


PLANNING FOR GROWTH









Overview of responses from site promoters, statutory bodies and local interest groups

June 2019

Potential sites for housing and employment

HERTSMERE

LOCAL PLAN HERTSMERE

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1. Introduction

1.1 This report provides an initial overview of the responses received from site promoters, statutory bodies and local interest groups on the *potential sites for housing and employment* report published in October 2018. Over an eight week period responses from over 2,100 individuals were received. A summary of the responses received from the general public is set out in a separate report that was published in February 2019.

2. Overview of consultation arrangements

2.1 The *potential sites for housing and employment* (PSHE) report followed an Issues and Options consultation in 2017. In addition to summarising the previous Local Plan consultation and providing an explanation of housing and employment needs, the PSHE report identified both strategic (250 homes+) and non-strategic sites which were being promoted. A detailed template was provided for each of the 26 strategic housing sites and 7 strategic employment sites. A technical assessment of all sites, including non-strategic promotions, was published at the same in a draft Housing and Economic Land Availability Assessment.

2.2 The PSHE report was published both as a PDF document and in an interactive format on the consultation portal now used by the council for public engagement on planning documents. This enabled the general public and other consultees to respond electronically to sites in which they had a particular interest and the use of the portal was actively encouraged in the publicity material and at the consultation events. Over 60% of those responding did so through the portal with the remainder via email or post. Those responses have now been uploaded into the portal meaning all responses received are now available to view online.

2.3 Five staffed exhibitions were also held during the consultation period with attendance at the various events set out in Table 1.

Table 1: Attendance at public exhibitions

Date	Location of consultation	Venue	Numbers attending
Wednesday 7 November	Bushey	St Margaret's Sports Centre	250
Tuesday 13 November	Potters Bar	Wyllyotts Centre	440
Wednesday 14 November	Borehamwood	St Theresa's Parish Hall	220
Wednesday 21 November	Shenley	Shenley Primary School	160
Thursday 22 November	Radlett	Radlett Centre	140

2.4 As well as advertising the recent Local Plan engagement on the side of the Council's refuse collection vehicles, newsletters were distributed by Royal Mail to over 40,000 households including those in London Colney and Colney Heath. There were some reports of non-delivery in a few locations and additional copies were distributed where it was clear this had occurred. It should be emphasised that households who have formally opted out of receiving door to door mail will not have received a copy.

2.5 Awareness of the public engagement was promoted through a social media campaign that resulted in extensive reach via the council's Facebook and Twitter feeds. This was co-ordinated by the Corporate Communications team and is set out in Appendix A to the general public responses report. There was also considerable press coverage throughout the eight week period with all of the local newspapers reporting on the public engagement / exhibitions and the views of the local community including some local campaigns. Press cuttings are set out in Appendix B of the general public responses report.

2.6 The level of interest resulted in significantly more responses than have been received on other planning consultations over the past decade. These have typically generated up to 300-400 responses and 50% fewer people attending public exhibitions than was achieved in November. Officers consider that this has been an effective exercise both in terms of raising awareness of the new Local Plan and securing a good response from the local community.

3. Overview of responses from site promoters, statutory bodies and local interest groups

3.1 The consultation served as an opportunity for the council to receive further information from the site promoters, statutory consultees and local interest groups. Whilst the majority of the site promoters responded with their own representation some sites received no formal representations. Any comments received from other parties interested in these sites have also been documented. Only a small number of sites were the subject of no representations from any organisation. Sites with no responses from site promoters, statutory bodies or local interest groups are listed in Table 2 below.

Table 2: Sites with no responses from site promoters, statutory bodies and local interest groups

Land availability assessment reference	Location
HEL235	Bushey Hall Garage, Bushey Hall Drive, Bushey
HEL216	Land West of Potters Bar Station, Darkes Lane, Potters Bar
HEL394	Safeguarded employment land, North West of Cranbourne Road Industrial Estate, Potters Bar
EMP6	Perimeter land around Aldenham Reservoir, Elstree Village (Withdrawn)

3.2 Where a promoter's representation covered several linked sites or responses by local interest groups and statutory bodies considered these sites together, (due to their proximity) one single combined proforma was created. Table 3 lists all of the instances where this was the case.

3.3 Residents' associations have not been included in this documentation and their responses have instead been analysed as part of the separate general public responses report. This report solely looks at local interest groups, site promoters and statutory bodies. Local interest groups were considered to be those whose remit covered a single issue or campaign whereas residents' associations tend to exist to represent the views of local residents across a

wider range of issues and considerations, some of which may be unrelated to planning.

Table 3: Combined site proformas

Land availability assessment reference	Location
HEL197a and b	Land North of Barnet Lane (1 and 2), Borehamwood and Elstree
HEL337a,b and c	Land East of Farm Way (Site 3, Site 2 and Site1), Bushey
HEL234 a and b	Well Cottage, Bentley Heath (Wagon Road and White House, Dancers Hill Road)
HEL225 and 226	(South East and North West) of the track between Loom Lane and Brickfields
EMP4 and HEL171	Land North of Centennial Park, Elstree
SM1, SM2 and SM3	Land (North and South) of St Albans Road and Land North East of Black Horse Lane, South Mimms
HEL228a and b	St Albans Road, South Mimms
HEL320 and 321	Land Formerly Part of Earl and Cross Keys Farm (north and south site), Cecil Road, South Mimms
H2 and EMP7	Tyttenhanger Estate (North of M25/B556) and Land East of M25 Junction 22
HEL219 and HEL252	Pegmire Lane, Patchetts Green

3.4 For the purposes of collating and analysing the comments received, officers have sought to separate out the individual issues, such as infrastructure and green belt, on each site. Responses received from developers and agents have been split into two categories, (1) the site promoter and (2) other developers and agents. A third category identifies responses from the statutory bodies and local interest groups.

3.5 An overall breakdown of responses is provided in Table 4. It should be noted that the majority of responders commented on multiple sites and this includes a number of developers/agents who tended to comment on the other promoted sites within the same settlement as their own.

Table 4: Breakdown of responses received from site promoters, statutory bodies and local interest groups.

Location of sites	Total responses made on sites in each settlement (Statutory bodies/local interest groups)	Total responses made on sites in each settlement (Developers/landowners)	*Number of sites promoted*
Borehamwood and Elstree	101	27	*26*
Bushey	45	25	*20*
Potters Bar	45	11	*17*
Radlett	47	33	*16*
Shenley	37	19	*8*
Elstree Village	22	5	*6*
South Mimms	13	14	*12*
Letchmore Heath	8	2	*1*
Other Locations	4	1	*4*
Garden Village	26	4	*2*
TOTAL	**348**	**141**	***112***

3.6 Although the majority of responses from the statutory bodies were related to a specific site(s) in the PSHE report, some general comments were also provided. In some instances, this was instead of commenting on an individual site. These non-site specific comments were analysed and added to the template for the sites where the response was considered to have particular relevance.

4. Summary of the substantive points raised

4.1 Overall, there were no significant discrepancies between the points raised by the general public and those raised by the other consultees. The impact on the green belt, the road network, and lack of key community facilities including education and healthcare facilities were still major considerations. The main difference was that a greater proportion of other consultee responses either supported or were neutral about development with a general recognition that there was a need for additional housing to meet local need. The key point of debate was therefore the scale and location of development as opposed to the need for it.

4.2 The comments received tended to raise site specific points and were less based on anecdotal information than the general public responses. This was especially the case when looking at the points raised in relation to the physical constraints, the impact on the wildlife and environment and other policy constraints. A large number of comments, made by statutory bodies and local interest groups, also tended to be topic/issue specific (e.g. wildlife and environment) as opposed to a more general assessment of the problems that development of the site would bring.

4.3 The comments were analysed along with a number of technical assessments which were primarily submitted by developers as part of their representations, as additional evidence to support their site promotion. In some instances this included work which sought to support the promoter's argument that the council's technical work was incorrect.

4.4 A small number of new sites were also promoted and a few promotions have been changed, resulting in the potential area for development either increasing or decreasing. These changes are summarised in Tables 5 and 6. Further information on the new site promotions and the alterations to existing sites will be provided within the updated HELAA which is scheduled to be published in the forthcoming months. In order to remain consistent the sites represented on the maps included within this document are exactly the same as those published within the Potential Sites for Housing and Employment (PSHE) report. A separate map showing the location of the new sites which were promoted post publication of the PSHE has been attached to the end of this report (see Appendix 1 for further details).

Table 5: Alterations to existing sites

Land availability assessment reference	Location	Site area			
		Gross (ha)		Net (ha)	
		Old	New	Old	New
B2 (HEL181)	Land North of Farm Way, Bushey (Compass Park)	48.5	-	24.15	15.91
HEL 355	Land South of Elstree Road	31.84	-	6.99	12.29
S1 (HEL370)	Land West of Porters Park Drive	31.92	-	15.96	6.00
S2 (HEL389)	Harperbury Hospital	11.14	39.52	7.24	21.71
BE4 (HEL376)	Land off Well End Road	105.6	49.04	17.68	17.27

Table 6: New sites promoted post publication of the Potential Sites for Housing and Employment report (see Appendix 1 for map)

Land availability assessment reference	Location (site promoter)	Site area Gross (ha)	Brief description of potential use[1]
HEL501	Land adjoining Fenny Slade, Potters Bar (Bidwells)	2.35	Residential, estimated capacity for 60 homes
HEL502	Birchville Cottage, Bushey (Landowner)	0.29	Residential, estimated capacity for 15 homes
HEL503	Land adjacent to Lissmirane Industrial Estate, Elstree (Lichfields)	5.16	Mixed use, estimated capacity for 145 homes
HEL504	Land East of St Albans Road, South Mimms (DLA Town Planning)	1.31	Residential, estimated capacity for 40 homes
HEL505	Land at Greenacres, Bushey (Preston Bennett)	0.78	Residential, estimated capacity for 30 homes
HEL506	Allum Lane South, Borehamwood and Elstree (King and Co/Aylward Planning)	1.44	Residential, estimated capacity for 50 homes
HEL507	Land rear of Kendal Hall Farm, Radlett (Fortress Land and Property)	5.62	Residential, estimated capacity for 135 homes
HEL508	26 Woodhall Lane, Shenley (DGH Realty Group)	0.74	Residential, estimated capacity for 25 homes
HEL509	Little Simpsons, Letchmore Heath (Apcar Smith Planning)	0.40	Residential, estimated capacity for 15 homes
HEL510	Melbury Stables, Bushey (Apcar Smith Planning)	0.41	Residential, estimated capacity for 20 homes
HEL511	Land at Woodcock Hill Village Green, Borehamwood and Elstree (Taylor Wimpey)	8.98	Residential, estimated capacity for 105 homes
HEL512	Norwegian Barn, Elstree (Agent on behalf of Landowner)	1.80	Residential, estimated capacity for 50 homes
HEL513	Oakfield Close, Potters Bar (Unknown)	0.28	Residential, estimated capacity for 15 homes
HEL514	Land west of Borehamwood (Radlett Park Golf Club), Borehamwood and Elstree (Strutt and Parker)	75.0	Residential, estimated capacity for 830 homes
HEL515	Land South of Rectory Farm, Shenley (Savills)	5.34	Residential, estimated capacity for 140 homes
HEL516	Land South of Greyhound Lane, South Mimms (DLA Town Planning)	12.3	Residential, estimated capacity for 275 homes
HEL518	Former Day Centre Grosvenor Road (HBC)	0.8	Residential, estimated capacity for 19 homes
HEL519a	Tarmac Land South of M25, London Colney – Site A (David Lock Associates)	1.67	Employment development
HEL519b	Tarmac Land South of M25, London Colney – Site A (David Lock Associates)	14.1	Employment development
HEL520a	Costco, Hartspring Lane (RPS Group)	6.52	Employment development
HEL520b	Land to the South East of Costco, North Western Avenue (RPS Group)	1.89	Employment development
HEL521	Bushey Hall Farm Site, Bushey Mill Lane (Dalcour Maclaren)	8.89	Mixed use estimated capacity for 290 homes

[1] Capacity figures are calculated using methodology in the published Housing and Employment Land Availability Assessment (HELAA). They are any indication only and do not mean that this exact number of homes would be built, were the site to be taken forward for development.

4.5 As indicated throughout this report, our assessment of sites to date has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, all submitted technical work has been reviewed and will need to be corroborated with statutory and specialist bodies and in some instances, additional work may need to be scoped and commissioned. We have sought to respond where a substantive point relating to one of our technical studies has been raised.

4.6 Particular concern was raised by a number of promoters and developers that the housing numbers and capacities are not sufficiently justified. Currently no new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest local housing need figures are now in excess of 700 homes per annum as opposed to the minimum of 500 stated within the PSHE report. This is due to updates in the government's standard methodology for calculating the housing need with the updated national planning practice guidance now stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections. The capacity figures stated within the report are based on a standard HELAA methodology agreed in consultation with neighbouring authorities.

5. Detailed breakdown of comments received by site

5.1 All responses submitted by site promoters, statutory bodies and local interest groups were individually reviewed. The organisations/groups were asked to provide their views on individual sites and in many instances, these were presented as site specific comments which tended to relate to the proposal directly, the site's location, or a specific policy consideration.

