

PLANNING FOR GROWTH



ISSUES AND OPTIONS Public Consultation Report



October 2018

Hertsmere Local Plan – Planning for Growth, Issues and Options

Public Consultation Report

Consultation Statement

1. Introduction

- 1.1 The Local Plan is used to guide decisions on matters ranging from the location of housing, schools, parks and open spaces to the design requirements of new buildings. Policies in the Local Plan are used when decisions on planning applications are made.
- 1.2 The housing requirements in the current Hertsmere Local Plan are based on Strategic Housing Market Assessment (SHMA) work carried out in 2010, which was informed by the urban capacity-based figures in the Regional Spatial Strategy for the area which has since been revoked. They are based on the period 2012-2027. As our recent study¹ has shown, there is a much greater need for housing in the area, and so we need to plan for this through a new Local Plan. The SW Herts SHMA identifies a level of need over 15 years of 9,000 homes, and the SW Herts Economic Study² finds that 9,000 jobs will be needed in Hertsmere over the plan period, so we would not be able to accommodate this level of growth within existing urban areas without a dramatic change to the density of housing. For the first time in many years, we have to consider allocating some land within the Green Belt for new homes, jobs and supporting infrastructure.
- 1.3 The timetable below shows the stages that are involved in the preparation of a new Local Plan. Stage 1, informal consultation, and Stage 2, Issues and Options Consultation, have been completed, and we are now working towards further engagement on a potential housing and employment sites
- 1.4 Throughout phases 1 to 3 in the table below we will also be working on preparing the evidence base which will inform the final Local Plan.

¹ <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/SW-Herts-SHMA-Final-Report-Jan16.pdf>

² <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/SW-Herts-Economy-Study-Feb16.pdf>

Stage	Dates	Status
1 – Informal consultation: Planning for Growth (Regulation 18)	December 2016 – January 2017	Complete
2 – Issues and Options consultation (Regulation 18)	September – November 2017	Complete
3 – Potential housing and employment sites (Regulation 18)	October – December 2018	Technical studies being undertaken.
4 – Publication Draft Local Plan (Regulations 19/20)	Autumn 2019	Not started
5 – Submission to Secretary of State (Regulation 22)	Winter 2019/20	Not started
6 – Examination Period (Regulation 24)	Tbc	Not started
7 – Adoption of Local Plan (Regulation 26)	Tbc	Not started

2. Informal consultation: Planning for Growth

- 2.1 As part of our early work on a new local plan for Hertsmere, the Council has carried out an informal consultation exercise to highlight that there is an objectively assessed need for a larger number of homes than is currently planned for through the Hertsmere Local Plan 2012-2027 – as evidenced by the South West Hertfordshire Strategic Housing Market Assessment 2016 (SHMA 2016) – and to help us to gauge the views of residents and businesses around the borough about how this projected growth should best be accommodated.
- 2.2 This does not form part of the later statutory representations process on the production of a local plan, and has been carried out at an early stage– under Regulation 18 - in order to introduce the main issues to be addressed through a new local plan, in particular an increase in housing and jobs growth.
- 2.3 There are various options available for addressing how to accommodate growth, including increasing densities within existing urban areas, extending towns and villages into the surrounding Green Belt, and planning for a new settlement somewhere in the borough. We felt it important at this early stage in the process to try to find out what local people think are the main positives and negatives about the borough at the moment, and what they think are the best solutions for accommodating housing and economic growth in the future.
- 2.4 We launched the initial round of public consultation on the New Local Plan in November 2016 with a business engagement event organised together with WENTA which supports small businesses and start-ups across the county.

Since then we have sent out a newsletter to all households in the borough, promoted our online questionnaire through the local press and held a forum for agents and developers.

- 2.5 Responses were received from around 300 individuals and organisations, with the majority of people completing the online survey or returning the survey by email. A [detailed summary of this consultation](#) was published alongside the Issues and options consultation material.

3. Issues and Options Consultation

- 3.1 This report sets out the consultation arrangements proposed by the Council in the development of the Hertsmere Local Plan Issues and Options Report. The Council recognise the importance of engaging the community from the outset of the Local Plan review process, and have carried out two rounds of public consultation at a very early stage in the plan-making process, to gauge opinions before any proposals are drawn up. To this end, in July 2017, the Council agreed a [Statement of Community Involvement](#) (www.hertsmere.gov.uk/sci) which sets out the ways in which we will engage with the community on local plans as well as planning applications.
- 3.2 As with the earlier round of consultation, the purpose of this early stage of consultation was to invite comments from interested parties on all relevant topics to help identify the issues that the Council should address in the new Plan. Receiving comments at this stage helps to ensure that the Plan sets off in the right direction and covers the things it needs to cover. It also helps to inform what further evidence may be necessary beyond that we have already collected or plan to collect. It was made very clear in the consultation material that the Council was not, at this stage, proposing any policies or stating which sites should be allocated for development in the new Plan.
- 3.3 Respondents were asked to comment on a draft Vision and set of Priorities. The consultation document then identified the key challenges that will be faced over the Plan period. Whilst comments were invited on all aspects of the new Plan, the draft document helped to steer the debate by setting out some key questions as to how these challenges may be best addressed.
- 3.4 The document set the context by explaining the very high levels of development need in the Borough and the reasons why all possible opportunities to deliver this need will need to be considered as the new Local Plan is progressed. The development approaches part of the document was split into five sections: redevelopment of urban brownfield sites; growth through new garden suburbs; growth of key villages; growth of smaller villages; and creation of a stand-alone garden village.

Consultation Process

- 3.5 The consultation period ran for nine weeks from 27 September 2017 until 30 November 2017 and in line with the Council's Statement of Community Involvement (SCI), a wide variety of methods were used to engage with interested parties. All consultation documents were made available to view on the Council's website and hard copies were distributed to all libraries in and around Hertsmere.
- 3.6 During the consultation period the Council's Communications Team assisted with the consultation and, in particular, they ran a campaign using social media. A detailed Communications Strategy was prepared and a variety of media outputs were used to engage with interested parties including: a promotional video featuring interviews with members of the public; a series of 'did you know...' infographics release at intervals on social media; press releases were put out in order to encourage local press outlets to give the consultation coverage, and coverage in all local newspapers.
- 3.7 In addition to the above:
- The second Local Plan newsletter was circulated to all households in the borough, following a launch newsletter in late 2016;
 - Separate briefing sessions / presentations were held for all Members;
 - Statutory consultees and all interested parties on the Council's database were informed of the consultation and invited to comment;
 - The main consultation document was supported by a set of FAQs and a bespoke response form was prepared (print version / hard copy);
 - The consultation document was placed on the council's new planning consultation system 'Keystone' which enables people to view the document online and respond directly to each section after logging in;
 - Officers and Members attended five evening exhibitions around the borough, where we put up display boards and were available to answer questions;
 - Tear-off response forms were prepared to accompany each issue within the document. These were made available at the exhibitions to enable people to comment on just the issues that mattered most to them; and
 - 'In Conversation' workshops were held at three locations around the borough which local groups and individual residents could register to attend. A facilitator was brought in to help lead round-table discussion about the issues. These events were attended by Members and officers.

Level of response

- 3.8 We received responses from around 350 separate individuals and organisations including local residents, local groups and organisations, statutory bodies, developers, and landowners. Approximately 500 individuals

attended drop-in sessions across the borough, and another 180 people came along to our workshops.

Overview of consultation process


- 3.9 Overall, the consultation was fairly well received and many of those involved (particularly those who attended briefing sessions and meetings) were grateful for the opportunity to help steer the direction of the Plan. However, there was some criticism in that some respondents thought that there should have been greater awareness of the consultation with residents in London Colney, in particular, highlighting that they had not been notified of the Issues and Options. In addition, some respondents thought the consultation document was too long whilst (to counter these) others thought that more detail should have been provided.
- 3.10 In local plan-making, councils are sometimes told they have consulted people too late in the process, after they have already produced a detailed plan containing specific options for housing, jobs, infrastructure etc. which appear to be 'set in stone'. We decided to do the opposite of this by consulting people before doing any detailed work. However we have still faced some criticism from a number of respondents who told us they could not comment meaningfully until there were some specific options on the table. As the work on the local plan progresses, the detail that is available will increase.
- 3.11 The new online consultation portal was used by 140 respondents. The submission of comments using this method represents a positive step forward as their entry straight into the database helped to ensure that comments could be managed in an efficient and timely manner. Evidence from other boroughs shows that it normally takes around 4 consultation events for the level of online responses through the portal to form the majority of responses, as it takes a while for residents to get used to the system, the database will become more up to date with time, and individuals are more likely to already have an account set up so won't have to set this up before they can submit comments next time around. Other comments received have subsequently been published on the portal.
- 3.12 The campaign co-ordinated by the Council's Communications Team was particularly effective. As an example, during the consultation period the following social media platforms encouraged public engagement as follows:

Facebook posts

- 3.13 26 Facebook posts were placed that received around 27,930 total impressions. These impressions received a 3 per cent engagement rate on average, which

means roughly 830 people clicked, commented on, reacted to or shared a post related to the Local Plan.


3.14 The best-performing Facebook post was the video “Hertsmere’s next 15: Your Local Plan”. The post reached 14,876 people, and got 12,852 views of which 6,571 were for at least 10 seconds. The average watch time was 18 seconds.



Hertsmere


Published by Cath Shepherd [?] · October 31, 2017 · €

We're asking for your views on how you would like Hertsmere to grow over the next 15 years. Here's a snapshot of some of the responses we've had so far and a look at the challenges and opportunities the borough faces. #hertsmereNEXT15 www.hertsmere.gov.uk/newlocalplan




Hertsmere next 15: Your Local Plan

03:04




Get More Likes, Comments and Shares

Boost this post for £7 to reach up to 4,000 people.



14,876 people reached

Boost Post



12

41 Comments

44 Shares

Performance for Your Post

14,876 People Reached

12,852 Video Views

243 Reactions, Comments & Shares

<div>44</div> <div>Like</div>	<div>8</div> <div>On Post</div>	<div>36</div> <div>On Shares</div>
<div>2</div> <div>Wow</div>	<div>0</div> <div>On Post</div>	<div>2</div> <div>On Shares</div>
<div>1</div> <div>Sad</div>	<div>0</div> <div>On Post</div>	<div>1</div> <div>On Shares</div>
<div>12</div> <div>Angry</div>	<div>4</div> <div>On Post</div>	<div>8</div> <div>On Shares</div>
<div>140</div> <div>Comments</div>	<div>56</div> <div>On Post</div>	<div>84</div> <div>On Shares</div>
<div>44</div> <div>Shares</div>	<div>44</div> <div>On Post</div>	<div>0</div> <div>On Shares</div>

3,729 Post Clicks


<div>321</div> <div>Clicks to Play</div>	<div>62</div> <div>Link Clicks</div>	<div>3,346</div> <div>Other Clicks</div>
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YouTube

3.15 Our film received 268 views on YouTube, but the majority of impressions and views of the video were through Facebook.

Twitter

3.16 Around 30 twitter posts were placed about the Local Plan during the consultation period.

<i>Tweet</i>	<i>Impressions</i>	<i>Engagement</i>	<i>per cent</i>
 Hertsmere BC @HertsmereBC · Oct 20 Do you live or work in Potters Bar? Do you care about the borough and want to help shape its future. Come to Tuesday's Local Plan drop-in pic.twitter.com/3WnpCAf7jL View Tweet activity	1,165	11	0.9%

	Hertsmere BC @HertsmereBC · 22h What's important to you about where you live? Housing? Jobs? Transport? Book a place at our In Conversation events to tell us what you think pic.twitter.com/fMh3KJ5UAe View Tweet activity	629	11	1.7%	Promote
	Hertsmere BC @HertsmereBC · Nov 1 Live in Potters Bar, Shenley or South Mimms? Want to help shape where you live? Come along to our In Conversation event on 15 Nov at 6.30pm. pic.twitter.com/hI2YT1dJqp View Tweet activity	615	13	2.1%	Promote
	Hertsmere BC @HertsmereBC · Nov 3 Book your place at one of these In Conversation events and help shape the future of the borough #hertsmereNext15 pic.twitter.com/4TW9GssXQB View Tweet activity	992	14	1.4%	Promote
	Hertsmere BC @HertsmereBC · Nov 3 Come to our drop-in sessions in Radlett & Bushey next week to find out more the different ways Hertsmere could grow #HertsmereNext15 pic.twitter.com/anuaZhvxZ8 View Tweet activity	869	6	0.7%	Promote
	Hertsmere BC @HertsmereBC · Nov 6 If you live/work in Bushey & want to have your say on future of the town & area, come to tomorrow's drop-in session 6.30-9pm Bushey Centre pic.twitter.com/8QaU3eq33O View Tweet activity	867	10	1.2%	Promote
	Hertsmere BC @HertsmereBC · Nov 28 Three days left to give your views and comments in our consultation and help shape the future of Hertsmere #hertsmereNext15 pic.twitter.com/R3szZE2bA9 View Tweet activity	628	5	0.8%	Promote

3.17 In addition to the data set out above, this information is useful as it provides an analysis as to what tools generated the most engagement. The findings of the report will help to guide the engagement strategy for future consultation stages.

3.18 Overall, whilst lessons can always be learned for future work of a similar nature, it is considered that the overall consultation was a positive undertaking. The use of the online portal worked reasonably well for a first-time use, and the Council successfully used a variety of methods to engage with a high number of groups / individuals. Whilst this engagement would have helped to generate the relatively high level of response it should also be acknowledged that the content of the consultation (particularly the notion that Green Belt land is likely to need to be built on) is likely to have driven a higher level of interest than would otherwise have been the case.

3.19 There are lessons to be learned from this consultation process, and we have received some comments and criticisms from the public about the process. These include:

Comment: The newsletter was not delivered to all households.

Response/learning: We used the services of an external distribution company to deliver the leaflets, and their records showed that some addresses in the South Mimms area were missed. This was rectified at no extra cost. A number of people in other areas told us they had not received a leaflet; however the GPS tracking used by the delivery company showed that the delivery people had visited the affected streets and in some cases it was possible to see they had gone into each property. It is unknown whether the leaflets were delivered along with unsolicited mail (e.g. pizza menus) and so were inadvertently thrown away; whether people did not properly read the leaflet and threw it away without realising; or whether the leaflets were not delivered to begin with. For future consultations we will consider whether any alternative delivery methods can be used and continue to monitor the results.

It was suggested by several people that officers should hand-deliver the leaflets. This is not a feasible solution given the costs of staff time compared with the costs of employing an external delivery company.

Some people suggested that an 'official-looking' letter from the council may have more impact than a colourful leaflet. Given past experience of delivering this type of letter to inform people about public consultation on local plan documents, we have found that it often gets ignored or thrown away, and we get a lot of worried phone calls from (mostly elderly) people who see an official letter and think they have done something wrong or need to take some urgent action. Therefore we plan to retain the newsletter format for the next round of Regulation 18 consultation. We will also distribute the next newsletter to residents in London Colney following the concerns expressed by some residents living there who weren't notified about the Issues and Options report.

Comment: The Issues and Options document was criticised for lacking in detail about the locations of sites.

Response/learning: The reasons for this have been addressed above, but some people seemed to think that the council had already made all of its decisions about future growth and was just holding it back from the public as some kind of conspiracy. There is no way to avoid this, as mentioned above, consulting too late and once decisions have been made provokes frustration as does consulting early while there is a genuine opportunity for people to have a say in the plan but where there are no specific proposals to be considered.

Comment: A number of people said that they found the consultation portal difficult to use/not user-friendly or simply did not work.

Response/learning: This may be because it is the first time we have used it in Hertsmere, or that they were not used to using this type of system. A factor in this may be the way that we had chosen to structure our document and the layout of the questions we had chosen to ask. This is something that we will look into for the next round of consultation in order to both make the experience better for consultees, and to improve the way we are able to use the system to extract data about the consultation, which largely depends on the way the document is set up from the beginning. Officers checked the portal every day to ensure that it was functioning correctly (which it was) and although some residents outside of the borough have stated that they could not get the portal to work, this may be down to the browser being used or network connection/speed.

Comment: Issues with initial facilitated workshops held in November 2017.

Response/learning: The first workshop received an angry reaction from a few attendees who wanted the chance to ask questions and share their views rather than take part in any group exercises or give their views. Some attendees (at both this and the other two workshops) felt that the way in which events were, in their view, taken over by a small number of vocal people, made it difficult for them to comfortably express their own views

Following this, we reviewed the format and content of the workshop alongside the Communications Team and the brief for the external facilitator who had run the workshop on our behalf.

The format was amended to allow a question and answer session with Members and senior officers at the beginning, a reduced round table discussion and a further question and answer session at the end.

Following the changes, the second and third events ran much more smoothly although there were of course strong feelings being expressed.

A number of people commented that they felt the second and third events were well-organised and that they were made to feel welcome.

There were a number of younger people at these events but a majority of those attending would have been in the over 50s age group. It is important that we hear from all age groups, including those who are currently able to access the housing market in the borough, and we will review how best we can reach out to all local demographics.

We would consider holding similar workshops again, however we would not underestimate the strength of feeling about the proposals, and expect people to

sit down straight away and work on a set of questions we had prepared; we would take into account everything we have learned from this experience.

- 3.20 We received positive feedback on the public drop-in exhibitions that were held around the borough. People generally felt that these were well-organised, officers were knowledgeable and friendly, and the exhibition display material was informative and well-presented.

4 Summary of comments

- 4.1 The high level summary below provides an overview of the main comments received during the consultation. A more detailed summary of the responses received to all questions from organisations and the development industry, is attached as an appendix to this report.

Q1 Vision: Do you agree with the proposed Local Plan Vision?

- 4.2 Those who supported the Vision and those who did not were broadly split in two. The majority of developers, land owners and consultation bodies and some residents and local groups lent their general support to the acknowledgement of the need for higher levels of housing and jobs growth, and its acceptance of the very likely scenario that some Green Belt release will be required alongside the development of brownfield land and provides a clear direction for the New Local Plan.
- 4.3 The majority of residents and residents' groups who responded did not support the Vision, in particular the aim to meet housing need in full, primarily due to concerns over infrastructure. To address these concerns suggestions were made in regards to sustainability, housing for older people, transport, jobs etc.
- 4.4 Points have also been raised about the Vision seeking to improve, rather than maintain, the natural and historic environment, and that it is not specific enough to Hertsmere or too good to be true.

Q2 Priorities: Do you agree with our proposed priorities for the Local Plan?

- 4.5 The majority of respondents supported the Priorities in general, and a number of specific points were raised, such as the need to provide new homes in sustainable locations, and a flexible spatial strategy to maximise the delivery of sustainable housing.
- 4.6 It was noted that some terminology used in this section was not as clear as it could be, and that the Priorities are contradictory, in particular the idea that building more homes will not improve, but instead worsen, the natural environment and traffic issues.

Part 2: About your borough and the planning issues it faces

Q3 Housing Need: Do you agree that the Council should aim to meet the actual level of housing need (600 homes per year) we have identified above?

- 4.7 The aim to meet OAN is generally supported by the development industry. A number of land promoters commented that the council should commit to meeting its full OAN, rather than 'aim' to meet this, and that OAN should be regarded as a minimum number rather than a target. Some respondents mentioned that the council should seek to meet unmet need arising from other parts of the SW Herts HMA and Greater London.
- 4.8 A number of representations question whether the figure is robust and what are the implications of the proposed Government standardised formula for establishing OAN. The Government methodology has been used to query the housing figure both from the perspective of local bodies seeking for a lower figure, and the development industry seeking to increase the number, as the output of the methodology varies depending on whether it is taken before or after January 2018 when the Core Strategy is 5 years old.

Q4 Affordable Homes: Do you agree that we should continue with our requirement for 35-40 per cent of new homes to be provided as affordable housing?

- 4.9 The majority of respondents to this question supported retaining this percentage subject to viability testing and robust evidence being available to support this. Some questioned whether this housing would be genuinely 'affordable' to local people (a comment made by many people at the public exhibitions and workshops), as well as meeting local needs in terms of size.
- 4.10 A small number of respondents from the development sector said that the Local Plan should not set a percentage for affordable housing, but should instead rely on viability testing on a site-by-site basis to secure the maximum number of affordable homes on each site.

Q5 Self-build homes: Do you agree that land within larger developments should be available for up to 10 per cent of homes to be self-build properties?

- 4.11 Most respondents agreed with this approach, however some made comments about how this would interact with the affordable housing requirement. Suggestions included rolling the self-build percentage in with any affordable housing requirement; excluding the number of self-build homes on a site from the number of homes used to calculate affordable housing; exempting schemes which provide a lot of affordable housing from having to provide self-build plots; and that self-build should be subject to viability testing.

- 4.12 The impact of self-build housing on the construction of larger developments was mentioned by a number of respondents, for example health and safety on a large site, and the need for design codes to ensure a harmonious development.

Q6 How should we meet the accommodation needs of Gypsies, Travellers Travelling Showpeople: Gypsies, Travellers and Travelling Showpeople

- 4.13 Of those who answered this question, the majority of responses from individuals, groups, organisations and developers indicated the council should plan for the needs of these groups alongside general housing need, and that sites should be found which are close to amenities. However, a limited number of responses from local people indicated an intolerance of the needs of this community, or considered that accommodation for these communities should be located as far from the settled community as possible.

Q7 Other housing need: How should we meet other types of needs, including housing for the elderly?

- 4.14 Accessible and adaptable homes were seen as important to meet the needs of an ageing population. There was a general view that housing for older people is best placed within or close to existing settlements with good access to facilities and public transport, or within new mixed communities with their own shops and services; a range of types of accommodation should be provided to meet different needs (e.g. bungalows, extra care flats, retirement communities); and affordable specialist housing should be incorporated.
- 4.15 Several local groups mentioned a need for smaller homes to meet the needs of older people downsizing as well as first-time buyers.

Q8 Jobs: Do you agree that we should plan for this level of new jobs (9,000 new jobs over 15 years) to support business creation and meet the employment needs of an increasing population?

- 4.16 The majority of respondents agreed with this. Some respondents indicated the felt that employment uses should be retained on the edges of existing settlements in order to retain vitality and proximity to sustainable transport links and other services, while others thought these types of employment areas should be used for housing and employment should be pushed out into the Green Belt. The local evidence of need should be robust, and employment development should be provided in accessible locations, and not used as a way to justify building homes in the Green Belt.

Q9 Retail and Shopping: Do you agree that we should maintain a high level of retail and services within the borough's shopping centres and local parades? What other uses may be considered appropriate in these areas?

- 4.17 Most agreed with this approach as it would help maintain vitality and viability of existing shopping areas. Some questioned whether there is currently a 'high level' of retail provision within centres.

Q10 Community facilities: What community facilities or local infrastructure improvements do you think should be given priority?

- 4.18 Health facilities, education (schools and nurseries), premises for faith groups, station car park improvements and highway improvements were most mentioned by individuals and local organisations. Consultation bodies indicated that specific sites need to be set out for education, and that provision for green infrastructure, young people, public open space and sport need to be made. A number of the representations indicate that any new facilities should benefit existing communities as well as new development, and some mentioned that the provision mechanism (whether CIL or Section 106) should be set out so viability impacts are known at an early stage.

Q11 Sustainable Travel: What types of sustainable transport improvements would you like to see prioritised locally as part of the future planning of our borough?

- 4.19 Responses to this question include that bus services, cycle and pedestrian routes into existing centres within the borough need to be improved; better bus links are needed between the main towns to connect with stations; and an integrated bus network (single ticketing) would improve the system. New development sites should prioritise cyclists and pedestrians, and should be well-connected without the need to use a private car. Facilities at existing stations could be improved (e.g. car parking and lifts).

Part 3 Where should new development be built?

Q12 Brownfield Sites: Which areas do you think are best placed to accommodate this type of growth and why?

- 4.20 Building on brownfield sites was supported by a majority of respondents as being the first option for development. There was recognition from many that land in urban areas needs to be used more efficiently, and that, even with higher density development such sites are in finite supply and will not be able to accommodate all of the needed growth. Reallocating edge-of-centre employment uses could free up brownfield land for housing. Higher density housing should be considered for the four main settlements, and appropriate densities and building heights should be indicated to provide the amount of development and to help identify impacts on the character of the surrounding area.

Q13 New garden/suburbs: Where do you think would be the most sustainable locations for garden suburbs?

- 4.21 There was general support for sustainably-located garden suburbs, providing they are able to deliver an appropriate level of infrastructure to meet their needs and those of the existing population without impacting negatively on existing infrastructure. Sites should be accessible and well-designed and incorporate community and commercial uses as well as housing. The relatively long lead-in times for large sites were mentioned, and the need for further evidence before any sites are selected. The need to review other options for growth (i.e. brownfield sites, urban densification) before considering releasing Green Belt sites was also raised.

Q14 Growth of key villages: Do you agree with this approach? Where do you think this development should take place?

- 4.22 This approach to growth was supported by around half of respondents to this question. This was in part because some representors understood the options as being exclusive of each other or that there was to be a 'principal' option taken forward which would meet the majority of housing need on its own. The council has tried to be clear that a combination of approaches is likely to be needed, however perhaps the Issues and Options Document was not sufficiently clear on this point. Views on which of the key villages would be most suitable to accommodate this form of growth were mixed, with most residents living in either of the villages saying their particular village was not suitable, and developers and planning consultants making a case for the suitability of whichever village their site is located within/adjacent to. Arguments have been made that both of the key villages, Elstree and Shenley, lack sufficient facilities and sustainable transport links, however converse arguments have also been made.

Q15 Other villages: Which villages do you think would be most suited to this form of growth?

- 4.23 Many respondents felt that the smaller villages in Hertsmere are unsustainable locations for growth, as they have few local services and facilities, and public transport links are poor. Others felt that some limited growth within or adjoining smaller villages could help to revitalise the village as well as supporting services in nearby villages, such as pubs, which suffer due to low population levels. There was a general consensus that the smaller villages are suitable locations for proportionate, small-scale growth (for example infill development on a very small scale), rather than large-scale growth.

Q16 Garden village: Do you support the idea of a new garden village as a long-term growth option for Hertsmere?

4.24 The consultation responses show general support for the concept of a garden village or new settlement. However, the possible location within the indicated area of search was not supported as widely. Many respondents (irrespective of their place of residence) thought that any new settlement should be located on a railway line, and that the area of search could only be reached easily by car, connecting directly into the motorway network and encouraging longer-distance commuting. Among residents living close to the area of search concerns were raised about traffic generation and impacts on house prices, as well as concerns amongst out of borough residents that they had not been consulted, and that the adjoining council (St Albans) had not been properly engaged in the process. There have also been reservations raised about this being the main approach to delivering new development in Hertsmere, because it will take a long time to get started on the ground (around 10-20 years), and that the 4,000 homes are unlikely to be delivered within the plan period. Some also indicated that the size of the proposed settlement would be too small to achieve the 'critical mass' needed to deliver the infrastructure requirements (needing 5,000-10,000 homes).

5 Next steps

- 5.1 To sit alongside this summary report, a more detailed schedule of comments made by organisations, developers and residents is appended to this document. Full versions of the representations are available to view as a hard copy at the Civic Offices in Borehamwood. Representations are also available to view on the council's [Consultation Portal](#),
- 5.2 Alongside the Council's existing evidence, the comments received through this consultation will help to steer the drafting of the new Plan and, where appropriate, the commissioning or preparation of new evidence. A revised Local Development Scheme is being prepared for submission to the Executive in January 2019. This will set out up-to-date timescales for the local plan work.

Appendix A

Issues and Options consultation (Reg 18, September-November 2017)

Developer, landowner and planning consultant representations with HBC responses

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
Part 1				
General comment				
	Planning Potential for Inland Homes Ltd	Land north of Barnet Lane	Land north of Barnet Lane is on the edge of Borehamwood and Inland Homes, who have an option agreement, intend residential development of up to 50 homes on the 1.66ha site.	The comments are noted. We have considered all sites put forward through the call for sites and Issues and Options consultation process, and assessed them against our published HELAA methodology in order to judge their suitability for housing or economic development. The findings are published in our HELAA.
	Matt Hill – Maddox Planning Consultants for Northern Trust		Support the overall strategy of the Plan and support the Council's efforts being undertaken to ensure an up-to-date local plan is in place.	The support is welcomed.
	Tarmac Trading Limited		Fully supportive of option to deliver homes through sustainable garden village. Owns 36 acres of land within area of search for a garden village. Suggest area of search should not be limited to land north of the M25 and highlight strong existing highway links to area of land set out in the representation. Given existing sporting and heritage visitor attractions in the area it may be a good location for additional similar facilities linked to a new garden village. TTL also owns and operates land within Tyttenhanger Quarry within the area of search.	The support is welcomed and comments noted. The land ownership details have been fed into the council's HELAA.
	Rapleys for AEW Europe	The Point, Borehamwood	The representation promotes a site known as The Point in Borehamwood town centre, currently occupied by an entertainment complex and a multi-storey car park. The freehold is owned by the council. The site is promoted for residential use due to: <ul style="list-style-type: none"> • The current buildings are tired and not up to modern standards; • Set back from Shenley Road so redevelopment for other town centre uses would be difficult; • Improvement to visual amenity; • Housing would soften the interface between the town centre and the neighbouring residential area; • Highly accessible/sustainable location; • Helping to meet housing need; • No loss of identified shopping frontages. 	We have assessed all sites promoted against our published HELAA methodology in order to judge their potential suitability for housing or economic development and the findings are set out in the HELAA. The site is currently within the town centre boundary, although not designated as primary or secondary shopping frontage, so may be suitable for a range of town centre uses.
	Pegasus Group for Taylor Wimpey	Land south of Watford Road, Elstree	The site to the South of Watford Road, Elstree, is deliverable (suitable, available and viable) in the short-term and offers the opportunity to accommodate a high quality development of approximately 150 new homes. These Representations demonstrate that the promotion of the site is not exclusive to any one particular 'approach' as set out in the draft Local Plan, and instead highlights the site's suitability to contribute towards HBC's housing needs in all circumstances (in line with the sustainable development principles of the NPPF), and accordingly sets out the 'Exceptional Circumstances' necessary to justify a revision to the Green Belt boundary The Local Plan should identify (allocate) a supply of specific developable sites to meet HBC's objectively assessed housing needs in full (minimum of 9,000 net additional homes between 2019-2034) as far as is consistent with the policies of the NPPF; and In preparing the new Local Plan, HBC should consider revising Green Belt boundaries consistent with the policies of the NPPF in the context of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the exceptional circumstances test.	The comments are noted. We have considered all sites put forward through the call for sites and Issues and Options consultation process, and assessed them against our published HELAA methodology in order to judge their suitability for housing or economic development. The findings are published in our HELAA. A Stage 2 Green Belt review has been produced which considers Hertsmere's Green Belt in more detail against the purposes set out in the NPPF.

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			<p>Guidance at all levels is clear that it is up to Local Authorities to determine where development should and shouldn't go;</p> <ul style="list-style-type: none"> • The preparation of a new Local Plan provides the appropriate mechanism to review the Green Belt boundary and release sites for development where this promotes sustainable patterns of development and exceptional circumstances apply; and • The new Local Plan should plan positively and support the release of the site from the Green Belt and replace with a Strategic Allocation to be delivered in the early part of the new Local Plan to demonstrate that the spatial objectives of HBC can and will be delivered. 	
	Richard Wall	Land at Elstree Road and Dagger Lane	<p>Site of 17 hectares bordered by Elstree Road and Dagger Lane put forward for development approval through call for sites for housing. If the submitted site is taken forward it would increase pressure for infrastructure which would be incorporated into plans under the guidance of the local plan.</p> <p>A mixed-use development also to include infrastructure requirements may also be acceptable to the client.</p>	<p>The comments are noted.</p> <p>We have considered all sites put forward through the call for sites and Issues and Options consultation process, and assessed them against our published HELAA methodology in order to judge their suitability for housing or economic development. The findings are published in our HELAA.</p> <p>It should be noted that the process of obtaining planning permission is separate to the call for sites and HELAA process, which forms part of the evidence base for the new local plan. The allocation of a site through a local plan does not replace the need to obtain planning permission.</p>
	Lichfields for CEG	Potters Bar Golf Course	<p><i>Green Belt</i></p> <ol style="list-style-type: none"> 1. mix of the five potential development approaches identified in the I&O document will be required to meet housing need and maintain a supply position within the plan period. To meet the needs of Potters Bar and Hertsmere, it will be necessary for the Council to properly consider development options in Potters Bar, which will inevitably require a review of the Green Belt Boundaries in this location. 2. Potters Bar Golf Course was considered as part of the 2010 SHLAA and through which the site was considered to be deliverable within 1-5 years and achievable. 3. In 2016, Tyler Grange, acting on behalf of CEG, undertook a Green Belt Review of Broad Locations around Potters Bar. The areas of search for 'Garden Suburbs' identified within Hertsmere Issues and Options Public Consultation Planning for Growth (September 2017) fall within Zones 1 and 3 of that study. The CEG Strategic Green Belt Review identified that these zones make a lesser contributions to the Green Belt than land within Zone 2 and concluded that Zone 1 is the best option for Green Belt release. The findings of this Green Belt review are discussed in more detail in the representation. 4. CEG welcomes that the Council has correctly begun the process of a Green Belt review to inform the new Local Plan, in line with the NPPF. 5. The Hertsmere Green Belt Review has assessed the whole of Parcel 47 which contains Potters Bar Golf Course as scoring moderately well against the purposes of the NPPF. Based on this report, comparative to the Potters Bar Golf Course (parcel 47), it is considered that the alternative locations are not as sustainable – in terms of links to public transportation, and employment areas as outlined in Section 5.0 – and as highlighted in both the Council's 2017 Review, and CEG's initial Strategic Green Belt Review, these broad areas have been assessed as making a greater contribution to the purposes of the Green Belt than the Golf Course. 6. The Tyler Grange Green Belt Review has sub-divided the area into three distinct Local Land Parcel. This shows the land within the golf course (Parcels N1 and N2) makes a Low contribution to the Green Belt. 7. CEG considers the council's 2017 GB Assessment supports the conclusions of CEG Strategic Green Belt Review. Therefore Potters Bar Golf Course could sensibly be released from the Green Belt without compromising the purposes of the Green Belt in national policy terms, whilst providing the opportunity to create a well-defined and long-term GB boundary around Potters Bar, which better reflects the shape and scale of the settlement (whilst also accommodating its need for housing). 8. Other factors which can be considered to contribute to exceptional circumstances need to be fully reviewed and considered. 	<ol style="list-style-type: none"> 1. The comments are noted. 2. The deliverability of the site will be reaffirmed each time the SHLAA/HELAA is updated based on information provided by the landowner and any other relevant available information. 3. The HELAA process and Stage 2 Green Belt Assessment will inform consideration of any potential Green Belt boundary changes. 4. The support is welcomed. 5. The comments are noted. The HELAA process includes taking into account a site's accessibility and its proximity to local services. A Stage 2 Green Belt Assessment has been undertaken which looks at the Green belt in more detail, and will play a role in deciding which sites are taken through into the next stage of the new Local Plan. 6. The comments are noted. 7. The comments are noted, and in order to present a robust case for Green Belt release the council will be considering multiple factors which may form part of a case of exceptional circumstance through its local plan evidence base.

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1 Vision				
<i>Do you agree with the proposed Local Plan Vision?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	<ol style="list-style-type: none"> 1. The need for new homes, strong local economy and better environment is supported. The Vision also acknowledges that to deliver the development needs required for Hertsmere by 2034 not only will brownfield sites need to come forward for development, but that some Green Belt release will be required. This approach is supported to ensure appropriate, sustainably located growth. 2. It is, however, not clear from the wording of the Vision whether the envisaged 6,000 homes are in addition to the 3,000 already in the pipeline. This wording needs clarifying in the Vision to reflect 600 dwellings per annum across the 15 years lifespan of the Local Plan. 3. The Vision also needs to reflect a potential increase in housing numbers taking into account the likely increase in housing numbers that would arise from the Government's standard method for calculating local authority housing needs. This is not yet an approved standard methodology, but the indications are that the annual delivery for Hertsmere would increase from around 600 to 700 dwellings per annum. It is therefore proposed that the wording for the Vision should read a "minimum" of 9,000 dwellings across the Plan period, if and until a standardised methodology is in place. Such approach would ensure that the Vision is consistent with the para 47 of the NPPF requirement to 'boost significantly the supply of housing'. 4. The Vision also seeks to build on its strong economy and attract more enterprises and businesses. Again this approach is supported, but it is noted that an estimated 9,000 additional jobs in total will be created during the 15 years of the Local Plan. This is a significant growth in local employment, and needs to be linked to housing growth and infrastructural needs of the authority. With this amount of growth, there is a need for providing an upper level of housing, which is sustainably located, rather than restricting growth. It is noted that to support the amount of growth more schools, doctors' surgeries, clinics, community facilities, green space for leisure and recreation and improved public transport are required. 5. The Vision also emphasises the need for more shops and leisure facilities across the borough. This part of the Vision is supported, but there is a question over whether this Vision could be delivered if the Garden Village option for growth was considered over other options. The Garden Village approach would require its own needs, facilities and significant infrastructure requirements, reducing the benefits to the borough as a whole and to existing communities. Whereas the other options for development, including the new Garden Suburb option, would contribute more to the existing local community and present more sustainable development options that achieve the aims of the Vision. 	<ol style="list-style-type: none"> 1. The general support for the Vision is welcomed and the comments noted. 2. It is stated elsewhere in the document that around 9,000 homes are needed over 15 years, or 600 homes per year, but we agree that the Vision Statement could have set this out more clearly. 3. The Vision was prepared before the council had sight of the latest housing numbers from the Government. 4. The jobs target is linked to the housing growth through the Economic Study and SHMA, which were prepared in tandem with much cross-working between the two. Infrastructure needs will be considered during the continuing preparation of the local plan. 5. The Issues and Options document recognises that a combination of approaches for planning future growth are likely to be needed, and we do not envisage that any of the individual approaches would be taken forward in isolation.
	Richard House - Gladman Developments		<ol style="list-style-type: none"> 1. Generally agree but would be helpful to clarify whether the 6,000 homes referred to are in addition to the 3,000 already committed. 2. Vision could usefully refer to the need for specialised elderly persons accommodation given the substantial increase in the proportion of the population age 75 and over in the next 20 years. 	<ol style="list-style-type: none"> 1. The general support is welcomed. It is stated elsewhere in the document that around 9,000 homes are needed over 15 years, or 600 homes per year, but we agree that the Vision Statement could have set this out more clearly. 2. It is agreed that the Vision could refer to the increased proportion of older people.
	Ben Rose – Atelier Ten Building Services Engineers		<ol style="list-style-type: none"> 1. In general yes, but more homes need to be built. 2. Have to be clearer about providing access from these new and existing homes to the local amenities (including schools and doctors) and shopping facilities/town centres. 3. Environmental impact should be stronger and not just about giving access to greenery, but having a low impact on local and global environment. 	<ol style="list-style-type: none"> 1. The general support is welcomed. 2. It is the intention, as set out in the objectives and required infrastructure for each development approach, that new development would be well-connected to existing and new centres by active travel links and public transport. The details of these links are to be worked out through the plan-preparation process, and will involve extensive discussions with the relevant authorities. 3. This point is taken on board and will be considered when progressing the new Local Plan.
	Planning Potential for Inland Homes Ltd	Land north of Barnet Lane	<ol style="list-style-type: none"> 1. „Want to see evidence of amount of brownfield land available and likely to come forward within plan period. Request evidence is made available to the public. 2. Agree that Green Belt land needs to be considered but contest the nature in which Hertsmere are seeking to review GB boundaries. Release of smaller parcels can speed up delivery and have a less damaging impact on character of area. 	<ol style="list-style-type: none"> 1. This evidence is not yet available. The Issues and Options document is a very early stage in the plan-making process, setting out what we think the issues are, and what the options might be, and asking for comment on these before any decisions have been made. The entire available evidence base is on the council's website. The HELAA will make the amount of available land, both brownfield and

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			<p>3. It is clear that optimising brownfield areas alone will not meet full OAN, so contend that exceptional circumstances exist that warrant exploring GB release. Client wishes to highlight case of Calverton Parish Council v Greater Nottingham Councils (2015) and considerations of Hon. Mr Justice Jay in his matter [considerations are listed].</p> <p>4. Urge Hertsmere to prepare a Green Belt review and would welcome actively engaging with this process in promoting Land north of Barnet Lane for housing.</p> <p>5. Persistent unaffordability within Hertsmere and the rest of the HMA. Failing to accommodate unmet need within HMA could affect affordability and form part of exceptional circumstances for GB release.</p>	<p>greenfield, clearer and is likely to be published alongside the next stage of public consultation later in 2018.</p> <p>2. The council have not made any decisions on the release of Green Belt land and at this stage are simply considering all approaches. The reasons for considering that the release of larger amounts of land from the Green Belt for development include the difficulty of providing any reasonable levels of infrastructure if small parcels are released piecemeal, due to the inability to pool more than five S106 agreements towards the same piece of infrastructure. Infrastructure was the main issue raised by those who responded to our 'soft' consultation in 2016, so we have taken this into account in proposing possible options for growth. Contrary to the view put forward in the representation, it can also be considered that the release of small pieces of land from the green Belt can leave a less-defensible boundary, and cause greater harm on the Green Belt overall than larger releases. This is something for the council to consider during the local plan process, taking into account consultation responses.</p> <p>3. The comments are noted.</p> <p>4. The council published a Stage 1 Green Belt Assessment in September 2017 to tie in with the Issues and Options consultation. This was linked to directly from the Consultation Portal page under the Supporting Documents tab. This has since been followed by a Stage 2 Green Belt Assessment, but the Council has not involved specific land promoters directly in the assessment as it needs to be as objective as possible in order to be robust.</p> <p>5. The comments are noted.</p>
	Matt Hill – Maddox Planning Consultants for Northern Trust		We agree and support the Council's vision as set out within the Draft Local Plan.	The support is welcomed.
	Francesca Hill – Sworders for Mr and Mrs Monk	Wilton End Cottage, Radlett Lane, Shenley	<p>Disagree.</p> <p>1. In general we agree with the proposed Vision Statement and are encouraged to see that the Council has recognised the need to build new houses on Green Belt land to meet the housing needs of the Borough. The Vision Statement however does not include the provision of new homes at existing Key Service Villages as a sustainable solution, despite this being an option set out further in the document.</p> <p>2. Moreover, a strategy based purely on one option be it building on existing brownfield land or a new settlement will not deliver the number of houses required within life of the Local Plan or at the necessary build out rate to ensure a robust deliverable 5 year housing supply.</p>	<p>The general support is welcomed and the omission of a reference to green belt land around service villages and other villages is noted.</p> <p>1. Key service villages have not been neglected as potential locations for growth, for, as the submission points out, they are one of the approaches to growth set out later on in the Issues and Options document. They could, however be referenced in any vision statement (or similar) in the next iteration of the plan-making process.</p> <p>2. The Issues and Options document recognises that a combination of approaches for planning future growth are likely to be needed, and we do not envisage that any of the individual approaches would be taken forward in isolation.</p>
	Sarah Kasparian – Bell Cornwell LLP for Hightown Housing Association	Land at Rossway Drive, Bushey	<p>Agree with vision statement overall.</p> <p>However the numbers are vague and there is not sufficient explanation on how the housing target and housing supply has been reached. Confirmation is needed on whether the Council is intending on planning for the full objectively assessed housing need. The OAN is considerably higher the Core Strategy housing target, and we support the principle of planning for growth in Hertsmere.</p>	<p>The general support is welcomed.</p> <p>The full OAN (as an output of the SW Herts SHMA 2016) is 599 homes per year, rounded to 9,000 over 15 years. The council is starting with the intention to meet full OAN. The numbers have since changed with the publication of the new NPPF and finalisation of the national methodology, although the latter is set to change against in the near future with a further changes to the methodology set to be announced and consulted on by government.</p>
	Sarah Kasparian – Bell Cornwell LLP for DNA Capital LLP		<p>Agree with vision statement overall.</p> <p>1. However the numbers are vague and there is not sufficient explanation on how the housing target and housing supply has been reached. Confirmation is needed on whether the Council is intending on planning for the full objectively assessed housing need. The OAN is considerably higher the Core Strategy housing target, and we support the principle of planning for growth in Hertsmere.</p> <p>2. We would stress the importance of working with neighbouring authorities, on each delivering their required proportion for the housing market area. We understand that local authorities in South West Hertfordshire are working together and seeking to deliver individual figures, rather than artificially dividing the housing requirement.</p> <p>3. Land at Carpenders Park Farm, Oxhey Lane, Carpenders Park was submitted to TRDC as part of their HELAA/SHLAA. the boundary between Hertsmere and Three</p>	<p>The general support is welcomed.</p> <p>1. The full OAN (as an output of the SW Herts SHMA 2016) is 599 homes per year, rounded to 9,000 over 15 years. The council is starting with the intention to meet full OAN. The numbers have since changed with the publication of the new NPPF and finalisation of the national methodology, although the latter is set to change against in the near future with a further changes to the methodology set to be announced and consulted on by government.</p> <p>2. This is the current approach, however the authorities within this grouping are all at a similarly early stage of plan preparation, and are working closely together on strategic issues. The Government's indicated direction of travel is towards strategic planning across wider areas, so in light of this the SW Herts group of five authorities are in discussions about taking this approach forward.</p>

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			Rivers forms the eastern side of our clients land. We would welcome discussions at an early stage with both Three Rivers and Hertsmere on this site as a suitable, availability and deliverable site adjacent to Carpenders Park. The site would deliver a residential led mixed use development as it has the scope to provide community, education and employment floorspace.	3. The site is being considered through the HELAA process, and we will discuss this with TRDC before taking it further.
	Bob Woodman – DP9 Ltd for NBP Limited		Agree on the Vision for growth. It is important that new housing is also accompanied by new community facilities and that sufficient land is identified for commercial uses.	The support is welcomed and the comments are noted.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	<p>Agree with the need to build new homes but considered the figure of 3,000 should be seen as a target and not a limit. Therefore, if suitable sites come forward, planning permission should be approved.</p> <p>Agree with the need to utilise previously developed sites in sustainable locations before looking to release Green Belt land.</p> <p>In order have a strong economy and attract more enterprise and business it is necessary to provide high quality industrial and commercial premises, suitable to meet the needs of new businesses.</p> <p>However, equally as current industrial premises are vacated, they may not be appropriate for the needs of the new enterprises, these sites should be released for other uses, including residential.</p>	<p>The support is welcomed.</p> <p>The OAN figure for Hertsmere based on the latest evidence at the time of publishing the Issues and Options, of 9,000, with 3,000 already accounted for, rather than being a need for 3,000 homes. Planning applications are currently determined against the adopted development plan.</p>
	David Joseph – Bloor Homes	Land at Harperbury Hospital	<p>Disagree.</p> <p>We are pleased to see that the Council appears to progressing with a Plan which accepts the need to accommodate development & economic requirements.</p> <p>In addition, the Vision for the Issues & Options also provides a useful starting point for the priorities and a spatial response to development requirements.</p> <p>However, the spatial options subsequently set out, such as urban brownfield, new garden suburbs, supporting rural communities, growth of key villages are too prescriptive and may not be flexible enough to bring forward suitable development proposals which may not neatly align with the categorisations described.</p> <p>For example you will see from our answers to Questions 13, 14, 15 & 16 that land related to the former Harperbury Hospital site could accommodate a range of schemes and this should not be precluded due a narrow application of the Council's spatial option choices. Opportunity led outcomes should considered to complement garden suburbs or villages.</p> <p>We are also conscious that the recent Budget Statement identifies the need for planning activities in the South East to accommodate high levels of requirements and we therefore hope that the Council will continue to plan positively in response to this ambition.</p>	<p>The comments are noted.</p> <p>The Issues and Options document recognises that a combination of approaches for planning future growth are likely to be needed, and it is not envisaged that any of the individual approaches would be taken forward in isolation. This should provide the flexibility needed to secure a supply of housing land across the plan period.</p> <p>The starting point for the Local Plan is a spatial vision for the area, rather than an opportunistic approach based on available sites. Our starting point has been to suggest patterns of growth that we feel have the potential to present a sustainable spatial vision, but this does not mean that suitable options outside this vision will not be considered as they arise.</p>
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	<ol style="list-style-type: none"> 1. Support the principle of the Vision Statement, in particular the recognition through the Council's own Objectively Assessed Housing need that there is a minimum requirement for circa 9,000 dwellings to be delivered over the next 15 years. This is the minimum housing needs of Hertsmere District based upon demographic and other factors, including the building of a strong economy. 2. It is, however, noted that there is the potential through the proposed standard methodology for this requirement to be reduce to about 5,500 dwellings. This will not address the actual need for new homes based on a population increase of 20,000 people. 3. D2 Investments supports delivery of a choice of new homes to meet the housing needs of the local community. To achieve this element of the vision, there is a requirement through the Local Plan for a choice of site sizes and types at sustainable locations to be allocated across the District. Any spatial strategy should not 'put all its eggs' into one or two baskets (i.e. garden village or suburbs). 4. New Green Belt boundaries should take into account potential growth needs beyond 2034 through identification of reserve sites to provide enduring Green Belt Boundaries beyond 2034. 	<p>The general support is welcomed.</p> <ol style="list-style-type: none"> 1. The NPPF and PPG do not reference OAN being a 'minimum' level of housing to be delivered in an area. While we will be looking to provide a sensible buffer to allow for non-delivery, it could prove difficult to justify the release of Green Belt to accommodate significantly more housing than is required to meet OAN. 2. The standard methodology would have reduced the housing figure to 40% above the currently-adopted plan while that plan was less than 5-years old. The Core Strategy was adopted in January 2013, so this cap would now come off. A revised methodology has now been published the effects of which are yet to be analysed. 3. The support is welcomed. The council is not proposing to adopt one spatial strategy alone (e.g. a garden village), instead the overall strategy is likely to include elements of all of the proposed approaches to growth set out in the Issues and Options Document, in order to provide a supply of housing land which can be delivered throughout the plan period. 4. The comment is noted and consideration will be given to identifying reserve or 'safeguarded' sites for growth beyond the plan period.

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	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	<ol style="list-style-type: none"> Support the principle of the Vision Statement, in particular the recognition through the Council's own Objectively Assessed Housing need that there is a minimum requirement for circa 9,000 dwellings to be delivered over the next 15 years. This is the minimum housing needs of Hertsmere District based upon demographic and other factors, including the building of a strong economy. It is, however, noted that there is the potential through the proposed standard methodology for this requirement to be reduce to about 5,500 dwellings. This will not address the actual need for new homes based on a population increase of 20,000 people. A reduction in the level of housing would not address the significant gap between local earnings and the cost of housing which is acute in Hertsmere. In 1997, the ratio of lower quartile house prices to lower quartile gross annual earnings was 5.31. Some 20 years later in 2016 this ratio had almost trebled to 15.04. This is not sustainable. Further, a reduced housing requirement would necessitate the emerging spatial strategy to be revisited. The idea of a new garden village or garden large suburbs would be wholly inappropriate. High Moon supports delivery of a choice of new homes to meet the housing needs of the local community. To achieve this element of the vision, there is a requirement through the Local Plan for a choice of site sizes and types at sustainable locations to be allocated across the District. Any spatial strategy should not 'put all its eggs' into one or two baskets (i.e. garden village or suburbs). New Green Belt boundaries should take into account potential growth needs beyond 2034 through identification of reserve sites to provide enduring Green Belt Boundaries beyond 2034. 	<ol style="list-style-type: none"> The NPPF and PPG do not reference OAN being a 'minimum' level of housing to be delivered in an area. While we will be looking to allocate more sites than are required to meet OAN to provide a buffer to allow for non-delivery, it could prove difficult, in a constrained area like Hertsmere, to justify the allocation of land to accommodate significantly more housing than is required to meet OAN as this may not meet the exceptional circumstances test for the release of Green Belt. The standard methodology would have reduced the housing figure to 40% above the currently-adopted plan, but only while that plan was less than 5-years old. It will soon be 5 years since the Core Strategy was adopted in January 2013, so this cap would come off, and our interpretation of the methodology led to a figure slightly higher than the 9,000 homes over the 15-year plan period that the SW Herts SHMA arrived at. See response to 2 above. See response to 2 above. The support is welcomed. The council is not proposing to adopt one spatial strategy alone (e.g. a garden village), instead the overall strategy is likely to include elements of all of the proposed approaches to growth set out in the Issues and Options Document, in order to provide a supply of housing land which can be delivered throughout the plan period. The comment is noted and consideration will be given to identifying reserve or 'safeguarded' sites for growth beyond the plan period.
2 Priorities <i>Do you agree with our proposed priorities for the Local Plan?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	<ol style="list-style-type: none"> The priorities establish a link between providing housing, delivering economic growth, and improved infrastructure and environment. This approach is supported in principle. The concern, however, is the housing currently proposed does not take into account the economic growth envisaged by the emerging Local Plan, which is highlighted as a priority. In line with requirements of the NPPF, the priority of the Vision should be to meet full objectively assessed needs for housing rather than just 'increasing the supply of new homes'. It is not considered that the new Garden Village approach will assist in achieving the priorities of the new Local Plan, as it will focus improvements and investment in one part of the Borough. The new Garden Suburb approach is a more sustainable approach to development that will bring benefits to all parts of the Borough, rather than a focused individual area. 	<ol style="list-style-type: none"> The general support for the Priorities is welcomed and the comments on these are noted. The Issues and Options document recognises that a combination of approaches for planning future growth are likely to be needed, and we do not envisage that any of the individual approaches would be taken forward in isolation.
	Ben Rose – Atelier Ten Building Services Engineers		Yes, all good, but so far nothing ground breaking or out of the ordinary. Doesnt actually say the homes will be built, only planned, so if they aren't built (as not mandatory) then everything after is moot. Should be mandatory that the number of homes built exceeds the proposed number.	The local planning authority is required to produce a local plan which allocates enough land to meet the need for homes in its area. As part of this we need to be able to ensure that, to the best of our knowledge, all sites allocated are deliverable. Once we have narrowed down the selection of available sites for homes, and those sites have been through more public consultation, the council will work with the landowners/developers to ensure that we have as much certainty as possible over the deliverability of sites. This is required in order for a plan to be found sound.
	Planning Potential for Inland Homes Ltd	Land north of Barnet Lane	Agree but think increase in housing supply needs to be vast to meet need of borough and unmet need of HMA.	Comments are noted. The increase in housing supply in Hertsmere will be aiming at meeting full OAN for Hertsmere. It is not clear why Hertsmere should plan to meet any unmet need across the HMA in full.
	Stephen Rose – Quod for Sellar	Land at Rowley Lane, Borehamwood	<p>Sellar agrees with the proposed priorities, in particular delivering economic growth and enterprise by:</p> <ul style="list-style-type: none"> Responding to the needs of new businesses Identifying more sites for employment development and promoting investment 	The support is welcomed.

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			<ul style="list-style-type: none"> Supporting start-ups and the growth of existing businesses 	
	Matt Hill – Maddox Planning Consultants for Northern Trust		We agree with the Council's priorities for the Local Plan. Particularly, we agree with the Council's priorities for responding to local housing need. In addition, we agree with the proposed economic priorities of the Local Plan.	The support is welcomed.
	Sarah Kasparian – Bell Cornwell LLP for Hightown Housing Association	Land at Rossway Drive, Bushey	<ol style="list-style-type: none"> We agree with the principle of increasing the supply of new homes – but the number needs to be specific, taking into account suitable and available sites including the Green Belt. We agree with planning for more affordable homes for local residents – again, the number needs to be specific and realistic with an appropriate proportion reflected in the replacement policy for CS4. At present Policy CS4 is out of date as it does not reflect the preference for registered housing providers to manage larger sites with affordable units, rather than sites with just one or two affordable units. Policy CS4 also does not reflect the changes in Government policy for sites of more than 10 units. Hightown Housing Association would welcome the opportunity to be involved with policy making for affordable housing provision in Hertsmere as an active and registered housing provider based locally and managing a significant portfolio in the area. 	<ol style="list-style-type: none"> The support is welcomed and the comments are noted. The Issues and Options document represents a very early stage in the plan-making process and was undertaken prior to the council carrying out much of its evidence base work, including a HELAA and Stage 2 Green Belt Assessment, which has since fed in to a more detailed report to be issued in Autumn 2018. Again, the support is welcomed and the comments are noted. As above, much of the evidence work has yet to be carried out, and further detail will be published in later documents for public consultation. The comments are noted and Hightown HA will be consulted as progress on the local plan continues.
	Sarah Kasparian – Bell Cornwell LLP for DNA Capital LLP		We agree with the principle of increasing the supply of new homes. The housing target needs to be specific, taking into account suitable and available sites including the Green Belt. It should also be a priority to work jointly with neighbouring authorities to help them to deliver their housing targets and preparing supportive technical work.	<p>The support is welcomed and comments noted.</p> <p>The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA and is already working across the HMA on technical studies.</p>
	Bob Woodman – DP9 Ltd for NBP Limited		<p>Agree that new housing sites should be allocated and focussed in locations well served by infrastructure and supporting facilities.</p> <p>Agree that new and improved schools and health facilities should be provided, including for specialist and minority sectors.</p> <p>Agree that land should be provided for commercial requirements, including for industrial and B8 uses.</p> <p>Agree that the environment should be protected and enhanced where possible. There may be a requirement for limited development in the existing green belt and review of its boundaries should focus on the extent to which existing designated land meets the five Green Belt purposes.</p>	<p>The support is welcomed and the comments are noted.</p> <p>The council has commissioned a follow-up Stage 2 Green Belt Assessment focussing on the five purposes set out in the NPPF, which has now been produced.</p>
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edwarebury House Farm, Elstree Hill	The main priority is to provide for the step change in housing in Hertsmere to ensure that the right quantum of housing is provided in order to respond to housing need (including affordable housing). The new housing should be provided in sustainable locations, in order that it is accessible by public transport and can access a range of services.	The comments are noted.
	David Joseph – Bloor Homes	Land at Harperbury Hospital	<p>Agree</p> <p>We agree with the proposed priorities for the local plan. Nevertheless we believe that a more flexible spatial strategy would maximise the probability of these priorities being realised.</p>	The support is welcomed and the comments are noted.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	<ol style="list-style-type: none"> D2 Investments generally agree with the priorities of the Local Plan concerning housing provision. There is a need for the Local Plan to allocate a choice of site sizes and types at sustainable locations across the District. Any spatial strategy should not 'put all its eggs' into one or two baskets (i.e. garden village or suburbs). From the perspective of a spatial strategy, it should be a priority in the Local Plan to direct housing and employment growth to the principal settlements of Borehamwood, Radlett and Potters Bar. These are the 3 settlement which already have a good range of local facilities, services, employment opportunities and public transport, specifically railway connections. Other settlements, including Bushey, Shenley and Elstree, lack the wide range of facilities found at the three principal settlements. 	<p>The support is welcomed.</p> <p>The council is not proposing to adopt any one spatial strategy alone (e.g. a garden village), instead the overall strategy is likely to include elements of all of the proposed approaches to growth set out in the Issues and Options Document, in order to provide a supply of housing land which can be delivered throughout the plan period.</p> <p>The comments about locations are noted. It should be noted that Bushey is placed above Radlett in the settlement hierarchy in the Current Core Strategy, and also has a railway station (located just outside Hertsmere borough).</p>
	Star Planning for High Moon Developments	Land off Theobald	<ol style="list-style-type: none"> High Moon general agree with the priorities of the Local Plan concerning housing provision. There is a need for the Local Plan to allocate a choice of site sizes and 	<p>The support is welcomed.</p> <p>The council is not proposing to adopt any one spatial strategy alone (e.g. a garden</p>

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	Limited	Street, Radlett	<p>types at sustainable locations across the District. Any spatial strategy should not ‘put all its eggs’ into one or two baskets (i.e. garden village or suburbs).</p> <p>2. From the perspective of a spatial strategy, it should be a priority in the Local Plan to direct housing and employment growth to the principal settlements of Borehamwood, Radlett and Potters Bar. These are the 3 settlement which already have a good range of local facilities, services, employment opportunities and public transport, specifically railway connections. Other settlements, including Bushey, Shenley and Elstree, lack the wide range of facilities found at the three principal settlements.</p>	<p>village), instead the overall strategy is likely to include elements of all of the proposed approaches to growth set out in the Issues and Options Document, in order to provide a supply of housing land which can be delivered throughout the plan period.</p> <p>The comments about locations are noted. It should be noted that Bushey is placed above Radlett in the settlement hierarchy in the Current Core Strategy, and also has a railway station (located just outside Hertsmere borough).</p>
Part 2 About your borough and the planning issues it faces				
3 Housing Need				
<i>Do you agree that the Council should aim to meet the actual level of housing need (600 homes per year) we have identified above?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	<p>Disagree.</p> <ol style="list-style-type: none"> 1. The Council have a requirement, set out within para 47 of the Framework to boost significantly the supply of housing by ensuring that their Local Plan meets full objectively assessed housing needs. The Council should therefore be committing to, rather than aiming for, the delivery of a minimum of 600dpa. 2. It should also be noted that we similarly disagree with the notion that ‘the Government now leaves Councils to determine their own housing requirements’. Whilst a standardised approach is not yet in place, the NPPF is clear that full objectively assessed housing need has to be evidence based. 3. It should therefore be made clear that the aim is to meet full OAN which is a minimum of 600dpa. We would also reserve the position to comment fully on SHMA methodology once a housing target has been fixed as the Local Plan process progresses, particularly as housing numbers may increase further due to Duty to Cooperate. This would allow for a subsequent review of the amount of housing needed to accommodate the amount of economic growth proposed, and, also an allowance for an increase in need through the standard method of calculating housing need, particularly given the currently suggested calculation would result in a significant increase in housing requirements within Hertsmere. 	<ol style="list-style-type: none"> 1. The NPPF requires that local planning authorities boost significantly the supply of new homes by (among other things) using their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework (this last sentence means there may be cases where full OAN cannot be met). The NPPF does not require local authorities to deliver above their OAN. 2. The Vision was prepared before the council had sight of the housing numbers from the published methodology. This statement does not mean that we think councils can determine their own requirements irrespective of any evidence. 3. The jobs target in the Issues and Options document is closely linked to housing growth through the Economic Study and SHMA, which were prepared in tandem across the housing market area, with much cross-working between the two studies. The local plan does not need to repeat the NPPF in stating that it aims to meet full OAN where this would be consistent with the other policies in the NPPF.
	Richard House - Gladman Developments		Agree that the local plan should aim to deliver at least 600 homes per annum in accord with objectives in NPPF and the White Paper which states all local authorities should develop an up-to-date plan to meet housing requirement based upon an honest assessment of the need for new homes.	The NPPF requires that local planning authorities boost significantly the supply of new homes by (among other things) using their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework (this last sentence means there may be cases where full OAN cannot be met). The NPPF does not require local authorities to deliver above their OAN.
	Ben Rose – Atelier Ten Building Services Engineers		<ol style="list-style-type: none"> 1. That meets projected needs, but what about any current shortfalls, which the local house prices suggest that there is insufficient choice or availability. That is for people currently in the borough wanting to find suitable housing, and no doubt help other people back and rejoin families that they have had to move away from. In addition. 2. does this include for rent-able accommodation, rather than just new homes to buy, as know the costs of renting also indicate that there is insufficient to meet demand. 	<ol style="list-style-type: none"> 1. An increase in housing supply in this area is unlikely to improve affordability due to the proximity to London. 2. Private rented accommodation is not dealt with differently to market housing. Homes for affordable and social rent will be sought as part of an affordable housing requirement. The Government consulted last year on a build to rent model of delivery, which may be something that is worked into the delivery of sites across the borough if there is a local appetite for it, but we would not allocate sites specifically for this purpose.
	Planning Potential for Inland Homes Ltd	Land north of Barnet Lane	<ol style="list-style-type: none"> 1. Strongly support intention to meet full OAN identified in SW Herts SHMA (2016). Encourage inclusion of a meaningful buffer to ensure completion rates are above OAN. 2. The housing requirement identified in the I&O does not appear to seek to meet unmet need arising elsewhere in the HMA and in London. [Detailed update/commentary provided on neighbouring local authorities’ local plans]. 3. The I&O outlines an identified housing supply of 3,000 homes although the document does not steer you towards the evidence for this claim. [The submission provides a breakdown of where they think the figure of 3,000 identified homes comes from, which includes sites under construction, unimplemented permissions, completions, 	<ol style="list-style-type: none"> 1. The support is welcomed and the comments about delivering above OAN noted. Consideration will be given to this in the preparation of the Plan. 2. Hertsmere and the rest of the boroughs within the HMA are all at a broadly similar stage in the plan-making process, and regular duty to cooperate discussions are held between the members of the SW Herts group which commissioned the SHMA as well as St Albans. The council is working alongside other authorities in the HMA on the potential for a joint strategic plan across the HMA. We are well aware of the significance of the duty to cooperate (which is likely to become a ‘duty to agree’), and engage regularly with neighbouring authorities, including London boroughs, on strategic issues.

