(es) apply
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Paragraph 2.25 is now incorrect following the removal from the NPPG of the restriction on scale of housing development to which the requirement for affordable homes can apply.

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

**7. Please set out as precisely as possibly what change(s) you consider necessary to make the Plan**

- **legally compliant or**
  - **sound (having regard to the criteria you ticked at 5 above relating to soundness).**
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Paragraph 2.25 should be deleted to reflect the change to the NPPG referred to above.

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

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Yes  No

**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**



No, I do not wish to participate at the oral Examination

Yes, I wish to participate at the oral Examination

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

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Signature:  Steve Baker, Planning Manager

Date: 11<sup>th</sup> September 2015

**Part C** (Only needed once)

Name (Print): Steve Baker, CPRE Hertfordshire.

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First name	Steve	
Last name	Baker	
Job title (where relevant)	Planning Manager	
Organisation (where relevant)	CPRE Hertfordshire	
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<b>Part B</b>	<b>Name or organisation:</b> CPRE Hertfordshire	<u>For office use only</u> Ref No: support: object: change:
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**IMPORTANT: Please use a separate Part B form for each representation**

**3. To which part of SADM ('the Plan') does this representation relate?**

Paragraph	2.17	Policy		Policies Map		Other part of Plan (specify)	
-----------	------	--------	--	--------------	--	------------------------------	--

**4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:**

Please tick which boxes apply

4(a) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(b) Compliant with the Duty to Co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>
4(c) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	no comment to make	<input type="checkbox"/>

If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.

**5. If you consider the Plan to be unsound is this because it is not:**

5(a) Positively prepared	<input type="checkbox"/>	Please tick which box(es) apply
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**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible.**  
**If you wish to comment in support of the Plan's legal compliance, compliance with the Duty to Co-operate or soundness or wish to make any other comment, please also use this box.**

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

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

**7. Please set out as precisely as possibly what change(s) you consider necessary to make the Plan**

- **legally compliant or**
  - **sound (having regard to the criteria you ticked at 5 above relating to soundness).**
- You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

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

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

***Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity for further submissions based on the representation you are currently making. After this current publication stage, further submissions will only be able to be made at the Inspector's request, based on the matters and issues he/she identifies for Examination.***

**8. If you do not consider the Plan to be sound and the Council is prepared to make changes to the Plan which reflect your suggested change, would you be prepared to enter into a 'Statement of Common Ground' with this Council?**

Yes

No

**9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?**

No, I do not wish to participate at the oral Examination

Yes, I wish to participate at the oral Examination

**10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:**

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

*Please note: the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the Examination.*

Signature: 

Steve Baker, Planning Manager

Date: 11<sup>th</sup> September 2015

**Part C** (Only needed once)

Name (Print): Steve Baker, CPRE Hertfordshire.

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If you wish to be informed of the date of the submission of the Plan to the Secretary of State, please tick this box.

If you wish to be informed of the recommendations of the Inspector appointed by the Secretary of State to carry out the independent Examination of the Plan, please tick this box.

If you wish to be informed of the adoption of the Plan by Hertsmere Borough Council please tick this box.

If you no longer wish to receive communications from the Council on SADM please tick this box.