5.2 All of the comments received were categorised by topic. In some instances the same point was raised by multiple organisations/groups. Rather than list all of the points raised by each individual, the substantive points that were raised in relation to these topics were summarised to avoid unnecessary repetition in the analysis of representations and the council's initial response to the points raised. Whilst all feedback has been reviewed, some comments have not been included in the report if points raised were not considered to be substantive.

5.3 Some of the statutory bodies provided fairly generic comments in relation to a geographic area (rather than specific site) and where this occurred, they were allocated to all of the sites in close proximity to the area mentioned. However, some of the comments received related to the whole borough and these have been attributed to all of the strategic sites in the borough. Certain statutory bodies and local interest groups only stated whether they supported or opposed a land promotion and in these instances the support or opposition was noted under the 'principle of development' category.

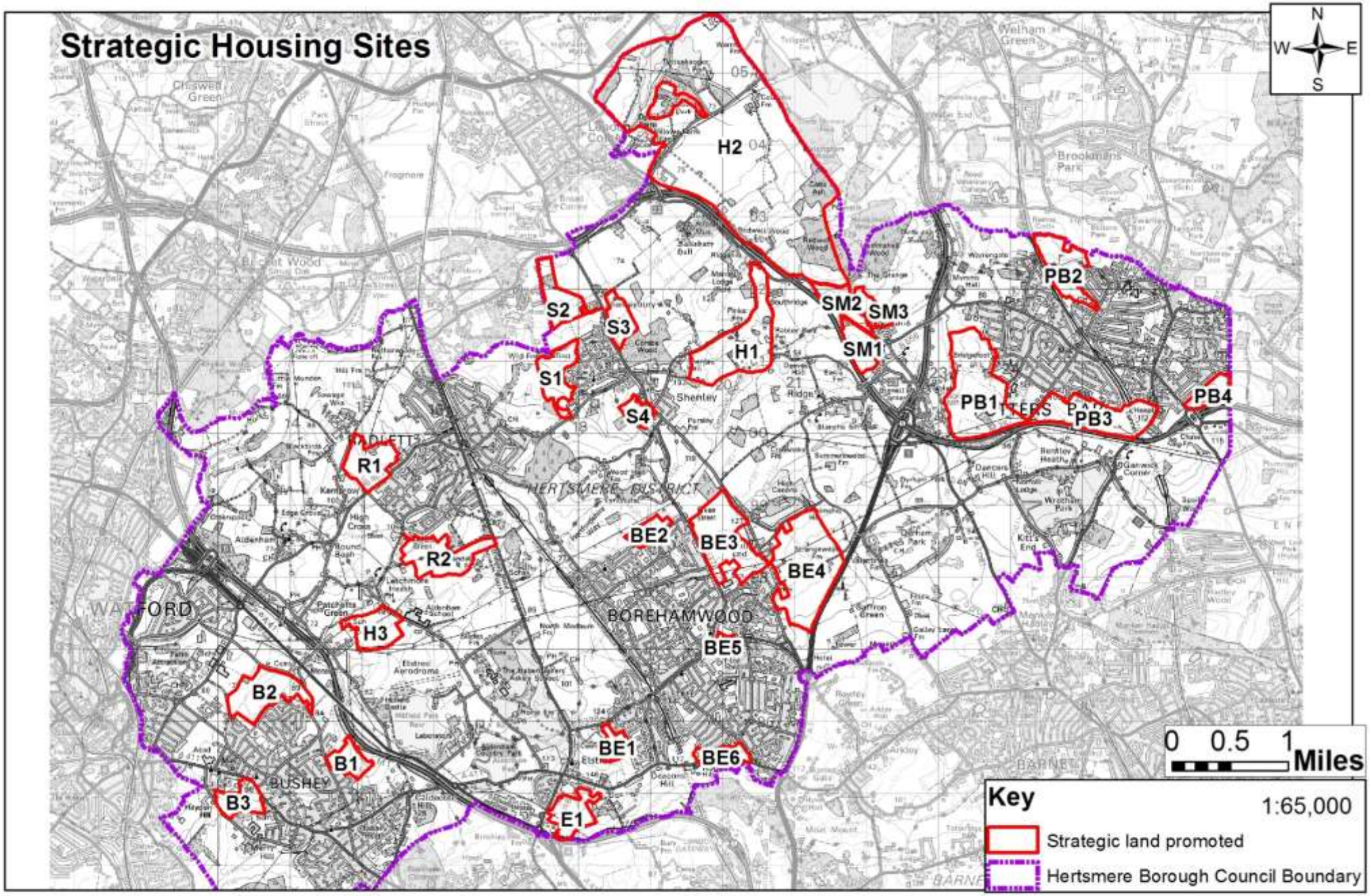
5.4 It is important to emphasise that a degree of interpretation and subjectivity was required when assigning comments to a particular issue. Some issues

overlap and although most responses could be easily categorised, it was not always clear which sites or issues were being referenced. This report should be used as a guide rather than as a precise measure of how the organisations/groups responded to the different sites which landowners developers and other promoters have put forward for development. Table 7 sets out how the different issues raised by the organisations/groups were categorised.

Table 7: List of issues raised by developers, landowners, statutory bodies and local interest groups

Issue	Areas covered
Services and facilities	Healthcare, education, community facilities, accessibility and proximity to services
Heritage	Listed buildings, conservation areas, archaeological interest
Minerals and waste	Active landfill and waste treatment facilities, historic landfill
Level of development	Quantum and pattern of existing development
Sports and recreation	Open spaces, sports and recreation facilities, public rights of way
Scale of development	Level of development, increase in housing need
Planning process and engagement	Public engagement, local plan procedure
Deliverability	Timeframe, build out times
Landownership and assembly	Adjacent sites, multiple ownership
Cross boundary co-ordination	Neighbouring boroughs and parishes co-operation
Housing figures	New housing figure, OAN levels
Capacity	Number of dwellings proposed, methodology
Technical studies	Evidence base, supporting documents
Environment and wildlife	Trees, habitats, ecology, biodiversity, agriculture
Green Belt	National guidance on green belt, coalescence, Hertsmere's green belt assessment
Physical Considerations	Powerlines, flooding, air quality and noise
Radlett NP	Neighbourhood planning considerations and implications for Radlett
Surrounding uses	Differing land-uses
Principle of development	General opinions on the scheme
Residential /Employment	Change of use, use class
Transport infrastructure	Traffic, travel times, pollution, public transport, site access
Existing Development	Brownfield sites, previous permissions, other large developments in the area
Landscape and Visual Impact	Character, setting, sense of place
Shenley NP	Neighbourhood planning considerations and implications for Shenley

6. Maps of Hertsmere Borough showing the potential housing and employment sites



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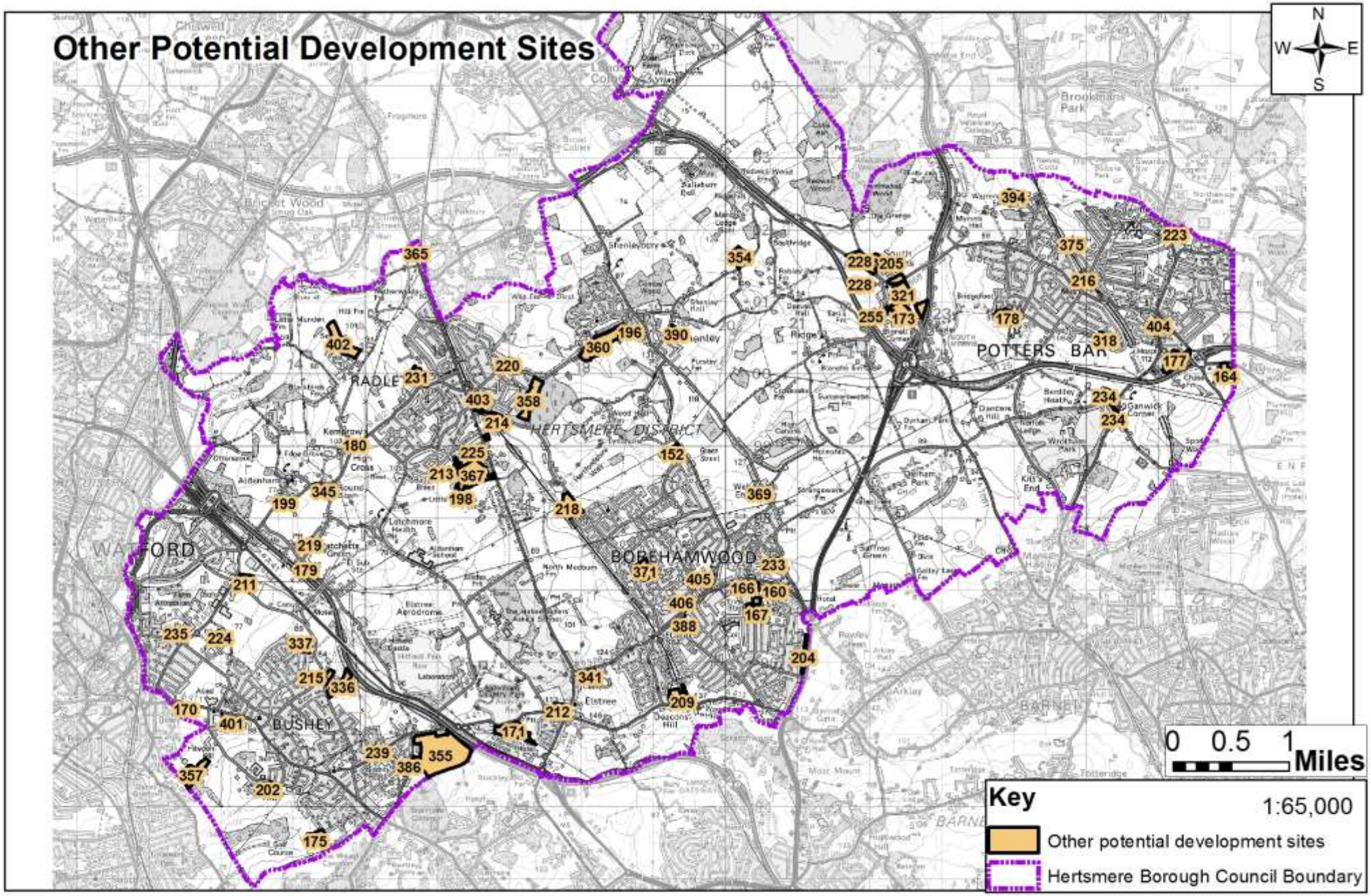

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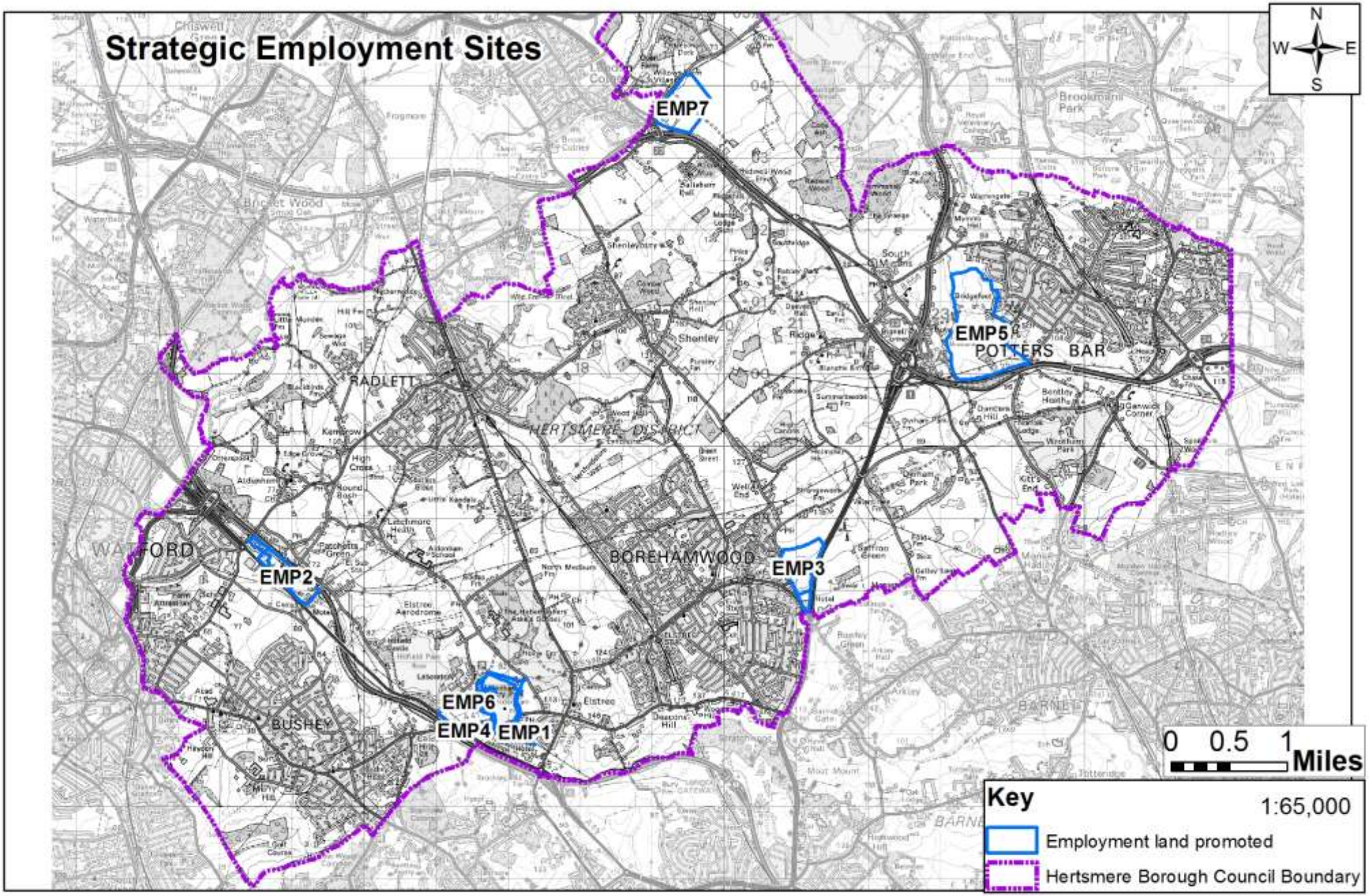