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			strategic allocations and opportunity sites, and deliverable sites from the previous SHLAA].	3. The identified housing supply is made up of the sources listed in the 2015/16 Five Year Housing Land Supply paper as identified in the representation. It should be noted that a 6% slippage and non-implementation rate based on past trends has been applied to the total deliverable housing land for the five-year period. This approach was accepted by the Inspector at the Examination in Public of the Site Allocations and Development Management Policies Plan in 2016. The allocations in the current local plan will be carried through into the new plan provided they are still deliverable and available. The existing local plan was drawn up with the intention of covering a 15-year period up to 2027, and so some allocated sites are likely to come forward later in the plan period, not all within the first 5 years.
	Planning Potential for Inland Homes Ltd	Land north of Barnet Lane	1. Agree that actual level of housing need should be met as a minimum. However would argue housing need is greater than 600 homes per annum due to need for; a buffer; expected shortfall arising within HMA; addressing London's shortfall; Also argue that identified housing supply of 3,000 is not robust.	1. The comments are noted. Hertsmere has not been approached to accommodate any shortfall arising from Greater London or the rest of the HMA. A local plan which allocates more land than is needed to meet it OAN, especially within the Green Belt, is unlikely to be found sound without any robust evidence of need which could constitute exceptional circumstances.
	Matt Hill – Maddox Planning Consultants for Northern Trust		We support the Council's acknowledgement within the Local Plan that they need to increase the number of new homes built to meet the growing demand and growth forecasts over the next twenty years. This is very pertinent considering the Local Plan already acknowledges that demand for housing in Hertsmere is very high. [Given the assessments in the SW Herts SHMA] are subsequently of the view that there are no reasons as to why the Council should depart from its identified OAN of 600 dwellings per annum and, as a result, it should be planning to meet this need as a minimum through the new Local Plan.	The support is welcomed.
	Francesca Hill – Sworders for Mr and Mrs Monk	Wilton End Cottage, Radlett Lane, Shenley	Disagree. The Council's aim to meet the actual housing need of 600 homes per year is welcomed. 1. Consideration should be given to the Government's new methodology for calculating housing need which is intended to be included in the revised National Planning Framework in Spring 2018. 2. Only planning for 10 years of housing need or not taking into account the likely household need using the new methodology would be contrary to Paragraph 85 as inevitably Green Belt boundaries will need to be revisited when housing need is reviewed for the latter part of the plan period. Indeed, whilst there is no guidance regarding how long beyond the development plan period Green Belt boundaries should remain unaltered it would not be unreasonable to plan for housing beyond 15 years given the certain need to further redefine green belt boundaries to meet housing need in the future. The Council should therefore also, as advised in paragraph 84, consider safeguarding additional land for future development in the longer term.	The support for meeting housing need is welcomed, and the comments are noted. 1. The new methodology for calculating housing need is now in place (albeit likely to be subject to further change) and this will be utilised moving forward. The Issues and Options document crossed over with the Government consultation in its publication, and so we were unable to include reference to any specific figures within this. That aside, the figures being draft means we cannot reasonably be expected to plan based on them until they are fully adopted as they would have no weight in an examination in any case. 2. The council is not proposing to plan for 10 years of housing need so we are not sure where this assertion comes from. Safeguarded land may be considered as part of the plan-preparation process.
	Chloe Tucker – Daniel Watney LLP for The Worshipful Company of Brewers	Land formerly part of Earl and Cross Keys Farm, South Mimms	As the standardisation will have an effect on the OAN figure for Hertsmere, it is advised that drafting the New Local Plan and undertaking site allocation should be delayed until that time. Furthermore, as there is a substantial difference between the current annual housing target and the OAN of the Borough, the Council as Local Planning Authority should be actively seeking all opportunities to deliver housing, in order to exceed their minimum housing target set through the Local Plan. [This is discussed in greater detail in the representations].	The comments on housing supply/need are noted. There is a requirement to demonstrate that work is progressing on local plans. Therefore work on the extensive evidence base which will underpin the new local plan will continue while we await a decision on the new national methodology for calculating housing need. However it is very unlikely that any decisions will be taken or further public consultation work carried out before the new NPPF is published, and so the new methodology will be taken into account at the time it is made available. The council takes decisions on planning applications based on the adopted development plan, unless material considerations indicate otherwise. The council can demonstrate a five-year housing land supply, and the local plan housing target is currently being exceeded. It is for planning applicants to make a case for the need for any housing which is not compliant with current policy on a case by case basis. The

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				council is proposing to plan to meet its new OAN in full through the new local plan.
	Richard Murdock – Woods Hardwick Planning Ltd for Haysgate Plant Hire Ltd		<p>We support the principle that the Council should aim to meet their actual housing need, to be identified through an up-to-date assessment of need. The final figure to be identified should be treated as a minimum and not a maximum. The Council should plan positively and ambitiously to deliver dwellings at rate beyond this identified threshold where this is sustainable.</p> <p>There is increasing pressure on Council's to deliver levels of housing in line with the identified requirements of the Government. This is evident from the publication of the recent Fixing Our Broken Housing Market White Paper, which reiterates the Governments commitment to increasing the delivery of new dwellings. Further, the Government are continuing to publicly state their commitment to speeding up and increasing housing delivery.</p> <p>We therefore urge the Council to be mindful of this in identifying the level of housing growth to be delivered within the new development plan.</p>	<p>The support is welcomed and comments noted.</p> <p>As a council, we are well aware of the increasing pressure from the Government to build more homes, which comes against increasing Government support for the protection of the Green Belt.</p> <p>We will await the update to the NPPF expected in Spring 2018 before taking any decisions on an approach to housing numbers and delivery through the new local plan.</p>
	Sarah Kasparian – Bell Cornwell LLP for Hightown Housing Association	Land at Rossway Drive, Bushey	We support the initial figure of 600 homes per annum over the plan period as a minimum. The Local Plan should provide a more suitable provision of housing land in the borough, which should also have positive implications for the provision of affordable housing. It is inevitable that sites will need to be released from the Green Belt to provide enough housing over the whole plan period.	The support is welcomed and comments noted.
	Sarah Kasparian – Bell Cornwell LLP for DNA Capital LLP		<p>We support the initial figure of 600 homes per annum over the plan period as a minimum, which is in line with the OAN and the Government's draft standardised methodology. The figure should also be reviewed when the revised National Planning Policy framework is published in 2018.</p> <p>It is inevitable that sites will need to be released from the Green Belt to provide enough housing over the whole plan period, which will also be applicable to adjoining authorities including Three Rivers who also have tightly drawn Green Belt boundaries.</p>	<p>The support is welcomed and comments noted. The housing figure will be reviewed in line with the revised Government methodology.</p> <p>The council is working alongside other authorities in the Housing Market Area (HMA), including Three Rivers, on the potential for a joint strategic plan across the HMA.</p>
	Bob Woodman – DP9 Ltd for NBP Limited		Agree	The support is welcomed.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	<p>Disagree.</p> <p>To meet the identified housing need, the Local Plan should seek to deliver 600 homes per annum, however, this should be seen as a target and not a limit; therefore, if suitable sites come forward then planning permission should be approved.</p> <p>To ensure the delivery of housing, particularly in the early years, the Council should look towards the contribution of previously developed land in existing urban areas, particular former employment and industrial sites. One such site is Edgwarebury House Farm, Elstree Hill, which represents previously developed land.</p>	<p>The comments are noted. The council is considering a range of options to facilitate housing delivery across the plan period, including considering the suitability of previously developed land.</p> <p>We have assessed all sites promoted against our published HELAA methodology in order to judge their potential suitability for housing or economic development and the findings are set out in the HELAA.</p>
	David Joseph – Bloor Homes	Land at Harperbury Hospital	<p>Disagree.</p> <p>The Plan proposes a sensible starting point for housing provision. However, the expression used suggests an ambition to only meet the suggested 600 dwellings per annum. This does not indicate a positive response to housing needs in an area with acknowledged signs of market stress. Consequently the stated priority aims of the Plan will not be met and the Plan should, at least treat this figure as a minimum.</p> <p>In addition, the existing and imminent under delivery of houses judged against the annual rate needs to be remedied. As such this backlog ought to be addressed as soon as possible.</p> <p>Moreover, the Plan seems to restrict its intentions to local needs. It is correct that the plan ought to consider cross boundary needs particularly where there are synergies between adjoining sites in adjacent authority areas.</p>	<p>The comments are noted.</p> <p>The SW Herts SHMA takes into account the fact that the borough (and HMA as a whole) is highly unaffordable, and that there are high levels of housing demand. These issues have been factored into the overall housing number of 599 dwellings per year.</p> <p>The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA and is already working across the HMA on technical studies.</p>
	Star Planning for D2 Investments Ltd	Organ Hall Farm,	1. The Council's own data identifies that there is a minimum requirement for circa 9,000 dwellings to be delivered over the next 15 years. This is clearly the minimum objectively assessed housing need for Hertsmere District.	<p>The comments are noted.</p> <p>1. The NPPF states that local planning authorities should use their evidence base to</p>

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
		Borehamwood	2. It is noted that the proposed standard methodology may well suggest a lower housing provision but this would be insufficient to meet the growth in population (estimated to be 20,000 people); address the acute housing affordability problem (a price/earnings ratio of 15.04 in 2016) and delivery strong economic growth (support 9,000 new jobs).	ensure that their Local Plan meets the full, objectively assessed need (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. It does not state that OAN is a minimum requirement that must be exceeded. 2. The SW Herts SHMA will be revised in light of the final standardised methodology.
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	1. The Council's own data identifies that there is a minimum requirement for circa 9,000 dwellings to be delivered over the next 15 years. This is clearly the minimum objectively assessed housing need for Hertsmere District. 2. It is noted that the proposed standard methodology may well suggest a lower housing provision but this would be insufficient to meet the growth in population (estimated to be 20,000 people); address the acute housing affordability problem (a price/earnings ratio of 15.04 in 2016) and delivery strong economic growth (support 9,000 new jobs).	The comments are noted. 1. The NPPF states that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed need (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. It does not state that OAN is a minimum requirement that must be exceeded. 2. The SW Herts SHMA will be revised in light of the final standardised methodology.
	Hannah Trubshaw – Pegasus Group for Taylor Wimpey	Land south of Borehamwood	Whilst HBC is currently able to demonstrate a 5-year housing land supply, the surplus margin is slim and given past delivery rates is likely to deteriorate rapidly within the first 5 years of the emerging Local Plan (2019 – 2024) when the proposed housing requirement of 600 dwellings per annum comes into effect. Indeed, HBC's housing requirement may increase further still should the Government's 'standardised methodology' for calculating housing need be adopted (i.e. increasing the need to 707 dwellings per annum). The scale of the housing challenge needs to be considered in the context of the recent Housing White Paper (February 2017) and recent Budget announcements (November 2017) which set the ambitious target to deliver 300,000 new homes per year nationally. There is a clear shift at the national level to significantly increase the delivery of new homes so considered that HBC should be planning to meet the higher housing need target of 707 net new dwellings per annum from the outset in the preparation of the new Local Plan. Such an approach will help ensure identified housing needs are met from the outset of the new Local Plan from 2019.	The comments are noted. The consultation draft of the standard methodology was published almost in tandem with the Issues and Options consultation, so we were not able to take this into account before publication. The SW Herts SHMA will be revised in light of the final standardised methodology.
	Pegasus Group for Taylor Wimpey	Land south of Watford Road, Elstree	The new Local Plan should identify a supply of specific developable sites or broad locations to accommodate OAN as far as is consistent with the policies of the NPPF; 1. Whilst HBC is currently able to demonstrate a 5-year housing land supply up to 2021, this situation is anticipated to change significantly as the emerging Local Plan requirement comes into effect from 2019. Accordingly, the new Local Plan should identify an additional supply of land from suitable Green Belt sites to come forward in the early part of the Plan period; and 2. It is not appropriate for HBC to rely on the 'Duty to Cooperate' as neighbouring Local Authorities are similarly highly constrained by Green Belt and facing similar challenges in meeting their own identified needs. 3. A review of the Issues & Options' 'five potential development approaches' indicates that HBC is not currently planning to meet identified needs within the Plan-period (2019 – 2034). A table indicates the number of homes to be provided through each proposed approach, and arrives at a shortfall of 667 homes over the plan period. 4. In light of the shortfall against identified housing needs and in combination with the evidence presented in Sections 3 – 7 above, it is considered appropriate for HBC to consider releasing 'deliverable' Green Belt sites in sustainable locations (such as Land South of Watford Road, Elstree) in the early part of the new Local Plan in order to contribute towards the Borough's significant identified housing needs and address the anticipated shortfall in housing supply.	1. The comments are noted. 2. The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA and is already working across the HMA on technical studies. 3. The Issues and Options document is not intended to be a site allocations plan, and does not provide enough information to enable the calculations set out in the response to have been accurately made. It sets out potential approaches and possible areas of search, without excluding other options which may come forward. 4. We have assessed all sites promoted against our published HELAA methodology in order to judge their potential suitability for housing or economic development and the findings are set out in the HELAA.
	Lichfields for CEG	Potters Bar Golf Course	1. The representation runs through the Government's proposed standard methodology for calculating housing need, applying the calculations to Hertsmere, and discusses national policy and guidance on the calculation of OAN. 2. The rep goes on to review the SW Herts SHMA, concluding that this does not comply with the national policy and guidance for calculating OAN due to the way the affordability uplift is calculated. It is clear that the OAN for Hertsmere as set out in the Issues and Options Consultation document is likely to be an underestimate of the true levels of housing need in the Borough for which it will need to plan. 3. CEG agree that the Council should seek to meet its current objectively assessed	1. The comments are noted. 2. The Issues and Options document was published for consultation very shortly after the Government consultation was launched, so did not incorporate the then draft methodology within it due to the timing. Meeting demographic need would already be an uplift of 115% compared to existing and past housing delivery, which would significantly boost housing delivery and arguably improve affordability. The SHMA applies a 5% uplift for affordability on top of this. There is no single agreed approach to identifying what scale of additional adjustment might be appropriate to address market signals, and

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			<p>needs, particularly given that adjacent authorities face similar constraints and it is unlikely that any unmet needs from Hertsmere could be met by neighbouring authorities.</p> <p>4. The Council should have regard to the potential changes proposed by Government, namely the proposed standardised housing need methodology which after January 2018 the proposed methodology, including the 40% cap above the household projections would give Hertsmere a new figure of 707 dwellings per annum.</p>	<p>improve affordability. The PPG paragraph 10 (ID: 2a-010-20180913) does not set out how such an adjustment should be quantified.</p> <p>The sensitivity analysis indicates that, all other things being equal, an uplift of around 95 homes per annum across the HMA would support the necessary improvement amongst younger households, in response to the market signals. It represents a 3% uplift on the base demographic need. This approach has recently been accepted at examination in Horsham.</p> <p>3. The comments are noted and support welcomed.</p> <p>4. The SW Herts SHMA will be revised in light of the final standardised methodology.</p>
4 Affordable Homes <i>Do you agree that we should continue with our requirement for 35-40% of new homes to be provided as affordable housing?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	<p>Agree</p> <p>The level of affordable housing proposed is supported. Through identifying larger sites within the new Local Plan for development, such as the new Garden Suburbs, this will increase the delivery of affordable housing as the sites are of an appropriate scale to come forward in the short term, unlike the new Garden Village option. This will also give more transparency and awareness to developers through the acquisition of land. However, the viability of a scheme does need to be taken into account to ensure appropriate development is delivered in the right locations and this should continue to be reflected within the new Local Plan, taking into account the particular circumstances of a development scheme.</p>	<p>The support is welcomed and comments noted.</p> <p>The local plan will be viability tested once it reaches a later stage of its production.</p> <p>Scheme viability continues to be a factor in the determination of planning applications; however the recent DCLG consultation Planning for the Right Homes in the Right Places included questions on restricting the ability of applicants to challenge viability on a scheme by scheme basis where sites have been allocated through a local plan and viability tested at that stage. If these proposals are taken forward this should improve the ability of local authorities to ensure delivery of an appropriate amount of affordable housing on allocated sites.</p>
	Richard House - Gladman Developments		<p>Agree with continuing 35-40% affordable homes to be provided subject to robust and up-to-date evidence to support that requirement. It is important for the local plan to recognise in some circumstances that requirement may make an otherwise acceptable housing development unviable.</p>	<p>The support is welcomed and comments noted.</p> <p>The local plan will be viability tested once it reaches a later stage of its production.</p>
	Ben Rose – Atelier Ten Building Services Engineers		<p>Absolutely, but is affordable as defined actually affordable? I predicted everything outlined in this section before i'd even read it in answering the previous question! There should be sufficient numbers of affordable houses to buy and to rent, and this shouldn't be based on a percentage of local market rates, but as defined based on local incomes. The numbers of affordable housing should be made mandatory and have minimum specification requirements to make them worthwhile.</p> <p>The self build is an excellent inclusion and should help foster small communities within the community.</p> <p>All new housing should enable certain common spaces and use types to be shared to eliminate the need for this space within individuals dwellings, thus making it easier to create affordable housing. e.g. office space, so no need for that within a dwelling; storage facilities onsite, so that people dont need to store things in already limited and expensive cupboard space in the dwelling.</p>	<p>Affordable homes for planning purposes are defined in the NPPF, and do not relate directly to local affordability levels (e.g. 'affordable rent' housing can be rented at a cost of up to 80% market rents, which in some areas is affordable, but in the south east is not). Local authorities do not have direct control over this unless they build the affordable homes themselves. Hertsmere are considering this as a long-term option, however like most local authorities is not set up to take on this role.</p> <p>Self-build housing will not necessarily be affordable, or form communities as our current register shows there is a demand for individual large properties (4-5 bed plus).</p> <p>This is an interesting idea, however the council cannot force this type of design and lifestyle choices onto the market. If the local plan were to include a policy requiring this, the majority of developers would be likely to argue it is not necessary on their scheme as people prefer their own space without having to interact with others, and it would not be delivered. Communal space in general needs housing tends to be underused outside of certain areas (e.g. certain parts of London where people are likely to move out of student or shared accommodation where they are already accustomed to sharing their space with others).</p>
	Matt Hill – Maddox Planning Consultants for Northern Trust		<p>The Council's intention to continue with its requirement for 35-40% of new homes to be provided as affordable housing within the new local plan is supported. However, to ensure the policy fully complies with national planning policy and guidance, it is considered pertinent to provide direct reference to viability testing within the wording of any forthcoming affordable housing policy so that 35-40% of homes on qualifying sites will be sought for affordable housing, subject to the necessary viability testing.</p>	<p>The support is welcomed. The government has recently proposed amendments to the ability of applicants to challenge viability on a case by case basis through its 'the Right Homes in the Right Places' consultation in late 2017. The outcomes of this are currently unknown, but in any case the local plan policy itself will be viability tested on a broad basis to help ensure its deliverability.</p>
	Sarah Kasparian – Bell Cornwell LLP for Hightown Housing Association	Land at Rossway Drive, Bushey	<p>1. We consider the proportion of affordable housing to be about right where there is to be a mix of market and affordable homes, but the Council does need to take into account the historic under-delivery of affordable housing as well as the potential for housing providers to deliver 100% affordable housing schemes. It would be helpful to understand what the number of affordable housing units required is, rather than a</p>	<p>1. The SW Herts SHMA sets out that a very large percentage of overall housing delivery would need to be 'affordable' in order to meet need. Therefore there is no realistic prospect of meeting actual need for affordable housing, let alone making up any pas under delivery without significant public funding and changes in national planning policy to support affordable housing delivery rather than to</p>

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			<p>proportion. It seems that the proportion is the Council's starting point, rather than the need.</p> <p>2. Furthermore, the Council's monitoring of affordable housing is poor and the figures should be published in accordance with the requirements of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012. Even on previous request for detail of affordable housing completions since 2013, the information has not been made available.</p> <p>3. If the information is not available what evidence does that Council have to continue to seek the same proportion of affordable housing? Particularly given the recent changes to thresholds and change to the overall housing needs, there needs to be transparency on the provision and completion of affordable housing in the Borough.</p> <p>4. We suggest retaining the policy requirement that only schemes which have been subject to viability testing should be able to review the proportions of affordable housing.</p> <p>5. On page 20 of the Sustainability Appraisal, the description of affordable housing needs to take into account the effect of the Ministerial Statement and planning practice guidance on thresholds for seeking affordable housing contributions.</p>	<p>undermine it. Therefore starting from the perspective of need would be unproductive, so instead we are starting from the perspective of a proportion that might be viable on the majority of development sites across the borough in order that some affordable housing may be delivered. Detailed viability work has yet to be carried out.</p> <p>2. The comments are noted and the council acknowledges that this data has not been published since the 2015/16 AMR. We have recently published a 5-year land supply paper for 2016/17.</p> <p>3. The council will be carrying out work to monitor policy implementation and to assess the viability of any policies as part of the work on the new local plan going forward. This information will be made publicly available once complete.</p> <p>4. The comments are noted.</p> <p>5. The comments are noted.</p>
	Sarah Kasparian – Bell Cornwell LLP for DNA Capital LLP		We support the continued approach to the thresholds for affordable housing and would seek to comply with policy requirements for housing types and tenures as far as possible, noting the close proximity of the site to Hertsmere.	The support is welcomed and the comments are noted.
	David Joseph – Bloor Homes	Land at Harperbury Hospital	<p>Clearly the viability of this requirement will need to be considered alongside any site specific and planning obligations requirements.</p> <p>Nevertheless, the Council ought to be responsive to a comprehensive range of property types and financial models.</p>	The comments are noted and viability will be consideration in determining the eventual affordable housing target for the local plan.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	Subject to viability considerations, a maximum affordable housing provision of between 35% and 40% of new homes to be provided on site would be an appropriate target. However, with the inability to secure affordable homes on sites of less than 10 dwellings and to avoid affordable housing being squeezed by viability considerations, there will be a need for a range of residential allocations of varying sizes and locations across the District to deliver these homes.	The support is welcomed and the comments are noted.
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	Subject to viability considerations, a maximum affordable housing provision of between 35% and 40% of new homes to be provided on site would be an appropriate target. However, with the inability to secure affordable homes on sites of less than 10 dwellings and to avoid affordable housing being squeezed by viability considerations, there will be a need for a range of residential allocations of varying sizes and locations across the District to deliver these homes.	The support is welcomed and the comments are noted.
	Lichfields for CEG	Potters Bar Golf Course	Yes. Subject to viability testing of 35-40% as an appropriate quantum of delivery of affordable housing in Hertsmere.	The support is welcomed and the comments are noted.
5 Self-build homes				
<i>Do you agree that land within larger developments should be available for up to 10% of homes to be self-build properties?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	<p>Disagree</p> <p>It is considered that this would be an onerous requirement on larger developments, and that there is not such a need within the Borough to provide for this level of self-build. The Self-Build and Custom Housebuilding Act of 2015 places a duty on local authorities to keep and have regard to a register of people who are interested in self-build or custom build projects in their area. This would therefore provide evidence of the level of demand. The Council keeps a register, but the Issues and Options Plan provides no evidence from this register to justify the amount of 10%. Any policy for the delivery of self-build plots needs to be clear as to how such a requirement would work alongside the requirement for affordable housing. It is considered that the delivery of self-build plots should be included within the proportion of affordable housing as a type of housing which makes</p>	<p>The comments are noted.</p> <p>The Issues and Options document is aimed at gauging opinion on the topic rather than proposing detailed policy, and the suggestions within it are not fully-evidenced at this stage. Detailed work will be carried out before any self-build policy is put forward through a draft local plan.</p>

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			home ownership more affordable	
	Richard House - Gladman Developments		Agree with principal of providing self-build homes on larger sites subject to evidence of demand. However where they are provided through an S106 agreement they should be excluded from the total number of homes used to calculate the AH requirement as they are part of the Government's moves towards making housing more affordable.	The comments are noted. Self-build housing is not part of the definition of affordable housing as currently set by the NPPF, and it does not contribute towards meeting the need for affordable housing as it is not automatically any more affordable than off-the-shelf market housing, so it would not be suitable to include it as such.
	Ben Rose – Atelier Ten Building Services Engineers		Absolutely. As mentioned above, will help foster little communities within communities, and people will design and build houses useful for them and how they will use them (and be able to maintain them) rather than as defined by a developer. e.g. who needs an en-suite bathroom when you have no cupboard space within a flat!	The support is welcomed and comments noted.
	Sarah Kasparian – Bell Cornwell LLP for Hightown Housing Association	Land at Rossway Drive, Bushey	No objection but there should be allowances for schemes that provide more affordable housing to be exempt from providing self-build plots. Self-build should also be subject to viability testing.	The comments are noted. We have yet to carry out detailed work on this (inc. viability assessment), so it is too early to reach conclusions, however self-build and custom-build homes should not automatically be excluded from the affordable housing calculations unless this is based on sound evidence as they are not necessarily affordable and do not contribute towards social rented housing for those most in need
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	Disagree. Whilst, the provision of self-build units can make a contribution to new homes; however, it is considered that not all large sites will be able to contribute self-build units as it may affect the viability of the site. As such the provision of self-build units should be considered on a site by site basis taking into account all constraints. It should be noted that small sites may come forward, which could provide a valuable source of self-build units.	The comments are noted.
	David Joseph – Bloor Homes	Land at Harperbury Hospital	Our experience with self-build schemes in other areas indicates that policies should be formulated carefully, particularly when these are intended to be brought forward alongside traditional developer models. For example it may be necessary for foundation slabs and/or shell properties to be provided as the practical implications and Health & Safety considerations may preclude the offering of plots of land to individual purchasers.	1. The comments are noted; however this is a model that has been successful elsewhere. See https://www.gov.uk/government/news/custom-build-supply-of-land for information on current schemes on HCA land alongside market housing. Similar developments are also taking place on privately-owned land.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	1. It would be more appropriate for the Local Plan to allocate site of less than 10 dwellings for self-build homes rather than seek to have a requirement for 10% of the new dwellings on allocated sites to be for self-build homes. 2. There are genuine issues associated with providing self-build plots as part of larger schemes. It is not particularly practicable or feasible to have isolated plots or small groups of plots within a large housing scheme which are not directly under the control of the house builder or main contractor because of tight health and safety requirements. 3. Secondly, the inclusion of self-build plots would affect viability because it is difficult to place a value on the land and when any payment might be received. Including self-build plots as part of the affordable housing provision might be a means of addressing this issue. 4. The final point is a requirement for 35%-40% affordable homes and 10% self-build plots directly impacts on the desirability and viability with only 50-55% of the dwellings on a site being capable of being sold as market homes.	2. The comments are noted. 3. The comments are noted; however this is a model that has been successful elsewhere. See https://www.gov.uk/government/news/custom-build-supply-of-land for information on current schemes on HCA land alongside market housing. Similar developments are also taking place on privately-owned land. 4. Self-build housing is not part of the definition of affordable housing as currently set by the NPPF, and it does not contribute towards meeting the need for affordable housing as it is not automatically any more affordable than off-the-shelf market housing, so it would not be suitable to include it as such. 5. The comments are noted and viability will be a consideration in the formulation of any self-build housing policy. There is an expectation that serviced plots for self-build homes would be sold at market value as they are not a form of affordable housing.
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	1. It would be more appropriate for the Local Plan to allocate site of less than 10 dwellings for self-build homes rather than seek to have a requirement for 10% of the new dwellings on allocated sites to be for self-build homes. 2. There are genuine issues associated with providing self-build plots as part of larger schemes. It is not particularly practicable or feasible to have isolated plots or small groups of plots within a large housing scheme which are not directly under the control of the house builder or main contractor because of tight health and safety requirements. 3. Secondly, the inclusion of self-build plots would affect viability because it is difficult to place a value on the land and when any payment might be received. Including self-	1. The comments are noted. 2. The comments are noted; however this is a model that has been successful elsewhere. See https://www.gov.uk/government/news/custom-build-supply-of-land for information on current schemes on HCA land alongside market housing. Similar developments are also taking place on privately-owned land. 3. Self-build housing is not part of the definition of affordable housing as currently set by the NPPF, and it does not contribute towards meeting the need for affordable housing as it is not automatically any more affordable than off-the-shelf market housing, so it would not be suitable to include it as such. 4. The comments are noted and viability will be a consideration in the formulation of

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			<p>build plots as part of the affordable housing provision might be a means of addressing this issue.</p> <p>4. The final point is a requirement for 35%-40% affordable homes and 10% self-build plots directly impacts on the desirability and viability with only 50-55% of the dwellings on a site being capable of being sold as market homes.</p>	any self-build housing policy. There is an expectation that serviced plots for self-build homes would be sold at market value as they are not a form of affordable housing.
6 Gypsies, Travellers Travelling Showpeople				
<i>How should we meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	Await further details from the Council regarding the number of new pitches and approach to delivery.	Further detail on the approach to delivery is expected to be included in the Regulation 19 Plan. Levels of need in the borough are assessed through the recently-published Gypsy and Traveller Accommodation Assessment .
	Ben Rose – Atelier Ten Building Services Engineers		Yes, but this needs to be provided with the required facilities, and the change in law to ensure that if they do set up anywhere else they can be moved on instantly to the designated spaces. Also these shouldn't be in anti-social places, otherwise they won't bother to use them.	The comments are noted. A change in the law is beyond the scope of a local planning authority.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	The provision of accommodation to meet the needs of gypsies, travellers and travelling showpeople, is extremely difficult to achieve, particularly as the operational requirements can often direct these sites to remote locations, which are generally not sustainable locations, and away from existing services, including schools.	The comments are noted.
	David Joseph – Bloor Homes	Land at Harperbury Hospital	We suggest that these needs are met by self-stand proposals which best reflect the functional and social requirements of these groups.	The comments are noted.
7 Other housing need				
<i>How should we meet other types of needs, including housing for the elderly?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	<ol style="list-style-type: none"> The provision of accessible and adaptable homes is provided through the relevant parts of the Building Regulations M4. However, site specific circumstances need to be taken into account and an allowance for exemptions needs to be provided within a policy where it is not practically achievable or financially viable to deliver this requirement. In relation to development for the elderly, the provision of accessible homes will go some way to providing for this age group. If specific specialist accommodation is needed this should be encouraged in the emerging Local Plan, but should not be a requirement of all developments, due to their specific individual circumstances. A set of criteria should be established for the preferred location, mix and tenure for this type of development. 	<ol style="list-style-type: none"> The comments are noted. There is no scope for planning policy to exempt a development from fully complying with the building regulations where this is not financially viable, as the two systems operate independently. The comments on specialist accommodation are noted and consideration will be given to establishing criteria for a preferred mix, tenure and type for this accommodation to help ensure it meets local needs.
	Richard House - Gladman Developments		How the plan will support the needs of older people and those with specialist care needs is a key area for consideration, and need to be based on a robust understanding of the scale of this type of need across the borough. The Housing White Paper expects clear policies to address the increasing importance of this issue. Extra care housing is mentioned as offering flexible support and care services on-site to suit the needs of individuals.	The comments are noted. We would agree that looking into how the plan can support the needs of older people and those with specialist care needs is a key area for consideration.
	Ben Rose – Atelier Ten Building Services Engineers		Plan housing for the elderly combined with student accommodation/nursery/schools/community centre so everyone can benefit from the community feel that this would engender, and overcome other social problems likely experienced by many marginalised sections of the community.	The comments are noted. It is agreed that specialist accommodation for older people is best located within a community alongside other forms of development, rather than being isolated. On larger development sites we would be seeking a mix of housing types wherever possible to encourage the formation of mixed communities.
	Sarah Kasparian – Bell Cornwell LLP for Hightown Housing Association	Land at Rossway Drive, Bushey	Hightown Housing Association develop and manage affordable housing of all types but have also identified a great need for affordable housing for the elderly, particularly extra care. This is a form of housing need that the Council should tease out of the general housing need in order to provide a target or indication for the Borough. Due to the tight Green Belt boundaries in Hertsmere, the Council should be considering specific areas where this type of housing could be appropriate. Hightown HA would be pleased to	The comments regarding affordable elderly / extra care housing are noted, and Hightown HA, along with other registered providers, will be consulted on affordable housing policy proposals as progress on the local plan continues.

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			discuss opportunities for such development with the Council at an early stage.	
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	Housing for the elderly should usually be on sites within the existing urban area in order that are widely accessible by public transport and have access to local services and community facilities. In addition, a range of accommodation (e.g. bungalows, nursing homes, extra care and retirement communities) should be provided to meet the different needs of elderly residents.	The comments are noted. It is agreed that specialist accommodation for older people is best located within a community alongside other forms of development, rather than being isolated. On larger development sites we would be seeking a mix of housing types wherever possible to encourage the formation of mixed communities.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	It may be appropriate to consider the potential to allocate sites for retirement villages. These units would be Class C3 dwellings rather than the residential care homes or extra care housing which would fall within Class C2. Any Class C2 units should not be part of the objectively assessed housing need. Sites suitable for retirement or elderly accommodation should appropriately be identified within the urban area (e.g. as part of the re-use of previously developed or under-utilised land) or the edge of the principal settlements of Borehamwood, Radlett and Potters Bar.	The comments are noted (Bushey is also regarded as being among the principle settlements).
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	It may be appropriate to consider the potential to allocate sites for retirement villages. These units would be Class C3 dwellings rather than the residential care homes or extra care housing which would fall within Class C2. Any Class C2 units should not be part of the objectively assessed housing need. Sites suitable for retirement or elderly accommodation should appropriately be identified within the urban area (e.g. as part of the re-use of previously developed or under-utilised land) or the edge of the principal settlements of Borehamwood, Radlett and Potters Bar.	The comments are noted (Bushey is also regarded as being among the principle settlements).
8 Jobs				
<i>Do you agree that we should plan for this level of new jobs (9,000 new jobs over 15 years) to support business creation and meet the employment needs of an increasing population?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	Agree The Issues and Options Local Plan highlight the need and opportunity provided by the Borough for employment growth, indicating an increase of around 9,000 jobs across the borough. There is an estimated 10 hectares of extra land required for employment use during the plan period. To accommodate this amount of growth is the accompanying requirement to deliver infrastructure and housing in the most sustainable way. New homes should therefore be located in sustainable locations, adjacent to existing settlements and public transport infrastructure.	The support is welcomed and comments noted.
	Ben Rose – Atelier Ten Building Services Engineers		Yes, but should be higher if can make it a place people commute to also from surrounding villages/areas. The areas described are only accessible by car or a currently inadequate bus service, if at all.	The support is welcomed and comments noted.
	Stephen Rose – Quod for Sellar	Land at Rowley Lane, Borehamwood	Agrees	The support is welcomed.
	Sarah Kasparian – Bell Cornwell LLP for DNA Capital LLP		We agree with the principles and support the allocation of new employment sites. It is not clear what format this would take at this stage given the type of need for small units for start-up businesses. We emphasise the importance of working with neighbouring authorities to deliver expected employment growth in the best locations and of the appropriate scale.	The support is welcomed and comments noted. The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA and functional economic market area.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	Whilst the creation of 9,000 new jobs is supported, this number of jobs should not be seen as a limit and additional jobs should be allowed. In providing new jobs it should be noted that former employment premises may not be suitable for the preferred employment sectors and as such former / vacant employment sites should be released for other uses, including residential, particularly when they are in sustainable locations and can be developed at higher densities.	The support is welcomed and comments noted. Employment allocations are to be reviewed as part of the local plan process.
	David Joseph – Bloor	Land at Harperbury	We appreciate that the Council is seeking to accommodate additional jobs in the area. However, there is no obvious link or explanation how well the Plan correlates housing	The comments are noted. The SW Herts SHMA and Economic Study have been

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	Homes	Hospital	provision with employment aspirations.	prepared in tandem and cross-reference each other.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	<ol style="list-style-type: none"> 1. Support the creation on 9,000 new jobs during the plan period. 2. However, D2 Investments caution against a dash to re-use industrial and business sites within the urban areas for housing rather than employment purposes. The re-use of such site for housing may be capable of being reported as reducing the need to amend Green Belt boundaries to deliver more homes but often at the expense of land being released from the Green Belt for employment purposes. 3. Based on typical employment densities, 9,000 new jobs in the sectors of importance to Hertsmere District (page 19) would require some 18 hectares of employment land rather than the 10 hectares indicated. 4. To maintain sustainable settlements, there is a need to retain the jobs within the existing urban areas as these are more accessible/sustainable. 	<ol style="list-style-type: none"> 1. The support is welcomed. 2. The comments are noted for consideration in the preparation of future stages of the local plan. At present the reallocation of employment land for residential uses is not being proposed. 3. The council has not indicated any land for employment uses yet. The Issues and Options document indicated the locations of land that is currently safeguarded for employment. Site put forward through the call for sit 4. The comments are noted, however at present the reallocation of employment land for residential uses is not being proposed.
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	<ol style="list-style-type: none"> 1. Support the creation on 9,000 new jobs during the plan period. 2. However, D2 Investments caution against a dash to re-use industrial and business sites within the urban areas for housing rather than employment purposes. The re-use of such site for housing may be capable of being reported as reducing the need to amend Green Belt boundaries to deliver more homes but often at the expense of land being released from the Green Belt for employment purposes. 3. Based on typical employment densities, 9,000 new jobs in the sectors of importance to Hertsmere District (page 19) would require some 18 hectares of employment land rather than the 10 hectares indicated. 4. To maintain sustainable settlements, there is a need to retain the jobs within the existing urban areas as these are more accessible/sustainable. 	<ol style="list-style-type: none"> 1. The support is welcomed. 2. The comments are noted for consideration in the preparation of future stages of the local plan. At present the reallocation of employment land for residential uses is not being proposed. 3. The council has not indicated any land for employment uses yet. The Issues and Options document indicated the locations of land that is currently safeguarded for employment. Site put forward through the call for sit 4. The comments are noted, however at present the reallocation of employment land for residential uses is not being proposed.
9 Retail and Shopping <i>Do you agree that we should maintain a high level of retail and services within the borough's shopping centres and local parades?</i> <i>What other uses may be considered appropriate in these areas?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	<p>Agree</p> <p>This approach will seek to maintain the vitality and viability of existing shopping and local parades, and will benefit both local and wider communities. This approach would also be supported through housing development in and around existing settlements, including the new Garden Suburbs, rather than creating a Garden Village that would compete with existing shopping centres.</p>	The support is welcomed and comments noted.
	Richard House - Gladman Developments		Agree subject to alignment of housing requirement with number of new jobs sought. Fewer homes than jobs could result in higher levels of unsustainable in-commuting.	The support is welcomed and comments noted.
	Ben Rose – Atelier Ten Building Services Engineers		Absolutely, but should try and encourage local people to set up businesses and shops using the retail spaces. This should be pro-actively encouraged by offer reduced rents/rates to locals (e.g. resident for 5 years or more) to set up here. Otherwise money gets funnelled out of the area. Should also have high-street presence for activities for those that have nothing else to do, so they aren't loitering in back streets/car-parks (youth) or stuck in their homes (elderly/disabled), and have close access to everything and everyone else from here.	The support is welcomed and comments noted.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	<p>Agree.</p> <p>The existing retail centres and parades should be retained in order that they continue to meet the needs of people who live and work in the area. In this respect compatible uses including residential should be permitted in these locations, where they would assist in enhancing the vitality and viability of the shopping areas.</p>	The support is welcomed and comments noted.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	The disintermediation associated with internet shopping means that there is a decline in the need for some types of shops to have a physical presence in local centres. Accordingly, any policies concerning local centres will need to be flexible and the re-use of vacant units for non-retail purposes will need to be part of this approach.	The comments are noted. The joint Retail Study currently being carried out across the SW Herts group of authorities will reveal more detail about current shopping trends across the wider area, including online shopping.

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			The fulfilment of on-line shopping orders is a matter which needs to be considered in the Local Plan. Should there be a policy for 'collection, delivery and return' hubs for internet shopping in Hertsmere District over and above the current employment proposals?	
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	<p>The disintermediation associated with internet shopping means that there is a decline in the need for some types of shops to have a physical presence in local centres. Accordingly, any policies concerning local centres will need to be flexible and the re-use of vacant units for non-retail purposes will need to be part of this approach.</p> <p>The fulfilment of on-line shopping orders is a matter which needs to be considered in the Local Plan. Should there be a policy for 'collection, delivery and return' hubs for internet shopping in Hertsmere District over and above the current employment proposals?</p>	The comments are noted. The joint Retail Study currently being carried out across the SW Herts group of authorities will reveal more detail about current shopping trends across the wider area, including online shopping.
	Lichfields for CEG	Potters Bar Golf Course	In light of the needs identified by the Council, CEG consider it fundamentally necessary for the Council to ensure existing services and retail outlets are maintained within the areas, so as to ensure both existing residents and future resident's employment needs can be met and maintained in a sustainable manner.	The comments are noted.
10 Community facilities				
<i>What community facilities or local infrastructure improvements do you think should be given priority?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	Consideration needs be given to locating schools and local community facilities that benefit both existing communities and new development. An approach to development that focuses provision in one place, such as a Garden Village, will direct investment away from existing settlements.	<p>We do not envisage that any of the individual approaches set out in the Issues and Options document would be taken forward in isolation; a combination of these approaches is very likely to be necessary.</p> <p>While a new settlement would require its own school(s) and other facilities, this does not mean that other forms of development, for example garden suburbs or village extensions, would not also incorporate new or improved schools and community facilities close to existing residential areas. The need for this type of infrastructure is set out within each of the options being suggested.</p>
	Ben Rose – Atelier Ten Building Services Engineers		<p>Doctors and/or walk-in centre.</p> <p>Free car parking. It is ridiculous that the only car-parking that helps the shops in Borehamwood is one provided privately, and you can only effectively use it once in a day. If you want people to use the facilities they have to be able to get to them. So either drastically improve transport to all corners of the borough, or make the parking such that people are willing/able to get close to what they are going their to use.</p>	<p>The comments are noted, and new or improved health care facilities are a requirement for any substantial form of housing growth so we will work with healthcare providers as part of the ongoing Local Plan process.</p> <p>Parking in existing shopping areas is not a matter the Local Plan can directly influence, but for the council's Parking Services Department.</p>
	Sarah Kasparian – Bell Cornwell LLP for DNA Capital LLP		We note the intention to develop a new secondary school between Bushey and Carpenders Park in order to relieve pressure on existing schools in the area. Whilst the scale of development at Carpenders Park Farm would not be sufficient on its own to provide a secondary school, the landowner would be pleased to consider the potential to accommodate and contribute towards a new school within their landownership subject to the viability of residential development at the remainder of the site. Please see the site representation for more information.	The comments are noted.
	Bob Woodman – DP9 Ltd for NBP Limited		<p>A range of community facilities will be required to meet the needs of Hertsmere's changing population. This includes:</p> <ul style="list-style-type: none"> • new schools for all sectors of the community • new medical facilities for treatment and recovery 	The comments are noted.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	<p>Education and healthcare will attract the greatest demand for new community facilities. Schools will be needed to meet the needs of young families at one end of the housing spectrum (i.e. the children) and healthcare facilities at the other end (i.e. the ageing population). The pressure for healthier lifestyles will also have the potential for additional facilities, such as gyms or other recreational facilities, to be provided for all ages in accessible locations.</p> <p>The obvious locations for many new facilities will be within and on the edge of the principal settlements. Again, this reinforces the need to be creative in the Local Plan</p>	The comments are noted.

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			regarding the re-use of industrial and business land within the urban area to deliver other land uses rather than just be fixated on new homes.	
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	Education and healthcare will attract the greatest demand for new community facilities. Schools will be needed to meet the needs of young families at one end of the housing spectrum (i.e. the children) and healthcare facilities at the other end (i.e. the ageing population). The pressure for healthier lifestyles will also have the potential for additional facilities, such as gyms or other recreational facilities, to be provided for all ages in accessible locations. The obvious locations for many new facilities will be within and on the edge of the principal settlements. Again, this reinforces the need to be creative in the Local Plan regarding the re-use of industrial and business land within the urban area to deliver other land uses rather than just be fixated on new homes.	The comments are noted.
	Lichfields for CEG	Potters Bar Golf Course	It is important for balanced communities to have good quality community facilities in easily accessible locations. The Potters Bar Golf Course site not only seeks to retain a nine hole golf course in the northern part of the site, but will also seek the provision of a leisure hub within the site to service the golf club but also the wider community. The development would be in close proximity to Darkes Lane, the increased population would provide traders with greater market opportunities as it currently struggles to maintain an effective service for the community.	The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
11 Sustainable Travel				
<i>What types of sustainable transport improvements would you like to see prioritised locally as part of the future planning of our borough?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	Services into existing centres within the borough need to be improved, including bus services, cycle and pedestrian routes. These improvements will be best provided for through a more dispersed approach to development, which is still focused in and around existing main settlements, such as available brownfield land and the new Garden Suburbs option for development. Development should be promoted in locations accessible to established centres via sustainable transport modes. As such, whilst the Garden Suburb approach is strongly supported, it must be recognized during the assessment of the Garden Suburbs that not all locations are equally sustainable.	The comments are noted.
	Ben Rose – Atelier Ten Building Services Engineers		Unless more buses come more often and a part of a unified network such that whatever bus pass I have I can use everywhere then I don't see it making a difference. In addition the limited number of cycle lanes are either on pavements, or are unprotected and stop to cross major junctions. All needs to be better. So does parking, as people parking on pavements reduces what limited accessibility for those that are willing to walk places, especially with wheelchairs/buggies etc.	The comments are noted. The County Council's Intalink Partnership is working towards integrated travel across the county. Parking on pavements is matter for the police.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edwarebury House Farm, Elstree Hill	Development should look to improve public transport links between peoples homes and places of work and town / local centres. Hertsmere has three train lines that taverse the District in an approximate north-south direction, however, given the difficulty in securing new stations, it is extreemly unlikely that additional access to these train services can be achieved. Therefore, the main focus should be in respect of linking the main settlements with improved bus services in terms of both frequency of services and reliability. In order to achieve this, within the existing urban areas (which are normally subject to the greatest levels of congestion), should look to incorporate priority junctions and / or guided rail sections to improve the movement of buses. In addition, developments should also make suitable provision for cyclist, including secure parking and safe cycle routes.	The comments on public transport links are noted.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	1. Rail and Underground improvement are not wholly in the control of either the District or County Councils. However, encouragement should be given to promoting additional cycle facilities at the railway stations within the 3 principal settlements and for improvements to cycle routes within these settlements. Similarly, bus services are not easily controlled by the Councils but encouragement should be given to better	The comments on public transport and electric vehicles are noted.

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			<p>bus stops, services and interchange facilities associated with development proposals. Concepts such as cycle with park and ride by bus should be explored.</p> <p>2. Considering the recent announcement about the phasing out of combustion engines by 2040, there will be a need for policies concerning the charging of electric vehicles at destinations.</p>	
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	<p>1. Rail and Underground improvement are not wholly in the control of either the District or County Councils. However, encouragement should be given to promoting additional cycle facilities at the railway stations within the 3 principal settlements and for improvements to cycle routes within these settlements. Similarly, bus services are not easily controlled by the Councils but encouragement should be given to better bus stops, services and interchange facilities associated with development proposals. Concepts such as cycle with park and ride by bus should be explored.</p> <p>2. Considering the recent announcement about the phasing out of combustion engines by 2040, there will be a need for policies concerning the charging of electric vehicles at destinations.</p>	The comments on public transport and electric vehicles are noted.
Part 3 Where should new development be built?				
12 Brownfield Sites				
<i>Which areas do you think are best placed to accommodate this type of growth and why?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	<p>Agree</p> <p>This approach is supported to ensure that a sustainable form of development is achieved. It should also be a consideration throughout the Borough, to ensure efficient schemes are delivered to assist in delivering required housing. Such development must of course be compatible with the surrounding context and must not conflict with other relevant planning considerations, such as daylight/sunlight and amenity etc.</p>	The support is welcomed and comments noted.
	Richard House - Gladman Developments		<p>Support. Finite supply of such sites and they will not on their own have capacity to accommodate the overall housing requirement. Affordable housing may not be achievable on sites where remediation is required.</p>	<p>The support is welcomed and comments noted.</p> <p>The Issues and Options document recognises that a combination of approaches for planning future growth are likely to be needed, and we do not envisage that any of the individual approaches would be taken forward in isolation. We understand that brownfield sites are in finite supply, and that they can be more difficult/expensive to develop than greenfield sites so will not provide a solution to meeting housing need on their own.</p>
	Ben Rose – Atelier Ten Building Services Engineers		<p>Sounds like these brownfield sites should be used to develop the overstretched services and get them fit for purpose first. Then start building extra homes on them after. Especially as these areas will be in better positions to serve existing communities. If they aren't suitable for homes and don't have the infrastructure for more people, but they still ought to be used, then provide the schools/doctors etc in these places. Whatever is left can then be used to intensively build housing on as the services will already be there. If the new buildings are built with sufficient sustainability and environmental measure implemented, the impact will be lower on the infrastructure, meaning they will be better accommodated.</p> <p>Also encouraging the relocation of some of the more unsightly and heavy industry out of the urban areas and replacing these now brownfield sites with housing would improve the make-up of the towns, especially e.g. areas in Borehamwood approaching Cowley Hill/A1, where there are a lot of warehouses which needn't be located there, but housing would be much better suited.</p>	<p>The comments are noted.</p> <p>Cutbacks in public funding sources mean it is not possible to deliver improvements to services until housing developments have been approved or are being built. This is because services have to be funded by private developers as in most cases the required funding from Government is not there. It is possible as part of the local plan to require that on particular sites allocated in the plan, developers build out community facilities first before any houses/flats are occupied.</p> <p>A number of these areas are allocated for employment uses in the current Local Plan (2012-2027), and we are in the process of carrying out work to help determine the level of occupancy and the types of industries that occupy these sites. However the council's view is that it is important to keep some level of employment relatively close to transport infrastructure rather than locating it in the countryside. Some former industrial areas in Borehamwood are currently being redeveloped as part of the Elstree Way Corridor Area Action Plan, and we do not envisage this going further towards the A1 at the moment. If employment/industrial uses were to be relocated into the green belt or outside of the borough, then towns would purely be dormitory towns with very little daytime activity, which would impact upon shops and local businesses.</p>
	Planning Potential for Inland Homes Ltd	Land north of Barnet Lane	<p>Support development of urban brownfield sites but consider insufficient evidence provided to indicate extent to which brownfield land can contribute to housing need</p>	The comment is noted. As mentioned above, the Issues and Options consultation represents a very early stage in the plan-making process, so this evidence will be

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			across the emerging local plan period.	available in due course once housing and economic land supply has been assessed.
	Richard Murdock – Woods Hardwick Planning Ltd for Haysgate Plant Hire Ltd	Land at Lyndhurst Farm, Borehamwood	<p>As part of supporting the challenging housing target outlined in the adopted Core Strategy, and in line with the objectives outlined in the NPPF and the adopted CS regarding the re-development of brownfield land in the Green Belt, we are proposing to submit a planning application on a site known as Land at Lyndhurst Farm, Borehamwood.</p> <p>We are submitting a pre-application enquiry but as part of this consultation we wish to draw the site to the attention of the Local Planning Authority as a suitable brownfield development site. We attach the pre-application submission for residential development that will assist with the delivery of new housing also deliver visual and environmental enhancements to this site, to the benefit of the site and the surrounding area.</p>	<p>The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.</p> <p>The development of brownfield sites may not be inappropriate development in the Green Belt, so may be acceptable under the current Local Plan 2012-27.</p>
	Sarah Kasparian – Bell Cornwell LLP for Hightown Housing Association	Land at Rossway Drive, Bushey	We support the redevelopment of urban brownfield sites and the increase of densities in urban areas. The four main settlements are ideal for such forms of development. It would be helpful to indicate the level of density that might be permitted, or the height of buildings which would be acceptable in order to provide that quantum of development.	The support is welcomed and comments noted. Further detail will be provided in the Regulation 19 Plan, expected to be published in late 2019.
	Sarah Kasparian – Bell Cornwell LLP for DNA Capital LLP		Whilst we do not disagree with the approach to brownfield land being redeveloped at higher densities, there is clearly a housing need greater than the capacity of existing brownfield sites. The risk with higher densities is not to compromise the quality of residential accommodation or character of the area.	The comments are noted.
	Bob Woodman – DP9 Ltd for NBP Limited		<p>Agree that a combination of approaches will be required to provide for necessary growth.</p> <p>An essential component of this will be to make best use of existing urban areas. This should involve a review of existing uses which have historically located in urban areas but could be transferred to new sites with better transport links, such as storage uses. Brownfield sites freed up in the urban areas could then make a valuable contribution to meeting housing needs.</p>	The support is welcomed and the comments are noted.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edwarebury House Farm, Elstree Hill	<p>It is agreed that within existing urban areas, land needs to be used more efficiently and in order to accommodate more housing in these areas, sites should be developed at a higher densities.</p> <p>In order to create sustainable developments, which are not dependent on the private car, these higher density developments should be focused around the higher order settlements, including Borehamwood, which has excellent train links between Bedford and London and beyond. In addition, the station has an intergated bus interchange, which provides bus servies to the wider area, including Elstree.</p>	The support is welcomed and the comments are noted.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	<ol style="list-style-type: none"> 1. As has already been identified, there would be some scope to accommodate housing development within the existing built-up areas on previously developed land. However, a balance does need to be struck between competing land uses. Not all previously developed sites should automatically be redeveloped for housing purposes just to meet a target. Instead, consideration should be given to a high proportion of the land being retained in employment use to contribute towards the space required to accommodate 9,000 jobs which are expected to be created. Further, because of their sustainable location, some previously developed sites should be used for community purposes. It has already been noted that re-using previously developed land for housing within the urban area does not always reduce pressure for the release of Green Belt land because the other uses are displaced to the edge of a settlement. 2. It is important to highlight that higher density housing developments tend to deliver a limited range of house types, in particular 1 and 2-bedroom apartments, which are marketed to a small segment of the market (singletons and young people). Higher density housing could be targeted at the ageing population if they could be encouraged to downsize to retirement or elderly accommodation. The emphasis on smaller dwellings on previously developed land highlights the need for a range of site types and sizes to be allocated in the Local Plan to deliver homes for all segments of the housing market. 	<ol style="list-style-type: none"> 1. The comments are noted. 2. The comments are noted. The mix of housing sizes needed to meet housing need in the area, and this will be taken into consideration in site allocation policies. The retention of employment areas within existing towns is currently supported. 3. The comments are noted. 4. The comments are noted, however the council has operated a CIL since 2014, and experience has shown that site-specific planning obligations are a more effective method of funding large-scale, site-specific infrastructure, and these cannot be pooled across more than 5 separate agreements.

