



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"/>	Policy No.	<input type="text" value="4"/>	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 development? Yes  No

### Justified

Is the MLP:

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

### Effective

Is the MLP:

- Deliverable over the plan period? Yes  No
- 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

## 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)*

CPRE Hertfordshire strongly opposes the proposal by the Plan for Preferred Area 1 for sand and gravel working at Briggens east of Stanstead Abbots in East Hertfordshire, as shown on Inset Map 4. We are particularly concerned that there is no specific justification or evidence presented in the Plan or referenced in the Plan for the creation of a new quarry in this location.

Given the Green Belt location and its environmental sensitivity, especially in terms of landscape and ecology, the absence of such justification, and in our opinion conflicts with the NPPF, render the proposal unsound. We noted in our representations on the consultation draft Plan that the Site Selection Report, dated March 2017, did not identify this site as one of the most appropriate site options, and described it in paragraph 7.7 as having potential for high impacts against five criteria considered at stage 3 of the sieving process, worse than any of the other sites identified in the consultation draft.

In the context of the reduced scale of population and household projections revealed by the latest ONS projections and the national policy for greater use of recycled and secondary aggregates as alternatives to land won aggregates, there is insufficient justification for the opening up of a new minerals site in this location during the Plan period.

*(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)*

The Site should be deleted from the Plan.

*(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?

To explain CPRE Hertfordshire's concerns about the proposed Preferred Area 1 at the Briggens Estate.

## 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:	22 March 2019
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- 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