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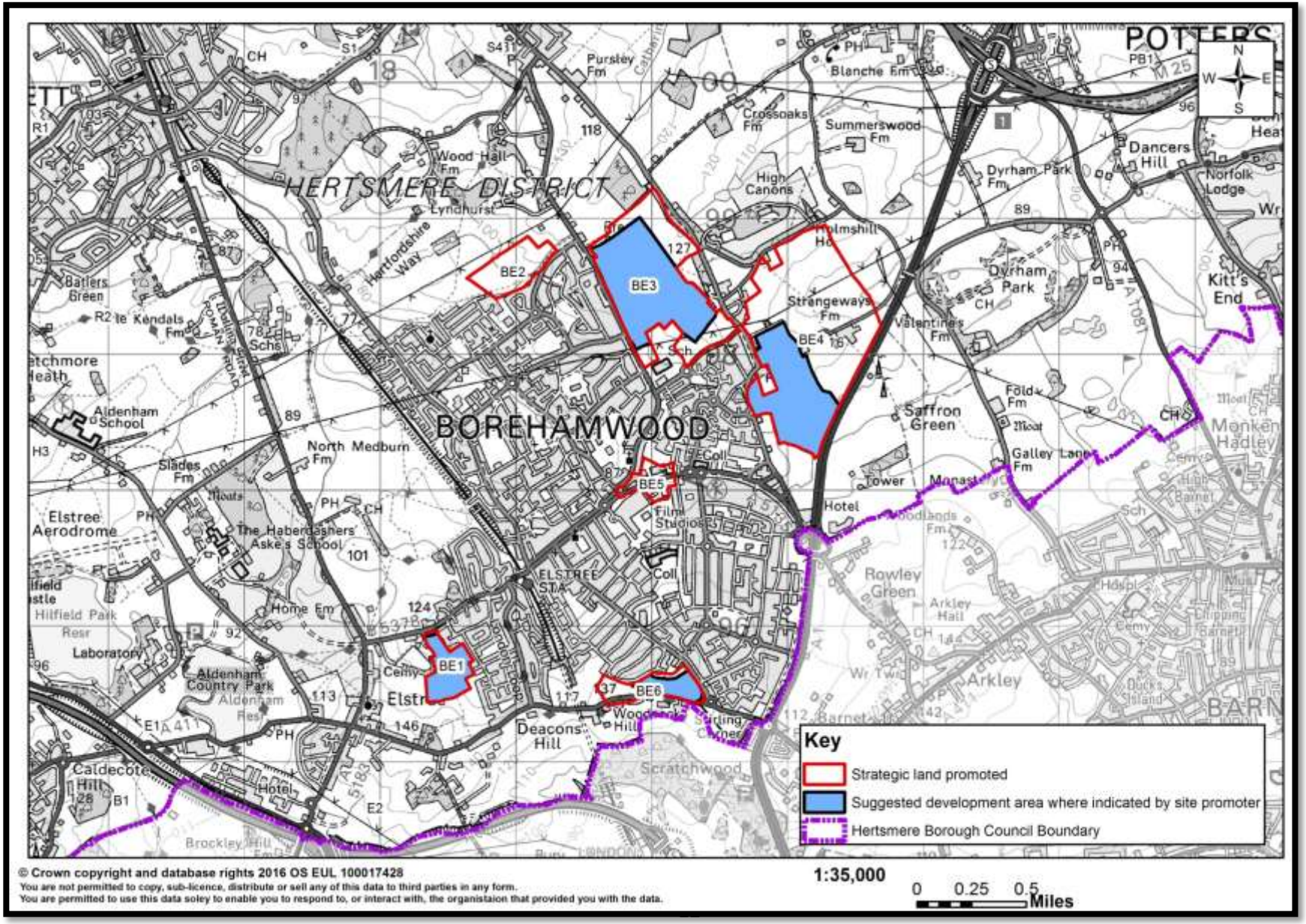
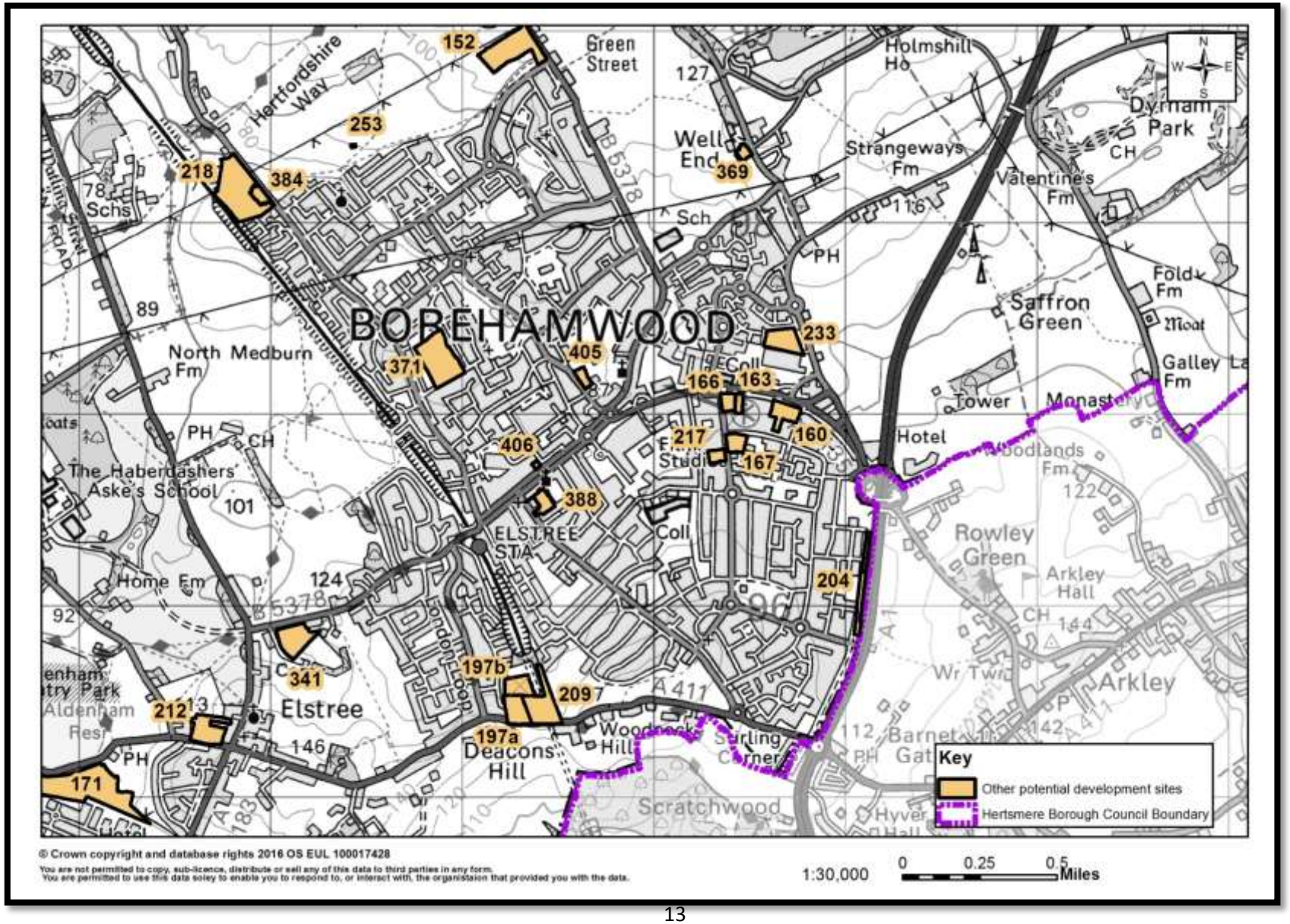
7. Summaries of feedback from site promoters, statutory bodies and local interest groups - Borehamwood and Elstree

7.1 - Map of Borehamwood and Elstree strategic housing sites



7.2 - Map of Borehamwood and Elstree other potential development sites



7.3 - Feedback forms – Borehamwood and Elstree

Strategic Housing Sites

Site address/ location	Land South of Allum Lane, Elstree	Site ref: BE1 (HEL393)

Breakdown of general comments received:

Total number of comments	11
Statutory bodies and local interest groups	8
Developers/ landowners (includes site promoter)	3

Site Promoter: Bidwells on behalf of Endurance Estates Strategic Land (EESL)

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Thames Water
- Environment Agency
- Elstree and Borehamwood Town Council
- London Borough of Barnet
- Allum Lane Fields Association (ALFA)
- The Woodcock Hill Village Green Members
- Transport for London (TfL)

Other developers/ landowners

- Barratt David Wilson Homes
- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing LPA figure will increase above 500 dpa
- Site can provide a comprehensive garden suburb to the existing settlement of Elstree and Borehamwood
- A suitable and accessible location (scores well in accessibility second only to BE5 – Elstree Way Corridor)
- Borders the primary settlement of Elstree and Borehamwood which has excellent transport links, facilities and services
- A logical continuation to the existing settlement
- Will help to meet the needs for elderly and care residents
- No heritage designations
- Consider green belt assessment to be mainly sound and robust but do not agree with aspects of the study as it relates to BE1
- Promoter has been liaising with HCC and CCG in respect to education, health care, and the small-scale waste recycling centre (just HCC)
- Could be delivered within the plan period

Summary:

The site promoter reiterates the Government's message that there is a significant demand for housing across the UK. Whilst the council have stated a target figure of 500 dwellings per annum, the promoter believes this is likely to increase with the government revised methodology calculating a need of over 700 dwellings per annum.

The promoter advises that the site can provide a comprehensive family focused garden suburb to the existing settlement of Elstree and Borehamwood and that this method of housing delivery is the most sustainable option. The site will include high quality and sympathetic new residential development, and extensive landscaped open space and green infrastructure.

The site is considered to be in a suitable, accessible and a well-connected location scoring well in accessibility and second only to BE5 (Elstree Way Corridor), adjoining the built up area which has excellent transport links by rail, bus and car, and an excellent range of facilities and services. The proposal will provide employment and long term socio-economic benefits including the provision of affordable housing, a mixture of housing types and community infrastructure. The promoter reiterates that the scheme will help to meet the needs for elderly and care residents.

The site has no scheduled monuments, archaeological remains, or landscape/ visual related designations and should provide a logical continuation to the existing settlement. The site also has no viability issues and will not impact on

the settings of listed buildings or conservation areas. The promoter acknowledges that the green belt is a key issue that needs to be considered but draws attention to the conclusion drawn out of Hertsmere's green belt assessment that the site has been identified as a location suitable for further consideration for release. Other site constraints are also mentioned but these are not considered to be insurmountable and the promoter has been liaising with CCG and HCC in respect to health care and education / waste recycling centre respectively.

The site is located in flood zone 1 and at low risk of surface water flooding. It is stated that these risks will be mitigated through a surface water drainage strategy which will capture overland flow at the source and SUDs.

The proposal will include a sympathetic design with open space and public footpath improvements, with the existing public rights of way incorporated into the scheme along with ecological and landscape assets. The promoter suggests that the site could be delivered within the plan period with 75 dwellings in years 1 to 5 and 208 in years 6 to 10.

An analysis of the council's green belt assessment has been submitted which in particular challenges the assessment of sub-area 52 in relation to purpose 2 and the fact that SA-52 is not contiguous with BE1 and as such it is not consistent with the stage 1 assessment. The consultant's report recommends that the part of the site not within SA-52 is included as part of the relevant sub-area (RA-10) for further consideration.

As part of the promoter's submission, technical notes have also been submitted in relation to highways and engineering.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the governments' standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

The site has been promoted as a new garden suburb which is one of the development approaches identified within the council's previous Issues and Options consultation. Whilst the council accepts that there are benefits with this approach Hertsmere is still exploring all approaches at this stage. Central government's requirement to meet objectively assessed need for housing and employment will require a step change in the scale of development. A range of locations beyond existing built up areas will therefore be assessed and where appropriate, increased densities will need to be considered.

The impact of any development in the green belt will be fully assessed and the analysis of the green belt assessment submitted by the promoter has been carefully reviewed. The council acknowledges that part of the site has been identified as suitable for green belt release within Arup's green belt assessment but reiterates the importance of carefully considering all factors that influence development. The Arup green belt assessment was an independent technical study which has now been finalised and the council is not intending to revisit the methodology or recommendations produced by Arup. The methodology itself was subject to consultation with neighbouring authorities and sets out the rationale for defining Hertsmere settlements with regard to purpose 2. However, there remains the scope for representations to be made on the Regulation 19 Local Plan prior to submission of the plan for examination.

Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics including flood management, the waste treatment facility and transport. It is however encouraging those discussions have started with HCC and CCG in relation to healthcare, education and waste. Hertfordshire County Council has developed its own 'COMET' traffic model for the county which as expected shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county

council has also carried out a high level transport assessment for all the larger potential housing and employment sites. However, further modelling will be required to assess the full impact development will have on the strategic and local road network.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Transport Infrastructure • Access to public transport is over 400m from parts to the site • Limited opportunities to divert service through site • Difficulties for access • Traffic gridlocked at peak times and the roads cannot cope with more housing • Predicted increase delays are inaccurate • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Hertfordshire County Council Growth and Infrastructure Unit • Elstree and Borehamwood Town Council • Allum Lane Fields Association (ALFA) • The Woodcock Hill Village Green Members • Transport for London (TfL)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Minerals and Waste • Directly adjacent to Elstree HWRC which is safeguarded under HCC's Waste Core Strategy 2012 • The relationship between the waste facility and proposed residential development needs to be carefully considered • Likelihood to generate noise complaints • Not good practice to have housing next to recycling centre due to noise and smell	• Hertfordshire County Council Growth and Infrastructure Unit • Allum Lane Fields Association (ALFA)
HBC's comments: The council continues to liaise with HCC Minerals and Waste department in relation to the waste treatment sites following receipt of comments from the Growth and Infrastructure Unit. The council will be guided by HCC with regard to the status of current minerals sites as well as development with implications for waste treatment facilities. The potential impact that any development would have on neighbouring sites of a differing land use (and vice-versa) will be taken into consideration when considering land use allocations. The council will seek to avoid "Bad Neighbour" situations from arising which, unless adequate mitigation can be put in place, would either prejudice the operation of existing commercial or other activities or would lead to poor environmental conditions within the new allocation. Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.	
Environment and wildlife • Low ecological sensitivity • Infill gaps in hedgerows with native planting, buffer woodland habitats	• Hertfordshire County Council Growth and Infrastructure Unit • London Borough of Barnet.

of cemetery • Historic orchard sites • Advise that a preliminary ecological appraisal is conducted • Located close to the Scratchwood Nature Reserve, a Site of Importance for Nature Conservation	
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • LPA should liaise with Thames Water to ensure housing does not outpace network upgrades • GP surgeries and dentist at full capacity although a new facility proposed on Elstree Way • Long distance from schools • Likely need for upgrades to the wastewater network • A housing and infrastructure phasing plan required to determine capacity within the water network • Requires 60 units of extra care housing, of which 12 should be accessible with disabilities	• Thames Water • Environment Agency • Allum Lane Fields Association (ALFA) • The Woodcock Hill Village Green Members • Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The South West Herts SHMA is currently in the process of being updated. The Local Housing Need Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters regarding requirements for this category of housing.	
Physical considerations • Problems of flooding are well reported at this site • High water table and underground streams • More concrete less opportunity for water to run off	• Elstree and Borehamwood Town Council • Allum Lane Fields Association (ALFA) • The Woodcock Hill Village Green Members
HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.	
Green Belt • Land plays an important part in preventing coalescence of settlements	• Allum Lane Fields Association (ALFA)
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by Arup is available to view on the council's website.	
Level of development • There has been significantly more development in Borehamwood than elsewhere	• Allum Lane Fields Association (ALFA)

HBC's comments: Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.	
Landscape and visual impact • Will diminish the scenic views and natural beauty of the area	• Allum Lane Fields Association (ALFA)
HBC's comments: Hertsmere will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Heritage • Possible archaeological sites	• Allum Lane Fields Association (ALFA)
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Landownership and land assembly • Site consists of three separate parcels of land	• Barratt David Wilson Homes
HBC's comments: Whilst land within multiple ownerships should not be seen as a significant constraint on development, measures will need to be taken by the site promoter/s to show that the site is deliverable and that all landowners are willing to work together on one collaborative scheme.	
Green Belt • Only part of the site is considered for green belt release	• Barratt David Wilson Homes
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Transport infrastructure • Only one point of vehicular access • Significant concerns against a number of HCC Transport Policy requirements	• Barratt David Wilson Homes • Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. All suggested accesses points will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Service and facilities • Existing GP services near capacity • 280 homes are insufficient for a sustainable Primary School in its own right	• Strutt and Parker

• Area under pressure for primary school places • Solely proposes housing with no community facilities	
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The council acknowledges that development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities.	
Landscape and visual impact • Character of area should be preserved	• Strutt and Parker
HBC's comments: Hertsmere will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Heritage • Contains archaeology and a locally listed building	• Strutt and Parker
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	

Site address/ location	Land North of Stapleton Road, Borehamwood	Site ref: BE2 (HEL359)

Breakdown of general comments received:

Total number of comments	10
Statutory bodies and local interest groups	7
Developers/ landowners (includes site promoter)	3

Site Promoter: Boyer on behalf of Fairfax Acquisitions Ltd

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Thames Water
- Environment Agency
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members
- Highways England
- Transport for London (TfL)

Other developers/ landowners

- Barratt David Wilson Homes
- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing LPA figure will increase above 500dpa
- Discrepancies between the HELAA and public engagement document
- Highly sustainable location immediately adjacent to Borehamwood and Elstree,
- Will not require significant intervention on transport grounds
- Potential to deliver social infrastructure on the site, especially if HEL152 is included
- 180-200 homes could be delivered in the first 5 years of the plan

Summary:

The site promoter reiterates the government's message that there is a significant demand for housing across the UK. Whilst the council have stated a target figure of 500 dwellings per annum, the promoter believes this is likely to increase with the government revised methodology calculating a need of over 700 dwellings per annum.

The promoter raises concerns around what it considers to be discrepancies between the HELAA and public engagement document. The HELAA acknowledges that the current LWS designation and green belt concerns can be overcome, and would not preclude the site from being considered suitable. However, this is not reflected in the public engagement document.

The promoter supports the conclusions drawn from the HELAA and agrees that the site has the potential to deliver approximately 350 new homes. The site is considered to be in a highly sustainable location due to it being immediately adjacent to Borehamwood and Elstree, and having 'medium' accessibility with reasonable access to public transport and local services (all facilities within 15 minutes cycle). The site will also not require significant intervention on transport grounds, and the site scores positively in respect to education, services, community cohesion and health in HBC's sustainability appraisal.

The promoter acknowledges that there is a need for additional health and educational facilities and recognises that there is potential to deliver social infrastructure on the site, especially if HEL152 is included. Finally, the promoter believes that the 180-200 homes could be delivered in the first 5 years of the plan.

As part of the promoter's submission the following technical studies have been submitted; landscape and visual impact assessment, heritage statement, preliminary ecological appraisal, arboricultural report, accessibility appraisal, contaminated land risks report and flood risk assessment.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The promoter has highlighted discrepancies between the HELAA and PSHE report. The council would like to reiterate that concerns listed within the PSHE report are general guidance based on our own local evidence base. Whilst the summary section does mention a list of challenges and constraints with the site, this does not mean that these challenges cannot be overcome. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics, including the LWS designations and transport.

The promoter has mentioned the possibility of including HEL152 within the scheme. The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground. However, measures will need to be taken by the site promoter/s to show that the scheme is deliverable and that all landowners are willing to work together on one collaborative scheme.

Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding. Moreover, full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Transport infrastructure • Borehamwood town centre is some distance away from the site and buses provide for limited school movements only – improvements to public transport accessibility should be explored • Only 25% of HCC Transport policy met. Concerns were raised against 75% of transport policy requirements. • Impact on strategic road network • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close	• Hertfordshire County Council Growth and Infrastructure Unit • The Woodcock Hill Village Green Members • Highways England • Transport for London (TfL)

to the London boundary or on strategic routes	
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Environment and wildlife • Potential to include biodiversity enhancements • Arable area has low ecological sensitivity although LWS quality habitat exists and may have ecological constraints • However recent survey suggests site no longer has ecologically interesting grassland habitat • Bats and great crested newts have been recorded	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • LPA should liaise with Thames Water to ensure housing does not outpace network upgrades • Likely need for upgrades to the wastewater network • A housing and infrastructure phasing plan required to determine capacity within the water network • Requires 60 units of extra care housing, of which 12 should be accessible with disabilities • Site is isolated from core services, facilities and amenities. • Long distance to GP facilities	• Thames Water • Environment Agency • Elstree and Borehamwood Town Council • The Woodcock Hill Village Green Members
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The South West Herts SHMA is currently in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters regarding requirements for this category of housing.	
Landscape and visual impact • Development would abolish a 'buffer' zone at edge of Borehamwood	• Elstree and Borehamwood Town Council • The Woodcock Hill Village Green Members
HBC's comments: LVA Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to preparing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. The council has yet to decide where it will commission its own LVA work but where this is not undertaken, it will look to corroborate the work that has already been submitted.	

Green Belt • HBC's green belt assessment does not recommend for further consideration	• The Woodcock Hill Village Green Members
HBC's comments: The impact of any development in the green belt will be fully assessed taking into account the findings of the Stage 1 and 2 green belt assessment which has been conducted by ARUP and is available to view on the council's website. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Green Belt • Unacceptable impact and hugely prominent in landscape terms	• Barratt David Wilson Homes
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Transport infrastructure • Vehicular access only via residential streets • Single point of access • Concerns against 75% of HCC Transport Policy requirements	• Barratt David Wilson Homes • Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. All suggested access points will be assessed for their suitability. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Services and facilities • Over 1.5 miles from town centre and all local shops and services • Solely proposes housing and no community facilities • Less sustainable location • Long distance from town centre and railway station • 350 homes are insufficient for a sustainable primary school in its own right • Existing GP services near capacity	• Barratt David Wilson Homes • Strutt and Parker
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Environment and wildlife • Ecological constraints	• Strutt and Parker
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new	

development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Landscape and visual impact • Contains landscape of rare historic character	• Strutt and Parker
HBC's comments: LVA Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to preparing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. The council has yet to decide where it will commission its own LVA work but where this is not undertaken, it will look to corroborate the work that has already been submitted. Nonetheless, the council will seek to minimise the landscape and visual impact of any new development and developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Physical considerations • High Voltage overhead power cable may limit deliverability	• Strutt and Parker
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	

Site address/ location	Land off Cowley Hill. Borehamwood	Site ref: BE3 (HEL347)

Breakdown of general comments received:

Total number of comments	11
Statutory bodies and local interest groups	8
Developers/ landowners (includes site promoter)	3

Site Promoter: Woolf Bond Planning on behalf of The Wrotham Park Estate

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
- Thames Water
- Environment Agency
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members
- Highways England
- Transport for London (TfL)

Other developers/ landowners

- Barratt David Wilson Homes
- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing LPA figure will increase above 500dpa
- BE4 has been submitted in conjunction with this site as a separate strategic site
- Development of the site would be acceptable having regard to the five green belt purposes
- 940 dwellings together with a mixed use neighbourhood centre and other supporting facilities
- Two vehicular accesses via Cowley Hill
- Potential linkages to Hertswood Academy
- Development should be achievable within the current 5 year period

Summary:

The site promoter reiterates the position of the Governments that there is a significant demand for housing across the UK. Whilst the council have stated a target figure of 500 dwellings per annum, the promoter considers this is likely to increase with the government revised methodology calculating a need of over 700 dwellings per annum. The site being of critical mass to secure the necessary funding and provision of required infrastructure is emphasised. It should also be noted that BE4 has been submitted in conjunction with this site as a separate strategic site.

The promoter considers that development of the site would be acceptable having regard to the five green belt purposes. In particular, the development would not result in unrestricted sprawl or coalescence and would prevent peripheral countryside locations from encroachment.

The proposal includes 940 dwellings together with strategic open space, recreation areas, and a mixed use neighbourhood centre. The promoter also highlights the possibility for the provision of a GP Surgery, 2FE primary school, allotments, and sustainable transport linkages**.** The proposal has been structured around a central open space area and will have two vehicular accesses via Cowley Hill, along with a mixed use area that will be abutting this road. The plan also shows potential linkages to Hertswood Academy.

It is noted that the promoter has mentioned that the scheme cold be delivered within the first 5 years of the plan. A key factor in the determination of sites will be the deliverability of the scheme. We acknowledge that not all sites will be delivered within the first 5 years of the adopted plan period but the council will wish to ensure that sites are built out within the time scales shown in the corresponding Local Plan allocation. We will look to include provisions within our plan for alternative sites to be brought forward where allocated sites are not being implemented.

Technical studies have been included alongside this representation (in response to issues raised in the council's documentation) by the developer to support the proposal including Landscape and Visual Overview, Flood Risk Assessment and Transport Appraisal. The promoter has indicated a desire to work to work collaboratively with the council and considers that development should be 'achievable' within the current 5 year period.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the governments' standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections. The council accepts that some of the site has been identified for green belt release yet reiterates the importance of carefully considering all factors that influence development, and the report only recommends the southern eastern part in conjunction with the part of BE4.