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			<p>3. To ensure a cross section of land uses are delivered, the quantum of new homes which are expected to be provided within the urban areas during the period up-to 2034 should be reduced from 3,000 to no more than 2,500 new homes. This reduction takes into account the need to retain other uses within the principal settlements to maintain their attractiveness and retain their credentials as sustainable locations for growth. The 500 dwellings or so not now being provided in the urban area should be part of the allocations on the edge of the principal settlements.</p> <p>4. It is noted a challenge is claimed that development across a large number of small sites will not provide the funding needed for the additional infrastructure required. However, such funding can be secured by an appropriately devised Community Infrastructure Levy.</p>	
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	<p>1. As has already been identified, there would be some scope to accommodate housing development within the existing built-up areas on previously developed land. However, a balance does need to be struck between competing land uses. Not all previously developed sites should automatically be redeveloped for housing purposes just to meet a target. Instead, consideration should be given to a high proportion of the land being retained in employment use to contribute towards the space required to accommodate 9,000 jobs which are expected to be created. Further, because of their sustainable location, some previously developed sites should be used for community purposes. It has already been noted that re-using previously developed land for housing within the urban area does not always reduce pressure for the release of Green Belt land because the other uses are displaced to the edge of a settlement.</p> <p>2. It is important to highlight that higher density housing developments tend to deliver a limited range of house types, in particular 1 and 2-bedroom apartments, which are marketed to a small segment of the market (singletons and young people). Higher density housing could be targeted at the ageing population if they could be encouraged to downsize to retirement or elderly accommodation. The emphasis on smaller dwellings on previously developed land highlights the need for a range of site types and sizes to be allocated in the Local Plan to deliver homes for all segments of the housing market.</p> <p>3. To ensure a cross section of land uses are delivered, the quantum of new homes which are expected to be provided within the urban areas during the period up-to 2034 should be reduced from 3,000 to no more than 2,500 new homes. This reduction takes into account the need to retain other uses within the principal settlements to maintain their attractiveness and retain their credentials as sustainable locations for growth. The 500 dwellings or so not now being provided in the urban area should be part of the allocations on the edge of the principal settlements.</p> <p>4. It is noted a challenge is claimed that development across a large number of small sites will not provide the funding needed for the additional infrastructure required. However, such funding can be secured by an appropriately devised Community Infrastructure Levy.</p>	<p>1. The comments are noted.</p> <p>2. The comments are noted. The mix of housing sizes needed to meet housing need in the area, and this will be taken into consideration in site allocation policies. The retention of employment areas within existing towns is currently supported.</p> <p>3. The comments are noted.</p> <p>4. The comments are noted, however the council has operated a CIL since 2014, and experience has shown that site-specific planning obligations are a more effective method of funding large-scale, site-specific infrastructure, and these cannot be pooled across more than 5 separate agreements.</p>
	Lichfields for CEG	Potters Bar Golf Course	CEG welcomes the Councils acceptance of the need to contribute to the objectively assessed housing need of Hertsmere through the delivery of 'Garden Suburbs'. As discussed in Section 3.0 to 6.0, CEG considers that a sustainable and necessary area for such growth is Potters Bar, in particular, the Potters Bar Golf Course located to the north of Potters Bar.	The support is welcomed and the comments are noted.
13 New garden/suburbs <i>Where do you think would be the most sustainable locations for garden suburbs?</i>				
	Peter Biggs - Preston Bennett for Kemprow Farm	Kemprow Farm, Radlett	This option for growth sets out a strategic vision for delivering a 300 to 500 new homes, and also other services and facilities, to accommodate the growth envisaged within each of the new garden suburbs. This planned growth would be most sustainably located around existing settlements, particularly those suburbs that are located nearer to town centres and major public transport hubs, such as railway stations located at Radlett and	The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			<p>Borehamwood.</p> <p>This approach therefore supports the inclusion of the land to the west of Radlett, extending out to High Cross. This land, including the site at Kemprow, is located along the B462, a main road into Radlett. There is already a frequent (every 10/20 minutes) bus service (398 and 602) that runs along the B462 between Watford, Potters Bar and Hatfield. There are bus stops located along the B462 in close proximity to the land west of Radlett, including in close proximity to High Cross and the site at Kemprow, Radlett Road.</p> <p>The railway station at Radlett provides a Thameslink stop into Central London. The land west of Radlett would be within a reasonable walking/cycle distance of the railway station, with the site at Kemprow being within 1.2 miles walking distance of the town centre and railway station.</p> <p>The land west of Radlett in landscape terms is relatively self-contained through existing landscape features, such as hedge lines and trees. The existing buildings at High Cross would also create a definitive boundary to the larger development and protect development encroaching into the open countryside beyond.</p> <p>Whilst the new garden suburb option envisages the provision of new services and facilities to support the development, it is noted that both Fair Field Junior School and Edge Grove School, are located in close proximity to the new garden suburb location.</p> <p>Although further work would be needed to understand the implications of the larger development at land west of Radlett, there is clearly an option to increase the size and capacity of existing schools if required. The locational advantage of being in close proximity to these services and existing educational facilities provides further positive sustainability credentials for the development of the land west of Radlett, including the land at Kemprow, as a new garden suburb.</p>	development.
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	<p>This option for growth sets out a strategic vision for delivering 300 to 500 new homes per suburb, and also other services and facilities, to accommodate the growth envisaged within each of the new garden suburbs. This planned growth would be most sustainably located around existing settlements, particularly those suburbs that are located nearer to town centres and major public transport hubs, such as Borehamwood.</p> <p>This approach therefore supports the inclusion of the land at Elle Dani Farm to the west of Borehamwood. There is already a frequent (every 6 minutes) bus service (107, 306, 615 and 823) that runs along the B5378 between Watford, Stanmore and Edgware. There are bus stops along Allum Lane at Knowl Way, within a short walking distance of the site.</p> <p>The railway station at Borehamwood provides a Thameslink stop into Central London. The land at Elle Dani Farm would be within an easy walking/cycle distance of the railway station, with the site at Elle Dani Farm being 0.6 miles walking distance (a 10 minute walk) of the town centre and railway station. The site is also closely located to the shops and school located within Elstree which are also within a 10 minute walk.</p> <p>The land at Elle Dani Farm in landscape terms is self-contained through existing landscape features, such as hedge lines and trees.</p> <p>The Elle Dani Farm Garden Suburb Vision document, Transport Feasibility report, and Ecology Note provide further detail about the proposed scheme at Elle Dani Farm to the west of Borehamwood, and highlights why the site is considered one of the most sustainable locations for a new Garden Suburb</p>	The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
	Richard House - Gladman Developments		Can be an appropriate way of delivering sustainable housing development, however reliance on these sites is unlikely to deliver significant amounts of housing in the short term due to long lead-in times. To secure housing delivery within the first 5 years of the plan, a wide range of smaller, readily-developable sites should be allocated.	<p>The comments are noted.</p> <p>The Issues and Options document recognises that a combination of approaches for planning future growth are likely to be needed, and we do not envisage that any of the individual approaches would be taken forward in isolation.</p> <p>We are aware of the lead-in times for large-scale developments such as garden suburbs, and so if that approach were to be taken forward, this would need to be in</p>

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				conjunction with other options for housing delivery in years 1-5 of the plan period.
	Ben Rose – Atelier Ten Building Services Engineers		Once the warehouses have been encouraged to relocate, all that land on edge of towns that is brownfield would benefit from this kind of new community, with its own hub, rather than building on green-belt, as it will just be continuing the urban sprawl that the green belt is there to prevent. Either that or new villages, but will have to have excellent transport links. Those areas indicated on the maps are already a long way from the main transport hubs, so will encourage increased car use rather than reduce the strain.	The comments are noted. The retention of employment areas within existing towns is currently supported. Garden suburbs are likely to be located in the Green Belt around the edges of the borough's four main settlements.
	Planning Potential for Inland Homes Ltd	Land north of Barnet Lane	Consider that Land North of Barnet Lane presents a sustainable location for growth, and that a greater number of small to medium scale Green Belt releases will have fewer implications on the purposes of the Green belt than large 300-500 dwelling suburbs proposed by this option.	The comments are noted. In a previous early round of public consultation, infrastructure was raised as the main issue by those who responded, and it is very difficult or impossible to provide significant infrastructure improvements through small developments, particularly as it is not possible to collect planning obligations from more than five developments to be put towards a single piece of infrastructure.
	Matt Hill – Maddox Planning Consultants for Northern Trust		The Council has identified the need to remove land from the green belt in order to accommodate the housing it requires during the life of the plan. It has identified potential areas of search but is yet to prepare a green belt assessment or an assessment of the landscape in these locations. As a result, there is little evidence available to assist with identifying a preferable location for green belt release for the purposes of housing development in Hertsmere at this stage. Nonetheless, we do support the Council's approach to planning for housing growth through the expansion of existing towns to create new garden suburbs and the release of green belt to facilitate such development. We also agree that there are a number of benefits to planning for housing growth through the creation of new garden suburbs [benefits listed in response]. We also agree that the most sustainable locations for garden suburbs would be around the key settlements of Borehamwood, Potters Bar, Bushey and Radlett and concur that each garden suburb should be able to accommodate circa 500 dwellings.	The support is welcomed. The council published a Stage 1 Green Belt Assessment in September 2017 to tie in with the Issues and Options consultation (this was linked to directly from the Consultation Portal page under the Supporting Documents tab). The council has since commissioned a Stage 2 Green Belt Assessment which has now been produced.
	Sarah Kasparian – Bell Cornwell LLP for Hightown Housing Association	Land at Rossway Drive, Bushey	We support the principle of garden suburbs. The four main settlements are sustainable with good transport and access to key services. The development of the smaller new garden suburb of 300 units is not significant and we question the level of development needed to support the facilities that have been highlighted on page 27 of the Issues and Options document. Site specific policies should be designed depending on the local area, needs for infrastructure, level of other development likely to come forward in the area and the scale of development. We support the areas of search proposed on the map on page 29 and in particular the development site east of Rossway Drive including Roughdown, which is subject to a current planning application for residential development, comprising 100% affordable housing (ref. 17/2081/FUL).	The support is welcomed and the comments are noted.
	Sarah Kasparian – Bell Cornwell LLP for DNA Capital LLP		We support the allocation and development of garden suburbs in sustainable locations. The housing need is high and Green Belt boundaries have not been significantly altered in south west Hertfordshire. Well chosen accessible, well designed, sustainable garden suburbs represents good planning.	The support is welcomed and the comments are noted.
	Bob Woodman – DP9 Ltd for NBP Limited		Planned extension of the major settlements should be the second component of the strategy for providing growth. Such extensions should take account of a review of existing green belt and the extent to which it meets the five objectives of: checking sprawl; preventing merger; safeguarding countryside; preserving historic settings; and assisting urban regeneration. Specific consideration should be given to the opportunities to identify new defensible boundaries to the green belt. For instance, the M1 motorway might provide a suitable boundary whilst allowing for growth/extension of Watford/Bushey. Consideration should be given to the need for larger sites to provide for necessary supporting uses for the growth of Hertsmere. These will include:	The comments are noted. The council commissioned a Stage 2 Green Belt Assessment which has now been produced.

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			<ul style="list-style-type: none"> • community uses which require significant built footprint and open areas – such as schools and medical facilities. • Commercial uses which require relatively large areas and separation from existing residential uses – such as B8 and open storage. 	
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edwarebury House Farm, Elstree Hill	Developing on Green Belt land has always been challenging and has generally been resisted, and notwithstanding recent Government announcements this does not appear to be getting any easier. The advancement of any site(s) within the Green Belt should only come forward following a detailed review of the possible options, and a technical review of the Green Belt boundary.	<p>The comments are noted.</p> <p>The council commissioned a Stage 2 Green Belt Assessment which has now been produced and which assesses the borough's Green Belt in more detail in relation to the five purposes set out in the NPPF.</p>
	David Joseph – Bloor Homes	Land at Harperbury Hospital	<p>The Company controls land forming part of the former Harperbury Hospital in St Albans District that has the benefit of a planning permission for a residential led redeveloped scheme (reference 5/15/0990 shown edged red on the plan attached (2264 – A- 1002 - C)). Construction of this scheme has recently begun.</p> <p>The Company also controls wider land holdings in both St Albans and Hertsmere Districts (edged blue).</p> <p>The land under our control has the potential to provide additional development in many forms such as a Garden Suburb. The development of a Garden Suburb in this location would benefit from a strong relationship to the existing and committed development in the area such as the new hospital and permitted housing together with existing sporting and recreational uses.</p> <p>Moreover, the recent planning permissions include provision of sustainable transport measures which could also support additional growth, including footpath improvements and public transport enhancements.</p> <p>Furthermore, the site has the potential to form a focus for the required infrastructure and links to other areas via enhanced green infrastructure.</p>	The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	<p>New garden suburbs each for 500 or so dwellings might be an appropriate strategy to adopt at 2 of the Areas of Search as part of a balanced portfolio of allocations to deliver a wide range of sites at the principal settlements. As part of this balanced portfolio there should be sites of between 50 and 200 dwellings identified at the principal settlements to make good any assumed shortfall from garden suburbs.</p> <p>There is a question whether Bushey should be included as a principal settlement. As it doesn't have a railway station, so more suitable for site of 50- 100 dwellings.</p> <p>The Areas of Search identified at page 29 are mainly inappropriate for a number of reasons which are set out in the representation. [This concludes that no areas of search should be progressed, but instead the promoted site should be progressed].</p> <p>Propose that Organ Hall Farm (north of Borehamwood) should be allocated for around 100 dwellings and sets out various reasons why the site is suitable.</p>	<p>The comments are noted.</p> <p>The council has carried out its own Housing and Economic Land Availability Assessment according to a methodology published and consulted upon in summer 2017 (the site at Organ Hall Farm has been put forward as part of that piece of work). The council has also commissioned a Stage 2 Green Belt Assessment which has now been produced alongside other evidence base work, so will make its own assessment of which sites should be taken forward.</p> <p>Bushey has a railway station, albeit sited just outside of the borough boundary.</p>
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	<p>New garden suburbs each for 500 or so dwellings might be an appropriate strategy to adopt at 2 of the Areas of Search as part of a balanced portfolio of allocations to deliver a wide range of sites at the principal settlements. As part of this balanced portfolio there should be sites of between 50 and 200 dwellings identified at the principal settlements to make good any assumed shortfall from garden suburbs.</p> <p>There is a question whether Bushey should be included as a principal settlement. As it doesn't have a railway station, so more suitable for site of 50- 100 dwellings.</p> <p>The Areas of Search identified at page 29 are mainly inappropriate for a number of reasons which are set out in the representation. [This concludes that no areas of search should be progressed, but instead the promoted site should be progressed].</p> <p>Propose that Land off Theobald Street, Radlett) should be allocated for around 100 dwellings and sets out various reasons why the site is suitable.</p>	<p>The comments are noted.</p> <p>The council has carried out its own Housing and Economic Land Availability Assessment according to a methodology published and consulted upon in summer 2017. The council has also commissioned a Stage 2 Green Belt Assessment which has now been produced alongside other evidence base work, so will make its own assessment of which sites should be taken forward.</p>

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
	Hannah Trubshaw – Pegasus Group for Taylor Wimpey	Land south of Borehamwood	<p>A review of the Issues & Options’ ‘five potential development approaches’ indicates that HBC is not currently planning to meet identified needs within the Plan-period (2019 – 2034). A table indicates the number of homes to be provided through each proposed approach, and arrives at a shortfall of 667 homes over the plan period.</p> <p>In light of the shortfall against identified housing needs and in combination with the evidence presented in Sections 3 – 7 above, it is considered appropriate for HBC to consider releasing ‘deliverable’ Green Belt sites in sustainable locations in the early part of the new Local Plan in order to contribute towards the Borough’s significant identified housing needs and address the anticipated shortfall in housing supply.</p> <p>In this regard, and without prejudice to their representations on Land South of Watford Road, Elstree, Taylor Wimpey strongly support the growth to the south of Borehamwood as suggested on Page 29 of the Issues and Options Document.</p>	<p>The Issues and Options document is not a site allocations plan, and does not provide enough information to enable the calculations set out in the response to have been made. It sets out potential approaches and possible areas of search, and does not exclude other options which may come forward.</p> <p>The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.</p>
	Lichfields for CEG	Potters Bar Golf Course	<p>The current Hertsmere Local Plan is discussed, including the following:</p> <p>The level of growth for Potters Bar set by the Core Strategy substantially underplayed the scale of existing local need and demand in the settlement. The outcome of this is that housing needs of Potters Bar have not been met. This lack of housing delivery has failed to capitalise on the excellent rail links to London provided, and the range of facilities and services Potters Bar offers.</p> <p>Future housing distribution should reflect a range of factors, including the availability of suitable sites to accommodate development as well as the relative needs and demands of each settlement in the Borough, with growth supporting the objectively assessed needs of the population and local economies in each settlement.</p> <p>It goes on to consider the demographic and associated socio-economic implications of different scales of housing growth in Potters Bar, illustrating that development equivalent to one or two ‘Garden Suburbs’ is likely to be necessary to avoid more significant socio-economic decline and grow the younger working age population.</p> <p><i>Why Garden Suburbs?</i></p> <p>The delivery of strategic-scale development in Potters Bar would provide a significant benefit to the authority in terms of meeting significant housing needs. Furthermore, strategic development allows for major necessary infrastructure to be provided in an efficient manner, which would otherwise be more difficult to coordinate with a number of small schemes, including transportation, education and health facilities.</p> <p><i>Why Potters Bar Golf Course?</i></p> <p>The Potters Bar Golf Course site represents the most sustainable option for the delivery of a ‘Garden Suburb’ in Potters Bar. The site is located with easy access to an array of existing community infrastructure comprising services, facilities and amenities. In particular, it is within 200m from the Darkes Lane (high street), between 500-1000m from educational facilities, and 400m from employment areas.</p> <p>The representation goes into further detail about the benefits of the site at Potters Bar Golf Course.</p>	<p>The comments are noted.</p> <p>The factors mentioned in the representation and others will form a part of the council’s evidence-gathering process as part of work on the new Local Plan. The council is currently considering all options for growth and a combination of different approaches is likely to be required in order to meet housing need across the plan period.</p> <p>The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.</p>
14 growth of key villages				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	<p>Disagree</p> <p>This approach will only deliver a limited amount of new homes, and would be located around more smaller, sensitive locations of Elstree and Shenley. Both of these locations are not well located in relation to railway links, and their sustainability credentials are more limited. Whilst it is acknowledge that some growth at these locations may be appropriate, it is considered the more sustainable development opportunities are around the main settlements. Strategic allocations should therefore be focused in around the main settlements to provide a more positive strategy to deliver the type and amount of</p>	<p>The Issues and Options document recognises that a combination of approaches for planning future growth are likely to be needed, and we do not envisage that any of the individual approaches would be taken forward in isolation.</p>

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			development proposed by the Vision and Priorities of the new Local Plan.	
	Richard House - Gladman Developments		Support where housing will enhance or maintain the vitality of rural communities. Benefits to providing new housing in rural areas include helping to sustain rural communities and businesses; providing new family housing can help to redress age imbalance towards older people; affordable housing in rural areas can be increased by allowing the development of larger sites; and locating housing development in settlements with good public transport links can assist in encouraging sustainable travel choices and maintaining the vitality of those transport links.	The comments are noted.
	Planning Potential for Inland Homes Ltd	Land north of Barnet Lane	Client does not support the growth of Elstree and Shenley as the principle solution to delivering housing need.	The comments are noted, however it is important for the client to understand that the council is not proposing any of the approaches set out in the issues and Options document as a 'principle' option, and will have to consider a range of the approaches set out in order to meet housing need in a sustainable and deliverable manner.
	Francesca Hill – Sworders for Mr and Mrs Monk	Wilton End Cottage, Radlett Lane, Shenley	<p>Agree with this approach and consider that allowing development in Shenley, a sustainable village to be appropriate.</p> <ol style="list-style-type: none"> 1. The Core Strategy established Elstree and Shenley as key service villages in its settlement hierarchy and acknowledged their contribution to the sustainability of the local community and place within the shopping hierarchy. Disagree with approach taken by Core Strategy to restrict growth in service villages to limited infill within the village envelope as inconsistent with national policy. 2. Turning specifically to Shenley, this is a sustainable settlement for development and to neglect to consider allocating sites here would be to ignore the need to take account of sustainable patterns of development as required by paragraph 84 of the NPPF. [Further, more detailed comment is provided about the long-term viability of Shenley village]. 3. In summary the Land at Radlett Lane is a good example of a site would promote a sustainable pattern of development in Shenley and help ensure the future viability of the village as a Key Service Village. This is in contrast to the alternative option to the south east of the village which would result in an elongated extension to the village, would be a clear encroachment into the countryside, would not relate well to the existing built form and would be located away from many of the village's key amenities and facilities. 	<p>The support is welcomed and the comments noted.</p> <ol style="list-style-type: none"> 1. Although it may be considered that restricting growth of service villages to small-scale infill is contrary to national policy, this approach was accepted at the post—NPPF examination in public of the Core Strategy. 2. The council is not neglecting this. Land around Elstree and Shenley is included within areas of search for growth in the Issues and Options document, indication that it is being considered alongside other options as part of delivering the necessary housing supply. 3. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
	Sarah Kasparian – Bell Cornwell LLP for Hightown Housing Association	Land at Rossway Drive, Bushey	We support a dispersed approach to housing development across the borough, with consideration given to the ability for schemes to deliver the appropriate level of infrastructure and affordable housing.	The support is welcomed and comments noted.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	<p>In order to plan for a sustainable expansion for the larger villages, in addition to planning for new local employment and facilities, there should also be a proportionate increase in housing.</p> <p>It is considered that Elstree offers opportunity for sustainable expansion, given its proximity to Borehamwood. In particular, there are a number of sites in Elstree, including Edgwarebury House Farm, that are current underutilised and could be redeveloped to provide new housing.</p> <p>In terms of Shenley, this village is not well served by public transport and as such is more dependent on private cars and does not offer an opportunity for a sustainable expansion.</p>	The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
	David Joseph – Bloor Homes	Land at Harperbury Hospital	<p>Yes, as set out in our response to Question 13, we suggested that our land holdings could support a Garden Suburb type proposal.</p> <p>In a similar vein our land could form the basis of an extension to the village type development now formed by the new hospital and the existing and committed development.</p>	The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	In the context of releasing land from the Green Belt for development, the NPPF requires account to be taken of the need to promote sustainable patterns of development, including channelling development towards urban areas inside the Green Belt boundary. The Framework is also clear that this approach facilitates the use of sustainable modes	<p>The comments are noted.</p> <p>The three principle settlements in Hertsmere are Borehamwood, Potters Bar and Bushey, with Radlett being fourth in the settlement hierarchy.</p>

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			<p>of travel and focuses development in locations which are, or can be made, sustainable as part of the solutions which are capable of supporting reductions in greenhouse gas emissions and reduce congestion.</p> <p>Development of up-to 1,000 dwellings at Shenley and Elstree is not a sustainable option in accordance with the Framework and should not be pursued.</p> <p>The scale of growth proposed at Shenley and Elstree conflicts with these policies and will inevitable create unsustainable development. Some growth may be appropriate but should not exceed say 100 dwellings at each settlement. The major growth should be directed at the 3 principal settlements, including Borehamwood and Radlett.</p> <p>D2 Investments has not view about where any reduced level growth should be located at Shenley or Elstree.</p>	
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	<p>In the context of releasing land from the Green Belt for development, the NPPF requires account to be taken of the need to promote sustainable patterns of development, including channelling development towards urban areas inside the Green Belt boundary. The Framework is also clear that this approach facilitates the use of sustainable modes of travel and focuses development in locations which are, or can be made, sustainable as part of the solutions which are capable of supporting reductions in greenhouse gas emissions and reduce congestion.</p> <p>Development of up-to 1,000 dwellings at Shenley and Elstree is not a sustainable option in accordance with the Framework and should not be pursued.</p> <p>The scale of growth proposed at Shenley and Elstree conflicts with these policies and will inevitable create unsustainable development. Some growth may be appropriate but should not exceed say 100 dwellings at each settlement. The major growth should be directed at the 3 principal settlements, including Borehamwood and Radlett.</p> <p>High Moon has not view about where any reduced level growth should be located at Shenley or Elstree.</p>	<p>The comments are noted.</p> <p>The three principle settlements in Hertsmere are Borehamwood, Potters Bar and Bushey, with Radlett being fourth in the settlement hierarchy.</p>
	Pegasus Group for Taylor Wimpey	Land south of Borehamwood	<ul style="list-style-type: none"> • In preparing the new Local Plan, HBC should consider revising Green Belt boundaries in the context of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the exceptional circumstances test; and • The site makes a limited contribution to Green Belt purposes and accordingly the release of the site would not give rise to significant 'harm' in Green Belt policy terms. <p>The site is suitable for residential development with no insurmountable environmental or technical constraints;</p> <ul style="list-style-type: none"> • The site is located within a sustainable location, suitable to accommodate new development; • The site is available for development now and is being actively promoted by a willing landowner and developer; • Residential development is confirmed to be a viable opportunity at this site; and • Accordingly, for the purposes of preparing the Local Plan, the site should be treated as a deliverable source of housing land with an expectation of completions achievable in the early part of the plan period (subject to the removal of the Green Belt designation). 	<p>The comments are noted.</p> <p>The Issues and Options document acknowledges the very likely need for Green Belt to be released to accommodate housing growth.</p> <p>The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.</p>
15 Other villages				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	<p>This approach will also provide a limited amount of new homes, but provides an opportunity for smaller villages to accommodate a small amount of new development to assist maintain local services, employment, and local communities. This type of village growth should be considered alongside other options, and be seen as additional provision for housing rather than being a primary focus of delivery.</p>	<p>The Issues and Options document recognises that a combination of approaches for planning future growth are likely to be needed, and we do not envisage that any of the individual approaches would be taken forward in isolation.</p>
	Richard House - Gladman		In identifying settlements with the potential for growth the range of facilities within that	The comments are noted. The proximity to existing facilities will be considered as part

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
	Developments		settlement should be taken into account as well as its accessibility to larger centres, rather than its population size. Para 55 of the NPPF states that "to promote the sustainable development of rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby".	of the process of considering sites put forward through the Housing and Economic Land Availability Assessment which will inform the selection of sites in the Local Plan.
	Planning Potential for Inland Homes Ltd	Land north of Barnet Lane	As in the response to question 14, small villages are not the appropriate locations for significant development.	The comments are noted.
	Chloe Tucker – Daniel Watney LLP for The Worshipful Company of Brewers	Land formerly part of Earl and Cross Keys Farm, South Mimms	The comments consider each of the smaller villages in Hertsmere and look at impacts on the Green Belt, services and resources, transport and sustainability and containment or sprawl. South Mimms is considered to be the best option for expansion of smaller villages and the other villages would be less sustainable locations for growth.	The comments are noted. It is likely that more than one smaller village will need to take some relatively small-scale growth in order to help to meet housing need and to maintain the long-term viability of the villages, and the sustainability of sites put forward around any of the villages will be assessed through the HELAA.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	Any growth to a smaller settlement would need to be proportionate and generally limited to small developments (circa less than 10 units), particularly as these settlements may not even be served by buses and the residents will be dependent on private cars. In terms of enabling sufficient development to support a greater range of local services, it is considered that this would require a level of growth that would not be in keeping with the existing settlement.	The comments are noted.
	David Joseph – Bloor Homes	Land at Harperbury Hospital	Land adjacent to the former Harperbury Hospital. As set out in our response to Question 14, we suggested that our land holdings could support a larger village expansion type proposal. In a similar vein our land could form the basis of an extension to a village now formed by the new hospital and the existing and committed development.	The comments are noted. The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	Limited scale growth at the other villages is appropriate to assist in sustaining their facilities and services and it may be appropriate for up-to 50 dwellings to be allocated at each of these settlements. D2 Investments has no view about where any growth should be located at the 5 identified villages.	The comments are noted.
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	Limited scale growth at the other villages is appropriate to assist in sustaining their facilities and services and it may be appropriate for up-to 50 dwellings to be allocated at each of these settlements. D2 Investments has no view about where any growth should be located at the 5 identified villages.	The comments are noted.
16 Garden village				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	Disagree This approach will focus development in one location within the borough, and will have significant implications across the borough and surrounding settlements beyond the boundary of Hertsmere. Infrastructure improvements would be concentrated towards the new Garden Village, rather than towards existing settlements, with significant infrastructure required to ensure that the new Garden Village becomes a sustainable location. The requirement for such infrastructure would significantly impact on the deliverability of new homes in the short to medium term. The Issues and Options Local Plan highlights a benefit that this option will reduce traffic and congestion through promoting cycling and walking routes. However, it would appear that the land identified for the new Garden Village is served by the M25 and A1(M), and will not be supported by a railway line. The implications of this option would therefore clearly generate and direct a significant amount of traffic onto a number of key nodal	The comments are noted. The Issues and Options document recognises that a combination of approaches for planning future growth are likely to be needed, and we do not envisage that any of the individual approaches would be taken forward in isolation. The council is aware of the long lead-in times for such settlements, being 10-20 years as stated in the 'Challenges' box in the new garden village section of the Issues and Options document. The council would not envisage such a large site commencing within the first 10 years of the plan period, which is why a number of combined approaches are required to meet housing need throughout the plan period.

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			<p>points, rather than being dispersed across the borough.</p> <p>The new Garden Village would also impact on the coalescence between the more main centres of Potters Bar, London Colney, St Albans and Hatfield, with significant impact on the openness of the Green Belt.</p> <p>This approach would appear to have a significant impact on more than just Hertsmere and will affect neighbouring authorities. If this option were to be favoured by the Council, there is clearly a duty to cooperate with adjoining authorities as to whether this is a sustainable option, both within the borough and surrounding areas.</p> <p>The delivery of this option will be a significant concern to meet the housing requirements. If based on 4000 dwellings, this would lead to a delivery of 266 dwellings per year from this development. This is across the 15 years split evenly. The reality of such a new Garden Village is the need to master plan, obtain outline planning permission, and obtain reserved matters approval, discharge planning considerations, and other approvals, as well as the land sale process. This preparation work will take a considerable amount of time, and has not been factored into the delivery of the new village.</p> <p>The development of the new Garden Village is unlikely to commence within 3 to 5 years, and from experience of these types of projects, potentially will not even start within the plan period by 2034. The new Garden Village approach therefore would have significant consequences on delivering the Council house targets across the plan period, and is itself not a sustainable form of development for this location.</p> <p>It is also considered that the new Garden Village is at odds with the aim of delivering further economic growth and a total of 9000 new jobs, which will be located within/adjacent to existing settlements. It should therefore follow that new housing should be sustainably located close to job opportunities and/or sustainable transport options.</p>	
	Richard House - Gladman Developments		May be an appropriate means of accommodating future housing growth, however the council should take into account the significant lead-in time to delivering such a development, particularly due to the need for significant infrastructure investment and where a site is in multiple ownership. In order to maintain a supply of housing in the early years of the plan period the local plan needs to include the allocation of smaller greenfield sites.	The council is aware of the long lead-in times for such settlements, and which is why a number of combined approaches are required to meet housing need throughout the plan period.
	Planning Potential for Inland Homes Ltd	Land north of Barnet Lane	<p>Supportive of Green Belt release, however the client wishes to highlight two principle concerns with this approach:</p> <ol style="list-style-type: none"> 1. Critical mass required to make a new settlement sustainable; CLG guidance (2007) indicates that 5,000-10,000 new homes are needed to create a self-sufficient settlement. Sufficient existing roads and public transport facilities are required. Note borough is highly constrained by AONB, AGLV and flood risk with limited major roads and existing links to public transport. 2. Deliverability of a new settlement within the plan period which would result in an undersupply of new dwellings within the plan period. 3. Complex land ownership issues may cause further delays. 	<ol style="list-style-type: none"> 1. The comments are noted, however it should be noted that Hertsmere has no AONB (the nearest being the Chilterns) or AGLV, and several major roads – the A1, M1 and M25 run through the borough. The Issues and Options document indicates that a settlement of 4,000 initially with the potential for future growth would be sought. 2. The council is aware of the long lead-in times for such settlements, and which is why a number of combined approaches are required to meet housing need throughout the plan period. 3. In allocating a site we are required to demonstrate its deliverability through public examination, which should help ensure that all allocated sites are deliverable.
	Matt Hill – Maddox Planning Consultants for Northern Trust		<p>The provision of a new garden village will therefore go some way to assisting the Council with meeting its housing demand over the plan period.</p> <p>As highlighted above, there is little evidence to assist with identifying a preferred location at this stage; however, we do support the Council on the release of green belt land to assist with the facilitation of the new garden village subject to it meeting the five purposes of the green belt as set out within paragraph 80 of the NPPF.</p> <p>We agree that there are a number of benefits to accommodating for a new garden village [benefits listed in response].</p>	The support is welcomed and comments noted.
	Francesca Hill – Sworders for Mr and Mrs Monk	Wilton End Cottage, Radlett Lane, Shenley	A strategy based purely on the provision of a new garden village will not deliver the number of houses required within life of the Local Plan or at the necessary build out rate to ensure a robust deliverable 5 year housing supply. Therefore if the Council considered this a viable option to meet long term future housing need it would need to take place in conjunction with developing other smaller sites in the district including those adjacent to	<p>The Issues and Options document recognises that a combination of approaches for planning future growth are likely to be needed, and we do not envisage that any of the individual approaches would be taken forward in isolation.</p> <p>The council is aware of the long lead-in times for such settlements, and which is why a number of combined approaches are required to meet housing need throughout the</p>

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			<p>Key Service Villages.</p> <p>In the case of a new garden village, the requirement for comprehensive master planning, new infrastructure planning and the provision of a significant range of facilities which could include schools and health facilities means that the likelihood of such a settlement meeting housing needs in the short to medium term is extremely unlikely.</p>	plan period.
	Chloe Tucker – Daniel Watney LLP for The Worshipful Company of Brewers	Land formerly part of Earl and Cross Keys Farm, South Mimms	<p>It is considered that a garden village is not the most appropriate form of growth for Hertsmere for a number of reasons. Firstly, the introduction of an entire new village, including 4000 new homes and services, will be far more damaging to the openness of the countryside and the greenbelt, than appropriate infill development and carefully planned extensions to existing towns and villages.</p> <p>Utilising the existing built environment, existing infrastructure and existing services is a far more sustainable approach to new housing development. Provision of an extension to an existing town or village will support the existing services, whereas providing new services for a new village may detract from these existing services, potentially leading to closures of shops and public houses. There is less disruption arising for an extension to an existing town or village than to create a whole new village.</p> <p>The extensive scale of the proposed garden village brings its deliverability into question. Furthermore, should the garden village eventually be delivered, it will take far longer to bring forward than a town or village extension. Hertsmere needs housing now and therefore a garden village option is not appropriate.</p>	<p>The comments are noted.</p> <p>Full assessment of the Green Belt and other impacts of a potential new settlement will be considered through the evidence base work being carried out, including the HELAA. The main concern raised in responses to early consultation was the ability of existing infrastructure and services to cope with current demand, with concerns raised about future growth of existing towns adding to that pressure.</p> <p>The council is aware of the long lead-in times for such settlements, and which is why the Issues and Options document recognises that a number of combined approaches are required to meet housing need throughout the plan period.</p>
	Sarah Kasparian – Bell Cornwell LLP for Hightown Housing Association	Land at Rossway Drive, Bushey	We support a dispersed approach to housing development across the borough, with consideration given to the ability for the scheme to deliver the appropriate level of infrastructure and affordable housing.	The comments are noted.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	<p>In order to be sustainable a new garden village would need to be accessible by a train service. Although there are three train lines crossing Hertsmere in a north-south direction, the train services operating along these lines serving London Kings Cross, St Pancras and Euston; however, creating a new station on any of these lines within Hertsmere would be challenging.</p> <p>Notwithstanding the difficulty in creating a new station on one of these lines, there is also limited space along these train lines to develop a new garden village. The eastern and western areas of the district are taken up with Potters Bar and Bushey respectfully. Whilst, Borehamwood and Radlett occupy a large area in the centre of the District adjacent to the Thameslink line, and if the areas between were developed, would result in a continuous built-up area along the railway line.</p> <p>As such it is considered that there does not appear to be a sustainable location for a new garden village.</p>	The comments are noted.
	David Joseph – Bloor Homes	Land at Harperbury Hospital	<ol style="list-style-type: none"> 1. Yes, again the opportunity presented by our land holdings could form the nucleus of a new garden village. 2. The land controlled by the Company amounts some 250 acres and is adjacent to land in public sector ownership. In combination, these areas could accommodate the mix of uses contemplated for a new garden village. 3. The nature of our arrangements with the former owners (Department of Health) means that proceeds would be reinvested in the National Health Service, as supported in the recent Autumn Statement. 4. Moreover, the site could accommodate a healthy new town (see https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/) 	<ol style="list-style-type: none"> 1. The Council has yet to carry out detailed assessments of all sites submitted to its HELAA process, so cannot comment on the merits of individual sites at this stage so as not to pre-judge the outcomes of this process. 2. The comments are noted. 3. This is noted; however this does not have a direct bearing on the assessment of the site through the Local Plan process. 4. A new town would need to be substantially larger than is being proposed in Hertsmere at the moment – upward of 10,000 homes.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	<p>This is an 'eggs all in one basket' approach and should be discounted as a matter of principle due to long lead-in times.</p> <p>The Area of Search would encourage trips by private car increasing greenhouse gas emissions and congestion. Future residents would not have the option to use rail services which are available at places such as Borehamwood and Radlett. The motorway junctions closest to the site are already congested and would require upgrade.</p> <p>Viability is an issue with large urban extensions and new villages because of the high upfront costs associated with infrastructure. The last new village to be delivered at Cranbrook required significant public funding to enable development to occur. A detailed viability assessment would be required before this option could be contemplated and it would need to consider sources of funding other than housebuilders.</p>	<p>The comments are noted.</p> <p>The council is aware of the long lead-in times for such settlements, and which is why the Issues and Options document recognises that a number of combined approaches are required to meet housing need throughout the plan period.</p>

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	This is an 'eggs all in one basket' approach and should be discounted as a matter of principle due to long lead-in times. The Area of Search would encourage trips by private car increasing greenhouse gas emissions and congestion. Future residents would not have the option to use rail services which are available at places such as Borehamwood and Radlett. The motorway junctions closest to the site are already congested and would require upgrade. Viability is an issue with large urban extensions and new villages because of the high upfront costs associated with infrastructure. The last new village to be delivered at Cranbrook required significant public funding to enable development to occur. A detailed viability assessment would be required before this option could be contemplated and it would need to consider sources of funding other than housebuilders.	The comments are noted. The council is aware of the long lead-in times for such settlements, and which is why the Issues and Options document recognises that a number of combined approaches are required to meet housing need throughout the plan period.
	Lichfields for CEG	Potters Bar Golf Course	Notwithstanding the complexities of the land assembly potentially required to facilitate a development of such a scale, given the size and scale of a 'Garden Village', and its potential proximity to the neighbouring authority, a development such as this would require the Council to engage with SADC through a 'duty to cooperate', which could further slow the sites deliverability. As a result, if new 'Garden Village' option were to be taken forward, schemes of this scale will take many years from inception through to actually delivering houses, due to the complexities of large scale housing delivery. As such, new 'Garden Village' would need to be complemented by a range of other forms of development and scales of site (including 'Garden Suburb' sites) that can come forward over the short to medium term to maintain a rolling five year housing land supply in Hertsmere	The comments are noted. The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA and functional economic market area. The council is aware of the long lead-in times for such settlements, and which is why the Issues and Options document recognises that a number of combined approaches are required to meet housing need throughout the plan period.
17 Any other comments				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	This submission supports the new Local Plan Vision towards delivering much needed housing within the Borough, but that it needs to be directed towards a more sustainable approach to development, than is envisaged by the new Garden Village proposal. There is also a need to ensure that the amount of housing reflects the employment strategy for attracting new employment into the borough. It is therefore considered the amount of housing needs to be a minimum, with the ability to increase taking into account further review of housing requirements and increased employment in the area. The work that has been undertaken and supports this submission for a new Garden Suburb at Elle Dani Farm, west of Borehamwood, demonstrates how this approach to Green Belt release can achieve a sustainable form of development that will benefit both occupiers of the new development and existing residents. It also demonstrates how this development will integrate with the local community, without unduly impacting on the openness of the Green Belt. This submission has therefore highlighted the benefits brought about through the delivery of new garden suburbs, including planned growth. As previously noted however, it cannot be assumed that all of the potential Garden Suburbs being considered are equal and clearly some are more sustainable than others. Consideration must be given to those Garden Suburbs which are more sustainably located to public transport, employment opportunities and community and social infrastructure. The accompanying information highlights that the land at Elle Dani Farm, is ideally located and could be incorporated within a new garden suburb, contributing to a sustainable form of development. I would therefore request that this representation is taken into account in progressing the site options for delivering sustainable growth within the borough.	The general support for the Vision and Priorities is welcomed and the comments on these are noted.
	Stephen Rose – Quod for Sellar	Land at Rowley Lane, Borehamwood	One of the objectives of the NPPF is to build a strong, competitive economy. The need to create jobs and for the planning system to proactively support sustainable economic growth is set out at paragraphs 18 to 21 of the Framework. In the case of Hertsmere, the need for employment floorspace has been assessed through the SW Hers Economic Study 2016 which concludes that a scenario delivering 9,000 jobs over the next 15 years would be most realistic. Sellar agrees with these conclusions and with Hertsmere's	The support is welcomed and the comments noted. A new HELAA is currently being carried out in order to identify an up-to-date supply of employment and housing land.

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			<p>intention to accommodate this growth by allocating further employment land.</p> <p>The 2015 Housing and Employment Land Availability Assessment (HELAA) is equally clear about the shortage of employment land supply in Hertsmere, noting that existing supply is provided largely by six main sites that are designated for that purpose along with a series of smaller designated and non-designated sites. Most are already intensively occupied and have little scope for further expansion.</p> <p>The Site Allocations and Development Management Policies Plan (adopted 2016) identifies the Rowley Lane site as one of two sites safeguarded for future employment development.</p> <p>Sellar therefore strongly supports the aspiration to meet needs in full and to utilise the safeguarded Rowley Lane site to do so.</p>	
	Matt Hill – Maddox Planning Consultants for Northern Trust		In summary, we support the preparation of the Local Plan and the Council's intention to meet its identified OAN of 600 dwellings per annum in the Local Plan. We support the Council's pro-active approach to planning for housing growth and support the provision of new garden suburbs and villages to accommodate the forecasted growth. We also commend the Council in acknowledging that it will need to consider the release of green belt land to enable the development of the new garden suburbs and garden village.	The support is welcomed.
	Chloe Tucker – Daniel Watney LLP for The Worshipful Company of Brewers	Land formerly part of Earl and Cross Keys Farm, South Mimms	<p>Due to the location of the site on the edge of the settlement boundary of South Mimms, we believe there is an opportunity for the site to be released from its greenbelt designation to deliver housing, either as a whole or as separate parcels of land, enabling a sustainable expansion to an existing village.</p> <p>Land at Earl and Cross Keys Farm is considered to be the most suitable site for the expansion of South Mimms village.</p>	Land at Earl and Cross Keys Farm is not within one of the areas of search for growth of key villages shown in the Issues and Options consultation document. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.

Appendix B

Issues and Options consultation (Reg 18, September-November 2017)

Bodies or Organisations representations with HBC responses

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
Part 1				
1 Vision				
<i>Do you agree with the proposed Local Plan Vision?</i>				
	Aldenham Parish Council		1. In general agree with the Vision. 2. Query how better environment will be achieved. What are the implications of energy self-sufficiency? Are wind farms being proposed?	1. Support for the Vision is welcomed. 2. The priorities set out in the Issues and Options document give a flavour of how we envisage this element of the Vision being achieved. Further detail will emerge in future iterations of the draft plan. In terms of energy self-sufficiency we will look at a range of policies and proposals which could contribute in a variety of ways to this aim, taking account of advances in technology and the appropriateness of various solutions to each type of situation.
	LB Barnet		Support intention to meet housing needs of existing and new communities, including appropriate levels of affordable housing and provision for other specific groups at sustainable locations together with required supporting infrastructure.	The support is welcomed.
	Colney Heath Parish Council		Vision is acceptable until you realise it means allocating significant green belt land adjoining Colney Heath for development. Lack of support for Watling Chase Community Forest means Hertsmere has given itself free rein to develop in the green belt.	The comments are noted. No local authority has 'free rein' to develop in the green belt. Any change to green belt boundaries needs to be justified by exceptional circumstances underpinned by a robust evidence base, work on which is currently under way.
	CPRE		1. Should not predetermine the scale of housing development, or how and where it should be accommodated. Too early to say the council favours the construction of a new settlement in the green belt. Council should say that it will apply the government policy and standard methodology. 2. New local plan will have to demonstrate that there are exceptional circumstances, not just a housing/employment need, if green belt boundaries are to be changed to accommodate new development. 3. Number of jobs needed and justified also depends on assessed need and a target set in the light of NPPF para 14 and constraints imposed by national green belt policy.	1. We are required by the NPPF to boost significantly the supply of new homes by (among other things) using our evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. So the clear intention is that full OAN should be met, although it is recognised that there may be circumstances where this is not possible. The council would wish to follow this approach but recognises there are significant constraints to development, including the green belt. In line with the Planning Practice Guidance 'Housing and economic land availability assessment' we have assessed all potential sites put forward through the Call for Sites or in response to this Issues and Options consultation against our published HELAA methodology in order to judge their suitability for development. At this stage it is not possible to comment on the extent to which OAN (whatever that figure eventually is defined as) can realistically be met and what target will actually be set. 2. No decisions about the release of green belt land have yet been taken. A stage 1 green belt review has been undertaken and is to be followed by stage 2 reviews in a number of parts of the borough, which will help to inform decisions about whether/where land may be released to meet identified need. 3. As with housing, it would be the council's intention if possible to meet the OAN, but this has to be viewed within the context of constraints to development, including green belt, that exist and a detailed assessment of all possible sites (see answer to point 1). It is also important that the delivery of new homes and jobs is kept in balance in order to support the development of sustainable communities and avoid the creation of 'dormitory' settlements where residents have to commute long distances to work.
	Environment Agency		1. Disagree with aim to minimise the impact of new development on the environment – should be to improve. Hertsmere's water environment has already been assessed as part of the WFD's River Basin Management Plan and a number of unique actions already exist which can be delivered through planning to achieve water quality and environmental improvements. Plan should promote the improvement and enhancement of the environment	1. The comments are noted and are helpful They will be taken into account in drafting policies for consultation in future iterations of the draft plan. 2. The current SADM allocations identify those that lie within a source protection zone and require a Preliminary Risk Assessment. We will discuss the wording of any appropriate

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			<p>through good planning and design.</p> <p>2. Hertsmere has significant area within Source Protection Zone. Any new development would need to ensure that there are no negative impacts on groundwater quality and where appropriate would contribute towards the remediation of any land contamination on the site.</p> <p>3. Development should be kept out of Flood Zones 2, 3a and 3b where possible. In particular, no development should take place within Flood Zone 3b (except water compatible) and only appropriate development in line with the NPPF should occur in Flood Zone 3a and 2. Development can also reduce flood risk and improve water quality through using a sequential approach to design on site and the sensitive use of SUDs.</p>	<p>policy in the new local plan with the EA.</p> <p>3. These comments are noted and are consistent with the approach contained within the borough's updated SFRA to which the new local plan will refer. It is recognised that a sequential approach to the location and design of new development will need to be taken.</p>
	HCC Public Health Service		<p>There should be explicit Health and Wellbeing policy hooks that can set expectations and shape healthy places. The vision sets out many of the aspirations that support healthy places and communities but could be improved through a more explicit reference to health and wellbeing aspirations as an interlinked and overarching principle setting the framework for the local plan.</p>	<p>The comment is helpful and will inform the development of the new local plan as it progresses through future iterations.</p>
	HCC Environment Department		<p>Support objectives set out in Vision Statement.</p> <p>1. Homes should be easy to reach by all modes of transport, not just the car. Development should be located sustainably or made sustainable through appropriate land use planning and by providing necessary public transport services and infrastructure, and walking and cycling links.</p> <p>2.'Having a better environment' should include reference to air quality – pollution and carbon emissions.</p> <p>3. Herts Ecology supports the vision to deliver a high quality environment</p> <p>4. Reference to Hertsmere's Green Infrastructure or Landscape Character Assessment could be made to ensure these provide a good context for growth and decision-making. Vision could be more aspirational and more locally distinctive – recognise importance of key strategic Green Infrastructure assets including greenways, Watling Chase Community Forest, wetlands and reservoirs of Aldenham Country Park and Hilfield Reservoir, rivers, and parkland estates of Shenley Ridge. Should set out how borough's natural environment, landscapes and key green and blue infrastructure assets will be conserved and enhanced to create local distinct and high quality places, be multifunctional, provide connectivity for people and wildlife, and deliver multiple environmental, social and economic benefits.</p> <p>5. Should mention the necessity of protecting and enhancing Hertsmere's historic environment, including designated, non-designated and as yet unknown heritage assets (as per NPPF).</p>	<p>The support is welcomed</p> <p>1. Agreed. The Vision set out in the Issues and Options document does not specify by car only. The priorities indicate that the local plan will help people in Hertsmere connect better by planning for better public transport, cycle and pedestrian routes and other sustainable transport initiatives.</p> <p>2. The comment is noted. Current local plan policies refer to air quality and it is likely that these, or policies based on them, will be carried forward into the draft new local plan for consultation.</p> <p>3. The support is welcomed.</p> <p>4. The comments are useful and will be considered as future iterations of the draft plan are prepared for consultation. We do not disagree with the points being made but will need to give consideration to the level of detail appropriate for a Vision Statement.</p> <p>5. The comments are useful and will be considered as future iterations of the draft plan are prepared for consultation. We do not disagree with the points being made but will need to give consideration to the level of detail appropriate for a Vision Statement.</p>
	Herts and Middlesex Wildlife Trust		<p>Disagree. NPPF makes repeated reference to sustainable development conserving and enhancing biodiversity and resulting in net gains to biodiversity. This fundamental plank of the NPPF should be explicitly referred to in the Vision e.g. add to the first paragraph to read: 'This will help people to improve their health and to stay healthier for longer. We will ensure that development results in measurable net gains to biodiversity by avoiding impacts where possible, and mitigating or compensating where it is not.'</p>	<p>The comments are useful and will be considered as future iterations of the draft plan are prepared for consultation. We do not disagree with the point being made but will need to give consideration to the level of detail appropriate for a Vision Statement.</p>
	Historic England		<p>Vision should refer explicitly to need to conserve or enhance the historic environment. Should reference the types of heritage assets. Should be more locally distinctive and identify what is special and unique to the area. This is important because the plan's strategic policies will derive from the Vision. NPPF says plan should include strategic policies to deliver conservation and enhancement of the natural and historic environment including landscape.</p>	<p>These comments are helpful and will be taken into account in drafting future iterations of the plan for consultation but will need to give consideration to the level of detail appropriate for a Vision Statement.</p>
	Letchmore Heath Village Trust		<p>Issues and Options document well argued and logical. Proposed Vision seems justified. Strongly endorse Vision statements that towns and villages retain their own distinct and separate identities, and ensuring all new homes have</p>	<p>The support is welcomed.</p>

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			adequate social infrastructure.	
	Radlett Society and Green Belt Association		<p>1. Too good to be true. Some ideas mutually exclusive – eg if somewhere is attractive the housing market will offset this by reducing affordability.. Permanence of the green belt should not be broken to provide for housing figures that might mistake demand for need.</p> <p>2. List of required infrastructure seems to be unfunded – who's going to pay for it?</p> <p>3. Support protection of our built heritage, countryside and farmland.</p> <p>4. Major threat is pollution from increased road and rail traffic associated with additional housing. Solar and wind power are sensible options in the right places.</p>	<p>1. The comment is noted.</p> <p>2. It is envisaged that infrastructure would be delivered in a variety of ways, making use of all available sources of funding. For major proposals it would be expected that the development would make a significant contribution to funding necessary infrastructure.</p> <p>3. The support is welcomed</p> <p>4. The comment is noted.</p>
	Ridge Residents Association		Agree	The support is welcomed.
	Sport England		Agree.Support the council's intention to ensure policies provide adequate sport and recreation facilities as part of new developments. Level of provision should be determined locally and be informed by the emerging Playing Pitch Strategy, Built Facilities Strategy and Sport and Recreation Strategy. Sport England expects the council to use the evidence base to set out proposals in the plan for protecting, enhancing and providing sport and leisure facilities in response to identified needs.	The support is welcomed. It is however noted, with respect to the recent studies mentioned, that these do not relate to the levels and distribution of growth that may need to be represented in the new local plan so additional evidence gathering may need to be undertaken.
	Transport for London (Commercial Development)		Support the aspiration for Hertsmere to be an attractive and more affordable place to live and intention to meet housing OAN.	The support is welcomed.
2 Priorities				
<i>Do you agree with our proposed priorities for the Local Plan?</i>				
	Aldenham Parish Council		In principle agree. Request additional caveats to proposed priorities relating to responding to local housing need (bullet 2 add 'particularly young people and key workers', bullet 4 add 'and meet the requirements of each settlement') and delivering growth and enterprise (explain what green infrastructure is), and clarify what is meant by 'support the rural economy'.	The in principle support is welcomed. The request for additional detail will be taken into account as future iterations of the plan are prepared for consultation.
	Colney Heath Parish Council		Very little to challenge, as in broad terms it's all required under the NPPF. But you have not protected the green belt from inappropriate or unplanned development nor provided evidence to back reasons for your proposals.	The Issues and Options document states that protecting the green belt against inappropriate or unplanned development is a priority. It would not however be appropriate at this early stage, given the scale of objectively assessed need and the very limited opportunities for development within the built up area, to give blanket protection to all green belt within the borough and to limit site selection to those which did not lie within the current green belt. A plan based on such an approach, whose development target would fall far short of identified OAN, would be unlikely to be found sound by an inspector. Without an up to date adopted plan the borough's green belt would be far more vulnerable to random applications from landowners in the green belt being granted permission on appeal. Some evidence base studies have already been undertaken and have been made available including as part of this Issues and Options consultation.- eg green belt stage 1, SHMA, Economy Study, Sustainability Appraisal. Others are in progress eg HELAA, SFRA, Retail and Leisure Study, and still more will be undertaken as preparation of the plan progresses through future iterations. This evidence base and the outcome of consultation with statutory bodies and local communities will inform the proposals and policies as they are drafted and refined throughout the plan preparation process.
	CPRE		Minimising loss of green belt land should be a priority. Important because this is national policy and also green belt is what makes Hertsmere an attractive place to live. This should be the number one priority and everything else should be viewed in this context.	We agree that the release of green belt should be minimised. The Issues and Options document states that protecting the green belt against inappropriate or unplanned development is a priority. The release of any green belt land for development will only be proposed where alternatives to this approach have first been considered and additional allocations are needed in order to meet identified need and suitable sites have been identified. It is however clear that a range of approaches to locating new development will be required in order to meet, or come anywhere near meeting, identified need.
	Education and Skills Funding Agency		Level of growth anticipated will place pressure on social infrastructure, including education facilities.	The Issues and Options document specifically recognises that housing and economic growth brings with it the need for social infrastructure to be delivered in a timely manner.

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
				The council is committed to working with developers and providers of infrastructure to ensure that this happens and that the infrastructure needed in order to ensure the creation and maintenance of healthy sustainable communities is delivered where and when needed. We will work closely with the Education Authority and with other authorities in and adjoining the SW Herts area to ensure that these needs are properly identified and appropriately met and that all possible sources of funding are identified and engaged. Regular meetings with infrastructure providers and other local authorities in SW Herts in order to facilitate this commence in February 2018.
	Elstree and Borehamwood Town Council		Whilst there is a need for development in the area this should be balanced with the infrastructure capacity, especially with regard to the local transport network, schooling and the provision of quality health services.	The Issues and Options document specifically recognises that housing and economic growth brings with it the need for social infrastructure to be delivered in a timely manner. The council is committed to working with developers and providers of infrastructure to ensure that this happens and that the infrastructure needed in order to ensure the creation and maintenance of healthy sustainable communities is delivered where and when needed. We will work closely with the agencies responsible for infrastructure delivery, including the Highway Authority, bus and rail operators, education authority and providers of health facilities and with other authorities in and adjoining the SW Herts area to ensure that these needs are properly identified and appropriately met and that all possible sources of funding are identified and engaged. Regular meetings with infrastructure providers and other local authorities in SW Herts in order to facilitate this commence in February 2018.
	Environment Agency		<p>1. Disagree with aim to minimise flood risk – should be to reduce flood risk.</p> <p>2. Would like to see increasing water efficiency as a priority. Hertsmere is classified as being under sever water stress. New development should take advantage of new water saving technologies to ensure the most efficient use of water resources.</p> <p>3. Agree with aim to support the protection and enhancement of biodiversity and encouragement and expansion of the green infrastructure network. Want to see this expanded to include rivers. Enhancing and protecting rivers would support and deliver the recommendations within the Hertsmere Green Infrastructure Plan (2011). Text should read ‘supporting the protection and enhancement of biodiversity and the borough’s watercourses.’</p>	<p>1. The comment is noted and will be taken into account in drafting relevant text and policies for consultation in future iterations of the draft plan.</p> <p>2. The comments are helpful and will be taken into account in drafting relevant text and policies for consultation in future iterations of the draft plan.</p> <p>3. The comments are helpful and will be taken into account in drafting relevant text and policies for consultation in future iterations of the draft plan. The Issues and Options document states that priorities for the new local plan include supporting the protection and enhancement of biodiversity and encouraging the provision of an expanded green infrastructure network.</p>
	HCC Environment Department		<p>1. Support. – particularly the priority to ensure that all new homes are built in places where there are or will be roads, schools, cycle routes, shops and other services and facilities nearby. More clarity would be required regarding any new road building as HCC’s draft Local Transport Plan (LTP4) ‘seeks to manage a transition away from a focus on highway capacity improvements and prepare the local transport system for a period of significant change enabled by technological advances’. Hertsmere should deliver its 4 priorities by improving public transport accessibility. New developments should be no further than 400m from bus stops. Developer contributions should be sought to pump prime new and improved bus services and facilitate pedestrian and cycling accessibility. Parking should be limited to reduce reliance in areas which have good access to sustainable modes.</p> <p>2. ‘Creating a better environment priority’ should include reference to pollution and carbon emissions. ‘Connecting people better’ priority should include reference to safety and security. The reference to encouraging good design should be for all development, not just public spaces. Supporting the building of greener more energy efficient homes should include reference to landscaped environmental solutions eg SuDS, rain gardens, reed beds, permeable surfaces etc. Should be specific reference to conservation and enhancement of landscape character and quality and protection and enhancement of the borough’s valued landscapes.</p> <p>3. Herts Ecology supports the priority to ‘help create a better environment’. There is no reference to importance of supporting farming or farming</p>	<p>1. The support is welcomed. The recent LTP4 consultation is acknowledged, and we agree with the overarching aim of increasing the use of sustainable modes of transport relative to use of the private car. Our response to this consultation has, however, pointed out that constraints on the location of new development may mean that highway capacity improvements may be required in certain locations in order to facilitate required growth and that specific schemes may come forward through the local plan and the growth and transport plan processes. We agree that improving accessibility to public transport should form an integral part of the development management process as it already does through policies in our adopted local plan. However alongside this, HCC needs to ensure that appropriate public transport infrastructure and services are identified and provided through a range of delivery mechanisms.</p> <p>2. The comments are noted and will be considered as future iterations of the draft plan are prepared for consultation.</p> <p>3. The support is welcomed. The comments are noted and will be considered as future iterations of the draft plan are prepared for consultation.</p>

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			enterprises which may help to contribute to achieving objective of maintaining landscape and biodiversity resources by providing sustainable land management practices.	
	Historic England		Agree but should use the term 'historic environment' rather than 'buildings and places' throughout.	Comment noted. We will look at this when preparing future iterations of the plan for consultation.
	Radlett Society and Green Belt Association		Welcomes the plan for 'affordable homes for local residents'. But how will this work in an open housing market? Planning for new schools and health facilities is high priority. Priorities would be better stated in a clear, more direct and jargon-free language, to avoid simply being a list of good intentions.	The comments are noted. With regard to affordable homes, it is acknowledged that this is an issue in a high cost area such as Hertsmere. Local authorities have been heavily constrained in their ability to provide new social housing and do not have direct control over rental levels unless they build the affordable homes themselves. Hertsmere is considering this but due to the complex nature of setting up this sort of arrangement will not be an immediate possibility. The council will however be able to ensure that occupancy of the affordable units provided is restricted to eligible households in housing need. This is an issue at which we need to look further.
	Ridge Residents Association		Agree	The support is welcomed
	TCT Trust		Disagree. Would list existing traffic and infrastructure issues which will all be exacerbated by the building of further housing. Green belt will need to be sacrificed to reap the benefit of a new settlement.	The comments are noted.
Part 2 About your borough and the planning issues it faces				
3 Housing Need				
<i>Do you agree that the Council should aim to meet the actual level of housing need (600 homes per year) we have identified above?</i>				
	Aldenham Parish Council		Question whether the figure is robust and what are the implications of the proposed Government standardised formula for establishing OAN?	The evidence base for this new local plan includes a SHMA undertaken jointly with other SW Herts authorities in 2016, which indicated an OAN of 599 dwellings per annum for Hertsmere. The Government's now published 'standardised' OAN produces a lower figure of 444 dwellings per annum but this excludes any buffer which is likely to take the figure over 500 units. However, further changes to the methodology are now planned. Nevertheless, it is likely that a housing target significantly in excess of the currently adopted 266 pa will need to be adopted in the new local plan.
	LB Barnet		Support strategy to make provision for meeting full OAN for homes and jobs.	The support is welcomed
	Colney Heath Parish Council		Government standardised methodology calculation for Hertsmere is 372 homes pa. Should reduce OAN to this figure. No need for major development in the green belt – areas with existing infrastructure can accommodate this need with minor settlements expansion or densification.	The figure of 372 published at the time by government benefited from a cap which was removed in January 2018 when the Core Strategy reached its 5 th 'birthday'. The Government's now published 'standardised' OAN produces a lower figure of 444 dwellings per annum but this excludes any buffer which is likely to take the figure over 500 units. However, further changes to the methodology are now planned. Nevertheless, it is likely that a housing target significantly in excess of the currently adopted 266 pa will need to be adopted in the new local plan. Even with a reduced OAN, it cannot be said at this stage that these needs could be met within the built up area or minor extensions to existing settlements. It must also be borne in mind that the provision of infrastructure to support new development will be more difficult with a more dispersed pattern of smaller developments.
	CPRE		Calculation of OAN is policy off. This is a starting point. Council's target must take constraints into account and can be lower than OAN. Plan should not aim to meet the 'actual level of housing need'.	The council has indicated that the aim is to meet the identified level of housing need, but given constraints on the availability of suitable sites (including green belt constraints) this may not be possible. The housing target can only be set once inter alia further work on the evidence base – including green belt stage 2 assessments – has been undertaken, and sites and areas put forward for development have been assessed for suitability through the process set out in our published HELAA methodology.
	Elstree and Borehamwood Town Council		Ideally there should be some form of ring fencing to help local people find homes near their families.	The comment is noted. The issue of local affordability of housing, particularly for young people wanting to get on the housing ladder is recognised but difficult to successfully address given the planning definition of 'affordable' housing and the constraints on local authorities as providers of social housing. This is an issue with which we will continue to engage.
	Environment Agency		Can this level of growth be accommodated within the existing infrastructure framework, particularly in relation to water supply and waste water treatment capacity? What measurers (ie phasing, investment etc) need to be in place to support this level of growth?	We are aware that development will need to bring with it the necessary infrastructure and that capacity to support growth will either need to exist, or to be provided in order to enable new development to proceed. Discussions have begun with infrastructure providers including Thames Water and the Environment Agency and will be on-going throughout the

