



For official use only:

Received date:

Registered date:

Rep No:

Ack'd:

## Hertfordshire Minerals Local Plan

### Proposed Submission 2019

#### Representation Form

Please use this form to make representations to the Hertfordshire Minerals Local Plan Proposed Submission document. This is the second version of the minerals planning document for Hertfordshire following the Draft Plan document which, once adopted, will become part of the statutory Development Plan for the county.

The online consultation portal is the county council's preferred method of receiving representations. This can be found at <http://hertscc-consult.limehouse.co.uk/portal>. Instructions on how to register and enter representations are found on the website.

If you are unable to use the online consultation portal, please use this form to make representations.

It is important that you use a separate form for each comment you wish to make. Further copies of the representation form are available from the county council on 01992 556 227 or may be downloaded from the county council's website: [www.hertfordshire.gov.uk/minerals](http://www.hertfordshire.gov.uk/minerals). Alternatively this form can be photocopied for further use.

#### Part 1

<b>Respondents details</b>	
Name: Steve Baker	Organisation: CPRE Hertfordshire
Address: 31a Church Street, Welwyn, Herts.	Tel No: 01438 717587
Post Code: AL6 9LW	Email: office@cpreherts.org.uk
<b>Agent details (if applicable)</b>	
Name:	Organisation:
Address:	Tel No:

Post Code:	Email:
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**You will need to sign this form to agree to the use of your details in relation to the Data Protection Act & General Data Protection Regulations for planning purposes in part 10**

**Part 2**

**Which part of the Proposed Submission Minerals Local Plan (MLP) does your representation relate to?**

Paragraph No.	<input type="text" value="5.6"/>	Policy No.	<input type="text"/>	Map No.	<input type="text"/>	Other	<input type="text"/>
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**Part 3**

The Minerals Local Plan will be examined to assess whether it has been prepared in accordance with legal and procedural requirements as detailed in the National Planning Policy Framework. Your representation must consider whether or not the plan is sound at this stage.

**Your representation must relate to the legal and procedural requirements and/or the Tests of Soundness, set out in the questions below.**

**Do you consider the document to be: (please tick)**

Legally and procedurally compliant	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No (see questions below)

**Part 4**

The National Planning Policy Framework sets out the 'tests of soundness' for a Local Plan. The four 'tests' have been listed below, with explanations as detailed within the national policy document.

**If you consider the Minerals Local Plan to be un-sound, which test of soundness do you consider the document fails?**

**Tests of Soundness**

**Positively Prepared**

Does the MLP:

- Provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable
- Yes  No

development?

**Justified**

Is the MLP:

- An appropriate strategy, taking into account the reasonable alternatives? Yes  No X
- Based on proportionate evidence? Yes  No X

**Effective**

Is the MLP:

- Deliverable over the plan period? Yes  No X
- Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground? Yes  No

**Consistent with National Policy**

Does the MLP:

- enable the delivery of sustainable development in accordance with the policies in the NPPF? Yes  No X

**Part 5**

**Please provide detailed comments explaining why you consider the plan is not legally compliant and/or unsound. If your representation is in support or to provide any other comment, please also use this box.**

*(Please be as precise as possible)*

As stated in our representation on the same paragraph in the Consultation Draft, The figure in paragraph 5.6 under the 'Need for Aggregates', of 1.39 million tonnes per annum (mtpa) to be planned for, was set in 2009, a decade ago, for the period that expires next year. This figure is carried forward in Section 8 (Strategic Aggregates Supply), in paragraph 8.4, as a commitment that Herts is obliged to meet under this out of date apportionment, but this figure is only valid until 2020, and the Plan should be based on future requirements, not forecasts from over a decade ago, or out of date development plan assumptions. CPRE considers that the use of pre-recession, pre-NPPF, and pre-Brexit projections, and the Plans based on them, is unsound and unjustified. This is particularly the case because the figures for future supply (paragraph 8.7) are intended to ensure supply not just for 15 years, but also for a further 7 years, which would mean the use of the now arbitrary provision of 1.39 mtpa, for **31 years**, nearly a third of a Century from the date it was originally agreed in 2009.

*(Continue on a separate sheet if necessary)*

**Part 6**

**Please give details of what change(s) you consider is(are) necessary to make the Minerals Local Plan 'sound', having regard to the test(s) of**

soundness you indicated in Part 4 above. You will need to state why your proposed change will make the document sound. Where appropriate, you should include your suggested wording of paragraph(s) or site brief(s).

*(Please be as precise as possible)*

*(Continue on a separate sheet if necessary)*

### Part 7

If you seek a change to the document, are you happy to deal with the matters by means of written representation or do you consider it necessary to attend a public examination to give your evidence?

I am happy to deal with this matter in writing

*Please tick **one** box only*

I wish to give evidence at a public examination

### Part 8

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

### Part 9

If you wish to be notified of future events please tick those below that apply.

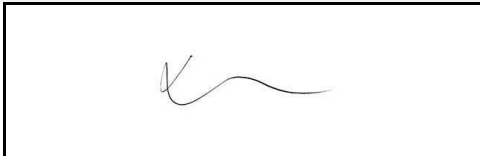
- i) That the document has been submitted to the Secretary of State for Examination
- ii) That the person appointed to carry out the Examination has published their report
- iii) That the document has been finally adopted by the Council

## Part 10

### Important note:

- The information that you provide, **including** personal details, will be held on a database and used by the Environment Department to respond to you and assist with the review of the Minerals Local Plan.
- The information that you provide, **excluding** personal details, will be publicly available for any other person to inspect.
- The information that you provide, **including** names and organisations will be shared with the Planning Inspectorate.
- By signing this form (responding to this consultation) you are agreeing to the county council holding your data for the duration of the Minerals Local Plan review.
- All personal data will be deleted following completion of the review.

### Declaration

Signature:  Date: 

- Tick here to be notified at a specific address of the publication of the Inspector's Report and subsequent adoption of the Strategy*

*Address for notification (if different):*

Thank you for your representations.

**All representations must be received by 5pm on Friday 22 March 2019.**

Forms can be submitted by email to [minerals.planning@hertfordshire.gov.uk](mailto:minerals.planning@hertfordshire.gov.uk) or by post to:

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Hertfordshire County Council  
County Hall  
Hertford  
SG13 8DN