The promoter points out that BE4 has been submitted in conjunction with this scheme. The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground. However, measures will need to be taken by the site promoter/s to show that the scheme is deliverable and that all landowners are willing to work together on one collaborative scheme. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics, including the potential linkages with Hertswood Academy, the provision of facilities (neighbourhood centre) and transport.

Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. All suggested accesses point will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Low to low/moderate ecological sensitivity • Potential to include biodiversity enhancements • Historic orchard sites • Potential for nesting birds and reptiles • Advise that a preliminary ecological appraisal is conducted	• Hertfordshire County Council Growth and Infrastructure Unit • Environment Agency
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • LPA should liaise with Thames water to ensure housing does not outpace network upgrades • Likely need for upgrades to the wastewater network • A housing and infrastructure phasing plan required to determine capacity within the water network • Requires 60 units of extra care housing, of which 12 should be accessible with disabilities • Isolated from core services, facilities and amenities	• Thames Water • Environment Agency • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • Elstree and Borehamwood Town Council • The Woodcock Hill Village Green Members

• Local GP surgeries at capacity • Too far from town's services and Cowley Hill already has traffic problems	
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The South West Herts SHMA is currently in the process of being updated which addresses and quantifies the need for extra care housing and will inform discussions with HCC and site promoters regarding requirements for this category of housing.	
Green Belt • Would cause coalescence of Borehamwood and Well End • HBC's stage 1 green belt assessment does not recommend this land for further consideration • HBC's stage 2 green belt recommends this site for further investigation. (Shenley PC disagree with stage 2)	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • The Woodcock Hill Village Green Members
HBC's comments: The impact of any development in the green belt will be fully assessed taking into account the findings of the Stage 1 and 2 green belt assessment which has been conducted by Arup and is available to view on the council's website. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. There are not considered to be discrepancies in relation to the Stage 1 and Stage 2 green belt assessments as they relate to this part of the borough. The parcels considered in Stage 1 typically covered a much larger area. The Stage 2 assessment was a more fine grained assessment enabling an individual site or land promotion to be considered as a smaller sub-area. Although this resulted in some different assessments against green belt purposes than the wider parcel, the Stage 2 assessment also considered the strategic contribution which a sub-area made to the wider parcel.	
Physical considerations • Areas of Flood Zone 3b (functional floodplain) should be safeguarded from development • Local Plan should consider how flood storage can be protected and maximized across the borough	• Environment Agency
HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.	
Transport infrastructure Concerns raised against significant proportion of HCC policy requirement • Development will impact on the strategic road network (SRN) • Cumulative assessment of sites (including BE3) across plan period needed highlighting residual impact on the SRN • Development should minimise impact upon the A1 Barnet bypass and Stirling corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes • Poor access to bus services – no service along adjacent road although potential to be served along Cowley Hill • Potential for enhancing public transport offering if in combination with adjacent sites	• The Woodcock Hill Village Green Members • Highways England • Transport for London (TfL) • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • The Woodcock Hill Village Green Members

• Additional cars would impact the surrounding road network • Not within walking distance of a train station • Existing traffic problems on Cowley Hill	
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	

Other developer/landowners responses:

N.B Respondents will be mentioned if they say anything that relates to any of the substantive points listed. This will result in some respondents being listed next to a sub point that they have not raised.

Substantive points raised	Responder/s
Services and facilities • Over 1.5 miles from town centre and all local shops and services • Existing GP services near capacity • 800 homes will sustain a primary school • Secondary School adjacent will have difficulty expanding to meet need	• Barratt David Wilson Homes • Strutt and Parker
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities.	
Physical considerations • Potential drainage issues due to high number of watercourses and ditches • High Voltage overhead power cable may limit deliverability • Sites which are within Zones 2 and/or 3 should not be released in where suitable sites at lower risk of flooding are available	• Barratt David Wilson Homes • Strutt and Parker
HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary. Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Green Belt • Only a small part of the site is considered for green belt release	• Barratt David Wilson Homes
HBC's comments: The impact of any development in the green belt will be fully assessed taking into account the findings of the Stage 1 and 2 green belt assessment which has been conducted by Arup and is available to view on the council's website. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent.	
Landscape and visual impact • Prominent location • Contains landscape of rare historical character	• Barratt David Wilson Homes • Strutt and Parker
HBC's comments: LVA Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to preparing these reports. To date, our assessment of sites has been primarily based	

on our own evidence base in order to ensure a level of consistency across all sites. The council has yet to decide where it will commission its own LVA work but where this is not undertaken, it will look to corroborate the work that has already been submitted. The council will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Transport infrastructure • Concerns against significant proportion of HCC transport policy requirements	• Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	

Site address/ location	Land off Well End Road. Borehamwood	Site ref: BE4 (HEL376)

Breakdown of general comments received:

Total number of comments	11
Statutory bodies and local interest groups	8
Developers/ landowners (includes site promoter)	3

Site Promoter: Woolf Bond Planning on behalf of The Wrotham Park Estate

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
- Thames Water
- Environment Agency
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members
- Highways England
- Transport for London (TfL)

Other developers/ landowners

- Barratt David Wilson Homes
- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing LPA figure will increase above 500dpa
- BE3 has been submitted in conjunction with this site as a separate strategic site
- Development of the site would be acceptable having regard to the five green belt purposes
- 525 dwellings together with supporting facilities and sustainable transport linkages
- The land to the south of the site is also safeguarded for employment
- Vehicular access from Rowley Lane and the land north of this should form the defensible boundary to the revised green belt
- Development should be achievable within the current 5 year period

Summary:
The site promoter reiterates the position of the Governments that there is a significant demand for housing across the UK. Whilst the council have stated a target figure of 500 dwellings per annum, the promoter considers this is likely to increase with the government revised methodology calculating a need of over 700 dwellings per annum. The site being of critical mass to secure the necessary funding and provision of required infrastructure is emphasised. It should also be noted that BE3 has been submitted in conjunction with this site as a separate strategic site.

The promoter considers that development of the site would be acceptable having regard to the five green belt purposes. In particular, the development would not result in unrestricted sprawl or coalescence and would prevent peripheral countryside locations from encroachment.

The proposal includes approximately 525 dwellings together with a local centre, a primary school, strategic open space, sports provision and recreation areas, and sustainable transport linkages. The land to the south of the site is safeguarded for employment. Vehicular access will be from Rowley Lane and the land north of this should form the defensible boundary to the revised green belt. The promoter notes that the hedgerow structure forms an important part of the scheme and will help to minimise landscape impacts and increase wildlife connectivity.

Technical studies have been included alongside this representation (in response to issues raised in the council's documentation) by the developer to support the proposal including Landscape and Visual Overview, Flood Risk Assessment and Transport Appraisal. The promoter has indicated a desire to work to work collaboratively with the council and considers that development should be 'achievable' within the current 5 year period.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The council accepts the green belt assessment identified part of the site as suitable for further consideration for green belt release but reiterates the importance of carefully considering all factors that influence development. The report only recommends the area north of Rowley Lane in conjunction with the part of BE3.

The promoter points out that BE3 has been submitted in conjunction with this scheme The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground. However, measures will need to be taken by the site promoter/s to show that the scheme is deliverable and that all landowners are willing to work together on one collaborative scheme. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics, including the proposed employment land, and transport.

Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. All suggested access point will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

It is noted that the promoter has mentioned that the scheme could be delivered within the first 5 years of the plan. A key factor in the determination of sites will be the deliverability of the scheme. We acknowledge that not all sites will be delivered within the first 5 years of the adopted plan period but the council will wish to ensure that sites are built out within the time scales shown in the corresponding Local Plan allocation. We will look to include provisions within our plan for alternative sites to be brought forward where allocated sites are not being implemented.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Transport infrastructure • Poor access to bus services – no service along adjacent road although potential to be served along Cowley Hill • Potential for enhancing public transport offering if in combination with adjacent sites • Considerable distance from public transport – station over 1.5 miles away • No buses serving site • Not within walking distance of a train station over 1.5 miles • Impact on strategic road network • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes.	• Hertfordshire County Council Growth and Infrastructure Unit • Elstree and Borehamwood Town Council • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • The Woodcock Hill Village Green Members • Highways England • Transport for London (TfL)

• Pressure on services and roads in Shenley	
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Environment and wildlife • Infill gaps in hedgerows with native planting • Potential to include biodiversity enhancements • Preliminary ecological appraisal required • Bats and great crested newts have been recorded • Advise that a preliminary ecological appraisal is conducted	• Hertfordshire County Council Growth and Infrastructure Unit • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • LPA should liaise with Thames Water to ensure housing does not outpace network upgrades • Likely need for upgrades to the wastewater network • A housing and infrastructure phasing plan required to determine capacity within the water network • Poor accessibility (scores 3 out of 10) • Local GP surgeries and primary/secondary schools at capacity • Requirement for another primary school - Cowley Hill site is too far away • Does not comply with NPPF in terms of distance to public transport	• Thames Water • Environment Agency • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • Elstree and Borehamwood Town Council • The Woodcock Hill Village Green Members
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Green Belt • HBC's green belt assessment does not recommend this land for further consideration • Loss of green belt land	• Elstree and Borehamwood Town Council • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • The Woodcock Hill Village Green Members
HBC's comments: The impact of any development in the green belt will be fully assessed taking into account the findings of the Stage 1 and 2 green belt assessment which has been conducted by ARUP and which is available to view on the council's website. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent.	
Physical considerations • Part of the site is within an area of flood risk	• Elstree and Borehamwood Town Council • Shenley Parish Council and

• Areas of Flood Zone 3b (functional floodplain) should be safeguarded from development • Local Plan should consider how flood storage can be protected and maximized across the borough	Shenley Neighbourhood Plan Steering Group • The Woodcock Hill Village Green Members • Environment Agency
HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.	
Planning process and engagement • Do not agree with showing so many potential sites located in the Parish of Shenley as part of Borehamwood. This is inaccurate and misleading makes it unnecessarily difficult for our residents to find the sections online to submit their comments.	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: Hertsmere is currently at the third stage of its Local Plan preparation process with the publication of the draft Local Plan scheduled for 2020. The public engagement in 2018 generated responses from over 2,000 people and 90 organisations/groups. Over 1,200 people attended staffed exhibitions and more than 40,000 newsletters were distributed to households across the local area. There was also extensive coverage within the local press and on our social media feeds and the council is pleased with the level of engagement on its Local Plan to date. The comment is noted and we will continue to keep consultation arrangements under review to ensure that any changes are made where these are considered necessary.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Physical considerations • Part of the site lies in the floodplain • Site at risk of flooding • Zones 2 and/or 3 should not be released where suitable sites at lower risk of flooding are available • Impacted by high voltage overhead cables • Blighted by motorway noise and air quality issues	• Barratt David Wilson Homes • Strutt and Parker
HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary. Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications. Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.	
Services and facilities • Over 1.5 miles from town centre and all local shops and services • Poor accessibility • Poor public transport (no bus services) • Existing GP services near capacity • Not well located for a new secondary school • Likely requirement for a new primary and secondary school arising from any development in Borehamwood	• Barratt David Wilson Homes • Strutt and Parker
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Transport infrastructure • A need to undertake strategic transport modelling prior to confirming whether it can be accommodated by local highway network • No high level transport assessment carried out but given complete absence of bus services unlikely to be positive • Local highways impact	• Barratt David Wilson Homes • Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Heritage • Within setting of listed buildings	• Barratt David Wilson Homes • Strutt and Parker
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	
Green Belt • Only a small part of the site is considered for green belt release	• Barratt David Wilson Homes
HBC's comments: The impact of any development in the green belt will be fully assessed taking into account the findings of the Stage 1 and 2 green belt assessment which has been conducted by ARUP and which is available to view on the council's website. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent.	
Landscape and visual impact • Prominent location • Contains landscape of rare historical character	• Barratt David Wilson Homes • Strutt and Parker
HBC's comments: LVA Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to preparing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. The council has yet to decide where it will commission its own LVA work but where this is not undertaken, it will look to corroborate the work that has already been submitted.	
Environment and wildlife • Contains a woodland enhancement zone • Existing operational agricultural unit	• Strutt and Parker
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues. Regarding the existing agricultural operations, the overall site is understood to be in single ownership although it would need to be demonstrated the land is genuinely available and deliverable given the existing agricultural tenancy.	

Site address/ location	Elstree Way Corridor Opportunity Sites, Borehamwood	Site ref: BE5 (HEL392)

Breakdown of general comments received:

Total number of comments	6
Statutory bodies and local interest groups	5
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England
- Transport for London (TfL)
- Thames Water
- Environment Agency

Site Promoter: Asset Management, Hertsmere Borough Council

Summary of site promoter's response:
No representations on PHSE report received

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • For single re-provision of Borehamwood Fire Station, Herts Fire and Rescue Services remain interested in land • Potential to relocate fire station elsewhere in the borough • Likely need for upgrades to the wastewater network • A housing and infrastructure phasing plan required to determine capacity within the water network • Requires 60 units of extra care housing, of which 12 should be accessible with disabilities	• Hertfordshire County Council Growth and Infrastructure Unit • Environment Agency • Thames Water
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The South West Herts SHMA is currently in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform ongoing discussions with HCC and site promoters regarding requirements for this category of housing.	
Transport infrastructure • Close proximity to public transport on Elstree Way – acceptable frequency • Impact on strategic road network • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes • Sites (including BE5) have potential to impact on Strategic Road Network (SRN) • Cumulative assessment of sites across plan period needed highlighting residual impact on the SRN	• Hertfordshire County Council Growth and Infrastructure Unit • Highways England • Transport for London (TfL)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all	

the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

Environment and wildlife • Limited due to previously developed nature of site • Potential to include biodiversity enhancements • Possible bat and bird roosts in tree and buildings	• Hertfordshire County Council Growth and Infrastructure Unit

HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.