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				process of preparing the new local plan in order to identify the measures that will be required in order to support the level of growth proposed.
	Greater London Authority		Welcomes the council's consideration of broad options to meet the identified housing need. Cooperation with neighbouring authorities in relation to meeting overall housing need within the HMA is required.	The support is noted. The council is engaged in on-going discussion with other authorities within and adjoining SW Herts with regards to meeting the housing need arising within the HMA.
	HCC Public Health Service		Quality and affordability of housing can determine the health of residents – good quality affordable homes are associated with numbers positive health outcomes. Housing must be high quality, affordable, accessible.	The comment is noted. Hertsmere commissioned a SHMA (and will also commission an update) jointly with other authorities in the housing market area in order to identify the full housing needs arising in the area. The Issues and Options vision includes for new homes to be built with good facilities in easy-to-reach places, along with the social and physical infrastructure needed to support this growth.
	HCC Environment Department		<p>1. Support meeting actual level of housing need where the appropriate improvement to services and infrastructure for public transport users, cyclists and pedestrians are made.</p> <p>2. Hertsmere should be looking strategically at housing provision across a wider area and work proactively with its neighbours in assessing future housing need.</p>	<p>1. The support is welcomed. The Issues and Options vision includes for new homes to be built with good facilities in easy-to-reach places, along with the social and physical infrastructure needed to support this growth.</p> <p>2. Consideration is being given to the production of a joint strategic local plan for the SW Herts area which would address matters including the meeting of housing need across the area..</p>
	Historic England		No view on figure but impact on historic environment is important. Allocation of housing sites should be in sustainable locations, of appropriate densities and character. Capacity for area to accommodate new housing development whilst maintaining its historic environment should be a key consideration so that quality and character of neighbourhoods, town and villages is conserved. Need to ensure sites and locations can accommodate new housing without undue harm to heritage assets and settings.	The comments are helpful and are consistent with policies in the current local plan, many of which will most likely be carried forward with or without amendments into the new plan. A robust assessment of all sites being considered as having potential for development will be undertaken with a view to ensuring inter alia that those selected are appropriate in terms of the relationship with and impact on the borough's environment, and that they will not cause harm to existing environments and wherever possible will secure improvements.
	House Builders Federation		<p>Council should plan for significantly more than 600 dwellings per annum.</p> <p>1. Cap on Government's standard methodology will come off January 2018 (local plan 5 years old).</p> <p>2. Affordability ratio has worsened since SHMA – from 10.98 to 15.13 (lower quartile)</p> <p>3. Hertsmere should work closely with HMA local authorities to ensure effective delivery of OAN across the HMA. Should also consider meeting unmet needs from outside the HMA (particularly London).</p>	<p>1. The figures in the Issues and Options document are ballpark figures based on the 2016 SHMA which is a robust technical study. This study will be updated as part of the preparation of the new local plan, in the context of most recent ONS projections and the final agreed methodology used by government.</p> <p>2. The SHMA included consideration of market signals and an allowance for this has been made in the currently identified OAN. However it is recognised that simply increasing the target for the number of dwellings to be delivered will not necessarily improve affordability for local people – it may serve at least in part to make the area more attractive to people moving in from areas such as London or seeking investment opportunities, serving once again to increase prices locally.</p> <p>3. The council is engaged in on-going discussion with other authorities within SW Herts, including with regards to meeting the housing need arising within the HMA. Hertsmere is committed to working closely with partners in the SW Herts groups of authorities (the HMA). Our technical studies are produced jointly with other authorities in the SW Herts grouping and early discussions concerning the possibility of producing a strategic level local plan covering cross boundary strategic issues and allocations are under way. It is likely that this would include the identification of levels of housing need, consideration of targets, and how these are to be delivered across the area.</p>
	Letchmore Heath Village Trust		To meet number of houses required a new garden village is the most attractive, probably essential option.	The support is welcomed.
	Radlett Society and Green Belt Association		There is no end to housing demand. Need to look at how many homes could be built within green belt constraints – this would be reasonable and fair approach, and also achievable. Even neglected overgrown green belt fulfils the key purpose of openness.	<p>We are required by the NPPF to boost significantly the supply of new homes by (among other things) using our evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. So the clear intention is that full OAN should be met, although it is recognised that there may be circumstances where this is not possible. The council would wish to follow this approach but recognises there are significant constraints to development, including the green belt.</p> <p>In line with the Planning Practice Guidance 'Housing and economic land availability assessment' we have assessed all potential sites put forward through the Call for Sites or in response to this Issues and Options consultation against our published HELAA methodology in order to judge their suitability for development. At this stage, it is not possible to comment on the extent to which OAN (whatever that figure eventually is defined</p>

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				as) can realistically be met and what target will actually be set.
	Ridge Residents Association		Agree.	The support is welcomed.
	St Albans City & District Council		It is appreciated that publication of the Government's consultation draft standard housing need methodology came at a similar time to the consultation going live and that it is only a consultation. However HBC's housing need assessment is not sufficiently robust because it does not address the higher levels of need suggested by the Government methodology.	As acknowledged in the SADC response, the Issues and options document was largely prepared prior to the publication of the government's consultation draft standard housing need methodology. The figures used in the Issues and Options document were those identified through the 2016 SHMA that was undertaken jointly with Dacorum, Three Rivers and Watford councils and identified housing need arising within the HMA and relevant figures for each local authority. It is considered that this was a robust piece of work; an update of the SHMA will be commissioned in the light of the latest ONS projections and the Government's published standard housing need figure once available. The currently published draft standard figures and formulae are open to interpretation and are of course only draft. Whilst Hertsmere's published standard need figure is 372 it is acknowledged that this will increase as the cap for local plans under 5 years old is removed January 2018; we anticipate that similar levels of need to the 600pa referred to in the Issues and Options document will be identified, but they could also increase – perhaps to around 700pa. This will be taken into account in identifying sites and areas for development, and in cross boundary discussions with neighbouring authorities concerning the meeting of need arising within the HMA. The Issues and Options document specifically referred to the standard method for calculating housing need and indicated that when finalised it may result in some changes to the level of housing need identified for Hertsmere, and that housing requirements in the borough will need to reflect the standard methodology.
	Shenley Parish Council		<p>1. Have you challenged Central Government's demand for local authorities to deliver so many houses given how much green belt there is in Hertsmere? There are lots of areas of green belt which could be developed as they are non-viable eg turnout fields etc at Patchett's now that the equestrian centre is being redeveloped.</p> <p>2. Brexit – do we actually need so many homes?</p> <p>3. Have you looked at the possibility of a new garden city being built to serve the growth needs of the wider Hertfordshire area – on one of the main train routes and using a smaller overall amount of green belt?</p> <p>4. Why are you proposing so many homes when the government only requires 372pa?</p>	<p>1. We are required by the NPPF to boost significantly the supply of new homes by (among other things) using our evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. Constraints, including green belt, will affect the final target that we decide on, but if this target is lower than our OAN this will have to be robustly defended. The assessment of all potential sites and areas for development will include how well they perform in relation to green belt purposes.</p> <p>2. We are unable at the local authority level to assess what the impact of Brexit might be. The housing figures to which we will eventually have to work will be those issued by the government following the recent consultation and any further local detail that emerges through an update to our SHMA.</p> <p>3. The South West Herts authorities are working together on strategic cross boundary issues and have recently started to discuss the potential for producing a strategic level spatial plan. The scope of this work is still being discussed and neither this nor the content of such a document has yet been agreed.</p> <p>4. The figure of 372 is the government's figure contained in the consultation document they published in 2017. Whilst Hertsmere's current standard need figure is 372 it is acknowledged that this will increase as the cap for local plans under 5 years old is removed (January 2018); we anticipate that similar levels of need to the 600pa referred to in the Issues and Options document will be identified, but they could also increase – perhaps to around 700pa.</p>
	Shenley Neighbourhood Plan Steering Group		<p>1. How has the figure of 9000 homes been arrived at?</p> <p>2. Have you challenged Central Government given how much green belt there is in Hertsmere? There are lots of areas of green belt which could be developed as they are non-viable eg turnout fields etc at Patchett's now that the equestrian centre is being redeveloped.</p>	<p>1. The figures used in the Issues and Options document were those identified through the 2016 SHMA that was undertaken jointly with Dacorum, Three Rivers and Watford councils and identified housing need arising within the HMA and relevant figures for each local authority. It is considered that this was a robust piece of work; an update of the SHMA will be commissioned in the light of the latest ONS projections and the Government's published standard housing need figure once available.</p> <p>2. We are required by the NPPF to boost significantly the supply of new homes by (among other things) using our evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. Constraints, including</p>

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			3. Brexit – do we actually need so many homes?	green belt, will affect the final target that we decide on, but if this target is lower than our OAN this will have to be robustly defended. The assessment of all potential sites and areas for development will include how well they perform in relation to green belt purposes. 3. We are unable at the local authority level to assess what the impact of Brexit might be. The housing figures to which we will eventually have to work will be those issued by the government following the recent consultation and any further local detail that emerges through an update to our SHMA.
	Transport for London (Commercial Development)		Should seek to meet full objectively assessed needs for market and affordable housing (NPPF para 14 and 47). Should take into account new standardised method. Should consider setting target that exceeds OAN in order to provide the flexibility to adapt to rapid change (as per NPPF para 14).	We are required by the NPPF to boost significantly the supply of new homes by (among other things) using our evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. The NPPF does not require local authorities to deliver above their OAN.
	Welwyn Hatfield Council		1. Supports proposed figure for starting point for exploring potential growth options and supports Hertsmere seeking to meet its own growth needs. Supports Hertsmere revisiting OAN assessment once the government has issued its finalised methodology for calculating OAN. 2. Formally request that as Hertsmere proceeds with preparation of a new plan it give consideration to whether it is in a position to meet some or all of the Welwyn Hatfield's unmet housing needs.	1. The support is welcomed. 2. A Memorandum of Understanding between the two authorities (May 2017) committed us to working together to explore where opportunities exist to accommodate any of the Welwyn Hatfield shortfall against its objectively assessed need within and beyond the plan period. This matter will continue to be addressed in the context of our DtC responsibilities.
4 Affordable Homes <i>Do you agree that we should continue with our requirement for 35-40% of new homes to be provided as affordable housing?</i>				
	Aldenham Parish Council		Agreed; council should insist on this provision, especially on larger sites.	The support is welcomed.
	Colney Heath Parish Council		A laudable ambition if achieved.	The support is welcomed.
	CPRE		Council should look for other ways to boost affordable housing than just increasing overall supply. Should promote direct provision of social and affordable housing. See papers produced by Ian Mulheirn, Oxford Economics on national housing shortage and relevance to areas of high housing demand such as here. Conclude that building more houses on the scale identified will have no impact on affordability or access to housing by local households.	The comment is noted. Local authorities have been heavily constrained in their ability to provide new social housing and do not have direct control over rental levels unless they build the affordable homes themselves. Hertsmere is considering this but due to the complex nature of setting up this sort of arrangement is not likely to be able to deliver any significant numbers of homes in the near future.
	House Builders Federation		Level set too high – Hertsmere has only achieved 26% affordable housing (Annual Monitoring report 2013/14) – full costs of policies must be taken into account in setting the level of affordable housing required (eg self-build, technical requirements, infrastructure requirements).	Given the affordability issues in the borough it is crucial that the maximum level of affordable housing possible be achieved in order to help address the housing the needs of the local community, although it is accepted that homes provided as affordable housing for planning purposes are still in many instances out of reach of the majority of those needing help to get onto the housing ladder locally. The local plan will be viability tested once it reaches a later stage of its production. The recent DCLG consultation Planning for the Right Homes in the Right Places included questions on restricting the ability of applicants to challenge viability on a scheme by scheme basis where sites have been allocated through a local plan and viability tested at that stage. If these proposals are taken forward this should improve the ability of local authorities to ensure delivery of an appropriate amount of affordable housing on allocated sites.
	HCC Public Health Service		Agree current affordable housing requirements should continue but should identify affordable housing in a way which is integrated, affordable for groups with specific needs, encourages social connectivity and has equitable access to green/open space. The provision of diverse housing types and affordable rental housing should also be considered.	The affordable housing SPD sets out our current policy with regard to variation in the types of affordable housing which should be provided, and current policies do require homes to be tenure blind and to meet all the criteria for good design that any other housing would be required to meet; this approach would be continued in the new local plan. Inclusion of the specific points suggested will be looked at when future iterations of the draft plan are being produced for consultation. The definition of affordable homes for planning purposes is set out in the NPPF, and sets the maximum cost at 80% of that achievable in the market. In a high cost area such as Hertsmere this is still out of reach of many local people. Local authorities do not have direct control over this unless they build the affordable homes themselves. Hertsmere is considering this but due to the complex nature of setting up this

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				sort of arrangement is not likely to be able to deliver any significant numbers of homes in the near future.
	Historic England		Supports provision but does not advocate a specific percentage.	The support is welcomed.
	Radlett Society and Green Belt Association		Advocate the provision and retention of smaller 2-4 bedroom homes - for downsizers and starter families. There is now a deficiency of affordable homes in Radlett and the market effectively prevents further creation due to high land values. Developers have avoided providing affordable units (viability). The current proposals do not state exactly how the Council will 'require' developers to respect this particular need; if it does not work for small sites, why should it work on larger ones?	Ensuring the provision of homes which are genuinely affordable is a difficult issue, particularly given the very limited extent to which the local authority can itself either provide or control the cost of houses. The definition of affordable homes for planning purposes is set out in the NPPF, and sets the maximum cost at 80% of that achievable in the market. In a high cost area such as Hertsmere this is still out of reach of many local people. We are aware that developers have in some cases used the viability argument to avoid providing affordable units; where large sites are identified in the new local plan the site requirements can be set out clearly from the start, meaning that they must be taken into account in the financing arrangements for any proposed development.
	Ridge Residents Association		Agree.	The support is welcomed.
5 Self-build homes				
<i>Do you agree that land within larger developments should be available for up to 10% of homes to be self-build properties?</i>				
	Aldenharn Parish Council		Where is the evidence that this is required?	The Government is keen to promote self-build housing through policies in local plans. As required by government regulations, the council maintains a Self-Build Register and this provides evidence of demand. Levels of demand indicated are not currently particularly high but the initiative is relatively new and demand may increase as it becomes more widely known. We will keep this under review as work on the new local plan progresses.
	Colney Heath Parish Council		You provide no evidence of demand.	The Government is keen to promote self-build housing through policies in local plans. As required by government regulations, the council maintains a Self-Build Register and this provides evidence of demand. Levels of demand indicated are not currently particularly high but the initiative is relatively new and demand may increase as it becomes more widely known. We will keep this under review as work on the new local plan progresses.
	Radlett Society and Green Belt Association		The Radlett Society has no strong views either way but would point out the impracticality of administering such quotas for self-builders. Obviously, self-build dwellings would require full planning consent, but with the appeals process as it is, there is no guarantee that the results would be in keeping with the general design and style of the majority of the approved dwellings.	The comments are noted.
	Ridge Residents Association		Agree.	The support is welcomed.
6 Gypsies, Travellers Travelling Showpeople				
<i>How should we meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople?</i>				
	Aldenharn Parish Council		Sites should be considered as & when needs arise.	The comment is noted. The council has a duty to provide pitches to meet the accommodation needs of gypsies and travellers falling under the planning definition. The recently-published Gypsy and Traveller Accommodation Assessment assesses levels of need in the borough. Proposed allocations will be included in the new local plan; when possible sites have been identified they will be included in future iterations of the draft plan for consultation.
	Colney Heath Parish Council		Colney Heath already provides a disproportionate number of pitches in St Albans so any pitches in Hertsmere should be away from Colney Heath area.	The comment is noted. The council has a duty to provide pitches to meet the accommodation needs of gypsies and travellers falling under the planning definition. The recently-published Gypsy and Traveller Accommodation Assessment assesses levels of need in the borough. Proposed allocations will be included in the new local plan; when possible sites have been identified they will be included in future iterations of the draft plan for consultation.
	Environment Agency		Caravans, mobile homes and park homes are classed as 'highly vulnerable' and are not appropriate in FZ3a or 3b. Their use in FZ2 is only appropriate if they have passed the sequential and exception tests	The comment is noted. Identification of potential sites will be consistent with the requirements of the NPPF.
	National Federation of Gypsy Liaison Groups		1. Provision should be made to meet the assessed need as a minimum and the level of need should be regularly reviewed. Provision should be made by a combination of site allocations and windfall sites arising through the process of planning applications. Therefore there needs to be 2 elements to the policy;	1. The comment is noted. The council has a duty to provide pitches to meet the accommodation needs of gypsies and travellers falling under the planning definition. The recently-published Gypsy and Traveller Accommodation Assessment assesses levels of need in the borough. Proposed allocations will be included in the new local plan; when

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			<p>firstly site allocations and secondly criteria to set out how and where planning applications will be favourable considered.</p> <p>2. It is clear from other comments already posted that the criteria for acceptability must allow for sites well away from existing settlements as sites within or near to settlements will be vigorously opposed by the settled community.</p>	<p>possible sites have been identified they will be included in future iterations of the draft plan for consultation. The current local plan includes both a criteria based policy and site allocations and it would be anticipated that this approach will be continued in the new local plan.</p> <p>2. In order to comply with PPTS 2015 and the need to promote sustainable development, sites should not be located far away from other settlements. Where new sites are being identified this is likely to be in conjunction with allocations for other types of new development rather than being 'grafted on' to existing residential areas.</p>
	Welwyn Hatfield Council		Recent Gypsy and Traveller Accommodation Needs Assessment Sept 2017 should be discussed as part of future DtC discussions. Assessment should take account of the need for residential pitches to be created to meet the need arising from the existing South Mimms transit site.	The comment is noted. Provision for gypsies and travellers will continue to be a matter for joint discussion between our authorities. With regard to the 2017 study, need for pitches arising from South Mimms has been included in the calculation of total need for new pitches.
7 Other housing need <i>How should we meet other types of needs, including housing for the elderly?</i>				
	Aldenham Parish Council		Support. Should be a needs analysis for each settlement. Provide a range of accommodation, well located in relation to town centre, nearby accommodation for support workers.	The support and suggestions are noted. Consideration will be given to establishing criteria for a preferred mix, tenure and type for this type of accommodation to help ensure it meets local needs. This becomes more important with increasing life expectancy and a growing proportion of the population being elderly and potentially requiring more care. We will welcome input from APC in relation to local housing needs as the preparation of the plan progresses.
	Colney Heath Parish Council		Should provide 2 and 3 bedroom housing to meet the needs of young in starter homes and older people as they downsize.	The comments are noted.
	Environment Agency		Residential institutions are classed as being 'more vulnerable' and are not appropriate in FZ3b. Their use in FZ3a is only appropriate if they have passed the sequential and exception tests.	The comment is noted. Identification of potential sites will be consistent with the requirements of the NPPF.
	HCC Environment Department		It will be important to support the social inclusion of elderly people through improvements to public transport and community transport services. Development contributions will be sought to deliver these enhancements.	The comments are noted.
	Radlett Society and Green Belt Association		Should provide bungalows, because these fulfil a useful purpose for the elderly and can be built in high densities and still retain a good degree of privacy. Another factor is the relative difficulty, due to adverse market conditions, for some older residents to downsize their home and perhaps free-up a larger property; brownfield sites near local services should be identified for the purpose.	The comments are welcomed and will be taken into account in developing policies and proposals for consultation as the plan progresses.
	Ridge Residents Association		Perhaps warden-controlled/assisted living properties could be built in smaller villages to keep local residents in their communities and or smaller properties to allow for downsizing.	The comments are welcomed and will be taken into account in developing policies and proposals for consultation as the plan progresses.
	Shenley Neighbourhood Plan Steering Group (and post it notes from public meeting)		We need sheltered/over 50s housing.	The comments are welcomed and will be taken into account in developing policies and proposals for consultation as the plan progresses.
	Transport for London (Commercial Development)		Council should consider how it can enable and encourage provision of good quality, well managed private rented housing (build to rent) to meet local needs.	The Government's response to its recent consultation on Build to Rent will be incorporated in changes to the NPPF to be published this year. We will consider whether this has relevance for the local plan once the Government's proposals are available.
8 Jobs <i>Do you agree that we should plan for this level of new jobs (9,000 new jobs over 15 years) to support business creation and meet the employment needs of an increasing population?</i>				
	Aldenham Parish Council		<p>1. Agree, but where is the evidence for this level of need locally?</p> <p>2. Hertsmere should consider encouraging the establishment of sector hubs.</p>	<p>1. The support is welcomed. The SW Herts Economy Study 2016 identified the level of need for jobs in each of the partner authority areas; the study will be updated as part of the process of building the evidence base for the new local plan.</p> <p>2. The creation of sector hubs is an interesting idea; it would however fall under the council's Economic Development function rather than the Local Plan.</p>
	Colney Heath Parish Council		Little evidence to support this. It seems a way to demand excessive housing building in the green belt.	The evidence is contained in the Economy Study 2016 that Hertsmere commissioned jointly with Watford, Three Rivers and Dacorum councils. The study will be updated during the

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				process of preparing the new local plan. The level of jobs forecast is closely linked to the number of houses required and the SHMA and Economy studies were carried out in tandem. It is, however, the case that the conclusions of the Economy Study did not drive the outcome of the SHMA: it was concluded that the preferred future jobs scenario did not require uplift in the objectively assessed housing need in order to provide a balance between the two.
	Dacorum Borough Council		Final decisions on employment land requirements need to take account of future updates to the SW Herts Economy Study. Numbers should reflect the Local Plan period (the Economy Study says 13800 jobs between 2013 and 2036. The numbers in the study should be seen as a starting point. The distribution of B class land allocations across SW Herts should be planned strategically.	A review of the SW Herts Economy Study and further discussion with our SW Herts partners, including in relation to strategic planning matters, will inform the allocation of sites in the plan. Consideration is currently being given to the SW Herts authorities (including Hertsmere) producing a joint plan dealing with strategic issues which would most likely include consideration of strategic employment allocations.
	Environment Agency		Can this level of growth be accommodated within the existing infrastructure framework, particularly in relation to water supply and waste water treatment capacity? What measures (ie phasing, investment etc) need to be in place to support this level of growth?	We are aware that development will need to bring with it the necessary infrastructure and that capacity to support growth will either need to exist, or to be provided in order to enable new development to proceed. Discussions have begun with infrastructure providers including Thames Water and the EA and will be on-going throughout the process of preparing the new local plan in order to identify the measures that will be required to support the level of growth proposed.
	Greater London Authority		May be useful to explore relevant economic linkages with London and to consider the potential role of the district in the wider market area for industry and logistics provision.	A review of the SW Herts Economy Study and further discussion with our SW Herts partners will inform the allocation of sites in the plan. The relationship with London will be taken into account as part of these considerations.
	HCC Environment Department		<p>1. Local plan should support provision of jobs in accessible locations and require improvements in public transport connectivity as part of any redevelopment of existing employment sites. Developer contributions to enhance access by non-car modes should be required. Travel Plans should be required, including improvements to public transport, walking cycling and car sharing, car park management local recruitment, flexible working, financial incentives and promotion. New employment areas should be located where there is good transport access.</p> <p>2. Employment in the area which could reduce the need for travel particularly to work in the north London boroughs is welcomed.</p> <p>3. Any change of use from employment to residential use within key employment areas should only be achieved through proactive planning processes.</p>	<p>1. The comments are noted. The priorities set out in the Issues and Options document indicate that the local plan will help people in Hertsmere connect better by planning for better public transport, cycle and pedestrian routes and other sustainable transport initiatives. We agree that improving accessibility to public transport should form an integral part of the development management process as it already does through policies in our adopted local plan. However alongside this, HCC needs to ensure that appropriate public transport infrastructure and services are identified and provided through a range of delivery mechanisms.</p> <p>We agree with the principle of providing jobs in accessible locations. As with housing, however, constraints on the location of new development may mean that new locations have to be considered, in order to facilitate required growth. Such areas may need investment in order to render them accessible – both through developer contributions and potentially other sources of investment as well. It is important that housing and employment growth are considered together in order to limit the need for commuting and the potential for creating 'dormitory' settlements where it is difficult for attractive, healthy communities to develop. We envisage that specific schemes may come forward through the local plan and the growth and transport plan processes.</p> <p>2. The support is welcomed</p> <p>3. This could need the introduction of Article 4 Directions. This matter is under consideration.</p>
	Heath Ways Residents' Association		Further businesses should be accommodated in 'Parks' and areas less attractive for housing. Junction of M25 / A1M could be appropriate although there is traffic congestion here.	The comment is noted and will be taken into account when locations for employment development are being considered in future iterations of the plan.
	Radlett Society and Green Belt Association		9000 jobs seems high and will have impact on highways and public transport. Need improved transport facilities and employment locations within easy reach. Support improved cycle network linking rail stations, schools and centres of employment.	The figure of 9000 has been identified through a robust Economy Study undertaken jointly with neighbouring authorities, and in conjunction with the SHMA (to ensure homes and jobs targets are coordinated). We agree that the location of new employment facilities and transport links to them is an important consideration. We also agree with the need to improve cycle links as suggested. The support for this is welcomed.
	Ridge Residents Association		Agree.	The support is welcomed.

9 Retail and Shopping

*Do you agree that we should maintain a high level of retail and services within the borough's shopping centres and local parades?
What other uses may be considered appropriate in these areas?*

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	Aldenham Parish Council		Residents have changed the way they shop; should consider more collection points or distribution centres rather than stores. Also consider hubs where services such as health, libraries, CAB etc are in one place.	The council has recently commissioned, jointly with neighbouring authorities, a Retail and Leisure study that will help to inform the local plan. Changing shopping behaviour and how best the local authority can respond to this is one element of the study. Co-locating services is a matter mainly for those services involved but sites could be allocated where the evidence points to need/opportunities to do so. Policies supporting this approach can be included in the plan (and in fact already to some extent are in the adopted plan).
	Colney Heath Parish Council		Colney Heath parish residents would only use those in the ill needed garden village.	The comment is noted but its meaning is not clear.
	HCC Environment Department		1. Retail and shopping facilities should be provided in the borough's shopping centres and should be accessible by all modes of transport. Support planning for economic development and regeneration of the borough's shopping centres and local parades to reduce the need to travel longer distances for these services. 2. Mixed use and residential development in main employment areas including town centres should be very carefully considered so as to avoid adverse impacts on travel need, car dependency and social inequalities in access to employment.	1. The Issues and Options document identifies ensuring our shopping centres can continue to grow and thrive as a priority. The support is welcome. 2. The comment is noted.
	Historic England		Agree. This will help conserve and protect the character of retail places – will maintain and enhance vitality and vibrancy by creating active street scene and characterful streets. 2.Other town centre uses that increase footfall.	The support is welcomed and comments noted.
	Ridge Residents Association		Agree	The support is welcomed.
10 Community facilities <i>What community facilities or local infrastructure improvements do you think should be given priority?</i>				
	Aldenham Parish Council		For Aldenham, a medical hub, improved Harper Lane bridge, extended car parks (including at railway stations), nursery/day care facilities, a lift at the railway station and a secondary school.	These suggestions are noted and will be considered as part of the process of preparing future iterations of the new plan. They all require the involvement of other agencies who would be responsible for their provision so will be raised in the context of future discussion with relevant bodies as work on the plan progresses. We will work closely with the agencies responsible for infrastructure delivery, including the Highway Authority, Highways England, bus and rail operators, education authority and providers of health facilities and utilities to ensure that infrastructure needs are properly identified and appropriately met and that all possible sources of funding are identified and engaged. Regular meetings with infrastructure providers and local authorities in SW Herts (including Hertsmere) in order to facilitate this commence in February 2018.
	Borehamwood Islamic society		Would like permanent premises in Borehamwood to allow them to serve Muslim and wider community of Elstree and Borehamwood. Enable them to expand and provide enhanced community offerings including for women, children, and interfaith activities. 'We are determined to contribute to and enhance the social fabric of the entire community of Elstree and Borehamwood.'(signed by 74 people).	This representation is welcomed. The provision of facilities for faith based communities is already supported in the adopted local plan, particularly where the opportunity for shared use may exist. The Islamic Society's continued search for community premises is noted and will be taken account of in drawing up future iterations of the local plan. The opportunity for the allocation of sites for new provision may particularly exist where significant areas of new development are proposed. However this should not deter the Society from continuing to seek premises in the interim as the possibility of and timescale for provision in this context cannot be assured at this time.
	Colney Heath Parish Council		Colney Heath parish residents would only use those in the ill needed garden village.	The comment is noted but its meaning is not clear.
	Education and Skills Funding Agency		Hertsmere's expression of commitment to ensuring that supporting infrastructure, including schools, is invested in and provided alongside homes is supported by ESFA. The plan should identify specific sites to deliver the school places needed to support the chosen growth strategy. Requirement for delivery of new schools to support housing growth should set out and include when needed, site area, site characteristics, need for safeguarding additional land for future expansion. Good Practice example – Milton Keynes Preferred Option policy CC7. Plan needs to make clear that development will be required to contribute to land and construction costs for new or expansions to schools to meet the need generated by the development. But policies also need to retain	This comment/advice is welcomed and will assist the council when drafting relevant policies and site requirements for education provision in the new plan.

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			flexibility to determine requirements at application stage so proposals can be based on the most up to date data on need.	
	Environment Agency		Would like to see priority given to improving the green space, green corridors and water environment of Hertsmere. This has multiple benefits for health, amenity, ecology and water quality. Have provided a list of projects for improving river health and resilience and contributing to achieving 'good' status under the WFD (EA and local authorities required to improve the quality of the UK's watercourses by 2025). None of Hertsmere's watercourses currently achieve 'good'. Strongly encourage the identified schemes to be included as a priority within the Local Plan.	The comments are noted and we agree that such improvements have multiple benefits and should be a priority. This will be taken into account in drafting future iterations of the plan for consultation. Consideration will also be given to how best to achieve the improvements to watercourses suggested and further discussions will be undertaken with the EA. Discussions with infrastructure providers including the EA in relation to accommodating the scale of growth anticipated across the wider area are also under way on a SW Herts wide basis.
	HCC Property (Development Services)		<p>1. <u>Youth Connexions</u>: there is no mention of facilities specifically for young people and children. This needs to be included, particular for young people and will be important if 35 to 40% of housing is to be affordable.</p> <p>2. <u>Libraries</u>: libraries enrich communities and change lives for the better and that they have a critical role in helping people to realise their potential, especially those from disadvantaged backgrounds. Hertsmere libraries function as community hubs offering services and facilities to cater for a range of community needs including those of children, students, job seekers, and the elderly.</p> <p>'Inspiring Libraries' is HCC's strategy for the Library Service up to 2024. The strategy sets out the vision and direction for the service and provides a framework for future decisions about service priorities. The strategy is based on three main themes:</p> <ul style="list-style-type: none"> ○ The library as a vibrant community asset; ○ The digital library; and ○ The library as an enhanced gateway to reading, information and wellbeing. <p>Borehamwood is a Tier 1 library. Bushey, Oakmere and Radlett are Tier 2 libraries. Borehamwood needs to be updated in line with the aspirations of HCC's Inspiring Libraries strategy, with provision of a flexible space that includes modern digital creative technologies for public use. Oakmere Library is the most undersized library in the county and has been identified in the Inspiring Libraries strategy as a priority for replacement.</p> <p>Any increase in populations arising from new housing developments will impact on existing services and will therefore necessitate an increase in library service provision in order to take account of additional demands on the service. We will therefore seek contributions from developers for service improvements appropriate to the scale and nature of proposed developments.</p> <p>The standard charge approach advises that infrastructure required as a result of new development should be provided at a benchmark of 30m2 additional space per 1,000 populations. In 2010, the MLA estimated that the cost of 30m2 of library provision was £105 per person (not including land costs). This included: design costs; build costs; external landscaping; car parking; fitting out of space; initial book stock; and IT.</p> <p>3. <u>Adult Care Services</u>: response sets out priorities for new provision on a town by town basis. In summary this would see an increase in supported living units for learning disability of 69, the creation of 12 units for people with Asperger's and 12 units for people with significant physical disabilities across the Borough. (<i>Site requirements for each type of use provided</i>).</p>	The information provided in HCC's response is all useful input to the process of preparing the new local plan. As proposals for the location and quantum of development in each area are firmed up discussions with HCC will continue in order to ensure that the meeting of infrastructure requirements is an integral and deliverable part of the plan.

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			<p>4. <u>Children's Services (Schools)</u>: The county council welcomes references to new primary provision in the consultation. 9000 dwellings equates to around 18 forms of entry. At primary level the potential requirements are:</p> <p><u>Redevelopment of urban brownfield sites</u> Up to 3 x 2FE primary school sites may be required and/or expansion of existing primary schools where possible.</p> <p><u>New Garden Suburbs</u> The garden suburbs could be more sustainable if they were larger i.e. at least 500 homes.</p> <ul style="list-style-type: none"> • Three suburbs proposed on edge of Potters Bar at approx. 500 homes each (1500 in total) may generate need for 3FE additional provision. The county council's preference would be for the provision of 2 x 2FE primary school sites, to help support growth in the wider area as well as from the new suburbs. . • Three suburbs proposed on edge of Borehamwood at approx. 500 homes each (1500 in total) may generate need for 3FE additional provision. The county council's preference would be for the provision of 2 x 2FE primary school sites to help support growth in the wider area as well as from the new suburbs. • Two suburbs proposed on edge of Radlett at approx. 500 homes each (1000 in total) would generate need for 1 x 2FE primary school • One suburb proposed on the edge of Bushey at approx. 500 homes would generate need for 1FE additional places. Given the lack of identified expansion potential within the town, the county council's preference would be to secure a 2FE primary school site to both accommodate growth from the suburb and support demand in the wider area. <p><u>Growth in Elstree Village and Shenley</u></p> <ul style="list-style-type: none"> • There is no identified expansion potential at Shenley Primary School, but a relocation and expansion could be explored. The proposed level of housing would mean that a second primary school within the village is unlikely to be sustainable or desirable. • There is no identified expansion potential at Elstree. Growth in Elstree may be able to be accommodated at a new primary school located in a western garden suburb, if it is of sufficient size to serve a wider area (see section 8.8), although consideration will need to be given to how accessible the proposed location would be for primary phase pupils. <p><u>Meeting the needs of other Villages</u></p> <ul style="list-style-type: none"> • Without knowing the location and size of housing numbers it is not possible to set out the level of need arising. It may be possible to meet the demand from expansion of existing schools, or through the new school provision, in neighbouring, larger settlements. <p><u>New Garden Village</u></p> <ul style="list-style-type: none"> • 4 x 2FE primary school sites would be required. • A new 8FE secondary school site would be required to serve the village. The county council's preference to date has been to site new secondary schools within, or on the edge of, existing larger settlements. Co-locating some of the primary provision with a new secondary school (i.e. an 'all through' model) may support sustainability. 	

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			Regardless of the approach taken it should be noted that the level of housing proposed will require the provision of new secondary school sites, given the limited capacity of existing schools to expand. Approximately 18FE of additional secondary school places will be needed. Provision for three new secondary schools will need to be made to support the level and distribution of development indicated, serving Borehamwood, the Bushey/Radlett area and Potters Bar and/or a new settlement in the east of the borough respectively. <i>(Education Statement for Hertsmere November 2017 attached to representation).</i>	
	HCC Environment Department		Provision of Green Infrastructure should be prioritised. PPG says GI is important to delivery of high quality sustainable development and should be a key consideration in local plans. Should include a strategic GI policy and should also be embedded across all relevant strategic policy areas such as water management, sustainable transport etc. A GI plan should show existing and proposed GI networks. Should reference the Hertfordshire GI Strategy, Hertsmere GI Strategy and how these translate into local projects. Delivery should be secured through planning obligations and a priority for delivery in IDP.	The comments are noted and the principle is included in the priorities for the local plan set out in the Issues and Options document. Consideration will be given to how best to incorporate this issue into the policies and proposals to be included in the draft local plan as future iterations are prepared for consultation.
	Herts and Middlesex Wildlife Trust		Natural areas which provide habitats for local conservation priorities are vital for people and biodiversity. These habitats should be based on the Herts Ecological Networks Maps for the area, linked to other habitats internally and externally, permeate as well as surround development, and be free from lighting impacts. Opportunities to build biodiversity into development should be encouraged. Features such as integrated bird and bat boxes, SUDS, and water saving/biodiversity features e.g. rain gardens, rills, green roofs should be incentivised. Native tree planting schemes should be applied wherever possible. Habitat creation should be accompanied with appropriate and funded management regimes to ensure in perpetuity delivery of biodiversity benefits.	The comments are noted and will be taken into account in formulating policies and proposals for inclusion in future iterations of the draft plan.
	Hertsmere Community Transport		Support safeguarding of Aldenham Country Park and Reservoir – vital importance to provide green open space with public access, water based leisure facilities. With less open space available with public access, would be a tragic loss to people with mobility issues affecting physical and mental health issues in the community and surrounding communities.	The comment is noted and will be taken into account in formulating policies and proposals relating to leisure and open space provision for inclusion in future iterations of the draft plan.
	House Builders Federation		Surprised at level of infrastructure provision being indicated for smaller developments (100 homes). Need to look at cumulative requirements in an area in consultation with CCG and Education authority. Would expect smaller developments to support infrastructure provision through CIL where there is limited scope for meeting needs on site. Larger sites may have potential for delivering strategic infrastructure on site. Clarity over what is being provided through CIL, and what through S106 needed, Need to ensure does not place undue financial burdens on development.	Consultation on the emerging plan to date has highlighted very clearly that ensuring the provision of necessary infrastructure in a timely manner is a significant concern for local communities. The council intends that the infrastructure requirements for new development will be clearly indicated in the plan. To assist in this it is intended that the next Regulation 18 consultation will be accompanied by an Infrastructure Delivery Plan. We will work closely with the agencies responsible for infrastructure delivery, including the Highway Authority, Highways England, bus and rail operators, education authority and providers of health facilities and utilities to ensure that infrastructure needs are properly identified and appropriately met and that all possible sources of funding are identified and engaged. Regular meetings with infrastructure providers and local authorities in SW Herts (including Hertsmere) in order to facilitate this commence in February 2018. It is recognised that for sites to be deliverable development has to be viable; the local plan will be viability tested once it reaches a later stage of its production.
	Radlett Society and Green Belt Association		Welcome better community facilities for the area. A large community hall for 250-300, additional nursery provision and a larger medical facility are required.	These comments are welcomed and will assist the council when drafting relevant policies and site requirements in future iterations of the new plan for consultation.
	Ridge Residents Association		Speed reductions are needed in and around all rural communities.	The comment is noted. Speed limits themselves are not a matter for the local plan but land use decisions have the potential to impact traffic conditions. The comment will be taken into account as work on the plan is progressed.
	Sport England		The emerging local plan should use the emerging evidence base for sport to	These comments/advice are welcomed and will assist the council when drafting relevant policies and site requirements in future iterations of the new plan for consultation.

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			<p>inform and justify the inclusion of the following policies.</p> <ul style="list-style-type: none"> • Policies that protect existing sport/leisure facilities where there is a need to do so to meet existing/future community needs which accord with paragraph 74 of the NPPF • Policies that support the principle of enhancing existing sports/leisure facilities to meet community needs e.g. replacement/extended pavilions, refurbished/replacement leisure centres, sports lighting to allow greater community use. • Policies and allocations that support the provision of new sports/leisure facilities that are required to meet identified needs e.g. site allocations for new playing fields, requirements in major housing and mixed-use developments for sport/leisure provision, sports hubs allocations etc. • Policies which ensure adequate provision for new development (especially residential) to provide for the additional sport/leisure facility needs that they generate through CIL and/or planning obligations. 	
11 Sustainable Travel <i>What types of sustainable transport improvements would you like to see prioritised locally as part of the future planning of our borough?</i>				
	Aldenham Parish Council		Improvement of Harper Lane bridge is key issue. Need to provide bus links to new settlement. Improve cycle routes, deck station car park, lifts to platforms and pedestrian bridge.	These suggestions are noted and will be considered as part of the process of preparing future iterations of the new plan. Most suggested proposals would require the involvement of other agencies who would be responsible for their provision so will be raised in the context of future discussion with relevant bodies as work on the plan progresses. We will work closely with the agencies responsible for infrastructure delivery, including the Highway Authority, Highways England, bus and rail operators, education authority and providers of health facilities and utilities to ensure that infrastructure needs are properly identified and appropriately met and that all possible sources of funding are identified and engaged. Regular meetings with infrastructure providers and local authorities in SW Herts (including Hertsmere) in order to facilitate this commence in February 2018.
	Colney Heath Parish Council		Those involving rail - so close to Potters Bar line and its links to Kings Cross. Also in Radlett and Elstree due to the rail services to, across and through London. Proposed bus services for the garden village are effectively unaffordable due to significant cuts made to local services.	The comments are noted. We will work closely with the agencies responsible for infrastructure delivery, including Highways England, the Highway Authority, rails and bus companies to ensure that infrastructure needs are properly identified and appropriately met and that all possible sources of funding are identified and engaged. Regular meetings with infrastructure providers and local authorities in SW Herts (including Hertsmere) in order to facilitate this commence in February 2018.
	Dacorum Borough Council		Would welcome discussion re SW Herts Growth and Transport Plan.	Comment noted. Both authorities will be involved with HCC in the preparation of the Growth and Transport Plan for SW Herts.
	Greater London Authority		Please link policies and proposals with those in the Mayor's Transport Strategy, including the promotion of Healthy Streets.	The comment is helpful. The Mayor's Transport Strategy will be considered as we progress the preparation of the new plan.
	HCC Property (Development Services)		Youth Connexions: east west public transport across the County is important if HCC is to maintain low NEET rates (young people not in education, employment or training).	The comment is noted. The importance of east-west transport links in the borough has been indicated in our response to HCC's recent LTP4 consultation.
	HCC Environment Department		<p>1. Plan should include a transport strategy for mitigating impacts of planned growth. Particularly important (as per LTP4) to manage traffic demand in order to achieve modal shift and improve sustainable travel provision. Must use parking restrictions and charging strategy to do so.</p> <p>2. Reliable and frequent bus services, promotion of walking and cycling, improvements to pedestrian cycle and bus infrastructure and greater use of business, residential and school travel plans are all essential to avoiding car reliance and supporting sustainable travel.</p> <p>3. Development at locations not currently well served by public transport would need to be realistically capable of becoming well served in a viable and sustainable way.</p>	<p>1. The comment is noted. We will continue to engage with HCC concerning the LTP4 and the appropriateness of demand management in the various situations and locations that occur and will occur across the borough.</p> <p>2. We agree with this statement.</p> <p>3. We agree with this statement and would anticipate working with HCC to ensure that this happens. We agree that improving accessibility to public transport should form an integral part of the development management process as it already does through policies in our adopted local plan. However alongside this, HCC needs to ensure that appropriate public transport infrastructure and services are identified and provided through a range of delivery</p>

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			<p>4. It would be beneficial to see prioritisation of connections between GI assets with green walking and cycling routes to help spread visitor pressure and enhance health and well-being.</p>	<p>mechanisms, including but not necessarily limited to developer contributions related to specific development sites.</p> <p>4. The comment is noted. Consideration will be given to how best to incorporate this issue into the policies and proposals to be included in the draft local plan as future iterations are prepared for consultation.</p>
	HCC Public Health Service		Development should prioritise active and sustainable travel, improving existing connectivity and urban permeability. This improves health by keeping people active and also reduces air pollution by reducing motorised transport.	The comment is welcomed and is in line with the Issues and Options stated priority of helping people connect better. The health benefits of promoting sustainable and active travel are recognised and can be specifically referred to in the plan.
	Highways England		Concern is with impacts from development on M25 (J22, 23, 24) A1(M) (J1) and M1 (J4, 5). Concerned that cumulative effect of 5 development approaches proposed could impact on safe & efficient operation of the Strategic Road Network (SRN). Council will need to provide sufficient evidence to demonstrate that the proposals have no residual sever impacts on the operation of the SRN or provide proposals to mitigate such impacts to an acceptable level. Must ensure that the cumulative effect is considered – individual sites may have limited effect.	The comments are noted. We are very aware that the quantum and location of new development proposed in the borough will be both influenced by and have an impact on the local and strategic transport infrastructure network and that transport considerations will be key to the acceptability or otherwise of many of the potential locations for new development. The selection of development options will be fully discussed with the relevant highway authorities and final proposals will be based on robust assessments that will include modelling of the traffic impact of a range of approaches. Highways England will continue to be consulted on and involved in this process. We will work closely with the agencies responsible for infrastructure delivery, including Highways England to ensure that infrastructure needs are properly identified and appropriately met and that all possible sources of funding are identified and engaged. Regular meetings with infrastructure providers and local authorities in SW Herts (including Hertsmere) in order to facilitate this commence in February 2018.
	Historic England		Support principle of sustainable transport improvements but don't advocate specific types as can have a positive and negative impact on historic environment. Upgrade to transport networks should be carefully planned to avoid harm to heritage assets. Schemes need to assess potential heritage impacts.	The support and comments are noted and welcomed.
	Letchmore Heath Village Trust		Use & expansion of rail capacity is an essential part of the plan together with regular bus services to and from railway stations and increased (double decker) parking at railway stations.	The comments are noted. These are issues that fall under the responsibility of agencies other than Hertsmere council but the provision and improvement of public transport in relation to the location of development is an important consideration. We will work closely with the agencies responsible for infrastructure delivery, including the Highway Authority, Highways England, bus and rail operators, to ensure that infrastructure needs are properly identified and appropriately met and that all possible sources of funding are identified and engaged. Regular meetings with infrastructure providers and local authorities in SW Herts (including Hertsmere) in order to facilitate this commence in February 2018. In general terms larger developments will tend to bring with them greater opportunities to provide and fund new infrastructure/services than smaller more piecemeal developments.
	Radlett Society and Green Belt Association		<p>The Radlett Society consider that there are many transport improvements that could be made eg</p> <ul style="list-style-type: none"> • Rail services: whilst these are largely outside the control of the local authority, the facilities, appearance and access around Radlett station leaves much to be desired. The access road has a difficult uphill, blind exit and is not useable by buses and coaches. There is no direct pedestrian access direct from Shenley Hill Bridge and platforms 2 and 3 are not step-free, meaning that disabled travellers arriving from London may have to use lifts at St. Albans station in order to return to Radlett. • The highway situation in Radlett is under severe strain at peak times, usually in the mornings when many car users are entering the central area. Weekday tailbacks on the entry roads are common. In this mix are school coaches, leaving in all directions. Parts of Watling Street have high levels of air pollution, which is unhealthy for pedestrians, many of whom are schoolchildren. At the very least, the Council urgently needs to find ways of smoothing or reducing the flow of traffic through Radlett. • The Parish Council in 2015 initiated a cycle initiative, in conjunction with 	These comments are welcomed and will assist the council when drafting relevant policies and site requirements in future iterations of the new plan for consultation. Where relevant they will be raised with other bodies responsible for the provision and maintenance of transport infrastructure in the borough.

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			<p>Herts CC, to improve cycling safety and facilities for all cyclists, for leisure, travel and exercise. Routes in desperate need of improvement were identified. Nothing much has happened and therefore this sustainable form of transport is avoided by all but the most intrepid. If anything comes out of 'Planning for Growth', some urgent improvements are needed here.</p> <ul style="list-style-type: none"> • Pedestrians: Many pavements in and around Radlett are not fit for purpose; they aren't regularly cleared of weeds and undergrowth and some are uneven and unsuitable for buggies, prams and wheelchairs, e.g. Aldenham Road. We would also mention that many pedestrians use the route from Shenley to Radlett, which is particularly narrow in places alongside a busy 60mph road. We would support the creation of a segregated pedestrian/cycle path parallel to the road, but separated by a safety zone. Similar improvements in Theobald Street, Watling Street and Watford Road would be welcomed. 	
	Ramblers		Development needs to be planned to minimise its effects on existing public rights of way network, and mitigation provided where there is an impact. Borough needs to coordinate with Rights of Way Service at HCC to ensure local plan and rights of way Improvement Plan for Hertsmere are kept in synchronisation. Plan needs to refer to ROWIP. List of factors to be considered in relation to a ROWIP in residential developments provided.	As the plan will aim to support an increasingly sustainable approach to travel in the borough, and rights of way make an important contribution to this, the suggestion is a sensible one. We will look at how best to build links with the ROWIP into the local plan as it is developed.
	Sport England		<p>Sport England would encourage the inclusion of a design policy which encourages developments to be designed to promote active lifestyles through sport and physical activity such as walkable communities and connected footpath and cycle routes (through use of Sport England's and Public Health England's established Active Design guidance (http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/))</p>	This comment/advice is welcomed and will assist the council when drafting relevant policies and site requirements in future iterations of the new plan for consultation.
	Transport for London		<p>1. Supports highway measures that help improve reliability of TFL contracted bus services and would like to review Transport Assessments for major developments affecting A1 junctions (Ripon Way, Stirling Way & Rowley Lane). 2. Would be helpful if some of the approaches put forward in the draft Mayor's Transport Strategy within London could be extended to the borough including the promotion of Healthy Streets, reducing road danger and improving air quality.</p>	<p>1. The comments are noted 2. The draft strategy will be reviewed and consideration given to the points raised.</p>
Part 3 Where should new development be built?				
12 Redevelopment of urban brownfield sites				
<i>Which areas do you think are best placed to accommodate this type of growth and why?</i>				
	Aldenham Parish Council		Land to rear of shops on North side of Watling Street, between Station Road & Park Road. Extra layer on car park at Radlett Railway station, telephone exchange in Park Road, extra floor on top of shops in Watling Parade & Newberries car park	These suggestions are welcomed and will be considered as the content of the plan is progressed.
	Colney Heath Parish Council		The urban areas have the best public infrastructure and increasing densities in the main urban locations reduces demand on the green belt.	The comment is noted and in principle is correct. However there is a limit to the extent to which densities in urban areas can be increased from both an environmental/quality of life and infrastructure point of view. From a sequential point of view the first priority will be to locate development within existing built up or previously developed areas, but other locations will also be required in order to meet the identified needs for homes and jobs.
	CPRE		This option is agreed. Also the suggestion of development at higher densities in suitable areas. Council should identify alternatives to green belt - unused and derelict land and buildings, PDL, other opportunities to redevelop to increase housing provision. Should use all powers including land assembly using full range of planning powers – should be a main component of new plan. Should be looking to provide more than 3000 homes in urban areas.	The support is welcomed. There are however limited opportunities for achieving significantly more new homes in the urban area in terms of the availability of sites, environmental considerations and the cost, time and complexity of bringing some sites forward for development. The plan will however continue to support the development of sites in the urban area and to maximise the contribution to housing supply that they can make.
	Environment Agency		1. Location and type of development must take into account the existing environmental constraints and must be an appropriate land use taking into	1. We are aware that capacity to support growth will either need to exist, or to be provided in order to enable new development to proceed. Discussions have begun with infrastructure

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			<p>account the NPPF. Level of growth must be accommodated within the existing infrastructure framework, particularly in relation to water supply and waste water treatment capacity. What measures (ie phasing, investment etc) need to be in place to support this level of growth?</p> <p>2. Hertsmere has significant area within Source Protection Zone. Any new development would need to ensure that there are no negative impacts on groundwater quality and where appropriate would contribute towards the remediation of any land contamination on the site.</p> <p>3. Development should be kept out of Flood Zones 2, 3a and 3b where possible. In particular, no development should take place within Flood Zone 3b (except water compatible) and only appropriate development in line with the NPPF should occur in Flood Zone 3a and 2. Development can also reduce flood risk and improve water quality through using a sequential approach to design on site and the sensitive use of SUDs.</p>	<p>providers including Thames Water and will be on-going throughout the process of preparing the new local plan in order to identify the measures that will be required in order to support the level of growth proposed.</p> <p>2. The current SADM allocations identify those that lie within a source protection zone and require a Preliminary Risk Assessment. We will discuss the wording of any appropriate policy in the new local plan with the EA.</p> <p>3. These comments are noted and are consistent with the approach contained within the borough's updated SFRA to which the new local plan will refer. It is recognised that a sequential approach to the location and design of new development will need to be taken.</p>
	HCC Environment Department		<p>1. Locating new development in these areas would provide opportunities to link to and improve existing infrastructure for walking and cycling and would have access to rail services. Development should be in places that are highly accessible by public transport and in walking distance of key services and amenities.</p> <p>2. Support higher density accommodation around main transport hubs provided appropriate parking demand management and travel planning is put in place. Need for investment to enable and encourage sustainable and active modes and provide a safe environment as Borehamwood and Potters Bar already congested, poor air quality.</p> <p>3. Support brownfield development as these sites generally represent most accessible locations and support use of sustainable transport.</p> <p>4. Herts Ecology supports the stated aim that required infrastructure should include enhanced green infrastructure.</p> <p>5. Other key challenges for developing on brownfield sites at greater densities/heights include overshadowing, impacts on microclimate, increased human activity and pressures.</p> <p>6. Urban GI interventions can help address some of the key challenges. <i>(Examples quoted).</i></p>	<p>1. In principle we agree with this. However the level of growth needed together with the existing pattern of development, including congestion and lack of available sites within the urban area, may mean that this approach is not in all cases either possible or desirable. Existing urban areas are already quite densely developed and congested.</p> <p>2. See answer to 1 above</p> <p>3. The comment is noted</p> <p>4. The support is welcomed</p> <p>5. The comments are noted. Policies in the local plan will require new development to be of good design and to meet the requirements of the Planning and Design Guide.</p> <p>6. The comment is noted</p>
	Historic England		See Historic England's Advice Note 3 for a suggested approach to assessing sites and their impact on heritage assets	The comment is welcomed and we will look at the Advice Note for suggestions when assessing the development potential of urban brownfield sites.
	Radlett Society and Green Belt Association		Support the re-development and regeneration of brown-field sites wherever appropriate as this is the least harmful way to maintain the long-term protection the Green Belt. Should sub-divide large housing plots to provide extra units of housing.	The comment is noted. It is likely that a combination of the approaches to locating new development will be necessary given the significant levels of need identified. However it is also likely that maximum opportunity to deliver growth on brownfield sites will be taken, as this may help to limit the extent to which development in the green belt will be necessary.
	Ramblers Association		Need to maximise brownfield development, keep building on green belt to minimum.	It is likely that a combination of the approaches to locating new development will be necessary given the significant levels of need identified. However it is also likely that maximum opportunity to deliver growth on brownfield sites will be taken, as this may help to limit the extent to which development in the green belt will be necessary.
	TCT Trust		Would list existing traffic and infrastructure issues which will all be exacerbated by the building of further housing. Green belt will need to be sacrificed to reap the benefit of a new settlement.	The comments are noted.
	Thames Water		Impact of local sewerage network on brownfield sites is less than greenfield so a policy that considers brownfield sites before greenfield would be supported.	It is likely that a combination of the approaches to locating new development will be necessary given the significant levels of need identified. However it is also likely that maximum opportunity to deliver growth on brownfield sites will be taken, as this may help to limit the extent to which development in the green belt will be necessary.
	Transport for London (Commercial Development)		Existing settlements such as Borehamwood should be prioritised for development as benefits from existing transport & social infrastructures. Optimise density to make best use of scarce land and provide scale of development which can deliver physical and social infrastructure	The support is welcomed.
13 growth through new garden suburbs				

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
<i>Where do you think would be the most sustainable locations for garden suburbs?</i>				
	Aldenham Parish Council		Area of search around Watford Road looks reasonable. Land rear of Newberries School between Shenley Hill & Theobald Street, Land rear of Loom Lane/The Ridgeway (Brickfields) & Fairfield School. Area at The Warren not supported because of impact on Harper Lane bridge.	The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
	Colney Heath Parish Council		1. Garden suburbs should be expanded with minimal impact on the green belt. 2. The locations proposed do not take into account the Arup (<i>green belt</i>) analysis. You propose to develop in parcels that strongly contribute to the green belt. 3. Need to take into account wider traffic implications of proposed development. The A414 and southern St Albans has significant traffic problems so development in this area should be avoided.	1. The comment is noted. 2. All that has been identified so far in the Issues and Options document are areas of search. There is no guarantee that sites for development will be allocated in these areas. Some well performing green belt parcels have areas in them which perform less well. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development. 3. See response 2 above. The selection of any development options in the final plan will need to be fully considered with the relevant highway authorities and final proposals will be based on robust assessments that will include modelling of the traffic impact of a range of approaches.
	CPRE		1. Incursions into green belt should depend on overall housing target and on capacity of other non-green belt locations – urban areas and PDL. Should not commit at this stage to new garden suburbs as council hasn't demonstrated exceptional circumstances exist to justify this approach. 2. People haven't been given a chance to say whether they agree with the principle or not.	1. It is clear from the initial work undertaken that we cannot deliver our OAN – however that is finally defined – whilst retaining a reasonably quality of environment in the existing built up area - without some new development taking place in what is currently green belt. 2. Some of the benefits and challenges of extending existing settlements through garden suburbs are set out in the Issues and Options document and people could answer 'nowhere' to this question if they did not agree with the principle.
	Environment Agency		1. Location and type of development must take into account the existing environmental constraints and must be an appropriate land use taking into account the NPPF. Level of growth must be accommodated within the existing infrastructure framework, particularly in relation to water supply and waste water treatment capacity. What measurers (ie phasing, investment etc) need to be in place to support this level of growth? 2. Hertsmere has significant area within Source Protection Zone. Any new development would need to ensure that there are no negative impacts on groundwater quality and where appropriate would contribute towards the remediation of any land contamination on the site. 3. Development should be kept out of Flood Zones 2, 3a and 3b where possible. In particular, no development should take place within Flood Zone 3b (except water compatible) and only appropriate development in line with the NPPF should occur in Flood Zone 3a and 2. Development can also reduce flood risk and improve water quality through using a sequential approach to design on site and the sensitive use of SUDs.	1. We are aware that capacity to support growth will either need to exist, or to be provided in order to enable new development to proceed. Discussions have begun with infrastructure providers including Thames Water and will be on-going throughout the process of preparing the new local plan in order to identify the measures that will be required in order to support the level of growth proposed. 2. The current SADM allocations identify those that lie within a source protection zone and require a Preliminary Risk Assessment. We will discuss the wording of any appropriate policy in the new local plan with the EA. 3. These comments are noted and are consistent with the approach contained within the borough's updated SFRA to which the new local plan will refer. It is recognised that a sequential approach to the location and design of new development will need to be taken.
	HCC Environment Department		1. Garden suburbs to main towns connected to town centres by cycling, walking and public transport links could meet the objectives of LTP4. Improvements to wider strategic highway network would only be acceptable if all other measures to support the LTP4 user hierarchy have been put in place. 2. Development should be supported where possible by extensions to existing bus routes, but larger developments may warrant new service provision. Developer contributions should be sought to pump prime services with prospects of long term viability. (<i>Details of existing service providers across the borough provided</i>). 3. Any urban extension should be planned from the outset to be highly sustainable from a transport perspective, including with key services and amenities as part of the settlement and excellent public transport links to other areas including employment locations 4. Herts Ecology supports the state aim that required infrastructure should include enhanced green infrastructure within new developments	1. The comments are noted. Discussions with the Highway Authorities regarding transport implications of this approach to the location of new development will continue. 2. We agree with this statement which is consistent with our priorities for helping people in Hertsmere connect better. 3. We agree with this statement which is consistent with our priorities for helping people in Hertsmere connect better. 4. The support is welcomed 5. We agree with this comment.

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			5. Potential locations for new garden suburbs need to take account of Wildlife sites. The mitigation hierarchy outlined in NPPF (avoid, mitigate, compensate) should be followed when considering any development options which may affect them.	
	HCC Property (Development Services) Landowner	Former Sunnybank Primary School site Carpenders Park, South Oxhey	1. The area of search south of Borehamwood appears to include land in HCC ownership to the south of the town. HCC will continue to work with HBC should this site be allocated for development. 2. Former Sunnybank Primary School site was submitted to the Call for Sites as one of the sites to be considered for development. The land on which the vacant school building is situated is previously developed land and as such, may come forward for development now outside of the Local Plan process. The remainder of the site falls within the Green Belt and HCC request that HBC consider whether it could contribute to the wider housing need identified within Potters Bar as part of the emerging Local Plan process. 3. HCC recently acquired land at Carpenders Park, South Oxhey to serve the future secondary education needs of Three Rivers, Watford and Hertsmere. The land is currently in agricultural use. HCC would be seeking an allocation for this land as a reserve school site.	The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
	Heath Ways Residents' Association		All facilities in Potters Bar are overloaded. Therefore 1. Development on the golf course and adjoining farm land must be avoided – green belt, would lead to creeping coalescence with Welwyn Hatfield (Hawkshead Road proposed development). 2. Possible expansion south east of High Street out towards the M25 could, if it included services and facilities, benefit those homes where these are currently under pressure.	The comments are noted. Any new development would need to bring with it the social and physical infrastructure needed, as indicated in the Issues and Options document. The golf course and area to the south of Potters Bar are in areas of search identified in the Issues and Options document, although this does not guarantee that sites in either area would be a suitable location for development. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
	Little Heath Action Group		Do not develop Potters Bar Golf Course, would harm the green belt and merge Potters Bar with Hatfield. Contrary to purposes of green belt and NPPF. Would be only 3 fields between Potters Bar and Hatfield if Potters Bar GC and site BrP7 proposed by Welwyn Hatfield go ahead. Would remove a clearly identifiable and defensible green belt boundary. Part of golf course is susceptible to flood.	The comments are noted. The golf course is in an area of search identified in the Issues and Options document, although this does not guarantee that sites in the area would be a suitable location for development. The suitability of the golf course and whether any part of it should be allocated for development will be considered as part of the process of assessing all sites put forward through the Call for Sites and in response to this Issues and Options consultation. Sites will be assessed against our published HELAA methodology in order to judge their suitability for development. Until this work is complete it is not possible to comment on the suitability of individual sites. The outcome will inform the selection of sites in future iterations of the draft plan for consultation.
	Radlett Society and Green Belt Association		1. Opposed to re-designation of green belt land, on the scale proposed, around Radlett. Even without Green Belt considerations, we consider that there are no suitable sites on the edge of Radlett because of significant constraints. To the south-west, the agricultural land quality from Watling Street to Watford Road is the highest in Hertsmere; in the quadrant between Watford Road and Watling Street, most of the land is in private ownership with some power lines present; to the north-east of the railway, access is poor and the land could be subject to flooding; further north-east there's a golf course with its recreational assets; to the south-east there's a former Landscape Protection Area of woodland and farmland, which is also a Regionally Important Geological Site and a breeding habitat for many species of birds. It has been in more-or-less continuous cultivation for at least the last 35 years. Between Theobald Street and Watling Street, the development would be restricted in area and hampered by topography and power lines. 2. What guarantee is there that school places will be forthcoming for new Radlett pupils? Radlett pupils will be competing for places in nearby towns with	1. The suitability of sites adjoining the existing towns and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Call for Sites and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development. 2. We are clear that major new development can only proceed provided the necessary infrastructure is in place. Should sites for development in the Radlett area be identified we would work with, in this case, the Education authority to ensure the needs are identified and provided alongside any proposed development.

