



Comments

Hertfordshire Minerals Local Plan Regulation 19 Proposed Submission Publication 2019 (14/01/19 to 22/03/19)

Comment by	North Hertfordshire District Council (MR Jamie Alderson - 1152271)
Comment ID	PSMLP121
Response Date	21/03/19 11:50
Consultation Point	Policy 8 Mineral Safeguarding (View)
Status	Submitted
Submission Type	Web
Version	0.1

Question 1a

Do you consider the document to be:

Legally and procedurally compliant	. Yes
Sound	. No

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

Positively Prepared	. Does Not Fail
Justified	. Does Not Fail
Effective	. Fails
Consistent with National Policy	. Does Not Fail

Question 3

Please provide detailed comments explaining why you consider the plan is not legally compliant and/or unsound.

The extent of the Sand and Gravel Minerals Safeguarding Area defined in the Proposed Submission Minerals Local Plan extends significantly into North Hertfordshire, where the Sand and Gravel Belt supporting the current plan does not.

The existing Minerals Consultation Areas Supplementary Planning Document (SPD) adopted by Hertfordshire County Council identifies Mineral Resource Blocks in North Hertfordshire at; North of Hitchin, West of Stevenage – Langley, West of Stevenage – Preston and Between Whitwell and Stevenage. These areas are incorporated into the expanded proposed Sand and Gravel Safeguarded Areas. It is important to note that the Minerals Consultation Areas SPD currently hangs off the adopted Minerals Plan, and was not subject to a public examination.

Our emerging Plan (as proposed to be modified) contains policy criteria on relevant sites within currently identified minerals areas in response to representations from the County Council. Although the scale of the proposals map makes it difficult to definitively identify the revised extent of the Safeguarding Area, it would appear to incorporate a number of additional proposed housing allocations. This includes a number of sites within the Plan's proposed five-year land supply.

With regards to the identified Sand and Gravel Minerals Safeguarding Area in the Proposed Submission Minerals Plan, the County Council should ensure that there is no undue impact or delay upon the delivery of sustainable, adopted development allocations. Development on housing or employment allocations that have been found sound through a Local Plan examination process should be proactively encouraged.

Question 4

Please give details of what change(s) you consider is(are) necessary to make the Minerals Local Plan 'sound' / legally and procedurally compliant, 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 County Council should ensure that there is no undue impact or delay upon the delivery of sustainable, adopted development allocations

Question 6

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 wish to give evidence at a public examination

Question 7

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

To effectively represent North Hertfordshire District Council

Question 8

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

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

Comment by	North Hertfordshire District Council (MR Jamie Alderson - 1152271)
Comment ID	PSMLP122
Response Date	21/03/19 11:56
Consultation Point	Policy 9 Safeguarding Bulk Transport and Bulk Handling and Processing Sites (View)
Status	Submitted

Submission Type Web
Version 0.1

Question 1a

Do you consider the document to be:

Legally and procedurally compliant . Yes
Sound . No

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

Positively Prepared . Does Not Fail
Justified . Does Not Fail
Effective . Fails
Consistent with National Policy . Fails

Question 3

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Hitchin Rail Depot has previously been identified as an area to safeguard in the Minerals Consultation Areas Supplementary Planning Document (SPD) adopted by Hertfordshire County Council. Walsworth Road Rail Aggregates Rail Depot is identified in the Proposed Submission Minerals Plan as a Mineral Infrastructure Consultation Area. It is possible that this safeguarding will prove to be a constraint to other forms of sustainable development. In searching for potential development sites for housing and other uses, the NPPF requires local planning authorities to identify suitably serviced and well connected brownfield sites for redevelopment within settlement boundaries in order to exhaust all possible opportunities for development sites before releasing Green Belt land.

Stevenage and Hitchin are located in close proximity along the East Coast Main Line. There are further rail sidings at Letchworth Garden City (recognising that these currently perform a different function). The exception criteria in Policy 9 are noted. However, an additional criterion should be added to say **"the alternate proposal would provide demonstrable, overriding benefits against other planning objectives"**.

It should be noted that Network Rail have previously submitted Railway Sidings, St Michael's Road, Hitchin for inclusion on North Hertfordshire District Council's Brownfield Land Register. This aims to identify suitable previously developed sites available for future development.

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An additional criterion should be added to say **"the alternate proposal would provide demonstrable, overriding benefits against other planning objectives"**.

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Comment by	North Hertfordshire District Council (MR Jamie Alderson - 1152271)
Comment ID	PSMLP123
Response Date	21/03/19 11:59
Consultation Point	Policy 20 Strategic Transport (View)
Status	Submitted
Submission Type	Web
Version	0.1

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Sound ☐ No

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Positively Prepared ☐ Does Not Fail

Justified ☐ Does Not Fail

Effective ☐ Fails

Consistent with National Policy ☐ Fails

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Paragraph 181 of the NPPF (2019) states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas. The policy should make specific reference to mitigating any potential negative impacts of any mineral extractions, and associated developments, on AQMAs within the County.

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