Other developer/landowners responses:
No comments received.

Site address/ location	Land North of Barnet Lane, Borehamwood	Site ref: BE6 (HEL209a)

Breakdown of general comments received:

Total number of comments	9
Statutory bodies & local interest groups	7
Developers/ landowners (includes site promoter)	2

Site Promoter: Armstrong Rigg Planning on behalf of Barratt David Wilson Holmes

Statutory bodies & local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- London Borough of Barnet
- Thames Water
- Environment Agency
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members
- Transport for London (TfL)

Other developers/ landowners

- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Demand for housing LPA figure will increase above 500 dpa
- 250 new homes across a range of housing types
- Environmental upgrades to the adjacent village green including a new community facility
- Ease of access to a wide range of shops, services and amenities
- High level of self-containment
- Significant highways improvements to mitigate against any impact caused by the development
- Opportunity to secure essential contributions towards the upgrade of educational and healthcare facilities

Summary:

The site promoter reiterates the Government's message that there is significant demand for housing across the country. Whilst the council have stated a target figure of 500 dwellings per annum, the promoter believes this is likely to increase with the government revised methodology calculating a need of over 700 dwellings per annum.

The promoter suggests that the site can deliver 250 new homes across a range of housing types, including a high proportion of 1 bed apartments. The site will also bring community benefits and net gains in biodiversity through environmental upgrades to the adjacent village green (including a new community facility and footpath enhancements) and the development of a new 'eco-suburb' on the southern edge. The site also benefits from an ease of access to a wide range of shops, services and amenities including Summerswood Primary School and Elstree and Borehamwood Station (1.5km away).

The promoter states that given the high level of self-containment, the site represents an obvious extension to the urban area of Borehamwood on both green belt and landscape grounds. Reference is made to the conclusions drawn from the council's green belt assessment that the removal of the site and its subsequent development would be unlikely to harm the performance and strategic importance of the green belt. The site therefore offers the weakest contribution towards the green belt of all 6 sites around Borehamwood.

The promoter states that significant highways improvements will also be provided in order to mitigate against any impact caused by the development and ease the current congested road network at Stirling Corner, including the widening and flaring out of the carriageways, the renewal of street markings and new signalisation.

The promoter acknowledges that there are TPOs on the site but considers the trees can be accommodated within the proposed development. The site is in flood zone 1 and surface water flooding is acknowledged; a surface water drainage strategy has been prepared to deliver a net improvement to the area and deal with any additional runoff.

The developer considers the site to be free from any physical constraints and so represents a suitable location for a landscape and habitat-led residential development, with Woodcock Hill providing a significant opportunity for a wide range of biodiversity enhancements. The opportunity to secure essential contributions towards the upgrade of educational and healthcare facilities is also emphasised.

As part of the promoter's submission the following technical studies have been submitted; transport and highways appraisal, preliminary ecological appraisal, ecological technical note, landscape and visual impact assessment, flood risk and drainage appraisal, tree report, contamination and ground conditions report and acoustic assessment.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The scheme includes proposals to upgrade the existing village green. These proposals are noted and would require further investigation. A new open spaces and recreation study is currently being conducted by Hertsmere which looks and the quality and provision of the borough's existing open spaces and sports facilities. The impact of development on the rights of way network will be considered carefully in consultation with HCC Rights of Way service. This will include both positive and negative effects such as the scope for routes to be created, improved and integrated within new development, as well as the impact on users of having to divert any existing routes

Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

The council accepts that this assessment concluded that the site would be suitable for further consideration. The impact of any development in the green belt will be fully assessed taking into account the findings of the stage 1 and 2 green belt assessment which has been undertaken by Arup and is available to view on the council's website. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics including flood management and biodiversity upgrades, community facilities (including upgrades to Woodcock Village Green) and transport.

Consideration will need to be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be mentioned if they say anything that relates to any of the substantive points listed. This will result in some respondents being listed next to a sub point that they have not raised.

Substantive points raised	Responder/s
Transport infrastructure • Good access to multiple bus services although limited at western end • Impact on traffic on Barnet Lane and beyond • Train station over 1.5 miles away • Too congested traffic flow and associated pollution problems • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Hertfordshire County Council Growth and Infrastructure Unit • Elstree and Borehamwood Town Council • London Borough of Barnet • The Woodcock Hill Village Green Members • Transport for London (TfL)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Environment and wildlife • Buffer against LWS to the west and other woodland habitats on site • Moderate level of ecological sensitivity due to trees and proximity to LWS • Advise that a preliminary ecological appraisal is conducted • Bats have been recorded • Land from Furzehill Rd to Hartfield Ave is part of a Wildlife Conservation Area since 2002 and there are TPOs on the trees. • The ancient enclosure hedges and the dewponds along Barnet Lane are registered with Herts Bio Records • Located close to the Scratchwood Nature Reserve, this is a Site of Importance for Nature Conservation.	• Hertfordshire County Council Growth and Infrastructure Unit • Elstree and Borehamwood Town Council • London Borough of Barnet • The Woodcock Hill Village Green Members
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • LPA should liaise with Thames Water to ensure housing does not outpace network upgrades • Likely need for upgrades to the wastewater network • Requires 60 units of extra care housing, of which 12 should be accessible with disabilities • GPs and schools in the vicinity already under pressure	• Hertfordshire County Council Growth and Infrastructure Unit • Environment Agency • Thames Water • The Woodcock Hill Village Green Members
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

The South West Herts SHMA is currently in the process of being updated. The Local Housing Need Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters regarding requirements for this category of housing.	
Level of development • 250 homes are already being constructed next to Woodcock Hill Village Green with no infrastructure	• Elstree and Borehamwood Town Council • The Woodcock Hill Village Green Members
HBC's comments: Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.	
Adjacent sites • Taken with HEL197a, HEL197b and HEL209a development would equate to 495 homes	• The Woodcock Hill Village Green Members
HBC's comments: The council recognises that multiple sites may emerge as part of one collaborative scheme. Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Landscape and visual impact • Contains landscape of rare historical character	• Strutt and Parker
HBC's comments: LVA Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to preparing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. The council has yet to decide where it will commission its own LVA work but where this is not undertaken, it will look to corroborate the work that has already been submitted.	
Environment and wildlife • Tree Preservation Orders limit development potential • Local wildlife site designation • Ecological constraints	• Strutt and Parker
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Sport and recreation • Western side forms part of Woodcock Village Green subject to town and village greens legislation	• Strutt and Parker
HBC's comments: The council notes that part of the site includes the designated Woodcock Village Green and this would require further discussion. A new open spaces and recreation study is currently being conducted by Hertsmere which looks and the quality and provision of the borough's existing open spaces and sports facilities. The impact of development on the rights of way network will be considered carefully in consultation with HCC Rights of Way service. This will include both positive and negative effects such as the scope for routes to be created, improved and integrated within new development, as well as the impact on users of having to divert any existing routes.	
Services and facilities	• Strutt and Parker

• Insufficient local infrastructure • Solely proposes housing and no community facilities • Existing GP services near capacity • 320 homes are insufficient for a sustainable primary school in its own right • Summerswood Primary School operationally full	
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Transport infrastructure • Concerns are raised against significant number of HCC policy requirements	• Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	

Strategic Employment Sites

Site address/ location	Land East of Rowley Lane, Borehamwood	Site ref: EMP3 (HEL206)

Breakdown of general comments received:

Total number of comments	5
Statutory bodies and local interest groups	4
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- London Borough of Barnet
- Highways England
- Transport for London (TfL)

Site Promoter: Lichfields on behalf of Legal and General Assurance Society Limited (L&G)

Summary of site promoter's response:

Key Points Raised:

- HBC has a target of delivering 9,000 new jobs by 2036
- Outline planning permission has been granted for the southern part of EMP3
- Insufficient space for development on existing brownfield sites for employment land
- A1 and Rowley Lane provide durable defensible boundaries and that the site performs less strongly against green belt purposes than the wider parcel

Summary:
The site promoter considers the site to be appropriate development that will help to contribute towards HBC's target of delivering 9,000 new jobs, and provide part of Hertsmere's employment land requirement.

The promoter confirms that outline planning permission has been granted for the southern part of EMP3 under application 14/1735/OUT and would consider setting aside some of the site (EMP3) for sports related development. Furthermore, given that the southern part of the site has been released from the green belt the northern part (HEL387b) would make a logical extension, and therefore should be released to allow for development.

The promoter also reiterates the need to release green belt land as there is insufficient space for development on existing brownfield sites. The promoter considers that the A1 and Rowley Lane provide durable defensible boundaries and that the site performs less strongly against green belt purposes than the wider parcel shown in HBC's green belt assessment.

As part of the promoter's submission the following technical studies have been submitted; landscape and visual impact assessment, ecological technical note, transport appraisal and flood risk and drainage appraisal.

HBC's comments: The council confirms that the outline planning permission has been granted for the site (14/1735/OUT) but this permission was specifically for a sporting centre of excellence which subsequently lapsed in early 2019. The council accepts that there is a need for both employment and residential within the borough, with the South West Herts Economic Study (2016) emphasising the need for additional office development. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics including policy designation, planning history and transport.

Part of the site is however designated as under Policy SADM9 as safeguarded land for employment development. Under the current Local Plan this part of the site could be released for employment purposes following a review of the current plan, if insufficient suitable employment land is available. The impact of any development in the green belt beyond this would need to be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Local ecological sensitivity • Potential to include biodiversity enhancements • Preliminary ecological appraisal required	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Transport Infrastructure • May generate an increase in commercial traffic, including HGVs, and Barnet would expect measures to minimise the negative effects on the amenity of residents and the environment • Development will impact on the strategic road network (SRN) • Cumulative assessment of sites (including EMP3) across plan period needed highlighting residual impact on the SRN • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• London Borough of Barnet • Highways England • Transport for London (TfL)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	

Other developer/landowners responses:

No comments received.

Other potential development sites

Site address/ location	Lyndhurst Farm, Green Street	Site ref: HEL152

Breakdown of general comments received:

Total number of comments	5
Statutory bodies and local interest groups	4
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- National Grid
- The Woodcock Hill Village Green Members

Site Promoter: Woods Hardwick on behalf of Hayesgate Plant Hire Ltd

Summary of site promoter's response:

Key Points Raised:

- Highly sustainable location
- Council has accepted some development may be acceptable on PDL land
- Wildlife designation is no longer valid given that it is arable land
- Would not jeopardise the wider green belt given the limited area proposed
- Possibility for developing in conjunction with BE2 could provide a second access and frontage from Cowley Hill

Summary:
The site is considered to be a highly sustainable location situated on the northern margin of Borehamwood and would be able to accommodate c. 100 dwellings.

The site is currently in an untidy and derelict state which includes areas of hardstanding and derelict buildings (and discarded industrial waste); subsequently it is stated the site can be considered to be brownfield land. This has been confirmed through pre-application discussion with the council who accepted that some form of development may be acceptable on the previously developed part of the site.

The promoter states that the site would bring opportunities for a mix of new homes including affordable and self-build, and that it would provide a sustainable option given its scope to co-ordinate with other sites and its proximity to Leeming Road shops. The site also will also enhance the character and visual amenity of the area by squaring off the extent of the built margin.

The promoter does acknowledge that there are certain development constraints. However, it suggests that that the wildlife designation is no longer valid given that it is arable land, and that the size of the land released would not jeopardise the wider green belt given its limited northern incursion. Furthermore, HEL152's current status as green belt land is not considered to be reflective of the state of the site.

The promoter highlights the possibility for developing this site in conjunction with BE2, due to their proximity, and the benefits and opportunities this could provide. This would include the provision of a second access from Cowley Hill, a greater number of homes and improvements to the character of the area including a frontage along Cowley Hill.

HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work will be required where deemed to be necessary. Officers are liaising with HCC Environment and resource planning regarding environment and wildlife issues. The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

The promoter points out that there is the possibility for this scheme to be developed in conjunction with BE2. The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground. However, measures will need to be taken by the site promoter/s to show that the scheme is deliverable and that all landowners are willing to work together on one collaborative scheme. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics, including the existing uses on the site and transport.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Considered to be unsuitable	• The Woodcock Hill Village Green Members
HBC's comments: The comment is noted.	
Environment and wildlife • Low ecological sensitivity • North east side is part of much larger Lyndhurst Farm 'eco site'. • Site has mixture of habitats and great crested newts have been recorded in the vicinity • Trees will have potential for nesting birds • Advise that a preliminary ecological appraisal is conducted	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • Not supported for development as it will have a significant impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Physical considerations • Overhead powerlines. Statutory safety clearances must not be	• National Grid

infringed	

HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.

Other developer/landowners responses:
No comments received.