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			pupils from within and outside Hertsmere. An upfront guarantee of full-funding of infrastructure is the very least that residents will expect.	
	Ramblers		Should focus more development at Borehamwood, Potters Bar, Bushey and Radlett to take advantage of rail links. Would enable leisure / country park focus in undeveloped north part of borough and also possibly avoid the need to extend South Mimms and Ridge.	The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development. The Issues and Options document recognises that a combination of approaches for planning future growth is likely to be needed, and we do not envisage that it would be possible to meet all the identified need by pursuing a very limited number of options. We will only be able to draw conclusions on this once the work outlined above has been undertaken.
	Transport for London (Commercial Development)	Land adj Barnet by-pass (Stangate Crescent/Wansford Park)	1. Site promoted through Call for Sites 2. Most sustainable location for garden suburbs will be on the edge of existing urban settlements which benefit from existing transport and social infrastructure	1. The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development. 2. The comment is noted.
	Welwyn Hatfield Council		Careful consideration will need to be given to infrastructure implications of growth already proposed in the vicinity of Potters Bar. Particular regard should be had to proposed allocations in the Welwyn Hatfield Local Plan at Little Heath, Brookmans Park, Welham /Green and Cuffley. Need continued cooperation with Hertsmere and other infrastructure providers to ensure proposed growth in Potters Bar area is supported by necessary infrastructure including education, health, community and sporting facilities.	The comment is noted. Hertsmere's Issues and Options document is explicit about the need to ensure that new development brings with it the infrastructure needed to create thriving sustainable communities.
14 supporting larger rural communities - growth of key villages <i>Do you agree with this approach? Where do you think this development should take place?</i>				
	Aldenham Parish Council		Do not expand Shenley as this will impact Radlett	The comment is noted.
	Aldenham Sailing Club	Land south of Aldenham reservoir	Concerned about future of Aldenham Reservoir due to remedial work required. Use s106 money from development of green belt land to the south of the reservoir to provide funding for repairs and/or replacement of the dam and to set up a Community Interest Company to manage the reservoir in perpetuity.	The comment is noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
	Colney Heath Parish Council		We support the approach as it uses existing infrastructure and is in line with Herts 2050 Transport Vision	The support is welcome.
	CPRE		1. Development in villages should be encouraged but only within existing settlement boundaries, Extension of boundaries should only be in exceptional circumstances as required by national policy. Oppose expansion of Elstree and Shenley because council has yet to show all the currently assessed housing employment need is acute enough to justify removal of land around them from the green belt once all alternative non-green belt locations have been taken into account. 2. Any development that is agreed should maximise density consistent with local character and potentially be defined in Neighbourhood Plans.	1. It is clear from the initial work undertaken that we cannot deliver our OAN – however that is finally defined – whilst retaining a reasonably quality of environment in the existing built up area - without some new development taking place elsewhere in the borough. Focussing some growth at key villages brings with it the advantage of being able to plan in and support additional infrastructure and services which can serve both existing and new residents. 2. The comment is noted. We would anticipate working together with any Neighbourhood Plan organisation to identify appropriate development sites within or adjoining the village boundary.
	Environment Agency		1. Location and type of development must take into account the existing environmental constraints and must be an appropriate land use taking into account the NPPF. Level of growth must be accommodated within the existing infrastructure framework, particularly in relation to water supply and waste water treatment capacity? What measures (ie phasing, investment etc) need to be in place to support this level of growth? 2. Hertsmere has significant area within Source Protection Zone. Any new development would need to ensure that there are no negative impacts on	1. We are aware that capacity to support growth will either need to exist, or to be provided in order to enable new development to proceed. Discussions have begun with infrastructure providers including Thames Water and will be on-going throughout the process of preparing the new local plan in order to identify the measures that will be required in order to support the level of growth proposed. 2. The current SADM allocations identify those that lie within a source protection zone and require a Preliminary Risk Assessment. We will discuss the wording of any appropriate policy in the new local plan with the EA.

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			<p>groundwater quality and where appropriate would contribute towards the remediation of any land contamination on the site.</p> <p>3. Development should be kept out of Flood Zones 2, 3a and 3b where possible. In particular, no development should take place within Flood Zone 3b (except water compatible) and only appropriate development in line with the NPPF should occur in Flood Zone 3a and 2. Development can also reduce flood risk and improve water quality through using a sequential approach to design on site and the sensitive use of SUDs.</p>	<p>3. These comments are noted and are consistent with the approach contained within the borough's updated SFRA to which the new local plan will refer. It is recognised that a sequential approach to the location and design of new development will need to be taken.</p>
	HCC Environment Department		<p>1. Shenley has potential for medieval remains associated with the medieval village and nearby moated site at the junction of Harris Lane and Mimms Lane. Elstree is on Watling Street – considerable potential for roman and medieval remains. Both villages contain numerous listed buildings. Should assess historic environment potential prior to allocation of land for development.</p> <p>2. Neither village has direct access to rail station and so will need strong public transport links by bus to reduce car use. Will need to consider travel to employment sites and secondary schools. Cycling infrastructure will be required to link these communities to the larger settlements.</p> <p>3. Herts Ecology supports the aim that infrastructure requirement for development of 300-500 homes should include enhanced green infrastructure within new developments. Also the same stated aim for up to 100 new homes but this should still also ensure the incorporation of natural features where appropriate.</p> <p>4. Wildlife sites to be taken account of – Shenley Park woodland and meadow Wildlife Site SW of Shenley; composers Park Wildlife Site west of Elstree. Redwell Wood is a very important ecological resource.</p> <p>5. should seek to provide or maintain land management activities within or adjacent to new settlement which will ensure character of settlement and adjacent countryside is secured. Provide opportunities for local people to access, enable biodiversity to be enhanced. Include in the master-planning for growth.</p>	<p>1. Areas of archaeological significance will be taken into account when assessing sites and areas for suitability for future development as per our published HELAA methodology.</p> <p>2. We agree with these comments; should any expansion of these villages be agreed these infrastructure requirements will need to be met.</p> <p>3. The support is welcomed and comment noted.</p> <p>4. The comment is noted and will be taken account of as potential development sites are assessed and policies and proposals for inclusion in future iterations of the draft plan are prepared for consultation.</p> <p>5. The comment is useful and will be taken account of as policies and proposals for inclusion in future iterations of the draft plan are prepared for consultation.</p>
	HCC Property (Development Services) Landowner	Edgwarebury House Farm	<p>1. The area of search for housing south of Elstree includes land in HCC ownership at Edgwarebury House Farm and the wider Edgwarebury Estate. This site could contribute to the wider housing need identified within Elstree as part of the emerging Local Plan process. Residential development could improve the site in terms of appearance, vehicular traffic generated and also make a contribution towards provision of appropriate sites for housing.</p> <p>2. The area of search for housing east of Shenley includes land in HCC ownership east of the village. HCC will continue to work with HBC should this site be allocated for development.</p>	<p>The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.</p>
	Heath Ways Residents' Association		<p>Any expansion to Ridge, Shenley or South Mimms should come later in the 15 year plan and only with absolute regard to their existing character.</p>	<p>The comment is noted.</p>
	Radlett Society and Green Belt Association		<p>Opposed to re-designation of green belt land, on the scale proposed. The expansion of Shenley would have a significant impact on road traffic to and from Radlett. The regular term-time peak-hour road traffic queueing into Radlett on Shenley Hill is already intolerable - significant delays. Bad for pedestrians and cyclists too - restricted in width and poor maintenance of the highway and footpaths, which are not continuous on either side. This route will need significant investment, at the very least, for the creation of a through cycle path from Black Lion Hill, Shenley to Radlett Rail Station.</p> <p>Also oppose the loss of green belt around Elstree, in particular to the north where the views from the top of Watling Street towards the west are, for some, dramatic and uplifting.</p>	<p>The comments are noted and will be taken into account in preparing future iterations of the Local Plan. The suitability of sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Call for Sites and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.</p>

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
	Shenley Neighbourhood Plan Steering Group (and post it notes from public meeting)		<p>1. If new garden village homes end up being in Shenley parish then Shenley village should not have any extra development. We don't need so many new homes to meet local need – emerging neighbourhood plan indicates our housing requirements will be shown to be no more than a few hundred homes. The garden village and possible extensions to Shenley are not needed for our community.</p> <p>2. Do not support development at Pursley Farm Field</p> <ul style="list-style-type: none"> actively farmed, potential for noise disturbance from grain dryer, farming an important feature of rural village. Numerous rights of way used by residents cross the land. One of the round Shenley routes from the tea rooms in Shenley Park. Would materially affect the rural character of the village <p>3. Support limited development with a mix of housing at the top of Radlett Lane – as identified in emerging Neighbourhood Plan. Would link to development at Porters Park and the older part of the village. Wouldn't support development below the existing Spinney bridleway including because of capacity of Radlett Lane for traffic.</p> <p>4. Green Belt is important for health and wellbeing, well used by local and wider community for walking, riding, cycling etc. Really important that local plan retains this. Don't build on the green belt</p> <p>5. Radlett Lane is very busy but twisty rural lane. This route can't be improved. Peak time queueing traffic between Cricket Club and exit to Porters Park Golf Club – takes a long time to get to Radlett. Development would make this route even more of a problem.</p> <p>6. Traffic from roundabout on B556 causes severe congestion. Shenley to Borehamwood via Green Street also has high volume of traffic – Shenley is a rat run.</p> <p>7. Where will children go to school? What about pressure on doctors?</p> <p>8. Will homes be for local people?</p>	<p>1. The comment is noted. No decisions about how the meeting of housing need will be distributed across the borough. A combination of approaches is likely but final sites and areas selected will depend on many factors and will be the subject of further consultation and discussion. See also response to 2 below.</p> <p>2. The comments are noted and will be taken into account in preparing future iterations of the Local Plan. The suitability of sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Call for Sites and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.</p> <p>3. See answer to 2 above.</p> <p>4. We agree that the retention of green belt and access to countryside is important for health and well-being. However it is also important that people have good quality homes in which to live, so a balance has to be struck. No decisions have yet been made about sites and areas that will eventually be allocated for development.</p> <p>5. These comments are noted and will be taken into account when potential areas for development are being considered. Before any decisions are made about sites to be allocated for development the traffic implications of any possible development will need to be assessed.</p> <p>6. See answer to 5 above.</p> <p>7. We agree it is very important that any new development doesn't exacerbate existing pressure on local services and where appropriate brings with it any additional or improved infrastructure required as a result of the development. There will be policies and proposals in the new local plan to achieve this.</p> <p>8. We acknowledge that this is a difficult issue in relation to market housing; there would be more control with regard to the affordable homes that would need to be provided as part of any development (over 10 units – to comply with government policy) as the council will ensure that occupancy of the affordable housing units provided is restricted to eligible households in housing need. This is an issue at which we need to look further.</p>
	Shenley Parish Council		<p>1. Shenley is historic rural village known for farming landscape and open spaces. Beautiful landscape setting, natural environment. Part of Watling Chase timberland trail – important for walking. Rights of way through the area. High quality green belt well used by local and wider community for walking, riding, cycling etc. Retaining access to green spaces is important for health and wellbeing.</p>	<p>1. The comments made are noted (as with all the comments reported these are a summary of the fuller representation made by the Parish Council). We agree that protection of the landscape setting, and retention of the green belt and access to the countryside are important for many reasons, including health and well-being. However it is also important that people have good quality homes in which to live, so a balance has to be struck. No decisions have yet been made about sites and areas that will eventually be allocated for</p>

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			<p>2. There is no employment in Shenley – what there is is mostly for people outside Shenley who probably drive here as there is little public transport</p> <p>3. Radlett Lane is very busy but twisty rural lane. This route can't be improved. Peak time queueing traffic between Cricket Club and exit to Porters Park Golf Club – takes a long time to get to Radlett. People complain that this road is dangerous. Development would make this route even more of a problem.</p> <p>4. Traffic from roundabout on B556 causes severe congestion (route from M25 to A1 at Borehamwood via Well End). Shenley to Borehamwood via Green Street also has high volume of traffic (including from people working in Borehamwood but living further away).</p> <p>5. Do not support development at Pursley Farm Field owned by HCC</p> <ul style="list-style-type: none"> actively farmed, potential for noise disturbance from grain dryer, farming an important feature of rural village. Numerous rights of way used by residents cross the land. One of the round Shenley routes from the tea rooms in Shenley Park. Would materially affect the rural character of the village Poor infrastructure – London Road to Well End is a rural country road with tight bends. <p>6. Do not support development at Wood Hall Stud fields down Radlett Lane for major infrastructure reasons, and would also materially affect the rural character of the village.</p> <p>7. Support limited development with a mix of housing at the top of Radlett Lane – as identified in emerging Neighbourhood Plan. Would link to development at Porters Park and the older part of the village. Could also provide community facilities, and possibly retail outlets here. Possible proposal including retirement development – emerging through neighbourhood plan process. Wouldn't support development below the existing Spinney bridleway including because of capacity of Radlett Lane for traffic.</p> <p>8. If new garden village sited in the area of search already suggested then the number of extra homes in Shenley Parish would mean that no extra housing should be required in the main part of the village. Emerging Neighbourhood Plan work indicates local housing need to be no more than a few hundred homes. Garden village plus 500 or more homes in the village means around 7 times more than our community needs – unreasonable. Only just getting Porters Park and old village integrated – new proposals unworkable.</p>	<p>development.</p> <p>2. The comment is noted</p> <p>3. Before any decisions are made about sites to be allocated for development the traffic implications of any possible development will need to be assessed. These comments are noted and will be taken into account when potential areas for development are being considered.</p> <p>4. See response 3 above</p> <p>5. The comments are noted and will be taken into account in preparing future iterations of the Local Plan. The suitability of sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Call for Sites and in response to this Issues and Options consultation. Initially, sites assessed against our published HELAA methodology in order to judge their suitability for development. Until this work is complete it is not possible to comment on the suitability of individual sites.</p> <p>6 and 7. See response to 5 above.</p> <p>8. No decisions about how the meeting of housing need will be distributed across the borough. A combination of approaches is likely but final sites and areas selected will depend on many factors and will be the subject of further consultation and discussion. See also response to 5 above.</p>
15 Meeting the needs of other villages <i>Which villages do you think would be best suited to this form of growth?</i>				
	Aldenham Parish Council	land at Patchetts Green	<p>Sensible approach. Letchmore Heath and Aldenham not suitable for any large developments – small developments only. APC has land at Patchetts Green which would be suitable (Call for Sites).</p> <p>Elstree Aerodrome would be a possible site in the longer term.</p>	<p>The comments are noted and will be taken into account in preparing future iterations of the Local Plan. The suitability of sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Call for Sites and in response to this Issues and Options consultation. Initially, sites have been</p>

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
				assessed against our published HELAA methodology in order to judge their suitability for development.
	Colney Heath Parish Council		The villages would be likely to benefit from carefully planned expansion and will contribute to a wider age range profile within each existing settlement.	The comment is noted.
	CPRE		Oppose any extension to smaller villages in order to meet housing need, with the exception of locally identified rural exception sites through Neighbourhood Plans. Support development within current boundaries.	The comment is noted.
	Environment Agency		<p>1. Location and type of development must take into account the existing environmental constraints and must be an appropriate land use taking into account the NPPF. Level of growth must be accommodated within the existing infrastructure framework, particularly in relation to water supply and waste water treatment capacity? What measures (ie phasing, investment etc) need to be in place to support this level of growth?</p> <p>2. Hertsmere has significant area within Source Protection Zone. Any new development would need to ensure that there are no negative impacts on groundwater quality and where appropriate would contribute towards the remediation of any land contamination on the site.</p> <p>3. Development should be kept out of Flood Zones 2, 3a and 3b where possible. In particular, no development should take place within Flood Zone 3b (except water compatible) and only appropriate development in line with the NPPF should occur in Flood Zone 3a and 2. Development can also reduce flood risk and improve water quality through using a sequential approach to design on site and the sensitive use of SUDs.</p>	<p>1. We are aware that capacity to support growth will either need to exist, or to be provided in order to enable new development to proceed. Discussions have begun with infrastructure providers including Thames Water and will be on-going throughout the process of preparing the new local plan in order to identify the measures that will be required in order to support the level of growth proposed.</p> <p>2. The current SADM allocations identify those that lie within a source protection zone and require a Preliminary Risk Assessment. We will discuss the wording of any appropriate policy in the new local plan with the EA.</p> <p>3. These comments are noted and are consistent with the approach contained within the borough's updated SFRA to which the new local plan will refer. It is recognised that a sequential approach to the location and design of new development will need to be taken.</p>
	HCC Environment Department		<p>1. Providing appropriate transport infrastructure for settlements of this size (propose up to 300 new homes) could be difficult unless already located on a bus network. Unlikely to generate sufficient patronage to make significant enhancements to existing bus services viable. Would probably benefit most from improved demand responsive and community transport options.</p> <p>2. Herts Ecology supports the state aim that required infrastructure for development of up to 250 homes should include enhanced green infrastructure and also for 100 homes although this should also still ensure the incorporation of natural features where appropriate</p> <p>3. Take account of Mill Cottage pasture Wildlife Site Ridge, and land by Elstree substation Wildlife Site Patchetts Green.</p>	<p>1. The comment is noted and will be taken account of as policies and proposals for inclusion in future iterations of the draft plan are prepared for consultation.</p> <p>2. The support is welcomed and comment noted.</p> <p>3. The comment is noted and will be taken account of as potential development sites are assessed and policies and proposals for inclusion in future iterations of the draft plan are prepared for consultation.</p>
	HCC Property (Development Services) Landowner		<p>1. The area of search for housing south east of Aldenham includes land in HCC ownership south east of the village. HCC will continue to work with HBC should this site be allocated for development.</p> <p>2. The area of search for housing north west of South Mimms includes land in HCC ownership north west of the village. HCC will continue to work with HBC should this site be allocated for development.</p>	The comments are noted. The suitability of the sites and whether they should be allocated for development has been considered as part of the process of assessing all sites put forward through the HELAA and in response to this Issues and Options consultation. Sites will be assessed against our published HELAA methodology in order to judge their suitability for development.
	Heath Residents' Association	Ways	Any expansion to Ridge, Shenley or South Mimms should come later in the 15 year plan and only with absolute regard to their existing character.	The comment is noted.
	Letchmore Heath Village Trust		May be small, individual house building opportunities in and around Letchmore Heath but significant development opportunities severely constrained. Road access is poor – rural roads used heavily by local school traffic. No local services, shops, schools or facilities that would meet the needs of an enlarged village. Residents currently have to drive to these services elsewhere. Public transport is a 15-20 minute walk away. Unique character of village. Don't sacrifice agricultural land.	The comments are noted. The possibility of planning for growth in smaller villages such as Letchmore Heath is only one of the options put forward for consultation in the Issues and Options document. Whilst there could be advantages in this in terms of being able to provide new or improved social and physical infrastructure as part of a planned expansion, it is recognised that this needs to be balanced against the need to protect green belt and the impact on the character of the village. Sites put forward through the Call for Sites and in response to this Issues and Options consultation have been assessed against our published HELAA methodology in order to judge their suitability for development so as to contribute to meeting the identified need for homes and jobs in the borough. Until this and other evidence base work is complete it is not possible to determine the extent to which development will be needed in each of the types of location identified in the Issues and Options consultation.
	Radlett Society and		The Radlett Society cannot see anything but harm resulting from the wholesale	The comments are noted. The possibility of planning for growth in smaller villages such as

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	Green Belt Association		expansion of the Green Belt, Conservation Areas of Letchmore Heath, Roundbush and Patchetts Green. Since these settlements have limited infrastructure, such expansion would not be cost-effective or ease congestion on their highways. There may be opportunities for limited infilling, but at the expense of higher densities, which would be unwelcome.	Letchmore Heath, Roundbush and Patchetts Green is only one of the options put forward for consultation in the Issues and Options document. Whilst there could be advantages in this in terms of being able to provide new or improved social and physical infrastructure as part of a planned expansion, it is recognised that this needs to be balanced against the need to protect green belt and the impact on the character of the village. Sites put forward through the Call for Sites and in response to this Issues and Options consultation have been assessed against our published HELAA methodology in order to judge their suitability for development so as to contribute to meeting the identified need for homes and jobs in the borough. Until this and other evidence base work is complete it is not possible to determine the extent to which development will be needed in each of the types of location identified in the Issues and Options consultation.
	Ridge Residents Association		This would depend on the percentage increase proposed.	Comment noted
	TCT Trust		Would list existing traffic and infrastructure issues which will all be exacerbated by the building of further housing. Green belt will need to be sacrificed to reap the benefit of a new settlement.	The comments are noted.
16 New Garden village <i>Do you support the idea of a new garden village?</i>				
	Aldenham Parish Council		1. Support concept. Ensure infrastructure that links traffic to the motorway system, rail links and site for new secondary school included, and liaison with neighbouring authorities. 2. Consider a new civic parish for new garden village.	1. The support is welcomed. The council is clear that any new settlement would be planned to include, and would deliver, the infrastructure required to create attractive, healthy sustainable communities. The garden village model provides a vehicle for the delivery of homes, jobs and infrastructure. Planning and delivery would need to involve all bodies with responsibility for the provision of services and infrastructure needed to support the community. 2. The comment is noted but this would not be a matter for the local plan.
	Colney Heath Parish Council		No need for a garden village (standard methodology need = 372pa). Location is unsustainable (no public transport). Decision has already been made behind closed doors – dumping need on Welwyn Hatfield and St Albans. Proposed location adjoins M25 – poor air quality, excessive noise, made up ground. Commuters will use congested roads to get to Radlett and St Albans rail stations. Harper Lane and A1081 suffer considerable peak time congestion already. A414 under considerable pressure, which is already forecast to increase (50,000 new homes within 5 miles according to HCC's Transport 2050). Local traffic should not be using the M25. Will almost link London Colney – Colney Heath – Hatfield and St Albans – contrary to green belt aims. New village should be free standing and have local support – this proposal doesn't meet these requirements. SSSIs will be affected.	The figure of 372 benefited from a cap which was removed in January 2018 when the Core Strategy reached its 5 th 'birthday'. The Government's now published 'standardised' OAN produces a lower figure of 444 dwellings per annum but this excludes any buffer which is likely to take the figure over 500 units. However, further changes to the methodology are now planned. Nevertheless, it is likely that a housing target significantly in excess of the currently adopted 266 pa will need to be adopted in the new local plan. A new settlement is one of a number of options for delivering this level of growth put forward for consultation. A combination of approaches to delivering the growth needed to meet needs arising in the borough is likely to be required. At this stage we are canvassing peoples' views on the possible development of a new settlement as part of an overall growth strategy; a decision to specifically include a new settlement in the new local plan, including its location if the proposal is to be taken forward, has not been made. The area of search indicated in the Issues and Options document has been identified having regard to factors including the current spatial distribution of development across the borough and likely availability of potential sites. There may be other potential locations for a new settlement if this approach to meeting development needs is pursued, and indeed several alternatives have been put forward in response to the Call for Sites and this Issues and Options consultation. There may of course be constraints which limit the extent to which any of these areas can deliver a new settlement. With regard to the area of search indicated in the Issues and Options consultation, it is acknowledged that Colney Heath Parish Council has raised issues that need to be addressed before any decision as to the suitability of the area for a new settlement is taken. Further work, including technical studies and discussion with neighbouring authorities and other statutory bodies responsible for the provision of infrastructure is required before sites can be identified and consulted on.
	CPRE		Strongly oppose the creation of any new settlement as this would involve removing land for at least 6000 houses plus retail and employment uses and associated infrastructure. Flies in the face of national policy for the protection of the green belt. No ready access to the rail network, unsustainable location.	The comment is noted. The council has to balance the need to protect the green belt with the need for development to serve the needs of a growing population. The current local plan is based on the principle of not allowing development in the green belt other than in the circumstances specifically set down in the NPPF. However this approach does not enable the council to deliver anywhere near our likely OAN. The likely shortfall of delivery of housing under that plan against a proper assessment of need was a significant reason for the inspector for the Core Strategy 2013 to require it to be reviewed within 3 years. We are

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				<p>now undertaking that review and the expectation is clearly that the aim should be to deliver as far as possible the full OAN – although it is of course acknowledged that constraints including the green belt may limit this to some extent. Our neighbouring authorities are similarly constrained so the possibility of being able to ‘out-source’ the meeting of need arising in Hertsmere is also very limited.</p> <p>The development of a new settlement is a realistic option for meeting the need for homes and jobs arising in the borough and is therefore one that needs to be considered. There are both benefits and challenges associated with this approach, some of which are set out in the Issues and Options document. We will analyse all responses, and all alternative approaches to meeting the borough’s needs before identifying sites for further consultation.</p>
	Dacorum Borough Council		<p>1. Unlikely that 4000 homes could be built as a standalone garden village during the plan period. Careful consideration needs to be given to the number that can realistically be achieved.</p> <p>2. Would welcome Hertsmere’s involvement in strategic sites study being considered for SW Herts to consider potential locations for new garden towns/villages on a wider geographical basis.</p>	<p>1. It is acknowledged that delivery of homes in a new garden village would be most likely to be towards the end of the plan period and beyond. However the Issues and Options document recognises that a combination of approaches for planning future growth is likely to be needed. The likely phasing of delivery would be taken into account in identifying the contribution that a new garden village (if this option is pursued) could make to meeting overall needs within the plan period when identifying the number and sizes of sites in other categories (brownfield, garden suburbs, village expansion etc) to be allocated in the plan.</p> <p>2. Hertsmere will continue to engage with Dacorum and other SW Herts authorities in relation to strategic planning matters across the area.</p>
	Elstree and Borehamwood town council		The new garden village is the town council’s preferred choice from the options listed.	The comment is noted.
	HCC Environment Department		<p>1. Archaeological potential: Scheduled Ancient Monument (South Mimms Caste) and 6 areas of archaeological significance. High potential for medieval remains in vicinity of Salisbury Hall, both north and south of the M25. Medieval church and possible deserted medieval settlement at North Mymms. Fields to south of Courser’s Farm have high potential for prehistoric remains. Heritage interest in Salisbury Hall also extends to its role as the de Havilland aircraft secret design centre during WWII. Should assess historic environment potential prior to allocation of land for development.</p> <p>2. Could present a positive opportunity for development with the critical mass necessary for viable new bus services and opportunities to plan sustainable transport infrastructure provision from the outset. Should include key services and amenities as part of the settlement and excellent public transport links to other areas including employment locations. Cost of providing necessary infrastructure should be taken into account at the outset.</p> <p>3. Area of search not well connected by sustainable transport but is well located for the strategic road network which could lead to it being a car based development. This part of the network already suffers from heavy traffic flows with J22 and J23 being identified as congested parts of the network, as are the connecting links on both A1 and M25.</p> <p>4. An aim to require infrastructure that includes enhanced green infrastructure should be included.</p> <p>5. Need to take account of Salisbury Hall Farm copse and Shenley Lodge Farm wood Wildlife Sites, Coursers Road gravel pit Wildlife Site, Redwell Wood SSSI, Round Wood, Cobs Ash, Potwells, Cangsley Grove, Hawkshead Wood, Mymmshall Wood Wildlife Sites.</p>	<p>1. Areas of archaeological significance will be taken into account when assessing sites and areas for suitability for future development as per our published HELAA methodology.</p> <p>2. The support is welcomed and comments noted.</p> <p>3. The comments are noted. No decision has yet been taken about the principle or location of a new garden village. The spatial options for locating a new settlement in Hertsmere are however very limited and it may be that innovative transport responses to enable the development of sustainable communities in an area which is currently not well served by public transport are required. These are matters that will require significant further consideration and discussion with HCC and other transport infrastructure providers.</p> <p>4. This is included in the Issues and Options document.</p> <p>5. The comment is noted and will be taken account of as potential development sites are assessed and policies and proposals for inclusion in future iterations of the draft plan are prepared for consultation.</p>
	Heathways Residents’ Association		1. This is the option favoured by the Association (although the Association opposes loss of Green Belt it accepts that this is probably inevitable) because it feels that all development must provide a green environment by way of trees, open spaces and as low density of development as is viable and must have a self-supporting infrastructure of schools, doctors, shops and an internal hopper	1. The comment is noted. We agree that the Association’s priorities would be most easily achieved in a new garden village, but we are also confident that attractive, sustainable communities can be created by extending and infilling in existing settlements; in fact both (and other) approaches to the location of new development will most likely be necessary if the development needs of our borough are to be met in full.

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			transport service. This is most achievable via a new garden village and would be more difficult to achieve in smaller developments. It must be self-sufficient in services and facilities thus avoiding even more pressure on those in existing areas. 2. The area near Savacentre/M25 appears to be suitable although it is Green Belt.	2. Comment noted.
	Herts and Middlesex Wildlife Trust		Building in the green belt or on green field sites should result in measurable net gain to biodiversity in accordance with NPPF. Development must follow the mitigation hierarchy, i.e. to avoid impacts first and if this is not possible, mitigate then compensate impacts. Net gain must be measurable by applying the DEFRA biodiversity assessment metric to all major development. Application of this metric will ensure an objective, fair, repeatable, ecologically robust and transparent system that delivers development and improvements in biodiversity. Development must be permeable to wildlife, habitats linked internally and externally and maximise opportunities for incorporation of wildlife features within development e.g. integrated bat boxes, SUDS etc.	These comments are useful and will be taken account of as potential development sites are identified and policies and proposals for inclusion in future iterations of the draft plan are prepared for consultation.
	Historic England		Support idea of new garden village in principle but depends on soundness of future site allocations. Consideration of Historic environment should be fundamental to defining boundaries – should undertake Historic Impact Assessments in accordance with advice note ‘Site Allocations in Local Plans’. Criteria for protection of heritage assets and their settings need to be included in each of the policies for garden village. Plan should outline how potential impacts on wider area will be mitigated and how allocation selection process has taken the historic environment into account.	The support is welcomed and comments noted. Historic England’s advice will help inform future iterations of the new local plan.
	Letchmore Heath Village Trust		To meet number of houses required a new garden village is the most attractive, probably essential option	The Issues and Options document recognises that a combination of approaches to planning for future growth is likely to be needed. However given the quantum of new housing likely to be required, we agree that a new garden village has to be seriously considered. The support is welcome.
	Little Heath Action Group		Potters Bar is full. Support garden village proposal which would provide opportunity for a well thought through strategic long-term plan to supply all the correct infrastructure & facilities for residents	The support is welcomed and comments noted.
	London Colney Parish Council		<p>Recognise need for additional building of homes but do not accept that it is reasonable for Hertsmere to deliver the significant majority of new housing need at this location to the detriment of London Colney residents. Object in strongest possible terms to garden village because:</p> <ul style="list-style-type: none"> • No rail access. M25 J22 heavily congested and M25 not intended for use by local traffic. London Colney suffers from traffic from M25 into St Albans, A414 and strategic rail freight site • Site straddles M25 – barrier to community cohesion. Noise and air pollution implications (would mean additional land take to provide buffer). Residents of new settlement would not use cycle, bus or other green transport options to significant degree. • Site affected by busy roads, gravel extraction and anaerobic digester at Coursers Farm – significant lorry movements. Noise and odour pollution are also a problem in relation to these facilities. • Would need a new junction on the M25. This would increase noise and air pollution and reduce the area available for development. Highways Agency funding unlikely to be forthcoming. Would lead to more traffic on M25 (including local traffic) • Affordable housing will not be affordable for local residents – people moving out of London will price local people out. • Will lead to coalescence – lose the separated identities of London Colney and Colney Heath. Hertsmere seeking to avoid coalescence between its communities so it is unreasonable to create it within St Albans. 	<p>A new settlement is one of a number of options put forward for consultation. A combination of approaches to delivering the growth needed to meet needs arising in the borough is likely to be required. At this stage we are canvassing peoples’ views on the possible development of a new settlement as part of an overall growth strategy; a decision to specifically include a new settlement in the new local plan, including its location if the proposal is to be taken forward, has not been made.</p> <p>The reasons for objecting to new homes being built in the area of search indicated in the consultation are all ones that we will need to fully investigate. It is acknowledged that the Parish Council has raised issues that need to be addressed before any decision as to the suitability of the area for a new settlement is taken. Further work, including in consultation with infrastructure providers and Duty to Cooperate neighbours is required before sites can be identified and consulted on.</p> <p>The area of search indicated has been identified having regard to factors including the current spatial distribution of development across the borough and likely availability of potential sites. There may be other potential locations for a new settlement if this approach to meeting the borough’s need for development is pursued, and indeed several alternatives have been put forward in response to the Call for Sites and this Issues and Options consultation. There may of course be constraints which limit the extent to which any of these areas can deliver a new settlement.</p>

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			<ul style="list-style-type: none"> Concerned about the loss of green belt. Impact being concentrated away from Hertsmere residents while ignoring the impact on neighbouring communities. Removal of green belt here increases urban feel and will damage ability of local residents to access green space. Green belt boundary should only be amended when all other reasonable options have been fully examined. Development to meet housing need should be distributed evenly within the Hertsmere area so that no one existing community is disproportionately disadvantaged. St Albans will bear brunt of increased demand on infrastructure such as GPs, schools, libraries and shops, but s106 monies will go to Hertsmere – this is inequitable. No mention of Duty to Cooperate. Housing need figures in the proposal are too low and time period of the plan (up to 2024) is inadequate bearing in mind the length of time that development of this size and all the associated infrastructure would take to implement. 	
	Radlett Society and Green Belt Association		The Radlett Society would take issue with the premise of this question, because the amount of developable land in Hertsmere is finite and fixed by the Government's Green Belt, which was and is intended to be a permanent block on the expansion of London. We do not see any difference, in terms of development in the Green Belt, between houses built for London or Hertsmere. There would be a loss of openness. It would also symbolise a rejection of the 'Duty to Co-operate' with St. Albans DC and London Colney PC. As, by our Constitution, we are opposed to Green Belt developments, we would support their comments.	The comments are noted.
	Ramblers		Object to new garden village as Ramblers have achieved a public rights of way improvement initiative in the Tyttenhanger estate north of Coursers Road, between London Colney and Colney Heath, with the proposals being confirmed early in 2018. Will link to wider public rights of way network and benefit riding and cycling communities as well as walkers. Now propose looking to develop walking routes in this area and around the area to the south, which is within the area of search. Locating a garden village here would cut across everything Ramblers have worked for here in last 7 years. Country Park might be ok, new garden village is not.	The comments are noted. There are many factors that will need to be taken into account in coming to a conclusion about whether and where to locate a new garden village in the borough. There are benefits and issues with every approach, some of which are set out in the Issues and Options document. However these comments will be taken into account when considering the matter; should ideas for a garden village which might affect public rights of way be progressed the way in which the network can be protected and improved as part of any development would be considered, and all legal requirements complied with.
	Ridge Residents Association		4000 homes equals a town not a village, would have huge impact on surrounding villages. Is the land safe to build on? Trips generated would have huge impact on all surrounding villages.	The comments are noted. It is acknowledged that any settlement of significant size will have an impact on the surrounding area; detailed work needs to be undertaken with regard to the potential impact that all possible locations for a new garden village could have, and ways of mitigating any negative impacts will need to be considered before any decisions about whether and where to allocate land for such a development are taken. Similarly the suitability of any land for development would need to be investigated before any specific allocations could be made. The suitability of sites put forward – including those submitted under the Call for Sites and responses to this Issues and Options consultation - will be assessed against our published HELAA methodology in order to judge their suitability for development. Until this work is complete it is not possible to comment on the suitability of individual sites. The outcome will inform the selection of sites in future iterations of the draft plan for consultation.
	St Albans City & District council		Justification for new settlement and for its location are unclear. There are issues regarding accessibility, proximity to the M25, urban design, potential community severance	A new settlement is one of a number of options put forward for consultation. A combination of approaches to delivering the growth needed to meet needs arising in the borough is likely to be required. At this stage we are canvassing peoples' views on the possible development of a new settlement as part of an overall growth strategy; a decision to specifically include a new settlement in the new local plan, including its location if the proposal is to be taken

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				<p>forward, has not been made.</p> <p>The area of search indicated in the Issues and Options document has been identified having regard to factors including the current spatial distribution of development across the borough and likely availability of potential sites. There may be other potential locations for a new settlement if this option is pursued, and indeed several alternatives have been put forward in response to the Call for Sites and this Issues and Options consultation. There may of course be constraints which limit the extent to which any of these can deliver a new settlement. With regard to the area of search indicated in the Issues and Options consultation, it is acknowledged that SADC has raised issues that need to be addressed before any decision as to the suitability of the area for a new settlement is taken. Further work, including in consultation with infrastructure providers and Duty to Cooperate neighbours is required before sites can be identified and consulted on.</p>
	Shenley Neighbourhood Plan Steering Group (and post it notes from public meeting)		<p>1. Why is there only one option for the new settlement in the Issues and Options consultation? Possible alternative site – land adjoining South Mimms Services. Easy access to M25 and A1(M) together with a wider choice of rail stations. Has this or any other sites been considered? What is the planning justification for placing the new village at the proposed location?</p> <p>2. Have St Albans District Council and Welwyn Hatfield District Councils been consulted?</p> <p>3. Where will the residents of the new garden village be employed?</p> <p>4. What research has been undertaken about the likely impact on the existing infrastructure?</p> <p>5. Major concerns:</p> <ul style="list-style-type: none"> • Not near a rail station, no public transport. Many people will commute so this should be a basic requirement • Impact of commuting to London on local roads – people will drive to St Albans, Radlett or Borehamwood, all going through Shenley. Congestion in surrounding area – Bell roundabout, Harper Lane/Watling Street. Additional traffic from proposed housing developments at Pastoral Centre, Harperbury and whatever happens at the Radlett Rail Freight site. Will effectively turn roads in and around Shenley into a virtually permanent state of gridlock. • Pollution from M25 	<p>1. A new settlement is one of a number of options put forward for consultation. A combination of approaches to delivering the growth needed to meet needs arising in the borough is likely to be required. At this stage we are canvassing peoples' views on the possible development of a new settlement as part of an overall growth strategy; a decision to specifically include a new settlement in the new local plan, including its location if the proposal is to be taken forward, has not been made.</p> <p>The area of search indicated in the Issues and Options document has been identified having regard to factors including the current spatial distribution of development across the borough and likely availability of potential sites. There may be other potential locations for a new settlement if this option is pursued, and indeed several alternatives have been put forward in response to the Call for Sites and this Issues and Options consultation. There may of course be constraints which limit the extent to which any of these can deliver a new settlement. With regard to the area of search indicated in the Issues and Options consultation, it is acknowledged that Shenley Neighbourhood Plan Steering Group has raised issues that need to be addressed before any decision as to the suitability of the area for a new settlement is taken. Further work, including in consultation with infrastructure providers and Duty to Cooperate neighbours is required before sites can be identified and consulted on.</p> <p>2. All neighbouring authorities have been consulted on the Issues and Options document and we will continue to engage with them both individually and on a South West Herts basis as the process of plan preparation continues.</p> <p>3. At this stage it is not possible to say where people would be employed, but it would be the intention that should a new garden village be planned in any location it would include employment land allocations. A new garden village would not just be housing – the intention is not to create dormitory settlements where the majority of people have their employment and needs for services met elsewhere. Rather it would be a largely self-sufficient settlement providing opportunities for employment, as well as social and other infrastructure needed in order to create a sustainable thriving community.</p> <p>4. The Issues and Options document identifies in outline the types of infrastructure required to support new development. It has also asked people where they feel there is a need for new or improved infrastructure. Detailed work will need to be undertaken as part of the process of preparing future iterations of the plan for consultation. We are already working with the main infrastructure providers– transport, health, utilities, education, HCC services etc – to ensure that the infrastructure needs and all possible means of delivery are identified and secured.</p> <p>5. See answer to 1, 3 and 4 above. It is acknowledged that the neighbourhood plan steering group has raised issues that need to be addressed before any decision as to the suitability of the area for a new settlement is taken. Further work, including in consultation with infrastructure providers is required to assess this and other areas of the borough before sites can be identified and consulted on further. With regard to who would occupy the new homes, we acknowledge that this is a difficult issue in relation to market housing; there would be more control with regard to the affordable homes that would need to be provided as part of any development (over 10 units – to comply with government policy) as the</p>

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			<ul style="list-style-type: none"> Possible linking up of Shenley and garden village via land owned by Comer Homes Where will children go to school. What about pressure on doctors? Will homes be for local people? <p>6. Neighbourhood Plan is about what the community itself knows is best and what it needs. New settlement is being imposed on Shenley – this is not working together and cooperation.</p>	<p>council will ensure that occupancy of the Affordable Housing units provided is restricted to eligible households in housing need. This is an issue at which we need to look further.</p> <p>6. We are committed to working with Shenley Neighbourhood Plan steering group and the Parish Council. As we have consistently said, the plans for the borough as a whole are at a really early stage and there are many issues to be resolved and studies and assessments to be undertaken before any decisions can be made. We agree that local knowledge is incredibly valuable and that is why we have consulted with our communities at this early stage before significant amounts of preparatory work on the new local plan have been undertaken.</p>
	Shenley Parish Council		<p>1. Why is there only one option for the new settlement in the Issues and Options consultation? Possible alternative site – land adjoining South Mimms Services. Easy access to M25 and A1(M) together with a wider choice of rail stations. Has this or any other sites been considered? What is the planning justification for placing the new village at the proposed location?</p> <p>2. Have St Albans District Council and Welwyn Hatfield District Councils been consulted?</p> <p>3. Where will the residents of the new garden village be employed?</p> <p>4. Only a couple of fields will separate Shenley from the proposed new village. Very concerned about the proposed garden village site adjoining land at Shenley owned by Comer Homes – if this land is also eventually built on Shenley and the new garden village will join up and Shenley will no longer be a village.</p> <p>5. You have chosen the wrong area of search for new garden village:</p> <ul style="list-style-type: none"> not near a rail station. Majority of people won't be local and commute to London so will drive to St Albans, Radlett or Elstree and Borehamwood (th latter being much cheaper). no bus service. Even if provided it would be slow as it would keep stopping. Poor local infrastructure. Proposals likely to double existing traffic movements through Shenley. People will drive to St Albans, Radlett or Borehamwood, all going through Shenley. Congestion in surrounding area – Bell roundabout, Harper Lane/Watling Street. Additional traffic from proposed housing developments at Pastoral Centre, Harperbury and whatever happens at the Radlett Rail Freight site. Currently there is gridlock at peak times due to traffic having to give way at narrow bridge over the railway at Watling Street junction. Also concerned about effect on London Colney. 	<p>1. A new settlement is one of a number of options put forward for consultation. A combination of approaches to delivering the growth needed to meet needs arising in the borough is likely to be required. At this stage we are canvassing peoples' views on the possible development of a new settlement as part of an overall growth strategy; a decision to specifically include a new settlement in the new local plan, including its location if the proposal is to be taken forward, has not been made.</p> <p>The area of search indicated in the Issues and Options document has been identified having regard to factors including the current spatial distribution of development across the borough and likely availability of potential sites. There may be other potential locations for a new settlement if this approach (new garden village) is pursued, and indeed several alternatives have been put forward in response to the Call for Sites and this Issues and Options consultation. There may of course be constraints which limit the extent to which any of these can deliver a new settlement. With regard to the area of search indicated in the Issues and Options consultation, it is acknowledged that Shenley Parish Council has raised issues that need to be addressed before any decision as to the suitability of the area for a new settlement is taken. Further work, including in consultation with infrastructure providers and Duty to Cooperate neighbours is required before sites can be identified and consulted on.</p> <p>2. All neighbouring authorities have been consulted on the Issues and Options document and we will continue to engage with them both individually and on a South West Herts basis as the process of plan preparation continues.</p> <p>3. At this stage it is not possible to say where people would be employed, but it would be the intention that should a new garden village be planned in any location it would include employment land allocations. A new garden village would not just be housing – the intention is not to create dormitory settlements where the majority of people have their employment and needs for services met elsewhere. Rather it would be a largely self-sufficient settlement providing opportunities for employment, as well as social and other infrastructure needed in order to create a sustainable thriving community.</p> <p>4. The concerns are noted. No decision on the suitability or otherwise of any sites or areas included in the Issues and Options consultation have been made.</p> <p>5. See responses 1 and 3 above.</p> <p>6. A decision on the location for a new village, if that option is pursued, has not yet been taken. However several areas of the borough, including land in the South Mimms area, have been put forward for consideration and will be assessed consistently with the area of search indicated in the Issues and Options document.</p>

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			<ul style="list-style-type: none"> Where will garden village residents work? <p>6. Suggested alternative site for new garden village: land adjoining South Mimms Services. Easy access to M25 and A1(M) together with a wider choice of rail stations, better public transport (buses) and greater local employment options (Potters Bar, Barnet, Borehamwood and Elstree).</p>	
	TCT Trust		Would list existing traffic and infrastructure issues which will all be exacerbated by the building of further housing. Green belt will need to be sacrificed to reap the benefit of a new settlement.	The comments are noted.
	Welwyn Hatfield Council		<p>1. Would like a meeting to discuss the new garden village proposal as substantial new development in the area of search would have significant implications for Welwyn Hatfield. This is a DtC issue. Wish to flag up North Mymms Park is Grade 1 Listed Building and unregistered park and garden. Redwell Wood is SSSI.</p> <p>2. If any proposal comes forward on land which falls partly within Welwyn Hatfield any housing delivered on this land would be expected to contribute to Welwyn Hatfield's own housing need</p>	<p>1. The comment is noted. Discussions on DtC matters, including whether there is potential for locating a new settlement close to the Welwyn Hatfield boundary, will continue. Detailed assessments of sites lying within the area of search – or indeed in any other part of the borough – have not yet been undertaken but will take into account heritage and ecological issues along with all other relevant considerations.</p> <p>2. Hertsmere does not intend putting forward any sites for development which do not fall within the borough boundary.</p>
17 Any other comments				
	LB Barnet		Look forward to continued DtC discussion/Statement of Common Ground re strategic cross-boundary planning issues. Likely to include green belt, meeting housing need (including the needs of the elderly and the travelling community), employment land, strategic transport network.	The comments are noted and commitment to continued DtC engagement welcomed.
	Colney Heath Parish council		Should build high quality high density homes in city centres and around transport hubs and protect the green belt.	Increasing the density of development around transport hubs is consistent with HCC's latest LTP consultation and may in some circumstances be an appropriate response to the need to increase the sustainability of our settlements and transport systems. This does, however, have to be balanced against potential impacts on local environmental quality and character and the ability to provide infrastructure such as schools in these locations and may not be appropriate in all of Hertsmere's settlements. It is the case that on its own this approach would not obviate the need for some building in what is currently green belt. The comment is however noted, and it will be the intention to identify a range of approaches to meeting the borough's need for development, including new development within the current built up areas.
	CPRE		NPPF allows local authority to set development targets that would not meet assessed need (para14). Council should not pre-determine the scale of development that should be planned for at this stage. Documents shouldn't say that housing development has to be on a particular scale, and that this should include building a new settlement in the Green Belt. Also concern that new housing built in Hertsmere will not solve local housing issues of affordability or access to the housing market for local people – it will just result in loss of the green belt.	The content of NPPF paragraph 11 (previously paragraph 14) is acknowledged. However the clear intention is that the full OAN should be met. As a matter of principle, the council has indicated that it aims to deliver the borough's full OAN, but we cannot as yet say whether this will be possible, or even, given the various factors that need to be considered (including the extent to which different parcels of land fulfil the purposes of the green belt), desirable. The suitability of sites put forward – including those submitted under the Call for Sites and responses to this Issues and Options consultation – has been assessed against our published HELAA methodology in order to judge their suitability for development. This includes an assessment of the extent to which green belt purposes are met as evidenced by the recent green belt assessment undertaken for the council by consultants Arup.
	Dacorum Borough Council		Welcome joint planning across SW Herts, in which Hertsmere is a participant. Suggest the plan period should be to 2036 for consistency with the evidence base studies and other SW Herts authorities. Will be useful to continue to liaise on issues including biodiversity offsetting and sustainable design and construction, good practice in terms of delivery of green infrastructure, transit provision for travellers, and other cross boundary infrastructure matters.	The comments of support are noted. Hertsmere shares Dacorum's commitment to continued joint working and welcomes the suggestions for specific areas of work.
	Oliver Dowden MP	Land south of Aldenham reservoir	Should allocate land opposite Aldenham reservoir for housing development with a condition that it would finance the upkeep of Aldenham reservoir.	The comment is noted. The suitability of the site and whether it should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development. Until this work is complete it is not possible to comment on the suitability of individual sites. The outcome will

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				inform the selection of sites in the Local Plan.
	Education and Skills Funding Agency		<p>1. The Plan should explicitly reference key national policies relating to the provision of new school places.</p> <p>2. ESFA wishes to engage with HBC in the plan preparation process.</p> <p>3. Good practice example – LB Ealing ‘Planning for Schools’ DPD.</p> <p>4. Emerging ESFA initiative re forward funding schools for large residential developments may be of interest</p> <p>5. May be useful to amend Reg123 list when growth strategy has been agreed so that s106 can be used to fund new school places required to support housing growth. Method of calculating contributions required will need to be set out clearly.</p> <p>6. <i>Advice provided on producing proportionate evidence base.</i></p>	ESFA’s comments are helpful and will help to inform the next stages of plan preparation. Hertsmere will continue to engage with ESFA during this process.
	Elstree and Borehamwood Town Council	Land on south side of Watford Road	<p>1. Land on south side of Watford Road should be reserved for housing in order to protect Aldenham Reservoir</p> <p>2. Hertsmere council should approach more hard to reach groups within the community, including vulnerable adults and those with disabilities.</p>	<p>1 The comment is noted. The suitability of the site and whether it should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development. Until this work is complete it is not possible to comment on the suitability of individual sites. The outcome will inform the selection of sites in the Local Plan.</p> <p>2. The council has been particularly concerned to engage harder to reach groups with the process of preparing the local plan and has contacted a number of such groups to encourage them to participate. Any specific suggestions that the EBYC has with regard to specific groups, and how best to engage with them would be very welcome.</p>
	Hertsmere Community Transport	Land south of Aldenham Reservoir / Watford Road	Support the inclusion of this land for development subject to the condition that the developer funds maintenance / renewal of Aldenham reservoir dam. With less open space available with public access, would be a tragic loss to people with mobility issues affecting physical and mental health issues in the community and surrounding communities	The comment is noted. The suitability of the site and whether it should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Sites will be assessed against our published HELAA methodology in order to judge their suitability for development. Until this work is complete it is not possible to comment on the suitability of individual sites. The outcome will inform the selection of sites in the Local Plan.
	HCC Environment Department		<p>1. Development should be concentrated in places that are highly accessible by public transport and in walking or cycling distance of key services and amenities to reduce dependence on cars. Advantage to locating new development within existing urban areas. Key services within walking distance <2km, cycling <5km and where there is good public transport infrastructure – rail and bus.</p> <p>2. Location, layout and design of any new settlements or extensions should be informed by landscape and visual impact assessments and landscape sensitivity and capacity studies to ensure that development can be accommodated without causing unacceptable harm to landscape character and visual amenity.</p> <p>3. New local plan should reflect work on Green Infrastructure being undertaken by HPG Development Plans Group and Hertfordshire Landscape and Green Infrastructure Group.</p> <p>4. All development should ensure that ecosystems are properly considered when considering new settlement or site development. Strategically, wildlife corridors, stepping stones and existing habitats; locally, ecological. landscape features and landscaping should enhance the built and natural environment.</p> <p>5. Local Plan should reflect and be consistent with the LTP. ‘We will expect District Councils to take account of the emerging transport strategy and the policies it contains as they develop the current round of Local Plans’. New local</p>	<p>1. In principle we agree with this. However the level of growth needed together with the existing pattern of development in Hertsmere may mean that this approach is not, in all cases, either possible or desirable. Existing urban areas are already quite densely developed. Public transport facilities, particularly outside the main towns and north south links through the borough, are weak.</p> <p>2. The comment is noted. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.</p> <p>3. The comment is noted. We will consider how the GI issue should be embedded in the new local plan as we prepare future iterations of the draft plan for consultation.</p> <p>4. The comments are useful and will be taken into account as we prepare future iterations of the draft plan for consultation.</p> <p>5. We are working with HCC in relation to G&TPs. We have responded to the recent consultation on the draft LTP; that response should be read as a reply to these comments from HCC on the Issues and Options document. The schemes being promoted through the LTP do not necessarily take account of the level of growth being promoted through the new local plan. Discussions will continue.</p> <p>6. The advice is helpful and will inform preparation of future iterations of the draft plan for consultation. We consider that close working between our 2 authorities and other transport</p>

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			<p>plan and relevant Hertfordshire Growth and Transport Plans (SW Herts G&TP, South Central G&TP) must develop and work together in a coherent and integrated way. South Central G&TP identifies strong link between Hertsmere and outer London boroughs and high car usage to these areas. G&TP will set out objectives for the area and identify packages of transport schemes that will support LTP4 and identify areas where HCC plan to focus investment on transport infrastructure. There needs to be a connection between the areas of growth being promoted through the local plan process and the schemes identified through the GTP.</p> <p>6. HCC requires evidence in order to enable them to assess traffic implications of the local plan as it progresses and to identify mitigation measures. <i>Evidence requirements are set out in 'Requirements for Local Plans – August 2016'.</i></p> <p>7. Commuting flows to and from London need to be recognised and responded to in the local plan.</p> <p>8. Modelling already shows highway issues on part of Hertsmere's network. Any growth outside core areas of Borehamwood and Potters Bar (where there is good modal share due to rail and bus services) would require improvements to public transport to ensure sustainable developments and to reduce pressure on the highway network. Need early liaison with Highways England. Mitigating consequences of growth will be challenging and cannot be solved solely through capacity driven highway infrastructure improvements. Local plan should include policies which promote sustainable modes and create a foundation for change in travel behaviour.</p> <p>9. List of factors that Hertsmere should give particular consideration to:</p> <ul style="list-style-type: none"> • Location of major new development in proximity to main public transport interchanges / nodes • Appropriate amenities and community facilities easily accessible on foot to major new development sites • Parking provision to support reduced car usage, particularly at the most sustainable locations for development (i.e. near public transport interchanges). • Infrastructure for sustainable travel within new developments, and linking new development to key destinations including providing for improvements of existing infrastructure and networks • Needs and opportunities to improve public transport options to existing employment areas from local communities and addressing 'transport poverty' issues • Bus priority measures • Cycle parking in new developments and key journey destinations (stations, major employers, town and local centres) • Supporting more efficient and sustainable travel through technology, such as intelligent transport systems, electric vehicles, shared mobility etc. • Interventions to encourage behaviour change, such as travel planning and promotion • Planning for superfast broadband infrastructure to facilitate viable home working, business creation and economic growth <p>Will need to feed new growth figures into COMET model. Additional modelling likely to be necessary. Hertsmere and HCC need to work together to identify evidence required so that HCC can support the policies, development strategies and IDP being brought forward in the local plan at EIP. Any identified impacts will need to be considered as part of the local plan development.</p>	<p>infrastructure providers in relation to the location, timing and quantum of development to be proposed in the local plan and transport investment which may be required alongside such development is critical.</p> <p>7. The comment is noted.</p> <p>8. We are aware of current levels of congestion in the borough, of the need to liaise with all transport infrastructure providers in developing proposals to meet the borough's growth needs and to further embed the drive to enhance accessibility to and use of sustainable modes of transport in the local plan.</p> <p>9. The advice is helpful and will inform preparation of future iterations of the draft plan for consultation. We will work with HCC in respect of the necessary evidence base. Discussions with transport infrastructure providers across the wider SW Herts area commence February 2018 in order to ensure that infrastructure needs are considered at both the local and more strategic level as the boroughs progress their new local plans.</p> <p>10. These areas are shown on Hertsmere's adopted Policies Map and Policy SADM18 protects them from development which would unacceptably affect the mineral resource. It is likely that a similar policy would be included in future iterations of the draft plan for consultation. We are aware that HCC is consulting on a new draft Minerals Local Plan; depending on timescales it may be more appropriate for the new local plan to refer to this new plan than to the currently adopted one.</p> <p>11. The need to incorporate consideration of waste concerns in the local plan is acknowledged; policies in the currently adopted local plan cover these issues. We will consult with HCC Waste Management in developing policies and proposals in the emerging local plan.</p>

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			<p>Mitigation will need to be integrated into local plan's infrastructure planning processes. Early engagement and consideration of highways mitigation measures in the local plan process is essential. This includes the cost and deliverability of any proposed mitigation measures.</p> <p>Essential for Hertsmere to work with other neighbouring LPAs and other key stakeholders such as Highways England and Network Rail to develop deliverable mitigations as part of the Local Plan's development. It may be that some of these are of a more strategic nature and may be outside of the Borough or serve a wider area.</p> <p>LHA's response to a Local Plan will be based on our view of the cumulative impact of growth. It is unlikely that the LHA will be able to support at EiP any Plans which fail to identify and address these impacts. To ensure there is a mutual understanding on all matters relating to how the Local Plan manages transportation issues, the Highway Authority would recommend early and ongoing engagement, with regular scheduled progress meetings.</p> <p>10. <u>Minerals</u>: Hertsmere sits on the Sand and Gravel Belt identified in the Minerals Local Plan. MLP encourages prior extraction to avoid mineral sterilisation. Non-mineral development within the Minerals Consultation Area may not be determined until HCC has been given opportunity to comment on whether the proposal would unacceptably sterilise mineral resources. MCA around Harper Lane Rail Aggregate Depot and Rail and Recycling Depot also requires consultation for development within this area. HCC will oppose development proposals which are likely to prevent or prejudice the use of the safeguarded areas for the import or export of aggregates. Mineral Consultation Areas should be included on 'maps of the Plan area'. Emerging local plan policies should reflect policies adopted in the Minerals Local Plan (2007).</p> <p>11. <u>Waste</u>: additional growth will create waste through demolition, construction and occupation of developments. It is a key issue that should be addressed in delivering sustainable design and construction. Hertsmere has a duty to cooperate with HCC to help provide a suitable network of waste management facilities. Employment Land areas of search for the provision of waste management are identified in HCC's Waste Site Allocations Development Plan Document adopted July 2014. HCC does not wish to see these areas lost to alternative development. Emerging local plan policies should reflect policies adopted in the Waste Core Strategy Development Management Policies document (2012). Waste management sites are safeguarded in the Waste Core Strategy and Development Management Policies document 2012 and include several in Hertsmere. HCC will oppose development proposals which are likely to prevent or prejudice the use of land identified or safeguarded for waste management purposes...</p>	
	HCC Property (Development Services)		<p>1. <u>Hertfordshire Fire and Rescue</u>: would like to see a recommendation for sprinklers in all new buildings</p> <p>2. <u>Waste</u>: HCC, as the Waste Disposal Authority (WDA), is responsible for the disposal of Local Authority Collected Waste (LACW). This waste is either collected at the kerbside by the district and borough councils in the role of the Waste Collection Authorities (WCAs) or deposited by residents at Household Waste Recycling Centres (HWRCs).</p> <p>The Waste Core Strategy & Development Management Policies (2012) sets out the spatial vision, objectives and strategic issues for waste planning in the county and contains the policies to inform decisions for waste planning applications. The Waste Site Allocations (WSA) (2014) identifies suitable sites</p>	The information provided in HCC's response is all useful input to the process of preparing the new local plan. As proposals for the location and quantum of development in each area are firmed up discussions with HCC will continue in order to ensure that the meeting of infrastructure requirements is an integral and deliverable part of the plan.

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			<p>to accommodate facilities for the sustainable management of waste. Two existing HWRCs fall within Hertsmere; these are Potter Bar and Elstree. The Waste Disposal Authority identifies that in the long term (10-15 years) the Potters Bar HWRC is 'not ideal', as even expansion of this centre would be insufficient to increase container capacity. The Elstree HWRC is identified as being 'unsuitable in the medium term' (5 to 10 years).</p> <p>Key geographical areas where further provision of HWRC facilities are required to meet future need to 2031 (based on proposed housing developments within current plan) include HCC's Area of Search 2, the A414 corridor and the surrounding area, part of which falls into the Hertsmere area. The provision of one or two HWRC super sites along this corridor could better serve surrounding settlements including those within Hertsmere. The required plot size for a HWRC is one hectare. The plot should be located close to the strategic road network to ensure it is within a reasonable traveling time for residents.</p>	
	HCC Property (Development Services) Landowner		HCC recently acquired land at Carpenders Park, South Oxhey to serve the future secondary education needs of Three Rivers, Watford and Hertsmere. The land is currently in agricultural use. HCC would be seeking an allocation for this land as a reserve school site.	The comments are noted. The suitability of sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. We have assessed all sites promoted against our published HELAA methodology in order to judge their potential suitability for housing or economic development and the findings are set out in the HELAA.
	HCC Public Health Service		<p>1. Building health into urban environments is a vital step towards delivering longer term improvements in health across the whole of society. See Public Health England's 'Spatial Planning for Health evidence resource' for planning and designing healthier places. Can help address some of the causes of poor health through balancing provisions for a positive, healthy environment alongside the provision of healthcare facilities.</p> <p>2. New development should be subject of a Health Impact Assessment. New development should not be located in areas of poor air quality unless air quality mitigation is designed in. Particular care should be taken over the spatial location of facilities such as primary school, playing fields and sheltered housing.</p> <p>3. In identifying new locations for development and considering policies affecting existing communities, the council should ensure accessibility to all, promote healthy behaviours through the provision of good quality, safe, easily accessible infrastructure for walking, cycling and leisure reducing the need for vehicle use. A Health Impact Assessment should be undertaken as part of the Local Plan preparation.</p>	<p>1. The comment and suggested resource is useful and will be used to inform the development of the local plan. Many of the policies in the current local plan have a positive impact on health including through controlling the provision, quality and location of development and social infrastructure, ensuring the negative impact of development is mitigated, and protecting and enhancing the natural environment. This overall approach will be continued in the new local plan.</p> <p>2. This comment is useful and will inform the consideration of proposed development allocations and the drafting of policies relating to the environmental and health impact of development.</p> <p>3. The comment is useful and we will examine how and whether a Health Impact Assessment would add value to the local plan preparation process.</p>
	Heathways Residents' Association		<p>1. All development must provide a green environment by way of trees, open spaces and as low density of development as is viable.</p> <p>2. All development must have a self-supporting infrastructure of schools, doctors, shops and an internal hopper transport service</p>	<p>The comments are noted.</p> <p>1. The benefits of maximising green elements of the environment are many; low density development may, however, not always be appropriate in the context of the character of the local area. It may also be the case that allowing some higher density sites could contribute to reducing the need to allocate sites in the green belt and enable the provision of new homes in the most sustainable locations. However this will not be clear until further work to assess sites that have been put forward as having development potential has been undertaken.</p> <p>2. The need for new development to bring with it the necessary infrastructure is certainly accepted by the council and will be specifically addressed in the new local plan. This is referred to throughout the Issues and Options document.</p>
	Herts Constabulary		1. Local Plan should promote Secured by Design layout principles and physical security standards and look for applicants of major planning developments to	<p>1. This is consistent with policy CS22 and its supporting text in the adopted Core Strategy. The comments are helpful and will inform future iterations of the draft plan for consultation.</p>

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			liaise with Hertfordshire Policy Crime Prevention Service. 2. Advice of Herts Police CTSA (Counter Terrorism Security Officer) should be sought and advice incorporated within proposed developments defined as Crowded Places. 3. Night time economy can be a huge drain on police resources. Police and council need to liaise with Licensing.	2. The advice is helpful. We will look at how these points can be incorporated into the new local plan as its preparation is progressed. 3. The advice is helpful. We will look at how this point can be incorporated into the new local plan as its preparation is progressed. Policy SADM47 already addresses this issue and it is likely that the policy or an adaptation of it would be included in future iterations of the draft plan for consultation.
	Historic England		<i>Detailed advice concerning the preparation of a 'positive strategy for the historic environment' as required by the NPPF provided.</i> Guidelines include recommended approach to referencing setting, archaeology, listed buildings, conservation areas, registered parks and gardens, heritage at risk, non-designated heritage assets, green infrastructure, green belt, healthy lifestyles, design, streetscape, climate change and renewable energy, and advice on site allocations and on assembling a comprehensive and robust evidence base, <i>Recommendations on monitoring, the inclusion of a glossary, and mapping also included.</i>	The detailed comments and advice are helpful and will inform future iterations of the draft plan for consultation.
	House Builders Federation		Council must plan for a mix of sites that will deliver across the plan period to contribute to the government's aim of creating a more diverse housing market that supports both large and small housebuilders. Need range of size and location of sites.	The comment is noted. We recognise the need to plan for a variety of sites in terms of size and location. Smaller sites with few constraints are likely to come forward earlier in the plan period, whilst the complex issues around planning and delivery of larger strategic allocations mean that they are more likely to come forward later and may be more vulnerable to significant delays. This is a significant factor in our having identified a range of approaches to delivering new housing requirements and we have acknowledged that the final strategy is likely to feature a combination of some if not all these approaches. We have assessed all sites promoted against our published HELAA methodology in order to judge their potential suitability for housing or economic development and the findings are set out in the HELAA.
	Little Heath Action Group		Suggests Hertsmere & Welwyn Hatfield work together on cross boundary matters. Should be proper review of green belt in this area as both authorities are potentially looking to develop parts of it. DtC requires local authorities to work together on strategic matters. This would also include eg education and housing.	The comments are noted. We fully understand the duty to cooperate with neighbouring authorities on cross boundary strategic matters and will continue to work with Welwyn Hatfield on matters which affect both areas – including any proposals for development close to the boundary and any infrastructure implications which may arise. A stage 1 green belt review has been undertaken in Hertsmere. Consultation on the methodology for this work was undertaken with neighbouring authorities, including Welwyn Hatfield. A stage 2 assessment will shortly be undertaken in a number of areas such as this across the borough.
	North Mymms District Green Belt Society		Supports Little Heath Action Group comments. Hertsmere and Welwyn Hatfield must fulfil their DtC responsibilities and undertake a strategic review of the green belt on both sides of the boundary between the 2 authorities and ensure the essential characteristics of openness and permanence will be maintained.	The comments are noted. We fully understand the duty to cooperate with neighbouring authorities on cross boundary strategic matters and will continue to work with Welwyn Hatfield on matters which affect both areas – including any proposals for development close to the boundary and any infrastructure implications which may arise. A stage 1 green belt review has been undertaken in Hertsmere. Consultation on the methodology for this work was undertaken with neighbouring authorities, including Welwyn Hatfield. A stage 2 assessment will shortly be undertaken in a number of areas such as this across the borough.
	Radlett Society and Green Belt Association		1. Why did the Council not arrange a full public meeting in Radlett? 2. How can residents be persuaded that the housing figures of 9000 are actual 'needs' and not 'demands'? Furthermore, we expect Hertsmere to identify and fill all the empty homes in its jurisdiction before even considering Green Belt sites, other than those already 'safeguarded'.	1. Public meetings were not held anywhere in the borough; rather a series of 5 drop in events and 3 workshops were held in order to enable as large a number of people to attend and find out about the Issues and Options consultation as possible. 2. We are required by the NPPF to boost significantly the supply of new homes by (among other things) using our evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. We commissioned a SHMA jointly with neighbouring authorities which was undertaken by consultants and this identified the OAN for the borough. This figure will be adjusted once the Government agrees its final standard methodology for calculating OAN . 3. Planning for Growth refers specifically to working with other councils on planning issues that affect these areas as well as our own. We are engaged with our neighbouring authorities, including those in the SW Herts grouping of authorities and will continue to work with them and all other DtC bodies throughout the period of preparing the new local plan.

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			<p>3. Planning for Growth document omits any reference to 'duty to co-operate'.</p> <p>4. Our comments on the survey have been made without an opportunity to inspect the current 2017 HELAA report, recently compiled by Hertsmere. Although it is claimed that any site that in the assessment will not necessarily obtain planning consent, it would be useful to read the Council's comments and analysis of the sites.</p>	<p>4. We have assessed all sites promoted against our published HELAA methodology in order to judge their potential suitability for housing or economic development and the findings are set out in the HELAA. The extent to which each site meets the purposes of the green belt, as identified through the green belt assessment undertaken by consultants Arup forms part of this assessment</p>
	Ramblers		Ramblers wish to be involved in the development of the local plan and will comment in detail. Walking is important. Public rights of way network is key component of local infrastructure and needs to be protected, maintained, improved and developed so should be given full weight in development of new local plan.	The comments are noted. We agree that integration of improved opportunities for walking is an important element of developing a more sustainable approach to movement with environmental and health benefits. We will look at how these points can be incorporated into the new local plan as its preparation is progressed.
	Ridge Residents Association		Could all new properties across Hertsmere have solar slate roofs?	It is unlikely that we could require all properties to adopt this approach and in fact it may not be appropriate in all circumstances, but it is certainly something that could be encouraged through relevant policies in the new local plan. We will look at this when drafting policies for consultation in a future iteration of the plan.
	St Albans District Council		<p>1. Would like confirmation of Hertsmere's intentions with regard to development at (and over?) boundary with St Albans</p> <p>2. No mention of DtC arrangements, HBC's preferred approach to wider than district planning, or any potential specific joint / cross boundary issues and development options.</p> <p>3. Plan period should be to 2036 like other SW Herts authorities</p> <p>4. Cannot respond to consultation as no overall housing capacity estimate for the growth options. On what basis are sizes for garden suburbs put forward? How many are anticipated for each settlement?</p>	<p>1. No sites or areas for growth in areas outside Hertsmere are proposed.</p> <p>2. The purpose of the Issues and Options consultation document was to seek views on the different approaches to meeting identified need within the borough – it was not a draft plan. Nevertheless, reference to the current and continuing need to work with neighbouring authorities was made in the document. Hertsmere is committed to on-going joint working with SW Herts authorities and to all other aspects of the DtC. We are engaged in discussions concerning cross boundary strategic matters with our neighbouring authorities and actively, with these authorities, considering the possibility of preparing a local plan covering such issues. A number of our evidence base studies have been and will continue to be, commissioned jointly with our neighbouring authorities.</p> <p>3. At the time of drafting the Issues and Options document the timescale for this and other local plans was not clear and a 15 year timespan from the anticipated adoption date was proposed for our new local plan. Again at the time of drafting discussions concerning proposed joint working and the potential for a strategic local plan covering the wider area were at an earlier stage than is now the case. Although there is no requirement for individual local plans within the area to work to the same plan period it may make sense to do so; this issue will be considered further as work to prepare the plan progresses and further DtC discussions with neighbouring authorities take place.</p> <p>4. No decisions concerning the possible distribution of growth across the borough have</p>

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			<p>5. Unclear how the consultation reflects Hertsmere Green Belt Review</p> <p>6. The consultation is silent on HBC's relationship to London</p>	<p>been made. The Issues and Options consultation has been undertaken at a very early stage of plan preparation, prior to any decisions about how much development would be anticipated at any specific settlement or location. At this stage, the question is the extent to which people support the various options for meeting the borough's growth needs; further work drawing on inter alia technical studies, the outcomes from our recent Call for Sites and this Issues and Options consultation and DtC discussions will help to identify options for growth – which may include areas both within and outside the currently identified areas of search. It is not anticipated that any one category of option would be carried forward on its own, nor that all sites within the areas of search will eventually be allocated for development.</p> <p>5. The comment is noted. We have assessed all sites promoted against our published HELAA methodology in order to judge their potential suitability for housing or economic development and the findings are set out in the HELAA. The extent to which each site meets the purposes of the green belt, as identified through the recent green belt assessment undertaken by consultants Arup, forms part of this assessment.</p> <p>6. The relationship with and proximity to London is acknowledged. The adjoining London Boroughs, GLA and TfL have all been, and will continue to be consulted as we continue with work to prepare future iterations of the plan.</p>
	Shenley Neighbourhood Plan Steering Group (and post it notes from public meeting)		<p>1. Don't build on the green belt – it's to prevent villages merging with surrounding conurbations.</p> <p>2. We are developing a Neighbourhood Plan. This is about what the community itself sees the village expanding in the next 30 to 40 years. The community knows what is best for itself. New settlement is being imposed on Shenley – this is not working together and cooperation. <i>Response provides details on work that has been and is being undertaken to develop the neighbourhood plan.</i></p>	<p>1. The comment is noted. We have assessed all sites promoted against our published HELAA methodology in order to judge their potential suitability for housing or economic development and the findings are set out in the HELAA. The extent to which each site meets the purposes of the green belt, as identified through the recent green belt assessment undertaken by consultants Arup forms part of this assessment.</p> <p>2. We are committed to working with Shenley Neighbourhood Plan Steering Group and the Parish Council. As we have consistently said, the plans for the borough as a whole are at a really early stage and there are many issues to be resolved and studies and assessments to be undertaken before any decisions can be made. We agree that local knowledge is incredibly valuable and that is why we have consulted with our communities at this early stage before significant amounts of work have been undertaken.</p>
	Shenley Parish Council		<p>1. Don't build on the green belt – it's to prevent villages merging with surrounding conurbations. Don't make Shenley become another town. Historic rural village should be protected</p> <p>2. Parish is developing a Neighbourhood Plan. This is about what the community itself sees the village expanding in the next 30 to 40 years. The community knows what is best for itself – want assurances that council will cooperate with the Neighbourhood Plan Steering Group (DtC). New settlement is being imposed on Shenley – this is not working together and cooperation. <i>Response provides details on work that has been and is being undertaken by the Neighbourhood Plan Steering Group and discussions that have been held with Hertsmere.</i></p> <p>3. You should undertake another Reg 18 consultation prior to publishing draft Plan to allow everyone to access more of the evidence base including Call for sites info.</p>	<p>1. The comment is noted. We have assessed all sites promoted against our published HELAA methodology in order to judge their potential suitability for housing or economic development and the findings are set out in the HELAA. The extent to which each site meets the purposes of the green belt, as identified through the green belt assessment undertaken by consultants Arup forms part of this assessment. The need to avoid coalescence between settlements is a major issue to be taken into account in identifying any areas for potential future development.</p> <p>2. We are committed to working with Shenley Neighbourhood Plan Steering Group and the Parish Council. As we have consistently said, the plans for the borough as a whole are at a really early stage and there are many issues to be resolved and studies and assessments to be undertaken before any decisions can be made. We agree that local knowledge is incredibly valuable and that is why we have consulted with our communities at this early stage before significant amounts of work have been undertaken.</p> <p>3. Further consultation under Regulation 18 is planned for Autumn 2018.</p>
	Thames Water		1. Thames Water seeks to co-operate and maintain a good working	1. We welcome these comments from Thames Water and are committed to working with

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			<p>relationship with Hertsmere Borough Council and to provide the support needed with regards to the provision of wastewater infrastructure. For Thames Water to provide this essential service most effectively, it is vital that we are consulted at the earliest possible stage in the planning process. Thames Water would welcome information on the likely location, scale and phasing of development within the Borough at the earliest opportunity so that the information can be taken into account in Thames Water's assessments of upgrades that will be required to Maple Lodge Sewage Treatment Works. NPPF requires local planning authorities to take account of the need for strategic infrastructure. PPG sets out that adequate water and wastewater infrastructure is needed to support sustainable development.</p> <p>2. Borehamwood, Potters Bar, Bushey and Radlett all drain to Thames Water's Maple Lodge STW. Concern that allocations in these areas will put pressure on existing works. Upgrades to the works are being assessed with proposed delivery in AMP7 which runs 2020 – 2025. Need info on likely location, scale and phasing of development asap to include in the assessment.</p> <p>3. <i>Proposed policy and supporting text provided.</i></p>	<p>Thames Water and all Utility providers to ensure a coordinated approach to planning for the quantum and location of future development needed, in order to ensure that utilities investment plans can align with development needs. Decisions about the preferred location for different scale development across the borough to deliver the level of need identified in the Issues and Options document have not yet been made, nor even investigated in detail. Consultation with Thames Water and other utility providers will be a major input to the making of these decisions. Hertsmere will also be consulting with Thames Water at a more strategic SW Herts level through the recently convened Infrastructure Update meetings to be held jointly with Dacorum, Three Rivers, Watford and St Albans councils and relevant infrastructure providers including Thames Water.</p> <p>2. Comment noted. We will ensure we liaise with Thames Water and keep them updated.</p> <p>3. The proposed policy and supporting text is helpful and we will look at this when preparing future iterations of the plan for consultation. It appears to be largely consistent with the policy in the current local plan which again was produced with advice from Thames Water.</p>
	Theatres Trust		<p>Culture and cultural activity and cultural and community facilities support the day to day needs of local communities and help promote well-being and improve quality of life. They play a role in attracting and retaining residents and a skilled workforce and are important in supporting the local and visitor economy. Plan should therefore support arts and culture at all levels to support the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities. Policies should protect, support and enhance cultural facilities and activities, particularly those which might otherwise be traded in for more commercially lucrative developments, and promote cultural led development as a catalyst for regeneration in town centres.</p> <p><i>Suggested policy wording and definition of cultural and community facilities included in representation.</i></p>	<p>The comments are helpful and will inform future iterations of the draft plan as it is prepared for consultation.</p>
	Watford Borough Council		<p>No specific comments. But support the progress being made on the local plan. Welcome the approach to work collaboratively to deliver the growth needed in the SW Herts area.</p>	<p>The support is welcomed. Hertsmere is committed to continuing to work collaboratively, and to fulfil its DtC responsibilities with Watford BC.</p>
	Welwyn Hatfield Council		<p>Green belt is a key DtC issue – request discussion re strategic role and function of green belt where it relates to Welwyn and Hertsmere</p>	<p>The comment is noted and the need to work closely with Welwyn Hatfield regarding this and all DtC matters is agreed.</p>

Appendix C

Issues and Options consultation (Reg 18, September-November 2017)

Representations from individuals with HBC responses

Respondent	Summary of representation	HBC response
Part 1		
1 Vision		
<i>Do you agree with the proposed Local Plan Vision?</i>		
Resident of Borehamwood / Elstree	Agree. As long as it does not spoilt Borehamwood anymore.	The support is welcomed and the comments are noted.
Resident of Borehamwood / Elstree	Yes to garden village. No to infilling every piece of open ground in and around Borehamwood.	The comments are noted
Resident of Shenley	While some housing may be needed, already well-populated areas should not have to build as many houses as have already had a large quota	The comments are noted.
Resident of Shenley	Disagree. In regards to the proposed developments around the village of Shenley, I most certainly disagree. SHENLEY is a beautiful, rural village, which has already had significant developments made within it, such as Porters Park, which was not developed as a 'GARDEN VILLAGE' as put forward before development. The proposals would eliminate the very character through the numbers being built. Local infrastructure would be overwhelmed, such as the roads, doctors, local school as well as the very few local shops. It would effectively turn our loved village into a building site for years to come, with lorries delivering materials throughout each and every day. Also these sites were supposed to be 'green belt', previously unused, there are surely many other sites which could potentially be used. Please do not expand SHENLEY to the point where our village ceases to be the place so many of us find so dear to live in.	The comments are noted. The housing need figure for Hertsmere was determined in accordance with national planning policy and guidance. The Government is consulting on a new methodology for calculating this need, and the outcome of this could mean an increased housing figure for Hertsmere. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. The Issues and Options document makes it clear that infrastructure improvements are required alongside any of the potential options for growth.
Resident of Shenley	Disagree. In regards to the proposed developments around the village of Shenley, I most certainly disagree. SHENLEY is a beautiful, rural village, which has already had significant developments made within it, such as Porters Park, which was not developed as a 'GARDEN VILLAGE' as put forward before development. The proposals would eliminate the very character through the numbers being built. Local infrastructure would be overwhelmed, such as the roads, doctors, local school as well as the very few local shops. It would effectively turn our loved village into a building site for years to come, with lorries delivering materials throughout each and every day. Also these sites were supposed to be 'green belt', previously unused, there are surely many other sites which could potentially be used. Please do not expand SHENLEY to the point where our village ceases to be the place so many of us find so dear to live in.	The comments are noted. The housing need figure for Hertsmere was determined in accordance with national planning policy and guidance. The Government is consulting on a new methodology for calculating this need, and the outcome of this could mean an increased housing figure for Hertsmere. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. The Issues and Options document makes it clear that infrastructure improvements are required alongside any of the potential options for growth.
Resident of Shenley	Partially agree. Disagree with housing numbers. Do not agree with number of homes; figure is too high and will use too much Green Belt. What are the Government numbers for Hertsmere? Seem to have your eye on Shenley Green Belt. Our Green Belt must be protected more rigorously. It is important for our well-being. Once built on it is lost forever.	The comments are noted. The housing need figure for Hertsmere was determined in accordance with national planning policy and guidance. The Government consulted on a new methodology for calculating this need which would have resulted in a higher figure for Hertsmere. A new revised methodology has recently been published as part of the consultation on the new National Planning Policy Framework (NPPF), and outcome of this is likely to mean an increased housing figure for Hertsmere. The Issues and Options document indicates a number of areas of search for housing across the borough. A high-level Stage 1 Green Belt Assessment has been carried out, and a Stage 2 Green Belt Assessment has now been produced to inform our assessment of sites. a Stage 2 Assessment has been commissioned which will look at smaller areas in more detail. These studies assess Green Belt parcels against the purposes of Green Belt set out in the NPPF, and will form a part of the site selection process as work on the new local plan progresses.
Resident of Shenley	Agree. All a discussion of where and how many which is open to much debate.	The comments are noted.
Resident of Shenley	Disagree. With a falling birth rate do we really need so many houses.	The comments are noted.

Respondent	Summary of representation	HBC response
		The housing need figure for Hertsmere was determined in accordance with national planning policy and guidance. The Government consulted on a new methodology for calculating this need which would have resulted in a higher figure for Hertsmere. A new revised methodology has recently been published as part of the consultation on the new National Planning Policy Framework (NPPF), and outcome of this is likely to mean an increased housing figure for Hertsmere.
Resident of Shenley	The vision is overdevelopment and in view of Brexit causing GDP projection reductions in growth and less population growth no longer realistic.	The comments are noted. The housing need figure for Hertsmere was determined in accordance with national planning policy and guidance. The Government consulted on a new methodology for calculating this need which would have resulted in a higher figure for Hertsmere. A new revised methodology has recently been published as part of the consultation on the new National Planning Policy Framework (NPPF), and outcome of this is likely to mean an increased housing figure for Hertsmere. Any impacts of Brexit on housing need are not yet known, and the Government is proposing a national methodology for calculating housing need, so these variables will need to be factored in to the local plan-making process once they are known.
Resident of Shenley	I do not agree with the proposed 'Local plan Vision', as it will overwhelm the existing communities.	The comments are noted.
Resident of Shenley	Disagree. We do not need so many houses or jobs. Brexit is causing people to leave the UK. Hertsmere will lose its character and become another big town or sprawling suburb of London.	The comments are noted. The housing need figure for Hertsmere was determined in accordance with national planning policy and guidance. The Government consulted on a new methodology for calculating this need which would have resulted in a higher figure for Hertsmere. A new revised methodology has recently been published as part of the consultation on the new National Planning Policy Framework (NPPF), and outcome of this is likely to mean an increased housing figure for Hertsmere. Any impacts of Brexit on housing need are not yet known, and the Government is proposing a national methodology for calculating housing need, so these variables will need to be factored in to the local plan-making process once they are known.
Resident of Shenley	Strongly disagree. Shenley has already doubled in size over the past 25 years and the roads cannot deal with any more increase in traffic.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
2 Priorities <i>Do you agree with our proposed priorities for the Local Plan?</i>		
Resident of Borehamwood / Elstree	Before any new housing or radical plans for Borehamwood / Elstree, new roads are needed.	The comments are noted. The County Council who are responsible for roads have made it clear that new roads are very unlikely to be built in the county, and so new development needs to be carefully planned, and sustainable modes of travel made more attractive / usable to help us to discourage car use where possible.
Resident of Borehamwood / Elstree	Hope better infrastructure before new development.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Shenley	The plan is sensible but the quantity of housing planned is too great.	The comments are noted. The housing need figure for Hertsmere was determined in accordance with national planning policy and guidance. The Government is consulting on a new methodology for calculating this need, and the outcome of this could mean an increased housing figure for Hertsmere.
Resident of Shenley	Disagree. Do not build on proposed Shenley sites due to reasons already given.	The comments are noted.
Resident of Shenley	Disagree. Do not build on proposed Shenley sites due to reasons already given.	The comments are noted.
Resident of Shenley	Broadly agree. Agree that we need more suitable homes for the elderly/some retirement development (need one in Shenley which has a large number of older residents). Also need affordable housing for young people plus more employment opportunities. Hertsmere needs to be more realistic about infrastructure provision due to the current economic climate Shenley would need a bypass to cope with number of cars generated by the extra homes proposed and we know that will not happen. Shenley can only cope with limited development. You must spread the load evenly round the borough.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. The Issues and Options document makes it clear that infrastructure improvements are required alongside any of the potential options for growth. The County Council who are responsible for roads have made it clear that new roads are very unlikely to be built in the county, and so new development needs to be carefully planned, and sustainable modes of travel made more attractive / usable to help us to discourage car use where possible. There are many factors involved in determining where new development should go, including constraints like flood zones, sites of historic or natural interest and the purposes of the Green Belt, so it is not necessarily possible to distribute growth evenly around the borough, although no decisions have yet been made.
Resident of Shenley	Don't agree with the numbers but priorities are OK	The comments are noted.
Resident of Shenley	Agree. Very fine priorities but our roads are already clogged with traffic, schools oversubscribed, ditto GPs and hospitals.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to

Respondent	Summary of representation	HBC response
		delivering the new local plan.
Resident of Shenley	Shenley has already been tripled in size. We are now being told to take another 500 houses, meaning a quadrupling of the village since 1990. Plus a nearby new 'garden village' that will overload the local narrow road system.	The comments are noted. No decision have been made as to the location of housing. The Issues and Options consultation was an opportunity for people to express their views on some potential broad locations for development so that we are able to take those comments into consideration. Transport and roads will be one of many important considerations taken into account when potential areas for housing are being taken forward.
Resident of Shenley	I agree with the priorities, but not at the cost of the Green Belt which needs to be preserved as was originally intended.	The comments are noted.
Resident of Shenley	Agree but don't believe they can be achieved e.g. still no secondary school for Radlett, no shops were built to support Napsbury Park (even though they were planned), not possible to widen road Shenley to Radlett to access station.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Shenley	The Greenbelt (the lungs of London) needs to be protected and preserved as a priority.	The comments are noted.
Part 2 About your borough and the planning issues it faces		
3 Housing Need		
<i>Do you agree that the Council should aim to meet the actual level of housing need (600 homes per year) we have identified above?</i>		
Resident of Borehamwood / Elstree	Disagree. We should only build what we actually need, if we grow too fast there will not be enough infrastructure to deal with the demand as it is currently. One should build the infrastructure to prepare for the new developments.	The comments are noted. The level of housing being proposed is based on an objective assessment of what is needed for the borough, and has been worked out in accordance with national planning policy through the South West Herts Strategic Housing Market Assessment (SHMA) 2016 . Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Borehamwood / Elstree	Borehamwood is already overcrowded	The comments are noted, and the Issues and Options document sets out a range of ways in which new development might be accommodated throughout the borough.
Resident of Borehamwood / Elstree	Disagree. Inadequate provision and we should accept that we are in a high demand area and look to a greater number of homes and jobs. IN ADDITION WE NEED TO PLAN PROPERLY AND PUT IN INFRASTRUCTURE FIRST. In the past there has been little real planning just piecemeal building.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Borehamwood / Elstree	Disagree. Too much development in Borehamwood & Elstree, infrastructure strained in particular (doctors, traffic, schools).	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as part of delivering the new local plan. The Issues and Options document sets out a range of ways in which new development might be accommodated throughout the borough.
Resident of Borehamwood / Elstree	Disagree. Don't have facilities to support housing we already have. Need to increase schools, doctors, dentists etc.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Borehamwood / Elstree	Agree. It doesn't appear that there is a choice. Not sure why the existing housing target is being adhered to as surely this will make it harder to fulfil the likely future requirements?	The comments are noted. Planning law requires the adopted development plan is the starting point for decisions, and the current policies, which focus on protecting the Green Belt, do not allow for large-scale new development before a new local plan is in place. Importantly a new local plan will allow growth to be planned along with the necessary infrastructure rather than to happen in an ad hoc fashion.
Resident of Borehamwood / Elstree	Subject to solving traffic problems e.g. a bypass or solution to traffic from the town and wider area.	The comments are noted. Hertsmere and the whole of Hertfordshire are areas of very high car use, and the County Council's recent draft Local Transport Plan seeks to address this by encouraging more sustainable transport measures rather than building new roads. We are supportive of this through the new local plan, but are aware that additional infrastructure is needed in order to make this a reality and reduce traffic in our towns.
Resident of Borehamwood / Elstree	Disagree. Number too high for area, will increase traffic jams and pollution and increase strain on health service, particularly hospitals and A&E units.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident	Agree. But not by cramming maximum units in without thought of infrastructure and sustainability.	The support is welcomed and the comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to

Respondent	Summary of representation	HBC response
		delivering the new local plan.
Resident	Disagree- the council should provide as many houses as possible providing: A – no incursion into greenbelt; B – integrated transport infrastructure	In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident	Disagree. The borough should join forces with NGOs + other boroughs to resist these numbers which are leading to encroachments on the green belt	The comments are noted. The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA and is already working across the HMA on technical studies, although this is unlikely to lead to a reduction in housing numbers.
Resident of Potters Bar	Disagree. Is this amount of housing still required in light of Brexit? Concern on infrastructure including doctors, hospitals and schools.	The housing need figure for Hertsmere was determined in accordance with national planning policy and guidance. The Government consulted on a new methodology for calculating this need which would have resulted in a higher figure for Hertsmere. A new revised methodology has recently been published as part of the consultation on the new National Planning Policy Framework (NPPF), and outcome of this is likely to mean an increased housing figure for Hertsmere. Any impacts of Brexit on housing need are not yet known, and the Government is proposing a national methodology for calculating housing need, so these variables will need to be factored in to the local plan-making process once they are known.
Resident of Shenley	Initially we may need the number but cannot go on. The whole British Isles will be covered with housing.	The comments are noted.
Resident of Potters Bar	Disagree. The S.E. is very crowded and there is considerable wealth inequality throughout the UK. Think the answer lies in strategic investment in high speed road and rail to bring Midlands/North into London's catchment area to enjoy economic benefits.	The comments are noted, however changes in national policy and direction would be required at a Government level in order for this to be achieved; it is beyond the scope of a local planning authority/local plan.
Resident of Shenley	Shenley has already had a large increase in housing (hospital site) so further housing should be limited.	The comments are noted
Resident of Shenley	Disagree. You would run out of space, and would need to build shops and schools and roads.	The comments are noted.
Resident of Potters Bar	Brownfield sites should be utilised for new homes on understanding infrastructure is provided. Greenfield sites should be retained.	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Shenley	Disagree. 9000 homes is too high. Hertsmere should not be offering more homes than the Government expects them to. Our precious Green Bet should be protected.	The comments are noted. The level of housing being proposed is based on an objective assessment of what is needed for the borough, and has been worked out in accordance with national planning policy. The draft Government methodology for calculating housing need (released in September 2017) would have resulted in more than 9,000 homes being needed over the plan period. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Potters Bar	Where do the figures come from that say we need 600 new homes a year. Without that basic information we are not empowered to make a proper valued judgement.	The comments are noted. The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market Assessment (SHMA) 2016 , which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance. Links to this document were provided within the Issues and Options document (under the section on understanding local housing need) as well as in the Supporting Document section of the consultation web page. This is a fairly technical document, but an executive summary was published alongside it. In future local plan work, we will try to make it clearer where figures have been derived from.
Resident of Potters Bar	Disagree. The council should be challenging the government imposed targets.	The comments are noted. The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market Assessment (SHMA) 2016 , which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance. So was not directly imposed by government.

Respondent	Summary of representation	HBC response
		A draft Government methodology for calculating housing need was published in September 2017 which would have resulted in a higher figure. We submitted representations on this, and are awaiting the outcome of this consultation.
Resident of Potters Bar	Yes but not on green belt sites. Many brown sites still available, also a lot of unoccupied office blocks which could be used as studio accommodation for single people.	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Demand for business premises in the borough, in particular offices, is high, but due to national rules, office buildings can be converted to residential use without the need for planning permission, so the council has very limited control over these changes of use. We also have no control over the size and quality of the residential units, so they may be far smaller than our minimum size standards, may have no outdoor space or parking facilities.
Resident of Potters Bar	How has the figure of 600 new homes been arrived at?	The comments are noted. The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market Assessment (SHMA) 2016 , which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance.
Resident of Shenley	Disagree. Not within shenley village. Fill in where there are brown field sites only. The roads in and around shenley are congested. Roads are not suitable for heavy or more traffic.	The comments are noted. This housing figure relates to the whole of Hertsmere and not only to Shenley, and the council is considering a range of options for growth across the borough.
Resident of Shenley	Not enough infrastructure to support that amount of housing let alone expanding the area and building a new garden village. Roads, schools, medical, shops etc.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan, whichever combination of approaches to housing delivery the new Local Plan promotes.
Resident of Potters Bar	Agree	The response is noted
Resident of Shenley	See comment on Q1 (with a falling birth rate do we really need so many houses).	The comments are noted. The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market Assessment (SHMA) 2016 , which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance.
Resident of Shenley	I am convinced that London and the local area has a need for more than 600 new houses in Hertsmere. We could build over all of Hertsmere to meet London's need but we locals would object. So providing planning is properly carried out and Shenley does not suffer too much over-development/traffic problems I support 600 houses a year. But if planning does not listen to genuine Shenley concerns/parish plan I will withdraw my support.	The comments are noted. The borough council is keen to work with the Parish Council on its vision for Shenley village, although no decisions about the location of housing have yet been taken.
Resident of Potters Bar	1000 homes should be built each year to address the local housing shortage. Priority should be young people	The comments are noted.
Resident of Potters Bar	Number is too high taking into account the size of the existing town, 100 is more realistic. Some people are unable to find buyers for their homes and have to resort to renting them.	The comments are noted. The number of 600 homes per year is a number for the whole of Hertsmere borough rather than Potters Bar in particular.
Resident of Shenley	The council does need to ensure that it provides a SUFFICIENT number of affordable homes, but how has the 9000 homes / 9000 jobs assessment been arrived at. It is stated that the Local Plan is based on strategies built up between 2008 – 2016, so cannot therefore be taking account of the revised requirement following the border controls promised for post-Brexit, which will reduce the long term housing need	The comments are noted. The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market Assessment (SHMA) 2016 , which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance. Any impacts of Brexit on housing need are not yet known, and the Government is proposing a national methodology for calculating housing need, so these variables will need to be factored in to the local plan-making process once they are known.
Resident of Shenley	Strategies used outdated and need rethinking following Brexit. Greater border control will reduce need for so much additional housing	The comments are noted. The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market

Respondent	Summary of representation	HBC response
		<p>Assessment (SHMA) 2016, which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance.</p> <p>Any impacts of Brexit on housing need are not yet known, and the Government is proposing a national methodology for calculating housing need, so these variables will need to be factored in to the local plan-making process once they are known.</p>
Resident of Potters Bar	Disagree. 600 is predicted new households based on government forecast, it's not the actual level of housing need	<p>The comments are noted.</p> <p>The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market Assessment (SHMA) 2016, which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance.</p>
Resident of Potters Bar	Disagree with figure of 600	The comments are noted.
Resident of Potters Bar	Figures no longer realistic since Brexit	<p>The comments are noted.</p> <p>Any impacts of Brexit on housing need are not yet known, and the Government is proposing a national methodology for calculating housing need, so these variables will need to be factored in to the local plan-making process once they are known.</p>
Resident of Shenley	Agree. Not sure what info this is based on but looks reasonable.	<p>The comments are noted.</p> <p>The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market Assessment (SHMA) 2016, which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance.</p>
Resident of Potters Bar	More homes in the country and more than target in the borough	The comments are noted.
Resident of Potters Bar	Agree but new homes that will serve the existing community, should be affordable and social rented	<p>The comments are noted.</p> <p>A percentage (yet to be determined) of new homes on sites of 11 units and above will be expected to be Affordable according to the definition in the NPPF.</p>
Resident of Potters Bar	Figure too high	The comments are noted.
Resident of Potters Bar	Figure too high	The comments are noted.
Resident of Potters Bar	No more homes needed in Shenley	The comments are noted.
Resident of Potters Bar	Not enough infrastructure to cope with additional housing	<p>The comments are noted.</p> <p>Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan, whichever combination of approaches to housing delivery the new Local Plan promotes.</p>
Resident of Potters Bar	No evidence of need for new housing in area. Figure seems arbitrary and disproportionate.	<p>The comments are noted.</p> <p>The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market Assessment (SHMA) 2016, which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance.</p>
Resident of Potters Bar	Building of new homes proportionate to needs of local community, should include planning for schools, doctors, open spaces and transport	<p>The comments are noted.</p> <p>Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan, whichever combination of approaches to housing delivery the new Local Plan promotes.</p>
Resident of Potters Bar	Homes should be built as a matter of urgency due to a housing shortage, homelessness at an all time high and families living in substandard accommodation	The comments are noted.
Resident of London Colney	Proposed dwellings exceed the UKG'S assessment of need	<p>The comments are noted.</p> <p>The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market Assessment (SHMA) 2016, which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance.</p> <p>The Government's proposed standard methodology for calculating housing need is likely to lead to a higher number of homes being required for Hertsmere than the 9000 now that our local plan is more than 5 years old (the previously-published table of Government figures for each district was produced before our plan was 5 years old, so was capped at 40% above the numbers in the current plan). Since Jan 2018 this situation has changed.</p>
Resident of London	Stop investors buying new builds, need them for local people to live in. Don't want empty flats bought by	The comments are noted.

Respondent	Summary of representation	HBC response
Colney	overseas investors	The planning system is unable to control who buys market housing, however this is presently a greater issue in London than Hertsmere/Hertfordshire.
Resident of London Colney	Don't need any more houses	The comments are noted, however we are required to plan to meet future housing need in the borough.
Resident of London Colney	Hertsmere is already over developed	The comments are noted, however we are required to plan to meet future housing need in the borough.
Resident of London Colney	No evidence all the homes are needed	The comments are noted. The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market Assessment (SHMA) 2016 , which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance.
Resident of London Colney	Disagree with figure of 600	The comments are noted. The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market Assessment (SHMA) 2016 , which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance.
Resident of London Colney	Everywhere should take their fair share of houses where appropriate	The comments are noted. The locations for housing growth in the borough have not yet been determined.
Resident of London Colney	All of Hertsmere should be included	The comments are noted. The locations for housing growth in the borough have not yet been determined. The Local Plan will cover the whole of Hertsmere.
Resident of London Colney	Can't be a village with number of houses proposed will be a township	The comments are noted. The titles 'village' or 'town' do not relate to any set housing numbers, but we are seeking to plan for growth sensitively and to retain the character of existing settlements.
Resident of Shenley	Disagree. We don't need that many. People are leaving due to Brexit. No jobs in Shenley.	The comments are noted. The housing need figure for Hertsmere was determined through the SW Herts Strategic Housing Market Assessment (SHMA) 2016 , which was jointly commissioned by Hertsmere, Dacorum, Three Rivers and Watford councils. This study was carried out by a consultant in accordance with national planning policy and guidance. Any impacts of Brexit on housing need are not yet known, and the Government is proposing a national methodology for calculating housing need, so these variables will need to be factored in to the local plan-making process once they are known.

4 Affordable Homes

Do you agree that we should continue with our requirement for 35-40% of new homes to be provided as affordable housing?

Resident of Borehamwood / Elstree	A better definition of affordable of housing is needed. Currently most the properties are not remotely affordable even on an average salary. Hertsmere needs to put a selling price cap on all new builds	The comments are noted. The definition of affordable housing for planning purposes comes from the National Planning Policy Framework. This is the only type of affordable housing that can be sought through local planning policy. The affordability issue is one that we recognise, and is not unique to Hertsmere. The council is unable to intervene in the housing market, and doing so would be outside of its powers. Any intervention in the housing market would need to be done through central government policy.
Resident of Borehamwood / Elstree	All houses should be affordable	The comments are noted.
Resident of Borehamwood / Elstree	Agree	The comments are noted.
Resident of Borehamwood / Elstree	For local people and young people who work/live in Borehamwood	The comments are noted.
Resident of Borehamwood / Elstree	For young people	The comments are noted.
Resident of Borehamwood / Elstree	Should be genuinely affordable	The comments are noted.

Respondent	Summary of representation	HBC response
Resident of Borehamwood / Elstree	Not high enough percentage, should be social rent levels	The comments are noted. The definition of affordable housing for planning purposes comes from the National Planning Policy Framework. This the only type of affordable housing that can be sought through local planning policy.
Resident of Borehamwood / Elstree	Should be high priority	The comments are noted.
Resident of Potters Bar	Affordable Housing for youngsters is needed but not 35-40% of new homes	The comments are noted. Our housing market assessment shows that the level of need for affordable housing alone amounts to over 400 homes per year. Any further reduction in the level of affordable housing required on-site will simply exacerbate the level of unmet need forcing existing residents to move out of the area as they would be unable to afford to live in the area.
Resident of Borehamwood / Elstree	Disagree	The comments are noted.
Resident of Borehamwood / Elstree	Balanced mix of homes	The comments are noted.
Resident of Borehamwood / Elstree	Agree. Developers should sign contract agreeing to quota, priority should be given to local people and those with family in the area. Consider shared ownership schemes.	The comments are noted.
Resident	Local developers consistently avoid this obligation. Radlett has had no affordable housing built – this is unacceptable.	The comments are noted. The council takes affordable housing seriously and has introduced policy and guidance to assist in the provision of affordable housing across the borough. However, national planning policy currently allows developers to make the case that an affordable housing contribution would make the development unviable, and if this can be demonstrated they can legitimately provide fewer affordable units or agree a financial contribution.
Resident	Agree	The response is noted
Resident	Agree	The response is noted
Radlett	Need for social rented accommodation. Better solution to share ownership	The comments are noted.
Resident of Shenley	Reduce the number of large houses	The response is noted
Resident of Potters Bar	Disagree. This manipulates markets. Believe you should let housing demand type drive the type of housing built	The response is noted, however there is a significant problem with unaffordability of housing in this area and most of the south-east of England, so we will retain a policy on affordable housing in the local plan as the market does not deliver enough affordable housing to meet needs, in particular housing for social rent, on its own.
Resident of Shenley	Agree. Essential for public sector workers.	The response is noted
Resident of Shenley	Needs to be affordable	The response is noted
Resident of Shenley	Not necessarily, not if they ruin the character of villages and reduces the quality of life for residents.	The comments are noted. Affordable housing should be physically indistinguishable from market housing, and has to comply with the same design standards and guidance.
Resident of Shenley	Not necessarily, not if they ruin the character of villages and reduces the quality of life for residents.	The comments are noted. Affordable housing should be physically indistinguishable from market housing, and has to comply with the same design standards and guidance.
Resident of Shenley	40% of all new homes should be affordable. Hertsmere should be more innovative regarding home provision and look at cheaper environmentally friendly housing models.	The comments are noted. This is something that could be considered for the borough's own developments; it is not possible to insist on using a particular form of construction in housing delivered by external developers.
Resident of Potters Bar	We should ensure that all housing is affordable or kept in public control. The shift of provision of rented accommodation to the private sector is one of the biggest problems we have. New properties are being bought up by landlords and exploited. This needs to be stopped.	The comments are noted. It is not possible to ensure that all housing is affordable as developers build housing to make a legitimate profit so it is not their business to build entirely affordable schemes. Housing associations and local authorities which build affordable housing often include an amount of market housing within affordable housing schemes in order to help to fund it as there is very little public funding available for affordable housing. We will seek to ensure the maximum reasonable level of affordable housing is delivered on all sites that are allocated within the new local plan and other sites that come forward through the planning application process.
Resident of Potters Bar	agree	The comments are noted.
Resident of Potters Bar	Disagree. Not until 'affordable' has some meaning.	The comments are noted.
Resident of Potters Bar	Yes but it would be nice if properties were available to residents of Potters Bar not bringing people in from London etc. What does 'affordable' mean? Property prices and rent very high in this area.	The comments are noted. The definition of affordable housing for planning purposes comes from the National Planning Policy

Respondent	Summary of representation	HBC response
		Framework (NPPF) . These are the only types of affordable housing that can be sought through local planning policy. In most cases where social rented housing is provided the council retains control over nominating occupiers, and this is based on various criteria including a local connection test. The affordability issue in the area is one that we recognise, and is not unique to Hertsmere.
Resident of Potters Bar	75% should be affordable	The comments are noted. The evidence shows that a large number of affordable homes are needed in the borough. However such a high percentage is unlikely to be deliverable because it would not be viable for developers to do this.
Resident of Shenley	Agree	The comments are noted.
Resident of Shenley	Not in the shenley area – see above comments re: lack of infrastructure.	The comments are noted. Any new development or combination of developments above certain size would be required to provide infrastructure alongside homes.
Resident of Potters Bar	Agree	The comments are noted.
Resident of Shenley	Agree. Don't need more huge properties in Radlett or Shenley. Planning applications for such houses should be refused.	The comments are noted. We can encourage the provision of smaller homes through planning policy, but it is very difficult to refuse planning permission based solely on the size of a house if it complies with policy in other ways (e.g. design/appearance/impact on neighbours). If planning permission is refused without good reason this can be appealed to the Secretary of State and the council will not have a strong position.
Resident of Shenley	Agree	The comments are noted.
Resident of Potters Bar	Affordable housing must be a priority.	The comments are noted.
Resident of Potters Bar	Number is too high, 20% or less is more logical as Potters Bar already has several council/housing estates	The comments are noted. However affordable housing provision is a major issue for the borough, so we will seek to ensure the maximum reasonable level of affordable housing is delivered on all sites. The exact percentage is yet to be determined.
Resident of Shenley	Should be a major consideration as biggest need.	The comments are noted.
Resident of Potters Bar	New estates - maximum of 30-40% affordable should be made up of social rent and low cost ownership, marketed locally initially to cater to local residents. Local residents should be able to purchase properties when they've been in them for 5/10 years	The comments are noted.
Resident of Resident of Shenley	In order to afford a home, my daughter had to leave the area after our family has been in Shenley for three generations. Affordable housing is long overdue in this county.	The comments are noted. The council takes affordable housing seriously and has introduced policy and guidance to assist in the provision of affordable housing across the borough. However, national planning policy currently allows developers to make the case that an affordable housing contribution would make the development unviable, and if this can be demonstrated they can legitimately provide fewer affordable units or agree a financial contribution.
Resident of Potters Bar	Balanced mix of diverse types of houses	The comments are noted.
Resident of Potters Bar	Hertsmere failing to create integrated communities with diverse mix of housing types	The comments are noted.
Resident of Potters Bar	Agree	The comments are noted.
Resident of Potters Bar	Desirable	The comments are noted.
Resident of Shenley	Agree. Affordable – small houses perhaps rather than leasehold flats which would not be a good thing.	The comments are noted.
Resident of Potters Bar	“Affordable or “affordable? In the end, all houses must be affordable, otherwise people would not be able to afford them, and they would remain unsold. The largest proportion of a cost of a new home is the cost of the land. If this land was made available to developers (possibly local authority) at existing use prices, and the profits of the developers limited, those homes would become affordable, and if enough were built, the existing housing stock would drop in price.	The comments are noted. In an area of high housing demands and restrictive planning policies (Green Belt) like Hertfordshire, where there is any chance of getting planning permission to build housing there will be competition from multiple developers which inflates land values. Many sites put forward through the local plan process, particularly the larger sites, are already within the ownership of a developer, so inflated land values should not be a big issue on those sites and so we will seek to ensure the maximum reasonable level of affordable housing is delivered.
Resident of Shenley	My son and daughter would love to have continued to live in Shenley but even a small house is unaffordable locally. They both now live outside of the Borough. Housing needs to be affordable but greedy developers will want to maximise profit.	The comments are noted. The council takes affordable housing seriously and has introduced policy and guidance to assist in the provision of affordable housing across the borough. We will ensure the maximum level of affordable housing required by the Council's policies (currently at least 35%) is delivered within sites allocated.

Respondent	Summary of representation	HBC response
		This will be embedded in the plan and made clear to developers from the outset; the Council will not accept that it is unviable to provide affordable homes when sites have been demonstrated to be viable during the preparation of the plan.
Resident of Potters Bar	Agree with sentiment but commercial developers will fail to deliver at the required prices	The comments are noted.
Resident of Potters Bar	Agree with sentiment but commercial developers will fail to deliver at the required prices	The comments are noted.
Resident of Potters Bar	Needed for young professionals who live locally or sheltered homes for the elderly	The comments are noted.
Resident of Potters Bar	Ill defined and merely a relative concept	The comments are noted. The definition of affordable housing for planning purposes comes from the National Planning Policy Framework (NPPF) . These are the only types of affordable housing that can be sought through local planning policy.
Resident of Potters Bar	Percentage should reflect requirements of those living in the area and their needs	The comments are noted.
Resident of Potters Bar	Agree, rate of home ownership at all time low with young people bearing the brunt	The comments are noted.
Resident of Potters Bar	Figure seems high, relates to lower paid workers, mix should stimulate and support local needs	The comments are noted.
Resident of London Colney	Housing will not be affordable or for young people	The comments are noted. We will ensure the maximum level of affordable housing required by the Council's policies (currently at least 35%) is delivered within the proposed new garden village. This will be embedded in the plan and made clear to developers from the outset; the Council will not accept that it is unviable to provide affordable homes within the proposed new garden village.
Resident of London Colney	Housing will not be affordable	The comments are noted. We will ensure the maximum level of affordable housing required by the Council's policies (currently at least 35%) is delivered within the proposed new garden village. This will be embedded in the plan and made clear to developers from the outset; the Council will not accept that it is unviable to provide affordable homes within the proposed new garden village.
Resident of London Colney	Will there be any?	The comments are noted. We will ensure the maximum level of affordable housing required by the Council's policies (currently at least 35%) is delivered within the proposed new garden village. This will be embedded in the plan and made clear to developers from the outset; the Council will not accept that it is unviable to provide affordable homes within the proposed new garden village.
Resident of London Colney	Lack of real affordable housing	The comments are noted. The definition of affordable housing for planning purposes comes from the National Planning Policy Framework (NPPF) . These are the only types of affordable housing that can be sought through local planning policy.
Resident of London Colney	Lack of real affordable housing	The comments are noted. The definition of affordable housing for planning purposes comes from the National Planning Policy Framework (NPPF) . These are the only types of affordable housing that can be sought through local planning policy.
Resident of London Colney	Share developments more fairly across Hertsmere	The comments are noted.
Resident of Potters Bar	Agree	The comments are noted.
Resident of Shenley	Agree but none of the housing is affordable in this area. Rents much higher than elsewhere in UK. Builders can't afford to build them here.	The comments are noted. The council takes affordable housing seriously and has introduced policy and guidance to assist in the provision of affordable housing across the borough. We will ensure the maximum level of affordable housing required by the Council's policies (currently at least 35%) is delivered within sites allocated. This will be embedded in the plan and made clear to developers from the outset; the Council will not accept that it is unviable to provide affordable homes when sites have been demonstrated to be viable during the preparation of the plan.
5 Self-build homes <i>Do you agree that land within larger developments should be available for up to 10% of homes to be self-build properties?</i>		
Resident of Borehamwood / Elstree	Irrelevant there is no such thing. Market forces will dictate house prices, better to take bigger SIL or sec 106 payment and if possible build more dwellings to better meet the demand.	The comments are noted. However self-build and custom build housing does exist, and Government requires councils to meet the demand on their Self-build Registers. Self-build and custom-build housing is a form of market housing.
Resident of Borehamwood / Elstree	Disagree. Provide smaller homes and more of them to make better use of the land	The comments are noted.

Respondent	Summary of representation	HBC response
Resident of Borehamwood / Elstree	Do not see this as a priority	The comments are noted.
Resident of Borehamwood / Elstree	Agree	The comments are noted.
Resident of Borehamwood / Elstree	Disagree	The comments are noted.
Resident of Borehamwood / Elstree	Good idea. Suitable for smaller sites	The comments are noted.
Resident of Potters Bar	Why does the amount of self-building housing have to be specified?	The Government requires councils to meet the demand on their Self-build Registers. Self-build and custom-build housing is a form of market housing.
Resident of Borehamwood / Elstree	Should be for small to medium sized home as these could provide affordable housing for some.	The comments are noted.
Resident	Agree	The comments are noted.
Resident of Shenley	Depends on how big the land is going to be	The comments are noted.
Resident of Shenley	Agree.	The comments are noted.
Resident of Potters Bar	Agree in principle, subject to adequate information	The comments are noted.
Resident of Potters Bar	Not necessarily	The comments are noted.
Resident of Potters Bar	Yes, and also to prevent overly high density, exploitative, low build quality development projects	The comments are noted
Resident of Potters Bar	No, they take too long to build and leave the site like a building site among finished houses.	The comments are noted. Evidence shows that where self-build/custom build plots are included on a larger development site, this housing is often built out before the rest of the site as the serviced plots can be sold off to individual builders/owners at an early stage, and many people building their own home have an interest in completing it quickly. The developer of the wider site may wish to hold back on the number of completions per year in order to maintain a steady rate of sales.
Resident of Potters Bar	less than 10%	The comments are noted. The evidence for the level of need/demand in the borough has yet to be fully assessed, and this will be done before this is taken further and may reveal a figure different to 10%.
Resident of Shenley	Agree	The comments are noted.
Resident of Shenley	Depends on the extremity of larger housing being built. If housing needed then better to have smaller than mansion houses.	The comments are noted.
Resident of Potters Bar	Agree	The comments are noted.
Resident of Shenley	Agree	The comments are noted.
Resident of Shenley	Disagree	The comments are noted.
Resident of Potters Bar	No land should be available for self build as these are far too exclusive and expensive.	The comments are noted.
Resident of Potters Bar	Reasonable idea, provided prospective home owners are capable of project	The comments are noted. Self-build homes do not have to be built by the person who will occupy them – the term also includes custom-built homes and most are built by a construction company to the buyers specification, rather than by the owner.
Resident of Shenley	I do not agree with the proposal for larger developments ‘locally’, so have no view on the 10% proportion	The comments are noted.
Resident of Potters Bar	Provided they fit in with surrounding area and are built in accordance with planning laws	The comments are noted. When planning permission is granted for self-build and custom-build homes, this would include design codes (these can include things like building heights, garden sizes, separation distances, materials etc.) which would need to be adhered to.
Resident of Shenley	I do not agree with any more large developments in Shenley Parish.	The comments are noted.

Respondent	Summary of representation	HBC response
Resident of Potters Bar	Shouldn't be available on larger developments	The comments are noted.
Resident of Potters Bar	Should build where land is less scarce or buy brownfield property	The comments are noted.
Resident of Shenley	Agree	The comments are noted.
Resident of Potters Bar	10% sounds too high	The comments are noted. The evidence for the level of need/demand in the borough has yet to be fully assessed, and this will be done before this is taken further and may reveal a figure different to 10%.
Resident of Shenley	Agree. Adds variety and originality, though some conformity is needed	The comments are noted. When planning permission is granted for self-build and custom-build homes, this would include design codes (these can include things like building heights, garden sizes, separation distances, materials etc.) which would need to be adhered to.
Resident of Potters Bar	Would not work as part of a larger development	The comments are noted. The approach in Hertsmere has yet to be finalised, however this approach has been shown to work in other areas of the country.
Resident of Potters Bar	10% appears to be a high number	The comments are noted. The evidence for the level of need/demand in the borough has yet to be fully assessed, and this will be done before this is taken further and may reveal a figure different to 10%.
Resident of Potters Bar	Should be part of affordable housing quota	The comments are noted. However Self-build housing is not necessarily more affordable than market housing as the plots are sold at market prices. Including this within the affordable housing quota would lead to a reduction in the amount of affordable housing provided as developers would prefer to provide self-build plots than completed affordable housing units as they can sell these at market prices with a much lower cost to the developer.
Resident of Potters Bar	Not aware of necessity for these sites	The comments are noted. The evidence for the level of need/demand in the borough has yet to be fully assessed, and this will be done before this is taken further and may reveal a figure different to 10%.
Resident of Potters Bar	Only on brownfield land and after needs of elderly and affordable housing have been met	The comments are noted.
Resident of Potters Bar	Disagree	The comments are noted.
Resident of Potters Bar	Only if design is architecturally positive contribution towards character and appearance of area	The comments are noted. When planning permission is granted for self-build and custom-build homes, this would include design codes (these can include things like building heights, garden sizes, separation distances, materials etc.) which would need to be adhered to.
Resident of Potters Bar	Affordable and small dwellings only	The comments are noted.
Resident of Potters Bar	Only at reasonable dimensions to their plots of land	The comments are noted. When planning permission is granted for self-build and custom-build homes, this would include design codes (these can include things like building heights, garden sizes, separation distances, materials etc.) which would need to be adhered to.
Resident of Potters Bar	Percentage too high?	The comments are noted. The evidence for the level of need/demand in the borough has yet to be fully assessed, and this will be done before this is taken further and may reveal a figure different to 10%.
Resident of Potters Bar	If local provisions are in place	The comments are noted. When planning permission is granted for self-build and custom-build homes, this would include design codes (these can include things like building heights, garden sizes, separation distances, materials etc.) which would need to be adhered to.
Resident of Potters Bar	Better to keep land within a large scheme with more control of design and size of build	The comments are noted. When planning permission is granted for self-build and custom-build homes, this would include design codes (these can include things like building heights, garden sizes, separation distances, materials etc.) which would need to be adhered to.
Resident of Potters Bar	Problems with time taken for self build	The comments are noted. Evidence shows that where self-build/custom build plots are included on a larger development site, this housing is often built out before the rest of the site as the serviced plots can be sold off to individual builders/owners at an early stage, and many people building their own home have an interest in completing it quickly. The developer of the wider site may wish to hold back on the number of completions per year in order to maintain a steady rate of sales.
Resident of Potters	Already occurring on odd bits of land and back gardens	The comments are noted.

Respondent	Summary of representation	HBC response
Bar		
Resident of Potters Bar	In principle is ok if there's a time limit to finish them	The comments are noted. Evidence shows that where self-build/custom build plots are included on a larger development site, this housing is often built out before the rest of the site as the serviced plots can be sold off to individual builders/owners at an early stage, and many people building their own home have an interest in completing it quickly. The developer of the wider site may wish to hold back on the number of completions per year in order to maintain a steady rate of sales.
Resident of Potters Bar	No larger development allowed	The comments are noted.
Resident of Potters Bar	No larger development allowed, self builds can look like building sites for too long	The comments are noted. Evidence shows that where self-build/custom build plots are included on a larger development site, this housing is often built out before the rest of the site as the serviced plots can be sold off to individual builders/owners at an early stage, and many people building their own home have an interest in completing it quickly. The developer of the wider site may wish to hold back on the number of completions per year in order to maintain a steady rate of sales.
Resident of Potters Bar	Not sufficient demand, land should be set to provide most efficient volume of new homes whilst maintaining character/amenity	The comments are noted. The evidence for the level of need/demand in the borough has yet to be fully assessed, and this will be done before this is taken further and may reveal a figure different to 10%.
Resident of Potters Bar	Depends on size of plot	The comments are noted.
Resident of Shenley	Can't see point of self build, adds to level of control needed	The comments are noted. The Government is encouraging self-build and custom-build homes and requires local authorities to meet the demand on their Self-build registers. When planning permission is granted for self-build and custom-build homes, this would include design codes (these can include things like building heights, garden sizes, separation distances, materials etc.) which would need to be adhered to.
Resident of Potters Bar	Agree but it is important that the self-build homes fit into the development and stay in keeping with the other properties in the area.	The comments are noted. Design codes can be used to ensure that self-build homes conform to certain parameters (e.g. height, plot coverage, materials). Further work will be done on this as the local plan progresses.
Resident of Shenley	Disagree. Will only encourage very large houses.	The comments are noted. Design codes can be used to ensure that self-build homes conform to certain parameters (e.g. height, plot coverage, materials). Further work will be done on this as the local plan progresses.
6 Gypsies, Travellers Travelling Showpeople <i>How should we meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople?</i>		
Resident of Borehamwood / Elstree	More sites need to be made available in each town of Hertsmere instead of using public or private car parks	The comments are noted. We have a study which shows the need for sites across the borough, and are aiming to meet that need through allocating sites in the Local Plan.
Resident of Borehamwood / Elstree	Don't want pitches too close to residential areas	The comments are noted.
Resident of Borehamwood / Elstree	Designate sufficient land	The comments are noted.
Resident of Borehamwood / Elstree	Pitches should be on the edge of existing or new settlements	The comments are noted.
Resident of Borehamwood / Elstree	Unless they're responsible for their own waste and refuse they should not be given access to a site	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life. Just as with people moving into new housing developments, it is not possible to determine the future occupants of an authorised site based on how they might behave. Refuse is expected to be dealt with as

Respondent	Summary of representation	HBC response
		in any domestic property, and if any anti-social behaviour or environmental health issues arise these can be addressed in the usual ways.
Resident of Borehamwood / Elstree	Provide a site on the outskirts of town and charge them rent to be self financing	The comments are noted.
Resident of Potters Bar	Potters Bar already has its fair share of Gypsy Sites	The comments are noted.
Resident of Borehamwood / Elstree	Let them buy and maintain property like the rest of us.	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident	No. My understanding if this is a chosen lifestyle then important land resources should be utilised for static housing.	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life, which are a matter of ethnicity and tradition rather than simply a lifestyle choice.
Resident of Potters Bar	We shouldn't. Until there is better control/management of these communities councillors should take every action they can to avoid them coming to Hertsmere. It's a sad fact that travellers bring crime/litter to an area so we shouldn't do anything to attract them into the area.	The comments are noted. Gypsies and Travellers include a number of distinct ethnic groups in our society, and it is not possible or ethical to disallow a particular ethnic group from entering and living in a borough, whether they choose to live in permanent or moveable accommodation. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident of Shenley	The same rules need to apply to all equally i.e. paying council taxes, rates etc.	The comments are noted. Gypsies and Travellers living on authorised pitches pay council tax which is calculated in the same way as for bricks and mortar properties.
Resident of Shenley	Do we really need to accommodate these people?	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident of Shenley	Do we really need to accommodate these people?	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident of Shenley	Build them a small bit of land. Far away.	The comments are noted. Sites ideally need to be within a reasonable distance of local amenities, for example shops, schools, doctors' surgeries, to enable the residents to access these easily as with any bricks and mortar development.
Resident of Potters Bar	Careful consideration of local residents and consultation prior to sites being allocated	The comments are noted.
Resident of Shenley	Care needs to be given as to where these groups are sited to avoid problems with the local community as unfortunately they can be antisocial.	The comments are noted.
Resident of Potters Bar	The existing arrangements should be retained but not expanded	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning

Respondent	Summary of representation	HBC response
		framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident of Potters Bar	Low priority. Existing sites should be sufficient	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident of Potters Bar	Already have two large sites in Potters Bar!!!	The comments are noted. The comments are noted. The location of sites has yet to be determined.
Resident of Potters Bar	This is a comparatively small group of people and we should be able to meet their needs	The comments are noted.
Resident of Shenley	We already have many more sites than other Hertsmere areas	The comments are noted. However, while Shenley has one authorised site for one pitch at Shenleybury Cottages, Bushey has five sites (2 x 1 pitch, 1 x 2 pitches, 1 x 4 pitches and 1 x 30 pitches increasing to 33), Potters Bar has one site for 25 permanent pitches, and South Mimms has one transit site with one permanent and 25 transit pitches.
Resident of Shenley	Would be nice to see a whole suitable area for this group of need, in its own location and suited to them.	The comments are noted.
Resident of Potters Bar	Not at all	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident of Shenley	Some of these so-called travellers have adequate homes already – more checks should be done on them.	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident of Shenley	Hertsmere has a poor record of preventing inappropriate travellers' development at Shenleybury. Unfortunately travellers generally cause problems with 'illegal camping' as happened in Shenley requiring us to pay the clear-up costs. Like all they should be offered housing. Campsite pitches of the requisite number should be established well away from houses to reduce/stop undesirable impact on others. The police should enforce the law in them as elsewhere and not treat them as no go areas.	The comments are noted.
Resident of Potters Bar	All travellers should be only be accommodated within the borough on a short term basis of a maximum of one month. If they wish to stay longer they should consider permanent accommodation. The land devoted to them could be used for building permanent homes.	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident of Potters Bar	Entirely against the council meeting the needs of such people. If we did accommodate them those areas would deteriorate.	The comments are noted. Gypsies and Travellers include a number of distinct ethnic groups in our society, and it is not possible or ethical to disallow a particular ethnic group from entering and living in a borough, whether they choose to live in permanent or moveable accommodation. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning

Respondent	Summary of representation	HBC response
		framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident of Shenley	These groups of people, but the nature of their lifestyle, should have their own accommodation and we should not therefore have to meet their accommodation needs. I would have a more robust opinion on such a 'need' if I was assured that gypsies, travellers, et.al contributed to the upkeep and local services of appropriate sites as the borough's rate payers are obliged to do.	The comments are noted. We have a study which shows the need for sites across the borough, and are aiming to meet that need through allocating sites in the Local Plan. Gypsies and travellers do provide their own physical accommodation; meeting their needs simply means identifying suitable land in the same way that land is identified to meet the housing needs of the settled community. Gypsies and Travellers living on authorised pitches pay council tax which is calculated in the same way as for bricks and mortar properties. Planning permission is also required for pitches.
Resident of Potters Bar	Already a site in Potters Bar, place in a different part of Hertsmere	The comments are noted. The location of sites has yet to be determined.
Resident of Shenley	Any group of people considered for accommodation need to contribute to services and abide by same planning regulations	The comments are noted. Gypsies and Travellers living on authorised pitches pay council tax which is calculated in the same way as for bricks and mortar properties. Planning permission is also required for pitches. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident of Potters Bar	Fulfil statutory obligations for local needs, consider suitable locations, most households don't want a location close to their home for social issues	The comments are noted.
Resident of Potters Bar	Most households won't want locations close to their homes for ensuing social issues	The comments are noted.
Resident of Shenley	Discreet areas set aside but close to all amenities.	The comments are noted.
Resident of Potters Bar	Due to their lifestyles, not appropriate to accommodate them in the middle of towns or housing areas	The comments are noted.
Resident of Potters Bar	Should be placed somewhere they can integrate into the village/towns but in small groups	The comments are noted.
Resident of Potters Bar	Already have sites and could be expanded if necessary	The comments are noted. The current local plan allocates existing sites for expansion. However there is a limit to how far a site can be expanded before it becomes unmanageable, so we are looking into how best we can meet need going forward.
Resident of Potters Bar	Plan should not as a magnet or encourage these people, however, current arrangements should be maintained	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident of Potters Bar	Everyone needs a place to live but should have more stringent rules in place to ensure land is respected	The comments are noted.
Resident of Potters Bar	Already have sufficient arrangements	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.
Resident of Shenley	Should do nothing more. Even when they are given permission they just flout planning e.g. Travellers at Shenleybury.	The comments are noted. Local authorities have a responsibility to undertake housing needs assessments for the settled population, to identify their accommodation needs. These needs are fed into the local planning framework and the Council will address the housing need by providing different types of accommodation - for example flats, houses or perhaps sheltered accommodation. This is now the same for Gypsy and Traveller accommodation which is just another form of provision that takes into account people's different ways of life.