Site address/ location	Elstree Gate	Site ref: HEL160

Breakdown of general comments received:

Total number of comments	5
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	2

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Other developers/ landowners
- Turley

Site Promoter: Gerald Eve LLP

Summary of site promoter's response:
No representations received

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Support housing development	• The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.	
Environment and wildlife • Low ecological sensitivity • Potential for roosting bats and birds	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • Support for development but will have an impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will also need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Surrounding uses • Should recognise the proximity to and importance of neighbouring employment sites • Development should integrate with surrounding uses effectively • If proposed should have own mitigation measures so to not prejudice employment sites	• Turley
HBC's comments: The potential impact that any development would have on neighbouring sites of a differing land use (and vice-versa) will be taken into consideration when considering land use allocations. The council will seek to avoid "Bad Neighbour" situations from arising which, unless adequate mitigation can be put in place, would either prejudice the operation of existing commercial or other activities or would lead to poor environmental conditions within the new allocation.	

Site address/ location	Evelyn House, 3 Elstree Way, Borehamwood	Site ref: HEL163

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Site Promoter: Planning Potential

Summary of site promoter's response:

No representations on PSHE report received

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Support housing development	• The Woodcock Hill Village Green Members
HBC's comments: The comment is noted.	
Environment and wildlife • Low ecological sensitivity • Potential for roosting bats and birds	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • Supported for development but will have an impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will also need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Other developer/landowners responses:

No comments received.

Site address/ location	1 Elstree Way, Borehamwood	Site ref: HEL166

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Site Promoter: ISBA

Summary of site promoter's response:

Key Points Raised:

- The site is being promoted for employment purposes only
- Already identified in Local Plan as within an Employment Area
- Opportunity for a major gateway building
- Highly sustainable and accessible location for an office development

Summary:

The promoter confirms that the site is being promoted for employment purposes only. The site is 0.6ha and located on the junction of Elstree Way and Manor Way. Currently, the site is identified in the Site Allocations and Development Management Policies Plan 2016 as an employment area. (Policy SADM5)

The change in approach is a result of the increase in office to residential conversions under Permitted Development, and the increased need for office development in Elstree / Borehamwood. The promoter believes that this site will redress the balance between office and residential development and create an opportunity for a major gateway building, which could spur on the progression of Elstree Way as an employment location of choice.

The site is located along Elstree Way, a main road leading into Borehamwood Town Centre. The promoter considers the site to be in a highly sustainable and accessible location, which can support a car-free development, with public transport and active transport being attractive options. Elstree and Borehamwood Rail Station is located around 1.6km walking distance away. In addition, the site is in close proximity to bus stops, located 40m away on Elstree and Manor Way, and the frequency of services mean that public transport represents a realistic and attractive method of transport to the site.

The employment use for the site is supported by the existing Local Plan and should be carried through to the new Local Plan.

HBC's Comments:
The council confirms that the site is located within a designated employment area (Elstree Way). Policies CS8 and SADM5 in the current adopted Local Plan encourage economic development in this location. The council accepts that there is a need for both employment and residential within the borough. The South West Herts Economic Study (2016) does however emphasise the need for additional office development. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics including policy designation, and transport.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Support housing development	• The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each	

site will be assessed individually to determine whether it will be best suited to residential or employment. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.

Environment and wildlife • Low ecological sensitivity • Potential for roosting bats and birds	• Hertfordshire County Council Growth and Infrastructure Unit

HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.

Services and facilities • Support for development but will have an impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council

HBC's comments:

Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.

Full consideration will need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Other developer/landowners responses:
No comments received.

Site address/ location	1 – 3 Manor Point , Manor Way, Borehamwood	Site ref: HEL167

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Site Promoter: ISBA

Summary of site promoter's response:

No representations on PSE report received

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Support development of homes	• The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.	
Environment and wildlife • Low ecological sensitivity • Potential for roosting bats and birds	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • Supported for development but will have an impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Other developer/landowners responses:

No comments received.

Site address/ location	Land North of Barnet Lane 1 and Land North of Barnet Lane 2	Site ref: HEL197a and HEL197b

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Site Promoter: Planning Potential on behalf of Inland Homes

Summary of site promoter's response:

Key Points Raised:

- Capable of delivering 105 new dwellings, within the first 5 years of the local plan
- Would seek to bring both sites forward together HEL197a and HEL197b
- Various constraints acknowledged
- Suitable for release from the green belt, as is physically and visually contained
- Logical extension to Borehamwood
- Disputes the housing figure stated within the PSHE document and seeks clarification in the drop from 600 to 500

Summary:
The site promoter considers the site represents an important opportunity for new residential dwellings as it is capable of delivering 105 new dwellings, within the first 5 years of the local plan. The promoter also urges the council to not ignore small sites, especially those in highly sustainable locations and emphasises the importance of allocating small sites as well as strategic sites. The proposal has been supported by a transport strategy, and a landscape, ecology and arboricultural assessment. The promoter clarifies that whilst the site has been previously promoted as two separate parcels, they would now seek to bring both sites forward together.

The site is located within the green belt and flood zone 1, with the northern portion of the site identified as a LWS. A small parcel of temporary structures also exists in the corner of the site beyond which are TPO trees. The site is considered by the promoter to be suitable for release from the green belt, as it is physically and visually contained by well-established man-made and natural features, and forms a small, less essential part of the gap between Borehamwood and Greater London.

The promoter disputes the housing figure stated within the PSHE document and seeks clarification in the drop from 600 to 500 since the Issues and Options stage. It advises that the council should increases its housing target to accommodate the fully objectively assessed need (and a meaningful buffer) and the expected shortfalls arising from within the housing market area.

The promoter considers the site to be large enough to potentially secure benefits for the council and community, through affordable housing and open space. Furthermore, the site would form a logical urban extension to Borehamwood which given its position in the settlement hierarchy should be considered the most sustainable location.

As part of the promoter's submission the following technical studies have been submitted; transport strategy, representations in respect to landscape, ecological and arboricultural circumstances.

HBC's Comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The promoter has indicated that they would be seeking to bring forward both HEL197a and HEL197b together. The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground. However, measures will need to be taken by the site promoter/s to show that the scheme is deliverable and that all landowners are willing to work together on one collaborative scheme. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics, including flood management, LWS designation, TPO designation and transport.

The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Do not supporting housing development	• The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment where sites are to be allocated. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.	
Environment and wildlife • High ecological sensitivity for HEL197b due to Elstree Tunnel Grasslands LWS • Low ecological sensitivity for HEL197a • Potential for nesting birds in trees across both sites. Possible reptiles in HEL197b • Potential ecological constraints if development affects LWS • Advise that a preliminary ecological appraisal is conducted	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • Not supported for development (together BE6) as it will have an significant impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.	

Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Other developer/landowners responses:
No comments received.

Site address/ location	Land at Stangate Crescent and Wandsworth Park near the Barnet by-pass, Borehamwood	Site ref: HEL204

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Site Promoter: Transport for London Commercial Development

Summary of site promoter's response:

Key Points Raised:

- Would encourage a greater residential capacity than stated by the council

Summary:
The promoter considers the site suitable for residential development and would encourage a greater residential capacity than the 50 stated. This would ensure that the development opportunity is optimised. The promoter will undertake feasibility studies and suggests a design led approach to determining the capacity.

HBC's comments: The housing numbers stated within the report are based on a standard HELAA methodology agreed in consultation with neighbouring authorities. Further information on the breakdown of the capacity figures can be found within the HELAA document. It should be noted however that these figures may change as a number of the capacities were calculated based on there being no absolute constraints on some sites. In some instances, site boundaries have also changed followed representations from site promoters.

Statutory bodies and local interest groups:
N.B Respondents will be mentioned if they say anything that relates to any of the substantive points listed. This will result in some respondents being listed next to a sub point that they have not raised.

Substantive points raised	Responder/s
Principle of development • Support housing on the site	• The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment where sites are to be allocated. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.	
Environment and wildlife • Moderate if trees affected • Bats recorded in vicinity • Retain as many trees as possible as ecological sensitive • Advise that a preliminary ecological appraisal is conducted	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • Not supported for development as it will have a significant impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when	

allocating any new sites, and determining the scale, location and make-up of these allocations.

Full consideration will need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Other developer/landowners responses:
No comments received.

Site address/ location	Land North of Barnet Lane	Site ref: HEL209b

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Site Promoter: Rinsler and Co

Summary of site promoter's response:
No representations on PSHE report received

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Do not support housing development	• The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.	
Environment and wildlife • High ecological sensitivity • Potential for reptiles, nesting birds and possibly bats • Advise that a preliminary ecological appraisal is conducted • Part of Elstree Tunnel Grasslands LWS	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • Not supported for development as it will have an significant impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Landownership and assembly • Along with BE6 unsuitable for housing	• Elstree and Borehamwood Town Council
HBC's comments: The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground.	

Other developer/landowners responses:
No comments received.

Site address/ location	Manor Place Industrial Estate, Manor Way, Borehamwood	Site ref: HEL217

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Site Promoter: Savills on behalf of Legal and General Property Partners (Industrial fund) Ltd and General Property Partners (Industrial) Nominees Ltd

Summary of site promoter's response:

Key Points Raised:

- Site capable of delivering 40 dwellings
- Currently occupied by a two storey industrial building in the south west corner of the wider industrial park
- Within Elstree Way Corridor AAP
- Sustainable location within close proximity of town centre and other facilities
- Local authorities should identify at least 10% of their housing requirement on sites no larger than 1ha
- Brownfield land within an established settlement

Summary:

The site promoter considers the site is capable of delivering 40 dwellings as opposed to the 30 dwellings stated in the council's assessment and feels that this will be a more efficient use of the site. This is particular the case when considering its sustainable location and that the Elstree Way Corridor AAP seeks densities between 50dph to 80dph.

The site is currently occupied by a two storey industrial building comprising four industrial warehouse units with access to the site from Langdale Terrace. The site is currently bound by residential dwellings to the west and industrial buildings to the north and south. It is situated in the south west corner of the wider industrial park and within the Elstree Way Corridor with the AAP identifying the site as an opportunity area. (site 12: Manor Way)

The site is considered to be in a sustainable location within close proximity of the town centre and other facilities, including healthcare and education. The railway station is 1.3km away and the site is well connected to the highway network.

The promoter reiterates the point that local authorities should identify at least 10% of their housing requirement on sites no larger than 1ha, and that this site would represent an achievable and available site that would relieve pressure on less suitable sites. Furthermore, substantial weight should be given to the site being brownfield land within an established settlement.

HBC's comments: The housing numbers stated within the report are based on a standard HELAA methodology agreed in consultation with neighbouring authorities. Further information on the breakdown of the capacity figures can be found within the HELAA document. It should be noted however that these figures may change as a number of the capacities were calculated based on there being no absolute constraints on some sites. In some instances, site boundaries have also changed followed representations from site promoters.

The council accepts that the site is located within a designated opportunity site within the Elstree Way Corridor Action Plan. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics, including current policy designation, and transport.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Support housing development	• The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.	
Environment and wildlife • Limited protected species	• Hertfordshire County Council Growth and Infrastructure Unit
Services and facilities • Supported for development but it will have an impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Other developer/landowners responses:

No comments received.

Site address/ location	Organ Hall Farm, Theobald Street	Site ref: HEL218

Breakdown of general comments received:

Total number of comments	5
Statutory bodies and local interest groups	4
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- National Grid
- The Woodcock Hill Village Green Members

Site Promoter: Star Planning on behalf of High Moon Limited

Summary of site promoter's response:

Key Points Raised:

- The site has distinct boundaries creating sense of enclosure from wider green belt
- Accessible location with ready access to the town centre and local facilities
- Access into the site achievable
- Development would avoid power lines and floodplain

Summary:
The promoter is supportive of HBC's green belt assessment and believes that the site should be considered for green belt release. The site has distinct boundaries including the railway, Theobald Street and Borehamwood residential area which contribute to a sense of enclosure and prevent the development of this site impacting upon the green belt purpose of preventing coalescence between Radlett and Borehamwood.

The promoter considers the site to be in an accessible location with ready access to the town centre, Merryfield Community Primary School and the Leeming Road shops (within walking distance), and bus services along Theobald Street. Access to the site will be achieved in the vicinity of the current access to the building complex.

The promoter has acknowledged that there are constraints on the site, in particular the powerlines and floodplain. However, the intention is to keep the land north of the powerlines open and undeveloped and have no built forms on the floodplain associated with Tykes Water. The public footpath which crosses part of the site can be retained.

HBC's comments: The promoter has noted that there are physical constraints with the site. FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment agency and mitigation work will be required where deemed to be necessary. In relation to the powerlines the council will reiterate the points raised by the national grid that statutory powerline safety clearances must not be infringed. The national grid has provided the council with a list of the potential development sites which powerlines traverse.

Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics, including flood management, powerlines, the access and transport.
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Statutory bodies and local interest groups:
N.B Respondents will be mentioned if they say anything that relates to any of the substantive points listed. This will result in some respondents being listed next to a sub point that they have not raised.

Substantive points raised	Responder/s
Principle of development • Do not support housing development	• The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment where sites are to be allocated. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.	