Respondent	Summary of representation	HBC response
7 Other housing need <i>How should we meet other types of needs, including housing for the elderly?</i>		
Resident of Borehamwood / Elstree	Needs to be a radical review of social care policy at Government level – preferably a royal commission.	The comments are noted.
Resident of Borehamwood / Elstree	Work with builder who specialise in providing housing for the elderly and housing associations who can modify accommodation.	The comments are noted.
Resident	Research and planning for future needs as you seem to be doing.	The comments are noted, and we will continue to do this.
Resident of Shenley	No sheltered accommodation for the elderly to downsize to in Shenley. The disabled need similar homes.	The comments are noted
Resident of Shenley	Build some care homes	The comments are noted
Resident of Shenley	If we possibly can do	The comments are noted
Resident of Potters Bar	Plenty of housing currently provided in Potters Bar with care homes	The comments are noted
Resident of Shenley	Modern retirement villages work well plus developments like Slade Court in Radlett. More bungalows and small terraced houses and apartments but not high level in Shenley. Small starter homes and 1-bed apartments are needed for young people. Flooding Hertsmere with homes will not bring prices down sufficiently because commuters are buying them. Subsidy is needed ultimately. Does Hertsmere have money in the pot to do something?	The comments are noted. Models for the delivery of retirement housing, such as retirement villages, will be considered. The council is working with developers to deliver some equity share homes which are offered to buyers at below market value, with the council holding a share in the property and charging zero rent on its portion. Other delivery options are also being explored.
Resident of Potters Bar	The provision of retirement villages may be an answer to free up larger houses. The answer is not developing Green belt and creating a larger village than Elstree or Shenley in an area with no rail links and what will become another outpost of St Albans with prices to match. The council has a duty to develop brownfield sites fully before taking away countryside. The answer to questions about improving environment, more recreation, childhood obesity is not building on areas that can be and are already used for recreation.	The comments are noted. We are required by the National Planning Policy Framework (NPPF) to look to brownfield sites first before considering Green Belt sites. However the NPPF also requires us to ensure that local plans meet the full objectively assessed housing need for the area. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term. Currently around 80% of Hertsmere is designated as Green Belt and a large amount of that is open land. The new local plan would potentially seek to allocate around an additional 5% of land for housing in the worst-performing areas of Green Belt. A large amount of the Green Belt is not publicly accessible, and there is the potential that larger developments may be able to facilitate access to additional areas of the countryside.
Resident of Potters Bar	Developments within existing villages such as Shenley should prioritise over 50s and sheltered housing. This will enable residents to stay local while releasing larger housing stock to large, younger families.	The comments are noted.
Resident of Potters Bar	Need housing for the next generation who are struggling to find rent/deposits for property. Elderly residents need smaller homes to move to if they can no longer afford upkeep of larger properties. By keeping prices affordable for the elderly who have paid their taxes not ripping them off because they are old.	The comments are noted.
Resident of Potters Bar	Affordable accommodation is needed for elderly. At present we only have expensive care homes. Doctors have indicated that they are unable to cope if more care homes are built. Another medical centre would be necessary. Judging by the number of small flats being built in Potters Bar, I doubt we need more single-occupancy homes.	The comments are noted. Accommodation for elderly people is an important consideration as part of the new local plan due to an ageing population in the area, and the associated required infrastructure will be considered alongside this as part of the plan-making process.
Resident of Shenley	Some additional sheltered/warden houses should be built.	The comments are noted
Resident of Shenley	Greater need for bungalows, care homes, warden assisted areas for the older generation which in turn makes room in existing houses for local families or families moving into the area.	The comments are noted. Accommodation for elderly people is an important consideration as part of the new local plan due to an ageing population in the area.
Resident of Potters Bar	Sheltered housing	The comments are noted. Accommodation for elderly people is an important consideration as part of the new local plan due to an ageing population in the borough.
Resident of Shenley	I recently downsized from a 3-bed detached property in Shenley to my present address, which is one of only 4 properties in Shenley built for sale to over 55s. More of the same (or flats) would encourage residents to free up family homes.	The comments are noted. Accommodation for older people is an important consideration as part of the new local plan due to an ageing population in the borough.

Respondent	Summary of representation	HBC response
Resident of Potters Bar	The priority should be housing for young people not the elderly who have had ample chance to make their own arrangements.	The comments are noted.
Resident of Potters Bar	Think it would be a good idea if any future retirement homes include a few affordable apartments. Also the rest of the homes should be priced more realistically.	The comments are noted. Affordable housing is a big priority for Hertsmere, however the council and Local Plan has no control over house prices apart from those units which are specifically 'affordable housing'.
Resident of Shenley	The elderly should have the opportunity to down size or be housed within the community if they so wish, but this needs to be affordable and located in an area where the correct infrastructure is fully in place. (easy access to health, shops, transport etc)	The comments are noted. Accommodation for older people is an important consideration as part of the new local plan due to an ageing population in the borough.
Resident of Shenley	There is a serious lack of smaller, single story accommodation for elderly residents that want to stay in the area. Providing suitable dwellings would free up larger family homes.	The comments are noted.
Resident of Shenley	Need more bungalows in Shenley as it has quite a large elderly population. Also need some warden controlled sheltered housing.	The comments are noted.
8 Jobs <i>Do you agree that we should plan for this level of new jobs (9,000 new jobs over 15 years) to support business creation and meet the employment needs of an increasing population?</i>		
Resident of Borehamwood / Elstree	I think figure is extremely overestimated, a lot of industries are moving out of Hertsmere or being turned into housing at the current rate their will barely any jobs. In Borehamwood alone - most of the businesses in Elstree Way have been turned into housing, the Sainsbury's depot will be going in 2 years time- this should be turned into an industrial with low rents to promote small to medium size businesses.	The comments are noted. The Economic Study (2016), from which this figure is derived, is due to be updated later in 2018 alongside an assessment of housing need. The council has allocated part of Elstree Way for housing through its current local plan, in the Elstree Way Corridor Area Action plan. Outside of this area, the rest of Elstree Way leading to the A1 is designated as an important employment area. Some office units in this area have been lost to residential uses through national 'permitted development rights' which allow this to happen without the need for planning permission, so the council has no control over those losses. Some of these were still fully-occupied by businesses when they were converted. The council is taking a strong line on non-employment uses within its employment areas. For example, Elstree Way employment area has high levels of occupancy in both its industrial and office units, and any proposed changes of use to residential that require planning permission within the area will be refused in line with the current Local Plan 2012-27. Any housing proposal on the Sainsbury's depot will be strongly resisted by the council in line with current policy, and employment uses will be encouraged.
Resident of Borehamwood / Elstree	Needed locally	The comments are noted.
Resident of Borehamwood / Elstree	Essential	The comments are noted.
Resident of Resident of Borehamwood / Elstree	Agree	The comments are noted.
Resident of Borehamwood / Elstree	Where will the jobs come from, lots of empty warehouses and offices	The comments are noted. As part of our work on the new local plan we will be carrying out surveys of existing employment areas, and looking in to the demand for business premises in the borough. In Borehamwood in particular, demand for business premises, in particular offices, is high, but due to national planning rules office buildings can be converted to residential use without the need for planning permission, so the council has very limited control over these changes of use if the owners feel they can achieve a greater value from housing than business uses.
Resident of Borehamwood / Elstree	Agree. Need higher number, hopefully to reduce commuting. Doubt so many will be created as offices and industrial premises have been lost over recent years. Retail employment is nearly at maximum in Borehamwood. PR campaign might tempt London businesses to cheaper rental premises. Need small reasonably priced units for small companies.	The comments are noted. As part of our work on the new local plan we will be carrying out surveys of existing employment areas, and looking in to the demand for business premises in the borough. In Borehamwood in particular, demand for business premises, in particular offices, is high, but due to national planning rules office buildings can be converted to residential use without the need for planning permission, so the council has very limited control over these changes of use if the owners feel they can achieve a greater value from housing than business uses. Throughout the borough there are currently high rates of small business start-ups, so we would seek to encourage this to continue.

Respondent	Summary of representation	HBC response
Resident of Borehamwood / Elstree	Agree. More local jobs; more local prosperity.	The comments are noted.
Resident	Agree	The comments are noted.
Resident	Agree	The responses is noted
Resident of Shenley	Jobs don't need to be in the community as long as there are good communication sources e.g. trains, road, buses and technology.	The comments are noted. The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA, which could lead to a cross-borough approach to jobs, as well as looking at improving infrastructure and communication links.
Resident of Shenley	Agree. Provided the jobs assist the young to get employed.	The comments are noted. Employment rates in the borough are currently very (consistently between 81% and 85% since 2016) high, so we would want to help retain that level where possible.
Resident of Shenley	If robust research shows that 9000 jobs are required. Brexit might make the figure lower.	The comments are noted. The impacts of Brexit are currently unknown and we are proposing to re-run the SW Herts Economy Study in order to take into account changes that have occurred since it was carried out, including the currently-proposed changes to the National Planning Policy Framework (NPPF).
Resident of Potters Bar	agree	The comments are noted.
Resident of Potters Bar	Disagree	The comments are noted.
Resident of Shenley	The areas for jobs is in the towns of Hertsmere. Watford, St Albans, Borehamwood. There is little opportunity in the villages so building houses in the villages puts more traffic on the roads.	The comments are noted.
Resident of Shenley	Plan all you like but the reality is that most people in Hertsmere commute to London	The comments are noted.
Resident of Shenley	Do not believe 9000 jobs needed in view of Brexit. People tend to travel longer distances to work and a lot would be filled from elsewhere. Experience is that long-term planning is often wrong. We know 9,000 houses will be built but most jobs will be outside Hertsmere and houses are desperately needed.	The comments are noted. The jobs figure is not directly linked to the housing need figure – they both just happened to be 9,000. It is unrealistic to attempt to restrict new jobs to Hertsmere residents, but they would increase choice for people living in/moving to the borough. The relationships between where people live and work are very complex, and cannot be constrained by administrative boundaries. This number of jobs has been assessed as being a number which could boost the local economy, and which there is shown to be demand for from business. Long-term planning can only be done based on today's figures, so may well be proved to be wrong in the future. The Government is amending its National Planning Policy Framework (NPPF) to include a requirement for local plans, which normally plan for a 15-year period, to be reviewed every 5 years. This would include reviewing the housing and jobs numbers and considering whether any changes to the plan are required. This will help to deal with the uncertainty of long-term planning.
Resident of Shenley	Is 9000 homes / 9000 jobs a coincidental relationship? I see no basis for this figure. Shenley has no local employment to speak of. This was lost when the hospital site was developed. More homes will just generate more commuters and traffic to/from outside areas.	The comments are noted. The jobs figure is not directly linked to the housing need figure – they both just happened to be 9,000. This number of jobs has been assessed as being a number which could boost the local economy, and which there is shown to be demand for from business through the SW Herts Economic Study 2016 .
Resident of Potters Bar	Must be practicable against what is anticipated	The comments are noted. This number of jobs has been assessed as being a number which could boost the local economy, and which there is shown to be demand for from business through the SW Herts Economic Study 2016 .
Resident of Potters Bar	Figures compiled pre-brexit, a post brexit study should be commissioned	The comments are noted. The impacts of Brexit are currently unknown and we are proposing to re-run the SW Herts Economy Study in order to take into account changes that have occurred since it was carried out, including the currently-proposed changes to the National Planning Policy Framework (NPPF).
Resident of Potters Bar	Plan does very little to create new jobs in Hertsmere and meet employment needs of increasing population	The comments are noted. The plan proposes to allocate land to accommodate 9,000 new jobs in the borough. Following the adoption of the Local Plan, further work will be necessary to deliver the policies in the plan.
Resident of Shenley	Agree. Housing needed for new jobs holders who may not work in the local area. Need proximity of local transport to railway stations and bus stations.	The comments are noted.
Resident of Potters Bar	Agree	The comments are noted.
Resident of Potters Bar	Proposed level of jobs will not be required in local area	The comments are noted. This number of jobs has been assessed as being a number which could boost the local economy, and

Respondent	Summary of representation	HBC response
		which there is shown to be demand for from business through the SW Herts Economic Study 2016 .
Resident of Potters Bar	Proposed level of jobs will not be required in local area	The comments are noted. This number of jobs has been assessed as being a number which could boost the local economy, and which there is shown to be demand for from business through the SW Herts Economic Study 2016 .
Resident of Potters Bar	Depends on type, would not like to see ones that require a large number of vehicles to travel through Shenley	The comments are noted.
Resident of London Colney	Employment issues	The comments are noted.
Resident of London Colney	Disagree, people will want to live where they work which means a greater demand for housing	The comments are noted. This number of jobs has been assessed as being a number which could boost the local economy, and which there is shown to be demand for from business through the SW Herts Economic Study 2016 . <u>People tend to travel for work and the relationships between where people live and work are complex, so this will not necessarily be the case. The housing and jobs numbers being proposed through the local plan are underpinned by housing and economic studies which were carried out in conjunction with each other, so do relate to each other.</u>
Resident of Shenley	Agree	The comments are noted.
Resident of Shenley	Disagree. Don't need that many jobs. I worked for over 25 years in the pharmaceutical industry. You will not attract it here. They are all pulling out of UK. No industry except farming in Shenley. Any additional jobs in neighbouring areas will mean more travel.	The comments are noted. This number of jobs has been assessed as being a number which could boost the local economy, and which there is shown to be demand for from business through the SW Herts Economic Study 2016 .
Resident of Shenley	We were promised more job opportunities when the hospital site was developed. This never happened and I have no confidence that this will happen now. We will become an even bigger car park for commuters.	The comments are noted.
9 Retail and Shopping <i>Do you agree that we should maintain a high level of retail and services within the borough's shopping centres and local parades?</i> <i>What other uses may be considered appropriate in these areas?</i>		
Resident of Borehamwood / Elstree	I agree with this statement, however, there is not enough parking available and not enough entertainment based areas for younger people, would like to see an entertainment park	The comments are noted.
Resident of Borehamwood / Elstree	Fewer fast food shops, more small shops	The comments are noted.
Resident of Borehamwood / Elstree	Agree	The comments are noted.
Resident of Borehamwood / Elstree	More varied restaurants	The comments are noted.
Resident of Borehamwood / Elstree	Support what we have now, no new shopping parks	The comments are noted.
Resident of Borehamwood / Elstree	More leisure areas & green spaces in town centres, ensure high streets are maintained	The comments are noted.
Resident of Borehamwood / Elstree	Support local services, only downfall is free parking encourages visitors to town	The comments are noted.
Resident of Borehamwood / Elstree	Agree. Business & retail local government rates must come down	The comments are noted. The Local Plan is not able to influence levels of business rates or rents.
Resident of Borehamwood / Elstree	Agree. Housing above shops in retail outlets. Reduce council tax on shops so small shops can survive. Not too many of the same type together.	The comments are noted. The Local Plan is not able to influence levels of business rates or rents.
Resident of Radlett	Retail spaces should be maintained. Promote low business rates	The comments are noted. The Local Plan is not able to influence levels of business rates or rents.
Resident	Agree	The comments are noted.

Respondent	Summary of representation	HBC response
Resident of Shenley	We are well served by retail parks (Colney Fields)	The comments are noted.
Resident of Shenley	Agree that retail needs to be kept in the borough	The comments are noted.
Resident of Shenley	With increasing internet shopping, do not see how you can maintain a high level of retail. As is evident in Potters Bar where most units are fast food, nail bars or hairdressers. Would be better if these areas were used for housing.	The comments are noted. We have commissioned a retail study which will look into these issues, the outcomes of which will inform the progression of the local plan.
Resident of Shenley	Shenley needs a few more shops where possible	The comments are noted.
Resident of Potters Bar	Agree	The comments are noted.
Resident of Shenley	Towns should contain shops of all kinds not a majority of restaurants/cafes.	The comments are noted. We encourage a range of shops in our shopping centres and have policies which set out key parts of the centres which should contain a majority of retail shops. Restaurants and cafes are an acceptable town centre use when they are in the right places, but we are not able to control all changes of use from shops to cafes/restaurants, which are often permitted without the need for a planning application depending on the size and location of the shop.
Resident of Shenley	Agree. Keep business rates & rent rates affordable – don't spoil the local amenity.	The support is welcomed and the comments are noted. The Local Plan is not able to influence levels of business rates or rents.
Resident of Shenley	Due to parking charges people are encouraged to shop elsewhere (e.g. London Colney Retail Park). Borehamwood high street only survives because of free parking at Tesco/Boulevard. Radlett people shop in Borehamwood due to free parking at Tesco.	The comments are noted. Car parking charges are not set through local plans and are dealt with by different parts of the council, but free parking is not necessarily the answer to vibrant high streets. A London Councils report has shown that more and cheaper parking does not guarantee greater commercial success, and offering parking for 'free' actually means the costs fall elsewhere, usually on the local council and so on the local community. This report evidences that pedestrians and cyclists return more often to high street shops and spend more money over time than customers arriving by car. A Transport for London study into high streets showed 21% of shoppers felt town centres would be improved by less traffic. Car use in Hertsmere is much higher than in London (and the UK average), but it is to everyone's benefit to try to reduce this. Having unlimited free parking can harm high streets by attracting people to park there all day when making other trips – perhaps parking to go to work or a nearby station. This means retail customers arriving by car can't find a space. Free parking can also encourage more local people to make short car trips when they might otherwise walk, worsening traffic congestion and air quality in town centres.
Resident of Potters Bar	The Town does not offer a good variety of shops, e.g. mainly hairdressers, cafes and charity shops.	The comments are noted. We encourage a range of shops in our shopping centres and have policies which set out key parts of the centres which should contain a majority of retail shops. However a retail shop in use class A1 can change from, for example, a food store to a charity shop, hairdresser or carpet shop without needing to go through the planning process as these are all regarded as the same use class in planning.
Resident of Shenley	Need a commensurate level of retail and services, not high, needs to be mixed. Every other shop in Borehamwood is an eatery	The comments are noted. We encourage a range of shops in our shopping centres and have policies which set out key parts of the centres which should contain a majority of retail shops. Restaurants and cafes are an acceptable town centre use when they are in the right places, but we are not able to control all changes of use from shops to cafes/restaurants, which are often permitted without the need for a planning application depending on the size and location of the shop.
Resident of Shenley	How can you retain something that doesn't exist? Just a walk along Borehamwood high street shows no thought has gone into providing a variety of outlet	The comments are noted. We encourage a range of shops in our shopping centres and have policies which set out key parts of the centres which should contain a majority of retail shops. The planning system includes use classes, under which retail shops are classed as 'A1'. This classification covers a broad range of different shop types (e.g. food shops, charity shops, hairdressers, shops selling hardware or any other type of goods) and it is not possible to control the variety of shops within this class using the planning system. Other uses such as restaurants and takeaways fall within different use classes, so there is a degree of control, however national regulations allow some uses to be changed without the need for planning permission which limits the control the local authority has over shops.
Resident of Potters Bar	If there is demand yes. Potters Bar lacks a variety of shops	The comments are noted.
Resident of Potters Bar	Would not describe what exists as high level	The comments are noted.

Respondent	Summary of representation	HBC response
Bar		
Resident of Potters Bar	Not aware of high level of retails services within shopping centres and parades. With subsidised rents, local businesses could be encouraged	The comments are noted. The planning system is not able to influence or subsidise rents, so this would not be something that is able to be included in a local plan.
Resident of Shenley	Agree. Other uses appropriate in those areas: doctors, dentists, chemists, local shops rather than large supermarkets.	The comments are noted.
Resident of Potters Bar	Local retail areas buoyant and growing, should be maintained	The comments are noted.
Resident of Potters Bar	Local retail areas buoyant and growing, should be maintained	The comments are noted.
Resident of London Colney	Happy with local village shops. Not current high level of retail services, business rates too high	The comments are noted.
Resident of Shenley	Agree	The comments are noted.
Resident of Shenley	Agree but this must be enforced e.g. planned shops were not built at Napsbury because developers would make more money from houses.	The comments are noted. (Napsbury Park is within St Albans borough).
Resident of Shenley	Borehamwood high street shows no thought has gone into providing a variety of outlets	The comments are noted. We encourage a range of types of shops in our shopping centres and have policies which set out key parts of each centre which should contain a majority of retail shops. However a retail shop in use class A1 can change from, for example, a food store to a charity shop, hairdresser or carpet shop without needing to go through the planning process as these are all regarded as the same use class in planning.
10 Community facilities <i>What community facilities or local infrastructure improvements do you think should be given priority?</i>		
Resident of Borehamwood / Elstree	A new theatre in Borehamwood to replace the Ark Theatre which got destroyed for a housing development (biggest waste of Hertsmere council's money). Borehamwood deserves a state of the art theatre - Potters Bar and Radlett has one.	The comments are noted
Resident of Borehamwood / Elstree	Transport	The comments are noted
Resident of Borehamwood / Elstree	Better, cheaper, more frequent bus services. Park and Ride so fewer cars but lots of buses.	The comments are noted
Resident of Borehamwood / Elstree	Health, police, education, parking at existing facilities on an obtainable and affordable scale	The comments are noted
Resident of Borehamwood / Elstree	Schools, shops, meeting places, surgeries	The comments are noted
Resident of Borehamwood / Elstree	Schools, shops, clinics	The comments are noted
Resident of Borehamwood / Elstree	Doctors, primary school places	The comments are noted
Resident of Borehamwood / Elstree	College facilities for older people. New school in Radlett or Elstree	The comments are noted
Resident of Borehamwood / Elstree	Need to engage with younger generation. Need places to socialise.	The comments are noted
Resident of Borehamwood / Elstree	Original plan for Studio Estate proposed school and community centre, they were never built.	The comments are noted
Resident of Borehamwood / Elstree	Transport, doctors, schools	The comments are noted

Respondent	Summary of representation	HBC response
Resident of Borehamwood / Elstree	Better public transport, cheaper buses, proper cycle routes	The comments are noted
Resident of Borehamwood / Elstree	There does not seem to be enough schools, primary and secondary, enough road improvements, hospitals, doctors or dentist facilities, shopping facilities.	The comments are noted
Resident of Borehamwood / Elstree	Education and health are high priorities	The comments are noted
Resident of Borehamwood / Elstree	Community centres, libraries, facilities for clubs, advice centres, surgeries close to shopping centres. Health services and schools	The comments are noted
Resident of Borehamwood / Elstree	Suitable place for a school is Old Haberdashers sports site on Croxdale Road	The comments are noted
Resident of Borehamwood / Elstree	Can schools cope with more pupils	The comments are noted. Schools will be assessed in conjunction with the county council, and consideration will be given to the expansion of schools and/or building of new schools.
Resident of Borehamwood / Elstree	Roads & traffic flow. No proper action taken to improve traffic flow over last 35 years.	The comments are noted.
Resident of Borehamwood / Elstree	Improve traffic flow. Overground or subway for road at Elstree traffic lights. Provide high standard of health services. Provide suitable housing to reduce homelessness. Provide sports halls and good education facilities. Waste water treatment and water pressure. Good refuse and recycling for all houses, flats and businesses. New homes should incorporate solar systems.	The comments are noted.
Resident	improve, expand, add schools	The comments are noted.
Resident	GP surgeries/health centres, schools, transport/roads, affordable housing	The comments are noted.
Resident of Bushey	Agree	The comments are noted.
Resident of Radlett	Education & health provision properly planned for. Radlett needs a secondary school	The comments are noted.
Resident of Potters Bar	More infrastructure in Potters Bar to support new housing	The comments are noted.
Resident of Shenley	Secondary schools	The comments are noted.
Resident of Shenley	Shenley needs a village centre similar to the Radlett Centre (not as big) to provide adequate space for parish council office/community activities including weekly lunches for senior citizens (used to happen at junior school) etc. Fibre internet connection. Larger doctors surgery.	The comments are noted.
Resident of Potters Bar	improve healthcare facilities	The comments are noted.
Resident of Potters Bar	Village hall, GPs/ Dentist. Bus + rail (public transport). Parking	The comments are noted.
Resident of Potters Bar	Transport	The comments are noted.
Resident of Shenley	Schools, gp's hospitals, play areas	The comments are noted.
Resident of Shenley	Too late. None were provide at Porters Park despite promises.	The comments are noted.
Resident of Potters Bar	Existing surgeries are in great demand and could not cope with additional patients. If an additional surgery were built I hope it would not be manned by expensive agency staff or doctors from other surgeries.	The comments are noted.
Resident of Shenley	Shenley is currently overwhelmed by through traffic (I believe Hertsmere have performed their own survey) and more needs to be done to control this, not make it worse. Public transport is poor and irregular More access to GP's is required. Getting appointments within a reasonable time is impossible unless you book a day on the presumption that you are going to be ill.	The comments are noted.
Resident of Shenley	London Road has become a cut-through between the M25 and A1. The morning and evening traffic is horrendous (sometimes stretching back to London Colney) we need to decrease the amount of traffic NOT	The comments are noted.

Respondent	Summary of representation	HBC response
	increase it	
Resident of Shenley	Priority to health	The comments are noted.
Resident of Shenley	Affordable leisure activities for young and elderly.	The comments are noted.
Resident of Shenley	Local infrastructure should include provision of new schools, doctors' surgeries, grocery shops and other relevant services such as new bus and cycle routes	The comments are noted.
Resident of Shenley	Community transport buses, schools, doctor surgeries, dentists, community meeting place – village hall for example – shops within walking distance – particularly with regard to old people.	The comments are noted.
Resident of Potters Bar	Schools, gp's	The comments are noted.
Resident of Shenley	Need infrastructure to support new housing proposals	The comments are noted.
Resident of Resident of Potters Bar	Schools	The comments are noted.
Resident of Potters Bar	Schools	The comments are noted.
Resident of Shenley	Transport, health, schools	The comments are noted.
Resident of Potters Bar	Council needs to ensure schools, doctor's surgeries and other pertinent facilities and infrastructure support number of proposed homes	The comments are noted.
London Colney	Need schools to accommodate new families/children	The comments are noted.
London Colney	Lack of sufficient infrastructure	The comments are noted.
London Colney	No secondary school for London Colney and primary schools nearing capacity. Doctors, dentists and other community facilities.	The comments are noted.
London Colney	Roads, schools, public transport, emergency services and healthcare.	The comments are noted.
London Colney	Schools are already full, doctor surgeries and so on	The comments are noted.
London Colney	How many school places will you provide? How many GP surgeries? Dentists?	The comments are noted. The numbers are to be determined during the plan-preparation process and will depend on the amount of development being proposed on any particular site, and will be determined in collaboration with the relevant agencies (e.g. NHS Trust, County Council).
London Colney	Provision of new schools, doctors, dentists, hospitals and facilities such as local shops. As far as I am aware, no new schools are able to be built so where will the children of these developments be educated? The schools in St Albans are very much at capacity and the only other schools in the location are Dame Alice Owens, Mount Grace and Hertswood Academy. Doctors and dentist practices in the area are already under pressure as are the hospitals.	The comments are noted. The need for new schools will be assessed in conjunction with the county council, and consideration will be given to the expansion of schools and/or building of new schools. New schools are able to be built, and the provision of sufficient additional school places (whether through expansion of existing schools or provision of new schools) would be a required part of any large new development.
London Colney	Hospital A&E centres at Watford and Stevenage are already stretched and roads at peak times have long queues of traffic. Promises of infrastructure changes in the areas, have not been forthcoming - such as the proposed traffic lights to ease movement from Colney Heath onto the A414 despite it being considered a 'good idea'. This doesn't bode well for new building work.	The comments are noted. An improvement plan for the A4141 corridor is currently being proposed by Hertfordshire County Council although implementation timescales are not yet known.
London Colney	Drainage in the village is already at capacity Schools are over-subscribed now both primary and secondary - where will children be able to go to school. The secondary school that was due to be opened on the Harperbury Site never materialised! Doctors surgeries - it's almost impossible now to get an appointment without waiting up to two weeks for one.	The comments are noted. Schools will be assessed in conjunction with the county council, and consideration will be given to the expansion of schools and/or building of new schools. New schools are able to be built, and the provision of sufficient additional school places (whether through expansion of existing schools or provision of new schools) would be a required part of any large new development. Healthcare facilities would be a requirement as part of any new large development such as a garden village or garden suburbs. GP waiting times are a nationwide issue and due in part to a lack of patient information about alternative healthcare options for minor complaints.
London Colney	None of the private developers pay for new motorways, schools, hospitals, GP clinic, Police, social services etc.... yet they collect massive profits for the privilege of building and selling our homes. Please please please get the infrastructure in place at all levels Before and houses get built!	The comments are noted. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	A development of this size would require huge investment in roads, hospitals, rail, schools, buses, sewerage, water, doctors and other facilities. Recent history shows that Hertsmere's ability to deliver these is at best improbable and if achieved would take many years, meaning many years of suffering whilst waiting for new services to be delivered. Many parents already cannot get their children admitted to local schools. Parents on the new site will simply	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of

Respondent	Summary of representation	HBC response
	apply to schools locally in St Albans, Potters Bar and elsewhere and local residents would then find they would be battling to school their children anywhere locally.	existing schools), additional healthcare provision and public transport links. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	I have lived in St Albans since 1986 and watched thousands of new houses being built in and around the area without any new infrastructure whatsoever, despite the fact that the population has grown massively. We have less hospitals, less police, insufficient schooling and the roads are mostly log jammed at peak points of the day or when an accident occurs on one of the surrounding motorways, which as we know is very frequently. To continually expand the population in an area without the appropriate infrastructure is to continually impair the quality of the lives of the people that live there and cause more stress and strain on the existing services as they attempt to cope with the impossible. Indeed, right now we need funds to play catch up with the infrastructure to accommodate the current population and these are simply not forthcoming.	The comments are noted. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	A development of this size would require huge investment in roads, hospitals, rail, schools, buses, sewerage, water, doctors and other facilities. Recent history shows that Hertsmere's ability to deliver these is at best improbable and if achieved would take many years, meaning many years of suffering whilst waiting for new services to be delivered. Increased pressure on schools: Many parents already cannot get their children admitted to local schools. Parents on the new site will simply apply to schools locally in St Albans, Potters Bar and elsewhere and local residents would then find they would be battling to school their children anywhere locally.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	I wonder if any of you have tried leaving London Colney, Colney Heath or Harper Lane during rush hour? tried getting a doctors/dentist appointment? Or tried to apply for school places?	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	The complete lack of infrastructure in the area.	The comments are noted.
London Colney	Any development will have a major impact on the transport infrastructure around London Colney which is already overloaded & will be further exacerbated by the proposed Strategic Freight Rail Terminal. I would be grateful if you could outline how you will address the additional education, transport, & health requirements for the additional population.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	Only accessible by car Will cause additional traffic air and noise pollution	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to

Respondent	Summary of representation	HBC response
	The proposed site will not be large enough to justify new railway links Likely to rely on bus services - currently being cut by Hertfordshire CC	delivering the new local plan. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	Existing infrastructure already jammed solid	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	A development of this site would require huge investment in infrastructure regarding roads, hospitals, rail, schools, buses, sewerage, water, doctors and other facilities. With the lack of infrastructure, parents on the new site will apply to schools locally in St Albans, Potters Bar and elsewhere and local residents here would then find they would be battling to school their children anywhere locally. There are no clear plans for affordable housing on this proposed site. There have been no answers regarding how many homes would be social housing or 'affordable'. The lack of answers to such basic questions invalidate your plan and make consultation a farce.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links. There is no detail at this stage because this is a very early stage in the process of producing a local plan which takes several years. The Issues and Options report only sets out the scale of growth anticipated in Hertsmere over the next 15 years and asks questions about where and how to achieve it. It is not supposed to be a complete local plan and there will be more public consultation before we are ready to produce a final draft local plan. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy. The council takes affordable housing seriously and has introduced policy and guidance to assist in the provision of affordable housing across the borough. We will ensure the maximum level of affordable housing required by the Council's policies (currently at least 35%) is delivered within sites allocated. This will be embedded in the plan and made clear to developers from the outset; the Council will not accept that it is unviable to provide affordable homes when sites have been demonstrated to be viable during the preparation of the plan.
London Colney	There will be 'excess dependence on the car and proper bus services' (already this is so) The need for 'adequate provision facilities for evening leisure activities' and the provision of 'shopping facilities' (There has already been several incidents of antisocial behaviour nearby, perhaps as a direct result of the lack of some of this, even now) '...frequently produce neighbourhoods that are poorly maintained and perceived to be unsafe by residents' '...tend to attract antisocial behaviour in areas with few social facilities"	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	The implications of this is that such a settlement would put pressure on out of borough resources and infrastructure. The assumption that there will be a new junction on the M25 is highly unlikely to be possible - what then!	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.

Respondent	Summary of representation	HBC response
		There is no suggestion of a new motorway junction; rather the potential for upgrading existing junctions is referenced.
London Colney	How about maintaining what we already have? Cleaning drains? Filling in pot holes in the road so I don't keep having to have my car suspension fixed? Road sweeping – never ever had one in our road! Upgrade the street lighting so people feel safe at night and which would also cut down on burglaries? I never go out after dark as it is almost impossible to see where you are going plus the lighting goes off at midnight so we are all forced to act like Cinderella and rush home so we can see enough to park.	The comments are noted, however these are not matters for the Local Plan. Clearing blocked drains, gulleys and manholes, potholes and street lighting are the responsibility of the Highway authority (Hertfordshire County Council - HCC) and can be reported directly to them here: https://www.hertfordshire.gov.uk/faultreporting/ . Street lighting has been switched off past a certain time across the county and was a decision made by the County Council to save energy and money, so you should approach your HCC elected member about this. Road sweeping is carried out by Hertsmere Borough Council on a schedule. Please call 020 8207 2277 for more information.
London Colney	This area has insufficient infrastructure in terms of schooling and medical services and the proposed site is very remote from the rest of Hertsmere.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links.
London Colney	The infrastructure barely supports what is here already, with many families already struggling to find school places for their children, local jobs to support them, and the poor access to the midland main line makes commuting difficult. The road infrastructure of the area does already significantly struggle with the current levels of vehicle movements, which has resulted in several recent fatal accidents. The A414, A1, M1, M25, A1081 in this area must have large sustained investment and improvement BEFORE a development of the size you are suggesting can safely and feasibly continue.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	Lack of school spaces; parking; healthcare facilities; shops	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links.
London Colney	I find this very misleading with a lack of information on the infrastructure for this growth or for a second stage of the proposed development.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. The Issues and Options document represents a very early stage in the plan-making process designed to gather opinions. We have a lot of evidence-gathering work to do before any proposals are taken through into a final draft plan for submission to the Secretary of State. Our Issues and Options document sets out the forms of infrastructure we will be seeking from large developments and we will work with developers to achieve things like new schools (or the expansion of existing schools), additional healthcare provision and public transport links.
Resident of Shenley	A secondary school is needed for the area. Currently all Radlett and Shenley children have to travel large distances to school. I understand Shenley Primary School cannot grow due to issues with strength of playground precluding lorries delivering mobile classrooms. There are also issues with drop-offs due to the narrow busy road. Consideration should be given to re-siting the schools and enlarging it.	The comments are noted. School provision is being investigated alongside the County Council as part of our evidence-gathering work for the new Local Plan, and will feed into later stages of the plan-making process. Once we have selected potential sites for growth, we will look at these in more detail alongside other sites in the area and existing developments that are in the pipeline. For example whether a new school (primary or secondary) and/or the expansion of existing school(s) would be most appropriate.
11 Sustainable Travel <i>What types of sustainable transport improvements would you like to see prioritised locally as part of the future planning of our borough?</i>		
Resident of Borehamwood /	The train network significantly needs improving - Thameslink are not fit for purpose - unreliable and poor excuses for cancelled trains.	The comments are noted. Management of the station and railways is not a matter directly for the Local Plan. Thameslink and

Respondent	Summary of representation	HBC response
Elstree	Even though the station is 24 hours it lacks staff during rush hour, often the side gate is closed and not enough staff if there is an emergency. Make the road network between Borehamwood Train station to the A1 into 2 lanes and remove the islands along Shenley Road.	Network Rail have their own improvement plans which work outside of the local plan process. A proposal to improve traffic flow along Shenley Road and in particular make it more friendly for pedestrians and cyclists is currently being considered in conjunction with the County Council as highway authority. Shenley Road is an Air Quality Management Area (AQMA) due to its poor air quality, so we are looking into ways to improve this.
Resident of Borehamwood / Elstree	Traffic at a standstill	The comments are noted. We are looking at ways to encourage more people out of their cars along with the County Council, who's latest Transport Plan supports walking, cycling and public transport as the principal modes of transport rather than road building/widening which only encourages more car traffic. This will be a gradual process so change cannot be expected overnight.
Resident of Borehamwood / Elstree	Thameslink line is dreadful. Don't cut 107 bus service	The comments are noted. Management of the station and railways is not a matter directly for the Local Plan. Thameslink and Network Rail have their own improvement plans which work outside of the local plan process. The 107 is run by TfL, so the borough council can oppose cuts and potentially assist with funding (although not in all cases) but does not have the final say on services being cut.
Resident of Borehamwood / Elstree	Bus routes and services.	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Borehamwood / Elstree	New East West main roads to North of Borehamwood, also to South of Elstree & By Pass	The comments are noted. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways.
Resident of Borehamwood / Elstree	Main roads improved and local roads widened	The comments are noted. However road widening and building is very unlikely to happen as it is no longer supported by the County Council through their latest Transport Plan. It has been shown that increasing the capacity of roads leads to more traffic, and the situation perpetuates itself. Instead we are supporting the County Council in encouraging a shift to walking, cycling and public transport for more journeys.
Resident of Potters Bar	More often and more choice	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Shenley	Buses to Borehamwood and Radlett stations to run early enough for commuters to use them.	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Shenley	Good bus services. More parking at railway stations. More free parking in shopping areas. Road improvements – straightening out dangerous corners, filling in potholes, repainting road markings etc. No new houses built unless roads can cope and roads adopted by council – understand the county council refuse to adopt new roads built on housing developments.	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements. Road widening and building is very unlikely to happen as it is no longer supported by the County Council through their latest Transport Plan. It has been shown that increasing the capacity of roads leads to more traffic, and the situation perpetuates itself. Instead we are supporting the County Council in encouraging a shift to walking, cycling and public transport for more journeys. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways.
Resident of Shenley	Shenley needs a reliable and frequent bus service if the use of cars is to be reduced.	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Shenley	The bus service between Shenley and Borehamwood is hourly on week days and non-existent on a Sunday. A better service to Elstree Station is surely a must.	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Borehamwood / Elstree	Train station bigger to cope with rush hour demand, need a more frequent and reliable service. More buses and routes. Reinstate school buses. Dedicated cycle lanes	The comments are noted. We are supporting the County Council in their latest transport plans which focus on sustainable transport. Improvements to bus services will be looked into as part of planning for new larger developments around settlements. Improvements to Elstree and Borehamwood station are currently being proposed by Govia Thameslink.
Resident of Borehamwood / Elstree	Better roads to cope with traffic	The comments are noted. Road widening and building is very unlikely to happen as it is no longer supported by the County Council through their latest Transport Plan. It has been shown that increasing the capacity of roads leads to more traffic, and the situation perpetuates itself. Instead we are supporting the County Council in encouraging a shift to walking, cycling and public transport for more journeys.

Respondent	Summary of representation	HBC response
Borehamwood	More buses 7 days a week through to St Albans.	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Borehamwood / Elstree	Traffic congestion.	The comments are noted. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways.
Resident of Borehamwood / Elstree	Traffic	The comments are noted. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways.
Resident of Borehamwood / Elstree	More bus routes around the borough, improvements to train service to London	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Borehamwood / Elstree	Increased problem of traffic congestion. Inadequate bus & train services	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Borehamwood / Elstree	Improvements to M25	The comments are noted. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways.
Resident of Borehamwood / Elstree	With reduction in train and bus operatives I cannot appreciate how these facilities would cope.	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Borehamwood / Elstree	Traffic congestion.	The comments are noted. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways.
Resident of Borehamwood / Elstree	Transport problems. If we can't build new roads, create a MagLev system linking local towns	The comments are noted. MagLev is a high speed rail option so would not be suitable for frequent-stopping services linking local settlements, and costs are very likely to be prohibitive.
Resident of Borehamwood / Elstree	High infrastructure can't cope with current levels of traffic	The comments are noted. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways.
Resident of Borehamwood / Elstree	Traffic is a big issue, building a by-pass would help to solve problem	The comments are noted. Road building is very unlikely to happen as it is no longer supported by the County Council through their latest Transport Plan. It has been shown that increasing the capacity of roads leads to more traffic, and the situation perpetuates itself. Instead we are supporting the County Council in encouraging a shift to walking, cycling and public transport for more journeys.
Resident of Borehamwood / Elstree	Radical solution to local traffic and roads Bypass Better exit routes	The comments are noted. Road building is very unlikely to happen as it is no longer supported by the County Council through their latest Transport Plan. It has been shown that increasing the capacity of roads leads to more traffic, and the situation perpetuates itself. Instead we are supporting the County Council in encouraging a shift to walking, cycling and public transport for more journeys. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so a bypass is unlikely to be supported.
Resident of Borehamwood / Elstree	Buses are my priority as I don't drive	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Borehamwood / Elstree	Bus and rail links improved due to increase use. Increase parking for shopping centres	The comments are noted. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure.
Resident	Money needs to be spent on public transport	The comments are noted.

Respondent	Summary of representation	HBC response
		The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure.
Resident of Bushey	Roads need improving and expanding before new housing developments	The comments are noted. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure.
Resident	Improve public transport and access to it. Encourage use of cycles.	The comments are noted. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure.
Resident	How about a tram system as trains can't be added	The comments are noted. Additional rail services are prohibitively expensive for the size of development that we are looking at in Hertsmere, so it is likely that a tram system would also be too costly, particularly given the relatively low population density in the area. Trams work best in high population areas such as cities. Bus services are more flexible as they don't need any specific infrastructure, and so are most suited to more dispersed areas.
Resident of Bushey	Needs to be even more affordable housing added	The comments are noted.
Resident of Radlett	Transport & highway improvements, cil projects?	The comments are noted. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure. It is more likely that where specific improvements are required as a result of a large allocated development site, these will be funded through section 106 agreements, however CIL funding could also be used.
Resident of Shenley	Frequent buses on routes to and from stations and major towns.	The comments are noted.
Resident of Potters Bar	improve public transport network. Build new houses along the train lines	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Shenley	Bus services need to be improved. Shenley bus services are infrequent and unreliable so poorly used. Commuters and students have no choice but to drive. More cycle routes are needed – Shenley to Radlett and Shenley to Borehamwood. People won't cycle in the winter months. Cars will always be used where public transport isn't adequate. Planners can't make people cycle to work.	The comments are noted. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Potters Bar	more dedicated facilities for cycling	The comments are noted. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure.
Resident of Potters Bar	It is not sustainable to expand the number of road users in the Shenley/ Radlett/ Borehamwood area - so public transport is a pre-requisite to any future building	The comments are noted. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure.
Resident of Shenley	Good bus services. More parking at railway stations. More free parking in shopping areas. Road improvements.	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure. Parking charges are not within the remit of a local plan.
Resident of Potters Bar	Believe rail and bus transport could not cope with a high volume of increased residents. Present parking is not adequate.	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Potters Bar	Adequate roads, good bus links needed. Trains not long enough for the number of people that use them	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements. Thameslink and Network Rail have their own improvement plans which work outside of the local plan process.
Resident of Potters	Improvement to section of M25 between South Mimms and Potters Bar, too many accidents. More reliable	The comments are noted.

Respondent	Summary of representation	HBC response
Bar	public transport	We will be working with Highways England to assess the potential impacts of new development in the borough on the motorway network. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Potters Bar	Integrate bus services with rail timetable	The comments are noted. Unfortunately timetables are not within the control of the Local Plan or the borough council more widely and are set by the transport operators.
Resident of Potters Bar	Infrastructure at capacity, investment needed in roads and rail	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Shenley	Regular and frequent bus transport as a social service – not necessarily to be run at a profit for the provider.	The comments are noted. Improvements to bus services and pedestrian/cycle access to services will be looked into as part of planning for new larger developments around settlements. Nationalisation of these services is outside of the control of the local authority and would need central Government action.
Resident of Potters Bar	Increased traffic congestion. Improve bus service and footpath routes to shops and stations	The comments are noted. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure. Improvements to bus services and pedestrian/cycle access to services will be looked into as part of planning for new larger developments around settlements.
Resident of Potters Bar	Roads can't support further growth, local bus services not practical	The comments are noted. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure. Improvements to bus services and pedestrian/cycle access to services will be looked into as part of planning for new larger developments around settlements.
Resident of Potters Bar	Roads can't support further growth, local bus services not practical	The comments are noted. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure. Improvements to bus services and pedestrian/cycle access to services will be looked into as part of planning for new larger developments around settlements.
Resident of Shenley	Extended bus route to and from Borehamwood station where parking is a problem	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
Resident of Potters Bar	Enforce weight restriction on lorries through Shenley.	The comments are noted. The police and the Trading Standards Service can enforce weight restriction orders under the Road Traffic Regulation Act 1984. Police can be contacted on the non-emergency number 101 to report incidences of lorries using the route.
London Colney	Infrastructure of cars/roads	The comments are noted.
London Colney	Excessive traffic and harmful emissions	The comments are noted. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure.
London Colney	Roads clogged	The comments are noted.
London Colney	10,000 + car movements daily through L Colney, infrastructure cannot cope. Poor bus service, no railway.	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
London Colney	Infrastructure can't cope	The comments are noted.
London Colney	Increase in traffic	The comments are noted.
London Colney	Increase in traffic	The comments are noted.
London Colney	Increase in traffic	The comments are noted.
London Colney	Will become a commuter village without links to public transport	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.

Respondent	Summary of representation	HBC response
London Colney	Traffic congestion, no railway station nearby	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
London Colney	Increase in traffic	The comments are noted.
London Colney	Increase in traffic	The comments are noted.
London Colney	Increase in traffic	The comments are noted.
London Colney	Clogged up roads, no railway station or bus service	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
London Colney	Increase in traffic	The comments are noted.
London Colney	Increase in traffic. Limited bus services	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
London Colney	Increase in traffic, new roads needed	The comments are noted. Road building is very unlikely to happen as it is no longer supported by the County Council through their latest Transport Plan. It has been shown that increasing the capacity of roads leads to more traffic, and the situation perpetuates itself. Instead we are supporting the County Council in encouraging a shift to walking, cycling and public transport for more journeys.
London Colney	The roads will not cope with the extra traffic, even now it can take ten minutes to get out the village at certain times of days; with the already approved development of hundreds of new homes on the site of the old Pastoral Center and the former Harperbury Hospital site this problem will get significantly worse, adding thousands of inhabitants to the area will bring the roads to a standstill. No amount of adjusting of traffic light sequences or changing junction layouts will compensate for the vast increase in traffic the proposed development will bring.	The comments are noted. The County Council's recent draft Local Transport Plan seeks to address high levels of car use by encouraging more sustainable transport measures rather than building new roads, so this supports our aims to improve public transport, walking and cycling infrastructure.
London Colney	4,000 or 8,000 houses would result in 16,000 more cars and 21,000 more car movements per day. Roads will be affected including M25, M1, A1, A405, A414, A1081 and A41. the planned Strategic Freight Rail Terminal will dramatically worsen this situation. To add huge extra pressures with no plan for transport and road infrastructure improvement is again unacceptable. The Herts strategy and programme manager, in an email to Anne Main MP on 20 th November 2017 states 'The A414, M25 and A1(M) are all identified as being congested'. M25: In the C4C meeting on 5th November, Mary Maynard, portfolio holder for planning stated: 'Any new development cannot straddle the M25', she continued 'A new development would need a new M25 junction...that's a no-no'. So, I ask, what are the plans for the M25 if you cannot straddle or build a new junction? This omission cannot be invested later.	The comments are noted. The new Local Plan is still at a very early stage in its development and work on transport modelling, highway infrastructure, and other important considerations has yet to be carried out. At the present time we are not considering a new M25 junction but rather upgrades to the existing junction. An proposed new settlement in this location would not straddle the M25. The 'area of search' shown in the Issues and Options document (which should not be taken to be a detailed local plan as it is simply an initial presentation of ideas to help us gauge local opinions) is an area that we were looking within for a suitable site for a garden village, and is not supposed to imply that the entire area would form a new settlement straddling the motorway. Any site for a garden village within this area of search would need to be on one side of the motorway only. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	Lower quality of life: Traffic issue will increase, harmful emissions will increase and overcrowding will ensue. Increased housing & traffic issues: Your 'local plan' is vague and is not clear on the actual number of houses to be built (4000-8000), but doubles or trebles the size of London Colney with possibly 21,000 daily car movements extra per day around London Colney. You have not detailed how you would deal with the traffic issues when the M25, M1, A1, A405, A414, A1081 and A41 are already gridlocked at times, and also when the proposed Strategic Freight Rail Terminal will already make these matters worse.	The comments are noted. The new Local Plan is still at a very early stage in its development and work on transport modelling, highway infrastructure, and other important considerations has yet to be carried out. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	Soon the rail freight will deliver and extra 4000 lorries per day to junction 22 of the M25 what will life be like for our residents when the "garden village" is added to all this.	The comments are noted. The new Local Plan is still at a very early stage in its development and work on transport modelling, highway infrastructure, and other important considerations has yet to be carried out. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. The rail freight depot is not yet a definite, and if it were to go ahead then additional traffic movements would be factored into the highway modelling work that we have to do. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as

Respondent	Summary of representation	HBC response
		policy.
London Colney	Traffic flows and Transport impacts particularly in light of developments already approved or in process within a radius of 5 miles of the proposed site. Sustainable Traffic plans are not considered in this proposal.	The comments are noted. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We are supporting the County Council in encouraging a shift to walking, cycling and public transport for more journeys. Sustainable transport planning cannot be done for a site until more information is known about it, and we would not want to carry out a large amount of work before we know whether a site is likely to be suitable in other respects (e.g. Green Belt impacts, availability, deliverability, ownership, flooding). We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	Any development will have a major impact on the transport infrastructure around London Colney which is already overloaded & will be further exacerbated by the proposed Strategic Freight Rail Terminal.	The comments are noted. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways.
London Colney	The southern St Albans area already has some of the worst traffic delays in Hertfordshire before developments already approved are even completed. Herts County Transport 2050 vision ONLY upgrades A414 and Abbey flyer. The site is not compatible with HCC policies (HCC 2050 proposal is to force people to use more sustainable forms of transport). The site will only add to the 10,000 additional daily vehicle movements already projected for the Rail Freight terminal.	The comments are noted. We are supporting the County Council in encouraging a shift to walking, cycling and public transport for more journeys. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. The rail freight depot is not yet a definite, and if it were to go ahead then additional traffic movements would be factored into the highway modelling work that we have to do.
London Colney	Trunk transport infrastructure overloaded (A414, A1, M25) and local rail services. Any development will need significant investment in major trunk roads and new rail links and stations not just local link roads.	The comments are noted. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. Road building is very unlikely to happen as it is no longer supported by the County Council through their latest Transport Plan. It has been shown that increasing the capacity of roads leads to more traffic, and the situation perpetuates itself. Instead we are supporting the County Council in encouraging a shift to walking, cycling and public transport for more journeys.
London Colney	The dependence of the use of private transport this can only exacerbate the already over use of the local public highways particularly the M25 and M1 etc.	The comments are noted. Before the new Local Plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways.
London Colney	Buses services not fit for purpose	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around settlements.
London Colney	Road infrastructure could not sustain additional vehicles	The comments are noted. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	Road infrastructure could not sustain additional vehicles	The comments are noted. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	Gridlocked roads	The comments are noted. Improvements to bus services will be looked into as part of planning for new larger developments around

Respondent	Summary of representation	HBC response
		settlements.
London Colney	Need transport infrastructure before developing	The comments are noted. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	Major impact on transport infrastructure around London Colney	The comments are noted. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
London Colney	Increase in traffic on Bell Lane roundabout, A414 & Harper Lane	The comments are noted. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.
Resident of Shenley	Accessing Radlett and Borehamwood stations from Shenley requires driving down country lanes. Radlett Lane is potholed, often flooded, long queues and narrow.	The comments are noted. Improvements to bus services and pedestrian/cycle access to services will be looked into as part of planning for new larger developments around settlements. Before the new local plan can be adopted we are required to carry out detailed work on the highway impacts which involves working with the county council over local roads, and Highways England on motorways. We need to be able to demonstrate that infrastructure can be delivered before a local plan can be considered to be sound by the Secretary of State through an independent examination and adopted as policy.

Part 3 Where should new development be built?

12 Brownfield Sites

Which areas do you think are best placed to accommodate this type of growth and why?

Resident of Borehamwood / Elstree	Use area by Holiday Inn for housing not football pitches	The comments are noted. This area of land has been put forward for employment uses as part of the council's Housing and Economic Land Availability Assessment (HELAA), and has been considered for its suitability for employment uses. It has already been removed from the Green Belt and safeguarded for employment uses through the current Local Plan 2012-27.
Resident of Borehamwood / Elstree	Only brownfield, don't reclassify greenfield	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Borehamwood / Elstree	No areas left to develop	The comments are noted.
Resident of Borehamwood / Elstree	Cowley Hill and Scratchwoods do not need to be developed	The comments are noted.
Resident of Borehamwood / Elstree	Use sites used for warehousing that stand empty eg Wickes Store & Imperial Place	The comments are noted. We are not currently proposing to vary the existing employment areas in the borough as there is still a need for employment uses in these locations. Imperial Place is currently fully occupied, and the Wickes Store is currently operating.
Resident of Borehamwood /	Destruction of Green Belt	The comments are noted.

Respondent	Summary of representation	HBC response
Elstree		
Resident of Borehamwood / Elstree	Fed up with new development	The comments are noted.
Resident of Borehamwood / Elstree	Land South of Aldenham Reservoir should be included for development. Destruction of green Belt	The comments are noted. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood / Elstree	Proposal to use Maxwell Park Community Centre for new junior school and nursery is preferable over using green space in Potters Lane	The comments are noted. A planning application has now been submitted for the site in Potters Lane as you may be aware. This is currently under consideration (ref. 17/2493/OUT).
Resident of Borehamwood / Elstree	Preserve Aldenham Reservoir	The comments are noted.
Resident of Borehamwood / Elstree	Thought aim was to utilise brownfield sites and not develop onto the green belt	The comments are noted. Brownfield sites will be considered first, however in order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release.
Resident of Borehamwood / Elstree	Borehamwood/Elstree over developed to bursting point.	The comments are noted.
Resident of Borehamwood / Elstree	How can you protect the environment when building on the green belt	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release.
Resident of Borehamwood / Elstree	Detrimental effects on noise levels and environment	The comments are noted.
Resident of Borehamwood / Elstree	Destruction of Green Belt	The comments are noted.
Resident of Borehamwood / Elstree	Land beyond The Fisheries suitable for development. Re-locate Reviva and develop land for housing	The comments are noted. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood / Elstree	Elstree Village/Centennial Park ideal to develop, plenty of land for amenities and access to A41 & M1 or A411 Land from Fisheries Pub to A41	The comments are noted. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood / Elstree	Do not destroy the wildlife	The comments are noted.
Resident of Potters Bar	Concerns over the intention to build on green belt land, both to the north and south of Potters Bar. There are brownfield sites which should be built on.	The comments are noted but there is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release.
Resident of Borehamwood / Elstree	Suitable brownfield areas but no building on greenbelt	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release.
Resident of Borehamwood / Elstree	Develop land opposite Morrisons	The comments are noted, however it is unclear where is meant as the land to the east of the A1 is not in Hertsmere (this is in Barnet), and only half the caravan park on Barnet Lane is within Hertsmere with the rest also being within Barnet.
Resident of Borehamwood / Elstree	Do not develop the green belt	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release.
Resident of Borehamwood /	Support inclusion of land south of Aldenham Reservoir for development	The comments are noted. Land in this area has been promoted through our local plan process, so we will be considering its

Respondent	Summary of representation	HBC response
Elstree		suitability for housing development.
Resident of Borehamwood / Elstree	Density of buildings in Elstree Way mean infrastructure cannot cope. Green belt will suffer when no more brownfield sites to build on	The comments are noted.
Resident of Borehamwood / Elstree	Do not develop green belt land	The comments are noted.
Resident of Borehamwood / Elstree	Further development of sites in Borehamwood is very limited as many have been used already. Losing more industrial land is likely to affect employment targets. Look at sites in Potters Bar that are showing their age.	The comments are noted. Sites across the borough are being considered, including a number of locations around Potters Bar. The council is strongly resisting the redevelopment of industrial areas for housing due to the need for employment space.
Resident	Adapt previously industrial areas. High streets which are losing tenants could be used for housing or community facilities.	The comments are noted. A retail study and work to assess current occupancy of employment sites is being carried out in order to inform the new local plan. However Hertsmere's industrial areas and high streets are mostly performing well with high levels of occupancy, so we are currently seeking to protect these areas due to the need for employment space.
Resident	The Elliots sports ground could be used for housing	The comment is noted.
Resident	The Elstree Way Corridor is good.	The comment is noted.
Resident of Radlett	Necessary to take land out of brownfield and green belt but must comply with design standards and have requisite infrastructure & green space	The comment is noted. We will be seeking infrastructure and green space as part of any new large developments in the borough, and are proposing to play a greater role in the delivery of large sites than in the past, allowing the council more control over the masterplanning and layout of new development.
Resident of Radlett	Develop Watling Street towards Elstree & Theobald Street towards Borehamwood	The comment is noted. Land along Theobald Street and Watling Street to the south of Radlett has been promoted through our local plan process, and we will be considering its suitability for housing development.
Radlett	Save Aldenham Reservoir and the Country Park	The comment is noted.
Resident of Shenley	Area opposite former Black Lion pub in Shenley if existing business moves.	The comment is noted.
Potters Bar	Borehamwood and Resident of Bushey. Better to increase density in existing towns than grow on greenbelt.	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Potters Bar	ideally along and around train lines to ease traffic routes	The comment is noted.
Resident of Shenley	Shenley's brownfield sites have been built on. If the Coombe Elestres site became available it would be ideal for a farm shop/ deli/ hairdressers/ other retail. Shenley had many shops in the past.	The comments are noted.
Resident of Potters Bar	brownfield sites are the best place for new housing that is close to existing transport and community facilities.	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release.
Resident of Potters Bar	well... brownfield sites as you say. Self evident?	The comments are noted. This question intended to ask which urban areas of the borough (Borehamwood, Potters Bar, Bushey or Radlett, or combination of these) do you think are most suited to this type of development.
Resident of Shenley	The Shenley Plan highlights the few areas that are acceptable.	The comments are noted in relation to sites in Shenley.
Resident of Shenley	Many older blocks of council flats have blocks of garages now only for storage – a waste of valuable land. In Shenley there is a field (once used for football) between Rectory Lane and Hillcrest Lane. Many years ago there were plans to build accommodation for older people.	The comments are noted. A number of council-owned garage blocks have been redeveloped for housing over the last few years (or there are plans to do so), although others still remain. This is a decision for the council's Estates Department and relevant elected Members to take.
Resident of Potters Bar	Bushey and Borehamwood	The comments are noted.
Resident of Shenley	The Hertsmere part of the former Harperbury hospital site. Adds to sustainability of the whole site development. Surplus industrial sites in Borehamwood A1 corridor. A411 Centennial Park. The predicted 9,000 jobs will either be in southern Hertsmere or more likely in London.	The comments are noted. We are in the process of considering all of the sites submitted for potential housing and jobs growth, of which Harperbury Hospital site is one, so are not currently in a position on comment on the suitability of individual sites.
Resident of Potters Bar	The Council should be identifying all waste and unused land and ensuring houses and flats are built on this. The green belt should be preserved. Such housing should be for young individuals and families.	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release.

Respondent	Summary of representation	HBC response
		Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Shenley	Brownfield sites but with supporting infrastructure. Borehamwood and Potters Bar best suited	The comments are noted. We are assessing land around both Borehamwood and Potters Bar as well as other parts of the borough through our local plan process, and will be considering its suitability for housing development.
Resident of Shenley	Borehamwood and London Colney are best suited as they have easier access to major roads meaning less disruption to the B road running through Shenley which was never intended for and cannot cope with such volume of traffic.	The comments are noted. We are assessing land around the borough through our local plan process, and will be considering its suitability for housing development.
Resident of Potters Bar	Concentrate development on Borehamwood. Building on brownfield is preferable to Green Belt	The comments are noted. We are assessing land around Borehamwood as well as other parts of the borough through our local plan process, and will be considering its suitability for housing development. A lot of recent development has taken place in Borehamwood, so significant infrastructure improvements are needed to allow more to take place.
Resident of Shenley	Proposed development on Pursely Farm is a terrible choice	The comments are noted.
Potters Bar	Protect green belt, disagree with developing on it when nowhere near to public transport	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Potters Bar	Green Belt should be safeguarded	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Potters Bar	Near stations	The comments are noted.
Resident of Shenley	Do not develop green belt land	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
London Colney	Will cause permanent loss of green belt land	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
London Colney	Green belt land	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
London Colney	Green belt land	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
London Colney	Effect on the environment	The comments are noted.
London Colney	Green belt land and air and noise pollution	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess

Respondent	Summary of representation	HBC response
		the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
London Colney	Air and noise pollution	The comments are noted.
London Colney	Green belt land	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
London Colney	Green Belt Land	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
London Colney	Support development of land south of Aldenham reservoir for housing	The comments are noted. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
London Colney	Green Belt land	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
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London Colney	Loss of green belt	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
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London Colney	Protect the green belt	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release.

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		Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
London Colney	Loss of green belt	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
London Colney	Building on green belt should not be a favoured approach when you have brownfield development	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
London Colney	Preserve the green belt, build on brownfield sites	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
London Colney	Object to removing green belt land	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
London Colney	Green belt should not be infringed upon	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Shenley	The sites should not be overdeveloped	The comments are noted.
Resident of Shenley	Borehamwood and Potters Bar seem the most industrial areas so should be a priority.	The comments are noted. We are assessing land around both Borehamwood and Potters Bar as well as other parts of the borough through our local plan process, and will be considering its suitability for housing development.
13 New garden suburbs <i>Where do you think would be the most sustainable locations for garden suburbs?</i>		
Resident of Borehamwood / Elstree	Possible solution	The comments are noted.
Resident of Borehamwood / Elstree	Bedfordshire	The comments are noted. We are not able to plan to meet housing need outside of Hertsmere, and a joint local plan with Bedfordshire is unlikely. The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA, which would lead to more joined-up planning across borough boundaries.
Resident of Borehamwood / Elstree	I support the new garden village	The comments are noted.
Resident of Borehamwood / Elstree	Elstree - good transport links and available space but need new main roads to cope with traffic	The comments are noted.
Resident of	Good idea. Infrastructure planned in advance	The comments are noted.

Respondent	Summary of representation	HBC response
Borehamwood / Elstree		Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Borehamwood / Elstree	Not sustainable, no infrastructure	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Borehamwood / Elstree	Makes sense, should focus on these types of development	The comments are noted.
Resident of Borehamwood / Elstree	Support. Areas which will not lead to 2 existing centres becoming 1 (e.g. Elstree & Borehamwood)	The comments are noted. A Stage 2 Green Belt Assessment has now been produced which looks in more detail at how certain areas contribute to the purposes of the Green Belt. This will help us in selecting sites to be taken forward to the next stages of consultation on the local plan.
Resident of Borehamwood / Elstree	Understand green belt land will have to be sacrificed	The comments are noted.
Resident of Borehamwood / Elstree	Support, green belt land less significant, ensure there is necessary infrastructure	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Borehamwood / Elstree	Land available close to Holiday Inn on A1 good option for new garden village	The comments are noted. No decisions have been made as yet over the exact location of development sites. Land in this area has been promoted through our local plan process for employment uses, so we will be considering its suitability.
Resident of Borehamwood / Elstree	Too long term to provide necessary scale of development in timescale required	The comments are noted. A number of different options will be needed in combination in order to ensure that housing can be delivered throughout the 15 years the plan will cover.
Resident of Borehamwood / Elstree	Redevelop Elstree Village, Centennial Park Roundabout perfect location	The comments are noted.
Resident of Borehamwood / Elstree	Concerned about development in area between Elstree & Borehamwood, will create increase in traffic and noise pollution	The comments are noted. No decisions have been made as yet over the exact location of development sites. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood / Elstree	Thought it was council policy to have a green area between communities for wildlife corridors and to help with air quality. Garden suburbs would impact on this.	The comments are noted. Council policy is set through the local plan, and so renewing this document gives the opportunity to reconsider current policy. The current local plan strongly protects the green belt, which has several purposes in national planning policy which relate to the merging of settlements, but do not relate to the quality of land, wildlife corridors or air quality. With any new development, particularly large-scale development, the council would seek through the new local plan to ensure that adequate open spaces and green corridors were provided.
Resident of Borehamwood / Elstree	Green belt should not be developed	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Borehamwood / Elstree	Against proposal to develop land behind Bishops Avenue, is Green Belt land and will merge Elstree & Borehamwood into one larger town	The comments are noted. We are in the process of assessing all of the sites which have been submitted to us as potential locations for development, so are unable to comment on individual sites at this stage. A Stage 2 Green Belt Assessment has been undertaken which looks at the Green belt in more detail, and will play a role in deciding which sites are taken through into the next stage of the new Local Plan.
Resident	Near main transport – train stations, main roads	The comments are noted.
Resident	Options not presented clearly enough. Need to see proposed development across borough boundaries to assess overall impact. Little brownfield in Radlett. Corridor west of railway line from old fire station to Harper Lane is possible.	The comments are noted. The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA, which would lead to more joined-up planning across borough boundaries.
Resident of Radlett	Support. Spread proportionally across built up areas of Hertsmere. Proposal for London Colney should maybe be made smaller	The comments are noted. No decisions have been made as yet over the exact location of development sites. It is not necessarily

Respondent	Summary of representation	HBC response
		possible to distribute growth evenly around the borough, although no decisions have yet been made. A range of site locations and sizes is likely to be needed to ensure a supply of housing throughout the 15 years of the plan.
Resident of Radlett	Practical for infrastructure to select one site but would bias traffic and environmental congestion in that area	The comments are noted. We are assessing land around Borehamwood, Bushey, Potters Bar and Radlett, as well as other parts of the borough, through our local plan process, to consider its suitability for housing development. A range of site locations and sizes is likely to be needed to ensure a supply of housing throughout the 15 years of the plan.
Resident of Shenley	Bushey Heath between M25 and A1. Close to Potters Bar and Borehamwood stations. Consolidated in an area where road links can be developed onto A1 and M25 junctions.	The comments are noted. We are assessing land around Borehamwood, Bushey and Potters Bar, as well as other parts of the borough, through our local plan process, to consider its suitability for housing development.
Resident of Shenley	Potters Bar, Bushey, Radlett and Borehamwood - infrastructure and facilities well provided including railway stations	The comments are noted. We are assessing land around Borehamwood, Bushey, Potters Bar and Radlett, as well as other parts of the borough, through our local plan process, to consider its suitability for housing development.
Resident of Shenley	Borehamwood, Radlett, Potters Bar and Bushey all have the infrastructure to support one, plus railway which is essential for commuting. Potters Bar and Radlett can probably cope with more development.	The comments are noted. We are assessing land around Borehamwood, Bushey, Potters Bar and Radlett, as well as other parts of the borough, through our local plan process, to consider its suitability for housing development.
Resident of Potters Bar	Not on the greenbelt	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Potters Bar	Somewhere with a rail link.	The comments are noted
Resident of Potters Bar	Anywhere that a full assessment of it has been done and the local residents consulted several times	The comments are noted. A range of assessments will be carried out before any decisions are made on the
Resident of Shenley	Look at the Shenley Plan. The parish council know more about Shenley and what will be acceptable than Hertsmere and their suggestions.	The comments are noted and we are aware of the emerging Shenley Neighbourhood Plan, however the garden suburbs approach only applies to the larger settlements in the borough (Borehamwood, Potters Bar, Bushey and Radlett).
Resident of Shenley	Area around S Mimms Services would be ideal in transport terms. Anywhere else will involve massive costs for road widening etc.	The comments are noted
Resident of Potters Bar	Do not think that Hertsmere can support these new houses, roads are congested enough	The comments are noted
Resident of Shenley	Area around South Mimms for transport reasons	The comments are noted
Resident of Shenley	Borehamwood between Watling Street/B5378/Railway line as far north as North Medburn Farm. Includes golf course (brownfield site?) (surplus of golf courses). The site is near Borehamwood railway station.	The comments are noted. A Stage 2 Green Belt Assessment has now been produced which looks in greater detail at the areas of land around the towns and villages in particular, including this area north/west of Borehamwood. This area of land as a whole has not been promoted through the Local Plan process, but could still potentially be considered once we have other evidence in place. Golf courses are considered to be greenfield sites as they are not covered by built development and are generally open.
Resident of Potters Bar	Should not be in close proximity to Potters Bar, already traffic congestion, not enough shops, local amenities already full	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Shenley	Theresa May has publicly stated that she is against the use of Green belt land – as am I – and this should be protected. Larger towns. Potters bar would be the lesser of evils. Shenley certainly does not lend itself to suburb development.	The comments are noted. The garden suburb proposal only applies to the larger settlements of Borehamwood, Potters Bar, Bushey and Radlett. As well as seeking to protect the Green Belt, the Government, through the National Planning Policy Framework (NPPF), requires local planning authorities to ensure that their Local Plans meet the full, objectively assessed housing need as far as is consistent with the policies in the NPPF. Housing is very much a Government priority. There is insufficient brownfield land within Hertsmere's settlements to meet our housing need, so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term. We have the chance now through the local plan to consider where in

Respondent	Summary of representation	HBC response
		the Green Belt housing might be accommodated with the least harm.
Resident of Shenley	The government has come out against building on The Green Belt. I am not familiar with all appropriate sites, but Shenley does not have the space or services available for any more development.	The comments are noted. As well as seeking to protect the Green Belt, the Government, through the National Planning Policy Framework (NPPF), requires local planning authorities to ensure that their Local Plans meet the full, objectively assessed housing need as far as is consistent with the policies in the NPPF. Housing is very much a Government priority. There is insufficient brownfield land within Hertsmere's settlements to meet our housing need, so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term. We have the chance now through the local plan to consider where in the Green Belt housing might be accommodated with the least harm.
Resident of Potters Bar	Should be on outskirts of Potters Bar towards London Colney and any suitable land in Borehamwood	The comments are noted. We are assessing land around Borehamwood and Potters Bar as well as other parts of the borough through our local plan process, and will be considering its suitability for housing development.
Resident of Potters Bar	Not required in Potters Bar, problems outweigh benefits. Needs to be on a railway or underground line	The comments are noted. We are assessing land around the borough through our local plan process, and will be considering its suitability for housing development.
Resident of Potters Bar	Not opposed but only if there is infrastructure to support it	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Shenley	Should not turn green belt into an urban area	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Potters Bar	Space for more housing adjacent to Site of Former Sunnybank School	The comments are noted. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Potters Bar	Disagree. Unless there is radical reorganisation of road, rail and possible underground systems, it will have a detrimental affect.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Potters Bar	Housing, jobs and infrastructure are more important than losing a small % of green space	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Potters Bar	Potters Bar Golf course would be a sustainable area to develop	The comments are noted. This area has been promoted for development through our local plan process, so we will be considering its suitability for housing development.
Resident of Shenley	No area suitable for such high density housing that would encroach on the Green Belt. Traffic congestion would be worse. Roads are already overcrowded.	The comments are noted. Garden suburbs by their nature are not high density developments, but have a more suburban layout such as already exists on the edges of most larger settlements. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Shenley	Would not say Radlett as they already have the worry of the rail freight site which is now being considered for housing. Same comment as earlier – promised shops at Napsbury Park were not delivered.	The comments are noted. Lessons can be learned from the past, and local planning authorities are now expected to have more involvement in the delivery of larger developments than was the case in the past, so we can work to ensure that services and facilities are delivered as planned. (Napsbury Park is in St Albans district).
14 growth of key villages		
Resident of Borehamwood / Elstree	If buildings are attractive and not shoe box flats	The comments are noted
Resident of Borehamwood /	Shenley, Elstree & Borehamwood do not need to grow	The comments are noted

Respondent	Summary of representation	HBC response
Elstree		
Resident of Borehamwood / Elstree	Elstree	The comments are noted
Resident of Borehamwood / Elstree	Develop Elstree village, plenty of land around Centennial Park Roundabout for homes and infrastructure. Relocate Reviva and develop land for housing	The comments are noted. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood / Elstree	Agree but not in Borehamwood	The comments are noted
Resident of Borehamwood / Elstree	Disagree with proposal for housing on land next to The Rise & Bishops Avenue. Green belt needs to be preserved, will cause traffic chaos	The comments are noted
Resident of Borehamwood / Elstree	Site rear of Bishops Avenue is not suitable, will cause further traffic issues, amenities and schools are not existent	The comments are noted. No decisions have been made as yet over the exact location of development sites. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood / Elstree	Concerned about expansion of Elstree & Borehamwood, causing further traffic problems	The comments are noted. No decisions have been made as yet over the exact location of development sites.
Resident of Borehamwood / Elstree	Land between Bishops Avenue & The Rise should not be developed, will cause further traffic congestion, amenities already full	The comments are noted. No decisions have been made as yet over the exact location of development sites. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood / Elstree	Concerned about urban sprawl and housing development in Elstree & Borehamwood, will cause further traffic congestion, not enough amenities	The comments are noted. No decisions have been made as yet over the exact location of development sites.
Resident of Borehamwood / Elstree	Object to developing land between Bishops Avenue & The Rise, green belt needs to be preserved, will cause more traffic congestion	The comments are noted. No decisions have been made as yet over the exact location of development sites. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood / Elstree	Concerned land behind The Rise and Bishops Avenue is under consideration for development. Green belt will be destroyed, traffic will be gridlocked. The location of the current waste disposal centre is also a problem	The comments are noted. No decisions have been made as yet over the exact location of development sites. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood / Elstree	Develop land South of Watford Road or Reviva recycling site at the bottom of Elstree Hill South	The comments are noted. No decisions have been made as yet over the exact location of development sites. Land south of Watford Road has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood / Elstree	Object to release of land in Elstree for housing development, local services already over subscribed	The comments are noted. No decisions have been made as yet over the exact location of development sites.
Resident of Borehamwood / Elstree	Do not develop Lodge Ave/Bishops Ave & The Rise	The comments are noted. No decisions have been made as yet over the exact location of development sites. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood / Elstree	Do not develop Lodge Ave/Bishops Ave & The Rise, traffic is already a major issue	The comments are noted. No decisions have been made as yet over the exact location of development sites. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood / Elstree	Disagree with proposal for housing on land next to The Rise & Bishops Avenue.	The comments are noted. No decisions have been made as yet over the exact location of development sites. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Borehamwood /	Agreed but subject to new radical road and transport policy first.	The comments are noted. Hertsmere and the whole of Hertfordshire are areas of very high car use, and the County Council's

Respondent	Summary of representation	HBC response
Elstree		recent draft Local Transport Plan seeks to address this by encouraging more sustainable transport measures rather than building new roads, which is a radical departure from previous plans. We are supportive of this through the new local plan, but are aware that additional infrastructure is needed in order to make this a reality and reduce traffic in our towns.
Resident of Borehamwood / Elstree	Oppose site identified on Allum Lane, would remove separation between Elstree & Borehamwood, exacerbate rush hour traffic and is too close to the cemetery	The comments are noted. A Stage 2 Green Belt Assessment has been undertaken which looks at the Green belt in more detail, and will play a role in deciding which sites are taken through into the next stage of the new Local Plan.
Resident of Borehamwood / Elstree	Villages should not be expanded	The comments are noted. No decisions have been made as yet over the exact location of development sites.
Resident of Borehamwood / Elstree	Would only add to existing problems around these areas	The comments are noted.
Resident	Growth in shenley would put even more pressure on access to Radlett station and other infrastructure. In either location danger of urban sprawl needs to be carefully controlled and proper community continues to develop, not a dormitory.	The comments are noted. We are keen to ensure that infrastructure and community facilities are provided alongside new housing to try to prevent creating dormitory settlements.
Resident	This area is green belt and building houses in this area will remove that green belt for ever	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident	Shenley: any sizeable expansion will put real pressure on services particularly road and rail.	The comments are noted.
Resident of Radlett	Every settlement should take some share of development. Land South of Watford Road suitable for employment land but if used for office development should be a new article 4 so can't be converted to housing	The comments are noted. No decisions have been made as yet over the exact location of development sites. It is not necessarily possible to distribute growth evenly around the borough, although no decisions have yet been made. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Bushey	Safeguarding Aldenham Country Park and the reservoir is vital. Support inclusion of Land to the South of Aldenham Reservoir	The comments are noted. Land in this area has been promoted through our local plan process, so we will be considering its suitability for housing development.
Resident of Shenley	Not a good approach. Roads are narrow and already well populated. Difficult to add on infrastructure to support villages as existing infrastructure are bursting.	The comments are noted.
Resident of Shenley	The area between London road in Shenley and The Spinney.	The comments are noted
Resident of Potters Bar	No. Villages are not the answer. People choose to live in villages to live in rural areas. They lack the infrastructure to support traffic, whereas towns already have train/bus stations.	The comments are noted. No decisions have been made as yet over the exact location of development sites. Any larger development sites within or adjoining villages would be expected to contribute towards infrastructure (e.g. community facilities, shops, school places).
Resident of Shenley	I agree that Shenley and Elstree should have some growth. Shenley growth should be limited due to the very limited infrastructure. It has 10,000 car movements daily through the village. T is a rural village with narrow roads. At peak times queues in Radlett Lane are horrendous. Our community needs 150-200 homes over the next 15 years. Elstree should have more development. It is near Elstree and Borehamwood Station, it has Centennial Park and infrastructure is better.	The comments are noted. The level of growth being proposed in each location has not yet been determined, and existing infrastructure, transport links as well as the ability of an area to provide new infrastructure will be considered as part of the process. Any larger development sites within or adjoining villages would be expected to contribute towards infrastructure (e.g. community facilities, shops, school places).
Resident of Potters Bar	not on the green belt	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Potters Bar	If Radlett or Shenley expand further they won't be villages anymore and will start to merge with neighbouring settlements.	The comments are noted. Radlett is not regarded as a 'village' for the purposes of the settlement hierarchy in the borough, due to the number of facilities/services based there. A Stage 2 Green Belt Assessment has now been produced which looks at the Green Belt in more detail against the purposes set out in the NPPF, which include preventing the merging of settlements. This, alongside other evidence, will play a role in deciding which sites are taken through into the next stage of the new Local Plan.
Resident of Shenley	Shenley is struggling with road congestion now. Few jobs, traffic congestion and long waits for GP appointments.	The comments are noted. (London Colney is not within Hertsmere Borough).

Respondent	Summary of representation	HBC response
	Elstree has better job opportunities and London Colney has better public transport.	
Resident of Shenley	Shenley is a beautiful village now being spoilt by 10,000 car movements daily. We have already coped with new houses at Porters Park. Any new building should be within village 'envelope'	The comments are noted. No decisions have been made as yet over the exact location of development sites. Any larger development sites within or adjoining villages would be expected to contribute towards infrastructure (e.g. community facilities, shops, school places).
Resident of Potters Bar	Don't agree, please leave us some green belt. Carefully planned expansion of Radlett towards Frogmore	The comments are noted. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term.
Resident of Shenley	Limited in scope. Shenley already greatly expanded through Porters Park estate. In last 10 years around 50 new houses have been built. Organic growth would suggest around 250 houses to meet local demand. Avoid filling in between London Colney and Radlett avoid Black Lion Hill and Radlett Lane. Some land offered west of London Rd. Houses could also be built between Mimms Lane/Harris Lane/London Rd within walking distance to village school.	The comments are noted. These suggestions will be taken into consideration during the next stages of plan preparation.
Resident of Shenley	I do not agree with this approach. Once a rural setting is compromised, it can never be regained. Shenley is a village community, which has already been subjected to substantial 'growth' in population terms with minimal consideration to the impact on existing services, despite the promises made when the hospital site was (over) developed. The traffic through the village has increased substantially to dangerous and environmentally adverse levels. The potential consideration of Pursley Farm and Radlett Lane will adversely affect the character of our rural village. Losing perfectly good arable land for housing is a nonsense.	The comments are noted. No decisions have been made as to the location of housing and a wide range of sites and areas are being considered, although it is likely that some land for development will be proposed in Shenley village. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Shenley	I repeat a previous statement that Shenley has already doubled in size. There has been no employment opportunities, extra schooling or increased medical facilities provided to support this growth.	The comments are noted. No decisions have been made as to the location of housing and a wide range of sites and areas are being considered, although it is likely that some land for development will be proposed in Shenley village. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Potters Bar	More traffic and congestion will be created	The comments are noted.
Resident of Potters Bar	No more development needed in Shenley	The comments are noted.
Resident of Shenley	Object to developing Shenley, local infrastructure (schools, public transport, roads) cannot cope	The comments are noted.
Resident of Potters Bar	Expansion of Elstree & Shenley will create more traffic and congestion. Do not expand South Mimms & Ridge, extra traffic will impact on Potters Bar	The comments are noted.
Resident of Shenley	Any additional large scale development in Shenley or on land shared with London Colney will bring traffic to a standstill	The comments are noted.
Resident of Potters Bar	Will be negatively impacted, infrastructure could not cope, traffic impact would be chaos	The comments are noted.
Resident of Resident of Potters Bar	Will be negatively impacted, infrastructure could not cope, traffic impact would be chaos	The comments are noted.
London Colney	Shenley has received its share of development (Porters Park). Disruption with no investment in the area. Already sufficient facilities to meet local peoples' needs so no benefit.	The comments are noted. No decisions have been made as to the location of housing and a wide range of sites and areas are being considered, although it is likely that some land for development will be proposed in Shenley village.
London Colney	Should only be small scale development	The comments are noted.
Resident of Shenley	Disagree. Shenley has already expanded (hospital site). Originality of villages needs maintaining. If they expand too much they will merge into the next village or town.	The comments are noted. The council is carrying out assessments of the Green Belt which will aid in selecting sites to take forward. One of the purposes of Green Belt is to prevent settlements from merging, so this work will assess how strongly areas of the Green Belt meet each purpose in order to identify those that contribute least. This information will enable informed decisions to be made about the most suitable locations for growth, when combined with other factors and constraints.
Resident of Shenley	Shenley has already had the development in Porters Park. Roads cannot cope and cannot be improved. Low level development e.g. behind London Road houses or near Hadleigh Close off Harper Lane may be appropriate. Not if any of it leads onto Radlett Lane. Also not on farm land e.g. Pursley Farm.	The comments are noted. No decisions have been made as to the location of housing and a wide range of sites and areas are being considered, although it is likely that some land for development will be proposed in Shenley

Respondent	Summary of representation	HBC response
		village.
15 Other villages		
Resident	London Colney has infrastructure and space for expansion	The comments are noted.
Resident of Shenley	Cannot speak for other villages. Shenley however carefully you expand will not cope with primary school, doctors and transport. Where will a secondary school be placed.	The comments are noted.
Resident of Shenley	If villages had services that were underused then perhaps this may suit some expansion	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Shenley	Patchetts Green with some in Aldenham, Ridge and South Mimms.	The comments are noted.
Resident of Shenley	Expand South Mimms, Ridge, Letchmore Heath, particularly Patchetts Green	The comments are noted.
Resident of Potters Bar	No villages should be expanded for the reasons already given in the previous section.	The comments are noted.
Resident of Shenley	South Mimms – close to M25. Badly needs new life.	The comments are noted.
Resident of Shenley	As so many houses are required all villages should have additional houses not just Shenley and Elstree. Proposals are not carefully planned. Council prefers to deal with single landowners to avoid too much work. This lazy narrowing of options is not acceptable.	The comments are noted. We are only able to take sites forward into the Local Plan if they are 'suitable, available and achievable'. This is set out in the national Planning Practice Guidance . A site is considered available for development when there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, long-term tenancies or operational requirements of landowners. Where issues are identified, we have to consider what might be done to resolve them. It is not always possible to trace an owner (e.g. where a Land Registry search shows no registered owner, or where a site is split up and owned by hundreds of individuals). We are not opposed to dealing with sites in multiple ownerships, providing the issues can be resolved and the work involved in doing so is not disproportionate to the benefits, particularly given limited local authority resources.
Resident of Shenley	Village expansion is not required to provide 'viable communities'. Village identities would be lost and it is wrong to suggest that expansion will help their long term sustainability. I am against such a proposal.	The comments are noted.
Resident of Shenley	Agree, South Mimms especially.	The comments are noted.
16 Garden village		
Resident of Borehamwood / Elstree	If built near junction 22, a train line or bus service should serve the village	The comments are noted.
Resident of Borehamwood / Elstree	Yes depending where it is. It will increase road traffic.	The comments are noted.
Resident of Borehamwood / Elstree	I support this	The comments are noted.
Resident of Borehamwood / Elstree	Support proposal for new garden village in London Colney	The comments are noted.
Resident	There are no benefits to such a development, only disbenefits.	The comments are noted.
Resident of Shenley	A new garden village will be a very good option for long term growth. Do not think plots for self-build housing should be encouraged as these normally would be large establishments. Develop pockets of open space for recreation.	The comments are noted. The council has yet to carry out detailed evidence-gathering work on self-build housing. Public open space would be a requirement of any large development which we would want to agree with developers up-front.
Resident of Potters Bar	Don't support it but if extra capacity can't be accommodated by existing towns then this is the most sensible option. Gives developers an opportunity to plan with a blank slate, minimises disruption for existing residents and enables the development of new transit hubs. Existing roads through villages cannot cope with growth in traffic already – must be pragmatic here and build more strategically for the future.	The comments are noted. It is likely that a number of options will need to be taken forward in order to provide a range of housing across the 15 years the plan will cover. This option would be longer-term, but would allow the necessary infrastructure to be considered from the outset and delivered alongside the development. The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA, which would lead to more joined-up planning across borough

Respondent	Summary of representation	HBC response
		boundaries.
Resident of Potters Bar	At junction of the M25 to ease local congestion concerns. North of M25 is clearer and supports strategic future growth if required.	The comments are noted. No decisions have yet been made about the exact location of a garden village. Traffic modelling will be carried out if a garden village proposal is progressed, and will form part of the process of assessing the suitability of a site.
Resident of Potters Bar	A massive new development near Shenley is the opposite of minimising the impact on existing communities. Roads already busy. Must be built on railway lines	The comments are noted. No decisions have yet been made about the exact location of a garden village. Traffic modelling will be carried out if a garden village proposal is progressed, and will form part of the process of assessing the suitability of a site.
Resident of Potters Bar	Support new garden village if it doesn't make traffic worse	Traffic modelling will be carried out if a garden village proposal is progressed, and will form part of the process of assessing the suitability of a site.
Resident of Shenley	Do not support a development that is bigger than London Colney (for example) the roads are already too congested.	The comments are noted. A proposed garden village would be around 4,000 homes to begin with (it is expected to take 10-15 years to be delivered), with the capacity to expand in the future. London Colney has around 10,000 homes, and nothing of that size is being proposed in the short to medium term.
Resident of Shenley	Support garden village but not where proposed. The site is not close to a railway station, and has no bus services or employment. There are groundworks and landfill to consider. The surrounding infrastructure would not cope. County Council will not spend money on road improvements. Realistically, 4,000 homes in this location will mean 8,000 extra cars driving through Shenley. Shenley infrastructure is struggling at the moment. Please listen to us we live here. Should reconsider land closer to South Mimms Services area; there could be more employment there. New residents would have access to railway stations (Potters Bar, Barnet, Cockfosters, Elstree and Borehamwood). Better public transport and access to the M25 and A1. Work with other boroughs to build a garden city on a mainline rout which could take everyone's excess housing requirement.	The comments are noted. Any new garden village would need to provide public transport links (i.e. bus services), local services (schools, healthcare, shops etc.) and employment opportunities. Traffic modelling will be carried out if a garden village proposal is progressed, and will form part of the process of assessing the suitability of a site. A significant amount of land in and around South Mimms has been put forward for consideration through the call for sites we carried out in 2017, and these sites will be considered alongside all others for their suitability for development. The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA, which would lead to more joined-up planning across borough boundaries.
Resident of Shenley	Yes but not in the area (Willows Farm, mosquito Museum) proposed. Put it in South Mimms Services (M25 J23). Better infrastructure, employment opportunities and services (buses and stations).	The comments are noted. No decisions have been made as to the location of housing and a wide range of sites and areas are being considered, including land around South Mimms may be more suitable as an extension to the existing village rather than a standalone garden village.
Resident of Potters Bar	Unless a rail link is built before such development all that will happen is a worsening of traffic, air pollution and pressure on local services that currently undermine quality of life in Hertsmere.	The comments are noted. Any new garden village would need to provide public transport links (i.e. bus services), local services (schools, healthcare, shops etc.) and employment opportunities, although the costs of a rail link are prohibitive for a development of the size being considered for Hertsmere. Traffic modelling will be carried out if a garden village proposal is progressed, and will form part of the process of assessing the suitability of a site.
Resident of Shenley	Any new garden villages must have schools. Currently Shenley children cannot all be accommodated at Shenley. Children from Shenley drive in and out. How stupid is that?	The comments are noted. Any new garden village would need to provide public transport links (i.e. bus services), local services (schools, healthcare, shops etc.) and employment opportunities. Parents have a choice over where their children go to school so some may choose to send them outside of Shenley. The faith school in Shenley will also attract pupils from outside the immediate area.
Resident of Shenley	The present proposed siting of a garden village is preposterous. There are already plans to develop at Harperbury and what about the Pastoral Centre, 20 homes there. The traffic generated will be enormous. At least 50% of cars will come through Shenley to Borehamwood. Others will use the motorway and Harper Lane (bridge will need widening).	The comments are noted. Traffic modelling will be carried out if a garden village proposal is progressed, and will form part of the process of assessing the suitability of a site.
Resident of Shenley	Yes, but at least the same density as Porters Park to avoid wasting valuable Green Belt. New village is not a garden village as was Letchworth. 9000 houses for 9000 jobs is a joke. Most incomers will work elsewhere. The main advantage of a new village would be to plan infrastructure and balance Hertsmere's housing provision by putting the village in south-east Hertsmere between the A1/M25/A1000. It would utilise the Kings Cross main line and tube lines as well as the main roads. Putting a garden village north of the M25 near junction 22 is the wrong place. Already overcrowded in rush hour and local small roads struggling. 10,000 vehicles pass through Shenley daily (HCC monitoring). New village in SE Hertsmere could provide workers for industrial expansion at Centennial Park. Also St Albans Rail Freight depot near London Colney would contribute to congestion at junction 22.	The comments are noted. The housing and jobs figures are drawn from our independent studies carried out in conjunction with neighbouring local authorities (Dacorum, Three Rivers and Watford), and the homes and jobs figures being the same is purely coincidental. Creating more jobs in the area is not expected to reduce the level of commuting out of the borough, but it is hoped will increase the draw into Hertsmere for businesses and employees from both within and outside of the borough. The exact location for a garden village has yet to be decided, however it is unlikely to be in the SE of Hertsmere as this would close the Green Belt gap between Potters Bar and Greater London (Hadley Wood). Traffic modelling will be carried out if a garden village proposal is progressed, and will form an important

Respondent	Summary of representation	HBC response
		part of the process of assessing the suitability of a site. This will factor in any neighbouring/nearby development such as the rail freight depot if it goes ahead.
Resident of Potters Bar	If a garden village were to be built, I do not think this should be in close proximity to the inner area of Potters Bar as existing access roads are already congested at times. Perhaps South Mims could be considered as it's on the far edge.	The comments are noted.
Resident of Potters Bar	Issues with proposal and location on map, lack of transport and sufficient infrastructure	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Shenley	A new garden village is a viable option, providing it is instead of, and not as well as, local options. Why is there only one option (Willows Farm area) when there are more suitable alternatives – for example the land adjacent to South Mimms services Any development should have a considerable land buffer between it and existing settlements, and be North of the M25 which – in the worst case scenario – should be it's most southerly border.	The comments are noted. It is likely that a number of options will need to be taken forward in order to provide a range of housing across the 15 years the plan will cover, as a garden village option would take a long time to begin to be built on the ground. A significant amount of land in and around South Mimms has been put forward for consideration through the call for sites carried out in 2017, and these sites will be considered alongside all others for their suitability for development. Land around South Mimms may be more suitable for consideration as an extension to South Mimms village rather than as a standalone garden village.
Resident of Shenley	Planned site is ridiculous. Who would build a garden village either side of the M25. North of M25 might be reasonable. Would not merge into Shenley, ruining the village community here. Why is there only one proposed site? What about S Mimms with its excellent transport links and proximity to A1/M25, Barnet, Potters Bar and Borehamwood.	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village; an initial area we were looking within to see whether suitable land might be available, based on the evidence we had at the time including a high-level Green Belt Assessment. A significant amount of land in and around South Mimms has been put forward for consideration through the call for sites carried out in 2017, and this will be considered alongside all other areas for its suitability for development. Land around South Mimms may be suitable for consideration as an extension to South Mimms village rather than as a standalone garden village.
Resident of Shenley	Should be closer to a railway station.	The comments are noted.
Resident of Shenley	Willows Farm site would enable growth as long as infrastructure & facilities to support are supplied	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Potters Bar	Willows Farm site would enable growth as long as infrastructure & facilities to support are supplied	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Borehamwood / Elstree	Only viable and acceptable way forward	The comments are noted.
Resident of Borehamwood / Elstree	Agree but need to look at roads and infrastructure	The comments are noted. Traffic modelling will be carried out if a garden village proposal is progressed, and will form an important part of the process of assessing the suitability of a site. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Borehamwood / Elstree	Not close enough to a railway station	The comments are noted.
Resident of Borehamwood / Elstree	Good idea. Infrastructure planned in advance	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
London Colney	What will happen to schools, GP's/medical support? Can the number of houses planned be shared? What will happen to the infrastructure of cars/road around the area?	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. The Issues and Options document sets out that a garden village would be planned for 4,000 homes within the 15 years the plan would cover, with the scope to increase this by 50% after that.
Resident of London Colney	Proposed build too much for the area, stretch a saturated village	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of London Colney	Concern that garden village will lead to coalescence of existing settlements	The Council would not support growth which leads to the coalescence of existing settlements. An initial green belt assessment has been undertaken which assessed the contribution of all Green Belt land against the purposes of Green Belt, as set out in the NPPF, including preventing the coalescence of settlements. A more detailed Stage 2 Green Belt Assessment has now been produced which is looking

Respondent	Summary of representation	HBC response
		at potential development locations and will identify where a risk of coalescence would occur.
Resident of London Colney	Only one proposal for a garden village, will double/triple the population. Consultation events have not been fit for purpose. The green belt should only be built on in 'exceptional circumstance' but this is not one such circumstance. Huge traffic increases with this development which would require huge investment in infrastructure and other facilities. There have been no answers regarding how many homes would be social housing or 'affordable' and there is no detail on numbers, affordable, housing, protection of the green belt, infrastructure, schools, roads, traffic, movements, hospitals or civic amenities.	Two specific garden village proposals from within the area of search were received including one at Rabley Green, near Shenley. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release; the option of a new settlement is capable of being an 'exceptional circumstance' as set out in the NPPF. Infrastructure, in particular, has been raised as a priority by many local people and the Council will be are focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size. There would be a requirement for at least 35% Affordable Housing within any new garden village.
Resident of London Colney	Object	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be are focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size.
Resident of London Colney	Object	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be are focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size.
Resident of London Colney	Object	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be are focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size.
Resident of London Colney	Object. Also were not notified of the proposals.	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be are focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size. The Council notified all neighbouring local authorities and parish Councils, including in London Colney, as part of its consultation on the Issues and Options. As more detailed proposals are drawn up, residents in neighbouring local authority areas will be notified but at this stage, the Issues and Options documents only identified an 'area of search' rather than a specific development site.
Resident of London Colney	Object. Also critical of the consultation process.	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be are focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size. The Council notified all neighbouring local authorities and parish Councils, including in London Colney, as part of its consultation on the Issues and Options. As more detailed proposals are drawn up, residents in neighbouring local authority areas will be notified but at this stage, the Issues and Options documents only identified an 'area of search' rather than a specific development site.
Resident of London Colney	Object	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be are focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size.
Resident of London Colney	Object	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be are focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size.
Resident of London	Object. Would like assurances that St Albans and Hertsmere Councils work together on any strategic	The comments are noted. The area shown on the map in the Issues and Options document is an 'area

Respondent	Summary of representation	HBC response
Colney	developments in the London Colney area and that residents on both sides are effectively consulted.	<p>of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size.</p> <p>The council is working alongside St Albans and other local authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA and will be working closely with individual neighbouring authorities on development sites which affect communities on both sides of the administrative boundary.</p>
Resident of London Colney	Object	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size.
Resident of London Colney	Object	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size.
Resident of London Colney	Object	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size.
Resident of London Colney	Object	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size.
Resident of London Colney	Object	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size.
Resident of London Colney	Object	The comments are noted. The area shown on the map in the Issues and Options document is an 'area of search' for a garden village and infrastructure, in particular, has been raised as a priority by many local people. The Council will be focussing on ensuring infrastructure is in place to support any new garden village and there will be a requirement for a wide range of local services and employment within the new settlement to support the creation of a community of this size.
Resident of London Colney	Object. Proposed village would be more twice the size of London Colney. This will destroy the green belt, threaten woodlands and wild life and cause further air pollution it would also put huge strains on the infrastructure of the area	The comments are noted.
Resident of London Colney	Object. Will have a huge impact on London Colney and its infrastructure and surrounding green belt land/wildlife. M25 is already at capacity.	The comments are noted.
Resident of London Colney	Object. The option smacks of NIMBYism. Hertsmere does not exist in isolation but London Colney hasn't been consulted on the matter. Consultation portal has not worked and nobody will know of infrastructure, environmental or ethical concerns if people cannot raise issues in a meaningful way.	The comments are noted. Feedback on consultation arrangements has been carefully considered and changes/improvements are being made, including distributing copies of the next newsletter to residents in London Colney. A full review of the consultation process is set out earlier in this report.
Resident of London Colney	Object. Roads will not be able to cope with extra traffic	The comments are noted.
Resident of London Colney	Agree but need to look at roads and infrastructure.	<p>The comments are noted.</p> <p>Detailed traffic modelling will be carried out if a garden village proposal is progressed, and will form an important part of the process of assessing the suitability of a site.</p>

Respondent	Summary of representation	HBC response
		Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of London Colney	Object. Concerns about the strategy being undertaken on the Garden City. Need to think big. None of the private developers pay for new motorways, schools, hospitals, GP clinic, Police, social services etc for the privilege of building and selling our homes. Get the infrastructure in place at all levels before houses get built.	The comments are noted.
Resident of London Colney	Object. Ineffective consultation and online portal. Poor choice of location for a garden village. Loss of green belt, lower quality of life and increased housing and traffic issues. Flood plain impact and huge infrastructure requirements. Lack of real affordable housing. Need to restart / and launch your consultation proposal again with at least six months to a new deadline so that all arguments and objections can be heard and dealt with properly.	The comments are noted. Feedback on consultation arrangements has been carefully considered and changes/improvements are being made, including distributing copies of the next newsletter to residents in London Colney. A full review of the consultation process is set out earlier in this report.
Resident of London Colney	Object	The comments are noted.
Resident of London Colney	Object. Ineffective consultation and online portal. Poor choice of location to appease residents elsewhere in the borough. Loss of green belt and huge impact on infrastructure.. Not an 'exceptional circumstance'. Increased housing and traffic issues with the plan vague on the actual number of houses to be built which will double or treble the size of London Colney. You need to restart / and launch your consultation proposal again with at least six months to a new deadline so that all arguments and objections can be heard and dealt with properly.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. Feedback on consultation arrangements has been carefully considered and changes/improvements are being made, including distributing copies of the next newsletter to residents in London Colney. A full review of the consultation process is set out earlier in this report. Detailed traffic modelling will be carried out if a garden village proposal is progressed, and will form an important part of the process of assessing the suitability of a site.
Resident of London Colney	Object on traffic and infrastructure grounds.	The comments are noted. Detailed traffic modelling will be carried out if a garden village proposal is progressed, and will form an important part of the process of assessing the suitability of a site. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of London Colney	Object. 20,000 homes can be built by expanding existing settlements. Loss of Green Belt and transport and infrastructure impacts. Impact on neighbouring Council services.	The comments are noted. Detailed traffic modelling will be carried out if a garden village proposal is progressed, and will form an important part of the process of assessing the suitability of a site. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of London Colney	Object. No local consultation. Loss of Green Belt which should only be built on in 'exceptional circumstance'. Transport infrastructure will be further exacerbated by the proposed Strategic Rail Freight Terminal. Education, transport and health requirements need to be addressed.	The comments are noted. Detailed traffic modelling will be carried out if a garden village proposal is progressed, and will form an important part of the process of assessing the suitability of a site. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of London Colney	Object. The evidence from the Hertsmere 1st survey in support of the proposal is basically weak. A NIMBY response with Hertsmere proposing to dump its housing problem on the very edge of its area without considering impact on adjoining communities. Understand that Hertsmere has potential to build 20,000 new homes. Loss of Green Belt, traffic, damage to woodland and wider infrastructure impact.	The comments are noted. The document states that 'several hundred' responses were received to the survey, and that the new settlement concept received the most support. There is no claim that this is statistically significant or representative of the borough as a whole – just of those who responded. Detailed traffic modelling will be carried out if a garden village proposal is progressed, and will form an important part of the process of assessing the suitability of a site. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of London Colney	Support the garden city.	The comments are noted. Approach advocated in the Issues and Options is for a garden village rather than a city.
Resident of London Colney	Online portal did not work. Consultation was not adequately promoted with conflicting information from Hertsmere and St Albans on consultation responsibilities. Hertsmere is already over-developed as part of the London Commuter belt; new homes should be sited elsewhere in the country. Misleading, proposal to extend urban area of St Albans into Hertsmere district rather than a separate garden village. Significant development already in London Colney/Shenley area. Transport infrastructure is already overloaded	The comments are noted. Feedback on consultation arrangements has been carefully considered and changes/improvements are being made, including distributing copies of the next newsletter to residents in London Colney. A full review of the consultation process is set out earlier in this report. The proposed area of search for a garden village is close to the borough boundary with St Albans, but there is no proposal to directly connect any new settlement with London Colney. A new garden village would be expected to provide its own infrastructure, and the council would play a role in delivering this if such a proposal were to go ahead.
Resident of London Colney	Object. Ineffective consultation and online portal. Poor choice of location to appease residents elsewhere in the borough. Loss of green belt and huge impact on infrastructure.. Not an 'exceptional circumstance'. Increased housing and traffic issues with the plan vague on the actual number of houses to be built which will double or treble the size of London Colney.	The comments are noted. Feedback on consultation arrangements has been carefully considered and changes/improvements are being made, including distributing copies of the next newsletter to residents in London Colney. A full review of the consultation process is set out earlier in this report.
Resident of London Colney	Object. Loss of Green Belt, detrimental effect on wildlife and loss of flood defences. Government advice on meeting housing needs actually excludes limiting factors. Development should be within the urban envelope with re-use of buildings prioritised. New garden village needs to be planned properly and assessed biologically by	The comments are noted.

Respondent	Summary of representation	HBC response
	experts.	
Resident of London Colney	Object	The comments are noted.
Resident of London Colney	Object. Little evidence that all the homes are needed.	The comments are noted.
Resident of London Colney	Object	The comments are noted.
Resident of London Colney	Overdevelopment, exceeds the housing quota	The comments are noted. The level of housing being proposed is based on an objective assessment of what is needed for the borough, and has been worked out in accordance with national planning policy. The draft Government methodology for calculating housing need (released in September 2017) would have resulted in more than 9,000 homes being needed over the plan period (now that the current Hertsmere Local Plan is more than 5 years old). This methodology has not yet been adopted so we must for now work on the basis of our own joint study.
Resident of London Colney	Green Belt should never be infringed on even in exceptional circumstances. The proposed size and proximity of the development will potentially double if not triple the current size of our Village. Public consultation has been woeful and choice of location will limit your scope of requirement to inform and consult residents, and as such many local residents have lost all faith in your ability to communicate	The comments are noted. Feedback on consultation arrangements has been carefully considered and changes/improvements are being made, including distributing copies of the next newsletter to residents in London Colney. A full review of the consultation process is set out earlier in this report.
Resident of London Colney	Object	The comments are noted.
17 Any other comments		
Resident of Borehamwood / Elstree	Arguing for a further school in the area when one has just closed is strange. Excessive building of new housing particularly around Studio Way without infrastructure. Few college facilities for older people compared to other local towns (e.g. Welwyn GC, St Albans). If a new school is needed this should be in Radlett or Elstree.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan. (Uncertain which school in Borehamwood has recently closed). The need for new schools is determined by the County Council as education authority. There is generally a need for new schools in places where the population is larger, and in close proximity to the population they serve.
Resident of Borehamwood / Elstree	Herts CC should use land they earmarked for freight terminal to build a garden city	This land is not within Hertsmere, so we cannot plan for development of this land through the Hertsmere Local Plan; this would need to be done by St Albans District Council.
Resident of Borehamwood / Elstree	People will move out of the area if it becomes too unattractive, crowded and hostile	The comments are noted.
Resident of Borehamwood / Elstree	Borehamwood already overcrowded, no infrastructure to support more development. Any new housing needs to be built in an area away from here.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Borehamwood / Elstree	Lack of consultation with the public	The comments are noted. Feedback on consultation arrangements has been carefully considered and changes/improvements are being made. A full review of the consultation process is set out earlier in this report. No decisions have been made as yet, and we are at a very early stage in the plan-making process. There will be several more stages of public consultation before a final draft plan is agreed, and following this, it will be submitted to the Secretary of State who appoints an independent inspector to examine the plan through a public examination before it can be adopted.
Resident of Borehamwood / Elstree	Safeguard Aldenham Country Park & Reservoir, of vital importance to continue to provide green open space with public access and leisure facilities	The comments are noted.
Resident of Bushey	Adhoc development in Bushey causing issues for roads and parking. Agree to new garden village as long as it has the infrastructure to support it first	The comments are noted.
Resident	More options please for residents in Radlett to downsize and release the 4/5 bedroom houses	The comments are noted.
Resident of Shenley	Shenley is a conservation area so how would even more homes contribute to this. The site would generate a ridiculous amount of traffic. The surgery and school and will not be able to cope. Will there be more police available?	The impact on existing conservation areas, as well as other heritage assets, will be an important consideration in determining the location and scale of growth. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Shenley	Concerned about plans for houses in and around Shenley without any infrastructure improvements to support it.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.

Respondent	Summary of representation	HBC response
Resident of Shenley	Oppose any housing development on any existing green belt or farmland in any part of Hertsmere. Previous developments in Shenley have resulted in increased traffic and an erosion of the 'village atmosphere' in Shenley. Extra support for the population expansion such as schooling and medical facilities, would not match the rising demand. To describe the development as a Garden Village would conceal the truth – effectively it is going to be a town.	In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Potters Bar	Potters Bar has already expanded and with new expansions it will stop being a small rural town and become a suburb of London.	The comments are noted. Potters Bar has experienced far fewer developments than other parts of Hertsmere (Borehamwood and Bushey have seen the most), as there are no major site allocations in Potters Bar in the current Local Plan 2012-27 or the Local Plan 2003 that preceded that. Green Belt assessments form a part of the work we do before we select sites to take forward through the local plan process, and one of the key purposes of the Metropolitan Green belt is to prevent Greater London merging with other towns. The M25 forms a hard barrier between Potters Bar and Greater London, so we will be careful not to allocate land for development which is south of the M25.
Resident of Shenley	Concerned that shenley infrastructure isn't capable of supporting any new houses. New housing would destroy the green spaces	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Shenley	Needs more schools in shenley. Need to improve public transport. Increase access to GP	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Potters Bar	Expanding will put strain on the infrastructure, which needs to be improved before housing can be added	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Potters Bar	Had no information about developments around South Mimms (found out from local paper).	The comments are noted. No decisions have been made as yet, and we are at a very early stage in the plan-making process. There will be several more stages of public consultation before a final draft plan is agreed, and following this, it will submitted to the Secretary of State who appoints an independent inspector to examine the plan through a public examination before it can be adopted. We put out press releases to all the local papers in order to increase the number of people who will hear about our proposals.
Resident of Potters Bar	Doesn't want Willows Farm to close	The comments are noted. Willows Farm itself is not part of the land that has been suggested to us for housing development, so the council has no plans for it to close.
Resident of Shenley	Concerned about the increase in traffic locally. This wouldn't be so much of a problem if we had a local train station	The comments are noted. Traffic modelling will be carried out if a garden village proposal is progressed, and will form an important part of the process of assessing the suitability of a site.
Resident of Potters Bar	All new buildings should have at least one electric car charging port	The comments are noted. We support electric car charging points and can look at policy for introducing more of these through new developments as part of the Development Management Policies section of the new local plan.
Resident of Potters Bar	Discovered bombs in back garden reckon that the fields behind park avenue- Potters Bar will have a load more	The comments are noted. The Local Plan allocates land for development, but before anything is built it still has to go through the normal planning application process, as well as meeting any other health and safety issues which are outside of the planning system. If there are such issues with the land, the landowner/developer will need to demonstrate that they can be overcome or the site will not be able to be developed.
Resident of Potters Bar	Do not agree with number of houses you say are needed in Hertsmere. Figure too high, will use too much of the Green Belt.	The comments are noted.
Resident of Potters Bar	Environmental priorities should have a higher focus on protecting the Green Belt.	The comments are noted. The Green Belt is not an environmental designation and says nothing about the quality of the land. Other designations, such as Local Wildlife Sites, Sites of Special Scientific Interest (SSSI), and Local Nature Reserves give an indication of the environmental quality of the land, and these are a separate, but important, consideration which will be taken into account in the selection of sites.
Resident of Shenley	A major expansion of Shenley would adversely impact the character of the village. Do not agree to the 4000 homes in the new garden village.	The comments are noted.
Resident of Potters	The council is betraying its residents by failing to challenge the government imposed targets. Section 9 of the	The comments are noted.

Respondent	Summary of representation	HBC response
Bar	NPPF specifically provides reasons why no Green Belt should be built on. Either the Government or the council will be acting ultra-vires if they do so. I suggest the council take the Government to judicial review before we residents take the council to judicial review.	The local plan draws the Green Belt boundaries for an area, and is able to re-drawn them providing 'exceptional circumstances' for doing so exist (para. 83). As well as seeking to protect the Green Belt, the NPPF requires local planning authorities to use their evidence base to ensure that their local Plan meets the full, objectively assessed housing need as far as is consistent with the policies in the NPPF. Those exceptional circumstances for amending Green Belt boundaries can include a need for housing in the area which cannot be met within existing built-up areas. In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release. Failure to do this could lead to unplanned development being permitted in the Green Belt, which would be more harmful in the long-term. Before a local plan is adopted it has to go through a long and rigorous process of public examination, carried out by a planning inspector, so this process provides the means through which residents can challenge a local plan or aspects of it before it is adopted. A judicial review of proceedings would only be possible after a decision has been made on a local plan by the planning inspector.
Resident of Shenley	Do not agree with plan, no one in Shenley would as it would just become an extension of the urban sprawl of Borehamwood. The priorities have been imposed by government who know or care little about Shenley and the people living there.	The comments are noted.
Resident of Potters Bar	Garden village won't work without improving infrastructure. There won't be enough water, road, social and medical for all the new homes.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Borehamwood / Elstree	Against house building near the Fisheries pub, junction at dangerous part of busy commuter road will add to already bad traffic problems, and schools and doctors are already busy.	The comments are noted. We are in the process of assessing all of the sites which have been submitted to us as potential locations for development, so are unable to comment on individual sites at this stage. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan.
Resident of Borehamwood / Elstree	Against building housing on Potters Lane and the new primary school proposed in Cowley Hill due to increased traffic, along with fumes and noise. Moved out of London for space and want to keep the area as it is.	The comments are noted. They relate primarily to a live planning application, and so have been passed to the Development Management Team. A reserve site for a primary school has been identified through the adopted local plan (Maxwell Park Community Centre), and has faced huge local opposition, which is the reason the County Council has looked elsewhere for a site for a new primary school.
Resident of Borehamwood / Elstree	Number one priority is to radically improve the roads and traffic management in Borehamwood and Elstree which is now appalling.	The comments are noted. Traffic modelling will be carried out if a garden village proposal is progressed, and will form an important part of the process of assessing the suitability of a site.
Resident of Borehamwood / Elstree	Land behind Bishops Ave, Lodge Ave & The Rise not suitable as a new 'garden suburb' due to access. Access through The Rise difficult due to parked cars; access from Allum Lane would be dangerous due to dip in road and existing accesses nearby.	The comments are noted. We are in the process of assessing all of the sites which have been submitted to us as potential locations for development, so are unable to comment on individual sites at this stage. However access and highway safety are important considerations that we would consult Hertfordshire County Council about before taking a site forward.
Resident of Shenley	Good for having a vision and developing. Please address the present issues with what we have before any development. 1. Lack of primary school places 2. No existing secondary school 3. Insufficient emergency services (e.g. police and doctors) 4. Infrequent buses	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan, including school places, healthcare and public transport. Some aspects of infrastructure are difficult to deliver without the support of landowners and developers who can provide the land/funding for infrastructure as part of a larger development scheme.
Resident of Shenley	Shenley is a historic rural village with lack of infrastructure and many rural roads, a lot single track. Much of the land is actually farmed. It is good quality Green Belt and well used by the wider community (public rights of way). 10,000 car movements per day through Shenley. Long queues in Radlett Lane, London Road and other places at peak times. Shenley needs 150-200 homes for the community over the next 15 years. Do not want character ruined by overdevelopment. 1000 homes in Shenley is not sustainable plus the garden village in Shenley Ward with many of the homes in Shenley Parish is madness. Extra infrastructure would not be forthcoming for economic reasons so Shenley roads would be gridlocked. There is no employment locally to support a new village, no nearby railway station and insufficient infrastructure. Any new garden village should be in a more sustainable area – the area suggested in new garden village section on Wrotham Park Estate land.	The comments are noted. Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan, including school places, healthcare and public transport. Any new garden village would need to provide public transport links (i.e. bus services), local services (schools, healthcare, shops etc.) and employment opportunities.
Resident of Shenley	Be careful not to give the impression that decisions have already been made and this process is being short-	The comments are noted.

Respondent	Summary of representation	HBC response
	circuited.	
Resident of Shenley	<p>Building on Green Belt is not acceptable. The Government does not advocate that Green Belt is where houses should be built.</p> <p>Building on agricultural land is ridiculous. We know we will be running out of food and water in the foreseeable future.</p>	<p>The comments are noted.</p> <p>As well as seeking to protect the Green belt, the Government, through the National Planning Policy Framework (NPPF), requires local planning authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed housing need as far as is consistent with the policies in the NPPF. Housing is very much a Government priority.</p> <p>In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release.</p> <p>Failure to do this could lead to a Local Plan being found unsound at examination because we would not have considered all the available options for housing, and unplanned development could then be permitted in the Green Belt, which would be more harmful in the long-term. We have the chance now to consider which bits of the Green Belt are not performing well, and where housing might be accommodated with least harm.</p> <p>High quality agricultural land will be avoided.</p>
Resident of Shenley	<p>Please protect our Green Belt. Working farm land should not be built on.</p> <p>No more huge mansions to be built in Radlett, Shenley or Elstree. Stricter planning controls on such builds.</p> <p>If Hertsmere is over-developed will we not lose future populations as they move further north?</p>	<p>The comments are noted.</p> <p>In order to meet housing need in the borough, a range of housing solutions is likely to be needed. There is insufficient brownfield land within settlements to meet housing need, and so we are having to assess the borough's Green Belt and consider the most suitable areas for release.</p> <p>High quality agricultural land, including working farm land that is viable and of high quality, will be avoided.</p>
Resident of Shenley	<p>At the Shenley presentation I was told that</p> <p>1 – prefer to deal with single landowners. With regard to Shenley this means concentration of development to the possible detriment of the village and local road traffic. Might be that several developers are better than one large one.</p> <p>2 – minimum development size 300 units plus to be sustainable. Does not agree with reality. Have been several developments of under 20 units in the village.</p> <p>3 – proposing a garden village both sides of the M25 was odd as it was only intended to be one side. This diverted attention away from where it really should have been. I suggested south of the M25 and was told this was unacceptable as it was Green Belt and adjacent to London, and answer I found odd and unacceptable as the council's proposal was Green Belt.</p>	<p>The comments are noted.</p> <p>1 – We are encouraging the owners of adjoining sites to work together to bring sites forward.</p> <p>We can only include sites in the Local Plan which are able to be delivered, and cannot include sites where, for example, land ownership is unknown, or a landowner does not wish to put their site forward.</p> <p>2 – Small developments of 20 units can be sustainable as they are generally able to be absorbed within the existing infrastructure of a village/town. Larger developments of around 300 homes can provide and sustain their own facilities, such as a primary school, shops, community centre and medical centre, and this is what would have been meant at the exhibition.</p> <p>If a number of small developments (50-100 homes each) come forward separately, it is more difficult for the council to justify the need for a high level of infrastructure provision, although the cumulative impacts will be the same as a larger development. It is more challenging to coordinate the provision of infrastructure both financially and practically when numerous sites come forward at different times.</p> <p>3 – The area shown on the map in the Issues and Options document is an 'area of search' for a garden village; an initial area we are looking within to see whether suitable land might be available, based on the evidence we had at the time including a high-level Green Belt Assessment.</p> <p>The area south of the M25 is within a very narrow gap between Potters Bar and London, so would have a greater impact on one of the purposes of the Green Belt as set out in the NPPF, which is to prevent the coalescence of large built-up areas. The area of search proposed by the council is within a larger gap between settlements, so would have less likelihood of causing settlements to merge.</p>
Resident of Potters Bar	<p>When I moved to Potters Bar in 2000 it was a desirable town with attractive properties, a good variety of shops and surrounded by countryside. Please do not change Potters Bar into an overpopulated area such as Stevenage or Luton.</p>	<p>The comments are noted.</p> <p>Any expansion of Potters Bar or other settlements would need to be demonstrated to be proportionate and sensitive to the character of the settlement, and would also need to provide sufficient infrastructure to support itself.</p>
Resident of Shenley	<p>The Green Belt should be maintained to prevent urban sprawl that would result. The Green Belt, including our beautiful villages, are visited by thousands and need to be preserved.</p> <p>Landowners are probably offering sites financial gain rather than philanthropy, and certainly not to contribute to the county's housing policy. Such sites should not enter the consideration process, no matter how tempting.</p> <p>Much is said in the plan about the correct infrastructure. Promises were made on the Shenley Hospital site but not carried through so it is difficult to take comfort in current promises.</p>	<p>The comments are noted.</p> <p>Developers and landowners are within their rights to seek financial gain from developing their land and land would not be put forward otherwise – the planning system does not expect landowners to 'donate' sites. The council has to make a careful assessment of each site submitted, and we expect developers to provide infrastructure and affordable housing on all sites allocated through the local plan and will work with them to achieve this.</p> <p>Infrastructure has been raised as a priority by many local people, and we are focussing on this as key to delivering the new local plan, including school places, healthcare and public transport.</p>
Resident of Shenley	<p>Shenley and Hertsmere is a lovely place to live. Please don't ruin it so that no one wants to stay or move here. Even with modest development, please consider the country roads and narrow bridges (Watling Street/Harper Lane).</p> <p>If a new garden village is planned it should be separate from existing developments.</p>	<p>The comments are noted.</p> <p>Traffic modelling will be carried out if a garden village proposal is progressed, and will form an important part of the process of assessing the suitability of a site.</p>

Respondent	Summary of representation	HBC response
London Colney	The document implies that the option with most support across Hertsmere is for a new settlement in the borough. 46% of those that took the survey which was completed by less than 1% of the population, does not appear to me to be statistically significant. Rather the opposite!	The comments are noted. The document states that 'several hundred' responses were received to the survey, and that the new settlement concept received the most support. There is no claim that this is statistically significant or representative of the borough as a whole – just of those who responded.
London Colney	Feel concerns have not been taken seriously. Lack of consultation. Can the research be shared with residents?	The comments are noted. We are at a very early stage in the plan-making process so no decisions have been made as yet. There will be several more stages of public consultation before a final draft plan is agreed, and following this, it will be submitted to the Secretary of State who appoints an independent inspector to examine the plan through a public examination before it can be adopted. All background documents will be published on our website as they become available: www.hertsmere.gov.uk/evidencebase .