Environment and wildlife • Low ecological sensitivity • Trees have potential for nesting birds and possibly bats • Priority butterfly species recorded in area	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • Not supported for development as it will have an significant impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Physical considerations • Overhead powerlines. Statutory safety clearances must not be infringed	• National Grid
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Other developer/landowners responses: No comments received	

Site address/ location	1 and 2 Borehamwood Industrial Park, Rowley Lane, Borehamwood	Site ref: HEL233

Breakdown of general comments received:

Total number of comments	5
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	2

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Other developers/ landowners
- Turley

Site Promoter: Gerald Eve LLP

Summary of site promoter's response:

No representations on PSHE report received

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Support housing development	• The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.	
Environment and wildlife • Low ecological sensitivity • Trees have potential for nesting birds and possibly bats • Limited ecological opportunities	• Hertfordshire County Council Growth and Infrastructure Unit
Services and facilities • Supported for development but will have an impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Surrounding uses • Borehamwood industrial park is an important piece of employment land and should be retained • Residential development would likely prejudice and constrain the distribution centre nearby and future opportunities for employment	• Turley
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment where sites are to be allocated. The potential impact that any development would have on neighbouring sites of a differing land use (and vice-versa) will be taken into consideration when considering land use allocations. The council will seek to avoid "Bad Neighbour" situations from arising which, unless adequate mitigation can be put in place, would either prejudice the operation of existing commercial or other activities or would lead to poor environmental conditions within the new allocation.	

Site address/ location	Allum Lane West, Elstree Village	Site ref: HEL341

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Site Promoter: King and Co

Summary of site promoter's response:

Key Points Raised:

- Welcome any proposals that involve joining with BE1 (HEL393)
- May be best delivered as part of a cohesive scheme
- Includes proposals to extend the Allum Lane Cemetery
- The site makes a limited positive contribution to the green belt
- The site is in an accessible location
- Could provide a mix of new homes

Summary:

The promoter points out that they are promoting both HEL341 and the land sandwiched between the refuse recycling centre and western border of BE1 (HEL393). As such the promoter welcomes any proposals that involve joining the sites together and has already been in discussion with the representatives of BE1 (HEL393) as this site may be best delivered as part of a cohesive scheme.

It is suggested that HEL341 can accommodate 40-50, with the additional land on the border supporting around 20 units, meaning that the wider land assembly, including BE1, could accommodate 350 homes. The promoter considers that a proposal which includes the wider land assembly will result in less green belt harm.

The scheme also includes proposals to extend the Allum Lane Cemetery by around 1 hectare up to Allum Lane, thereby providing a cemetery frontage which itself acts as a constraint to further development, and enough land for dedications for the next 10 years.

The promoter identifies a number of challenges including its impact on the green belt. However, it considers the site to make a limited positive contribution to the green belt or to have a significant impact on the character and landscape of the area. A lack of granularity when assessing the green belt has been given as a reason for the relatively high scoring in the council's green belt assessment. The promoter also highlights other constraints associated with the site including the waste recycling centre, a lack of school and GP places, and congestion along Allum Lane and has indicated a commitment to mitigating against these constraints and providing school facilities as required, as well as entering into discussions about the delivery of a GP surgery.

If developed the site could provide a mix of new homes, including affordable housing and self-build. The site is considered to be in an accessible location, situated 800m from the station with various bus routes operating along Allum Lane.

As part of the promoter's submission the following technical studies have been submitted; highways note, green belt note, and engineering note.

HBC's comments: It is noted that the promoter would welcome proposals that involve BE1 and considers that this site may be best delivered as a cohesive scheme. The council does not actively discourage multiple sites being promoted as part of one collaborative scheme and recognises that this may open up further opportunities for developing better outcomes on the ground. However, measures will need to be taken by the site promoter/s to show that the scheme is deliverable and that all landowners are willing to work together on one collaborative scheme.

A lack of granularity has been raised as an issue with the green belt assessment. The council conducted a two stage assessment with stage 1 typically covering much larger areas and stage 2 being a more fine grained assessment. This enabled the individual sites or land promotions to be considered as a smaller sub-area and the study is considered to have been sufficiently fine grained in its analysis of land. The strategic contribution that this sub area made to the wider parcel was also considered.

Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specific issues, including proposals to extend the Allum Lane Cemetery, the waste facility, and transport.

Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Do not support housing	• The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment where sits are to be allocated. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.	
Environment and wildlife • Low ecological sensitivity • Potential to incorporate biodiversity enhancements	• Hertfordshire County Council Growth and Infrastructure Unit
HBC comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	

Services and facilities • Not supported for development as it will have an significant impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council

HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.

Full consideration will need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Other developer/landowners responses:
No comments received.

Site address/ location	Well End Lodge, Well End Road	Site ref: HEL369

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Site Promoter: The Landowner

Summary of site promoter's response:

Key Points Raised:

- Not located within open countryside
- A new primary school has also been proposed nearby and development of Hertswood Academy is already underway
- Some development could be provided via PDL / existing buildings
- Recommended for further consideration in HBC green belt assessment
- In keeping with type of housing in Well End
- Achievable within the first 5 years of the local plan
- Directly served by Well End Road and Buckettsland Lane

Summary:

The site is surrounded by a scout's centre and a primary school to the north, residential dwellings and multiple self-contained units to the east, and woodlands and arable fields to the south and west. Furthermore, outline planning permission has been given to 58 dwellings to the south and west of the property (17/2494/OUT). The promoter therefore considers the site to not be located within open countryside and instead the character of the area contains a mixture of uses including residential, educational (Sitara Toto Montessori) and recreational (Well End Activity Centre, and Well End Horse Farm and Stables), on top of the existing woodlands and countryside. A new primary school has also been proposed towards Cowley Hill (17/2493/OUT) and construction of Hertswood Academy is already underway.

The site is currently residential and a house was previously located at the northern end of the site and so essentially there is no change in use. The promoter states that a certain amount of development could be provided via PDL. There is also some opportunity to rebuild and convert the existing buildings. The site also contains Well End Lodge which is locally listed, yet has been unkept for decades.

The site is recommended for further consideration as part of a strategic cluster within HBC's green belt assessment. Furthermore, outline planning permission has been granted on the fields which separate the property from Borehamwood. This site would make a logical extension with the new boundary to the green belt being Well End Road.

The site would be in keeping with the type of detached family housing within Well End and be achievable within the first 5 years of the local plan. The promoter considers there to be a huge demand for this type of home in the area with limited new development having taken place within the vicinity of the site. The site is directly served by Well End Road and Buckettsland Lane with the A1 and M25 close by.

HBC Comments: The council accepts that Arup's green belt assessment identified the site as suitable for consideration for green belt release yet reiterates the importance of carefully considering all factors that influence development. In terms of the surrounding uses and designations these will be considered as part of the process of further assessing he site. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics including transport, existing uses and designations.

The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Consider the site to be unsuitable	• The Woodcock Hill Village Green Members
HBC's comments: The comment is noted.	
Environment and wildlife • Low to moderate ecological sensitivity • Trees have potential for nesting birds and bats as well as buildings. Site may need to assessed for these species • Retain trees	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • Not supported for development as it will have an significant impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Other developer/landowners responses:

No comments received.

Site address/ location	Old Haberdashers Sports Ground, Croxdale Road, Borehamwood	Site ref: HEL371

Breakdown of general comments received:

Total number of comments	5
Statutory bodies and local interest groups	4
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- Sport England
- The Woodcock Hill Village Green Members

Site Promoter: Fairview New Homes Ltd

Summary of site promoter's response:

Key Points Raised:

- Highly sustainable location and site could provide a minimum of 75 units
- Development can overcome constraints listed in the HELAA.
- Council should allocate a range of sites to ensure they are available to deliver dwellings across the entirety of the plan period
- Proposal includes a significant amount of open space for public use, thereby improving on the current situation
- OHA have a requirement to provide facilities for their members thereby ensuring re-provision of sport pitches elsewhere
- Council should allocate sites available for development outside of the green belt first

Summary:
The promoter considers the site to be in a highly sustainable location and that development would not cause harm to levels of open space provision. It disputes that there are significant technical constraints (mentioned in HEELA) with the site that make it unsuitable for consideration, and believes that the proposal for residential development can overcome these concerns. The promoter also reiterates that there is high demand for housing within the borough, and that the council should allocate a range of sites to ensure they are available to deliver dwellings across the entirety of the plan period. The site is considered to be capable of providing a minimum of 75 units.

The proposal includes a significant amount of open space for public use, thereby improving on the current situation where the whole site is occupied as a private OHA member-only sports ground. Furthermore, the OHA have a requirement to provide facilities for their members thereby ensuring that there will be a re-provision of sport pitches elsewhere.

The promoter reasons that the council should allocate sites available for development outside of the green belt first, and that this site should be considered for residential development whereas other sites within the green belt would be better served to provide alternatives sport facilities for the OHA. A new sports ground and genuinely accessible open space are considered to be more appropriate uses for the green belt.

HBC's comments: The council accepts that in order to address central government's requirements to meet OAN for housing there will need to be a step change in the quantum of development coming forward. The site is however open space, protected under Local Plan policy SADM34 and a key factor in the determination of sites for allocation will be the deliverability of the scheme. Where there is an existing land use, relevant needs assessments will be required to demonstrate any existing development or activity is surplus to requirements, as well as being guided by the new open spaces and recreation study which is currently being undertaken (jointly with other south west Hertfordshire authorities) and which assesses the quality and provision of the borough's existing open spaces.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Low ecological sensitivity • Priority species white-letter hairstreak butterfly recorded • Potential to include biodiversity enhancements • Historic orchard sites in vicinity	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Landownership and assembly • OHRFC should not in any way benefit if this land were to be developed The land is only leased by OHRFC; HBC own the land	• The Woodcock Hill Village Green Members
HBC's comments: The site is currently owned by the council. Furthermore, the benefits of site disposal are not planning considerations, and therefore any potential future benefits for the parties involved will be not be considered as part of the process of preparing the Local Plan.	
Services and facilities • Not supported for development as it will have a significant impact in the immediate vicinity and an effect on the infrastructure overall • The allocation of this site would only be acceptable in principle if the sports ground was replaced with equivalent or better facilities in accordance with paragraph 97 of the NPPF and Sport England's playing fields policy	• Elstree and Borehamwood Town Council • Sport England
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Other developer/landowners responses:

No comments received.

Site address/ location	Organ Hall Farm (buildings), Theobald Street, Borehamwood	Site ref: HEL384

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Site Promoter: Star Planning on behalf of High Moon Limited

Summary of site promoter's response:

Key Points Raised:

- Suitable for circa 30-35 residential units rather than the 13 indicated
- Could potentially be classified as PDL given existing range of buildings
- Accessible location with ready access to the town centre and local facilities
- Existing gated access which provides access to both this site and HEL218

Summary:
The promoter considers the site to be suitable for circa 30-35 residential units rather than the 13 indicated in the HELAA. The site could potentially be classified as PDL given the existing range of buildings that occupy the site.

The promoter considers the site to be in accessible location with ready access to the town centre, Merryfield Community Primary School, the Leeming Road shops (within walking distance), and bus services along Theobald Street. The promoter has responded to the council's HELAA regarding site access and stated that there is an existing gated access which provides access to both this site and HEL218. This access will be used and Highways consultants have confirmed that this can be upgraded to a priority junction.

The public right of way can be retained to the southern part of the site and there is no covenant affecting development. The restriction which exists relates to overage payment to the previous owners who are supportive of the site being redeveloped for residential development.

HBC comments: The housing numbers stated within the report were based on those set out in the draft HELAA. However, this was an oversight as existing development comprises agricultural buildings and so would not fall within the definition of previously developed land where under paragraph 145 of NPPF, some redevelopment could potentially be regarded as appropriate in the Green Belt. The HELAA itself is being updated to reflect this.

The impact of development on the rights of way network will be considered carefully in consultation with HCC Rights of Way service. This will include both positive and negative effects such as the scope for routes to be created, improved and integrated within new development, as well as the impact on users of having to divert any existing routes.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Do not support housing development	• The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment, where sites are to be allocated. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.	

Environment and wildlife • Low ecological sensitivity • Potential for nesting birds and bats as well as buildings. Site may need to assessed for these species • Across the road is Organ Hall Pastures LWS	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • Not supported for development as it will have an significant impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Other developer/landowners responses:
No comments received.

Site address/ location	The Point, Shenley Road, Borehamwood	Site ref: HEL388

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Site Promoter: Rapleys

Summary of site promoter's response:
No representations on PSHE report received.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Low ecological sensitivity • Potential for roosting bats and nesting birds	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • Supported for development but will have an impact in the immediate vicinity and an effect on the infrastructure overall • Require more information but must not lose the cinema and bingo hall	• Elstree and Borehamwood Town Council • The Woodcock Hill Village Green Members
HBC's comments: Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The importance of retaining and/or improving leisure facilities on the site will form an important part of any further assessment of the site having regard to the approach set out in current Core Strategy Policy CS19 (Key Community Facilities). Full consideration will need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Other developer/landowners responses:
No comments received.

Site address/ location	Brook Road Car Park, Brook Road, Borehamwood	Site ref: HEL405

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Elstree and Borehamwood Town Council
- The Woodcock Hill Village Green Members

Site Promoter: Asset Management, Hertsmere Borough Council

Summary of site promoter's response:
No representations on PSHE report received

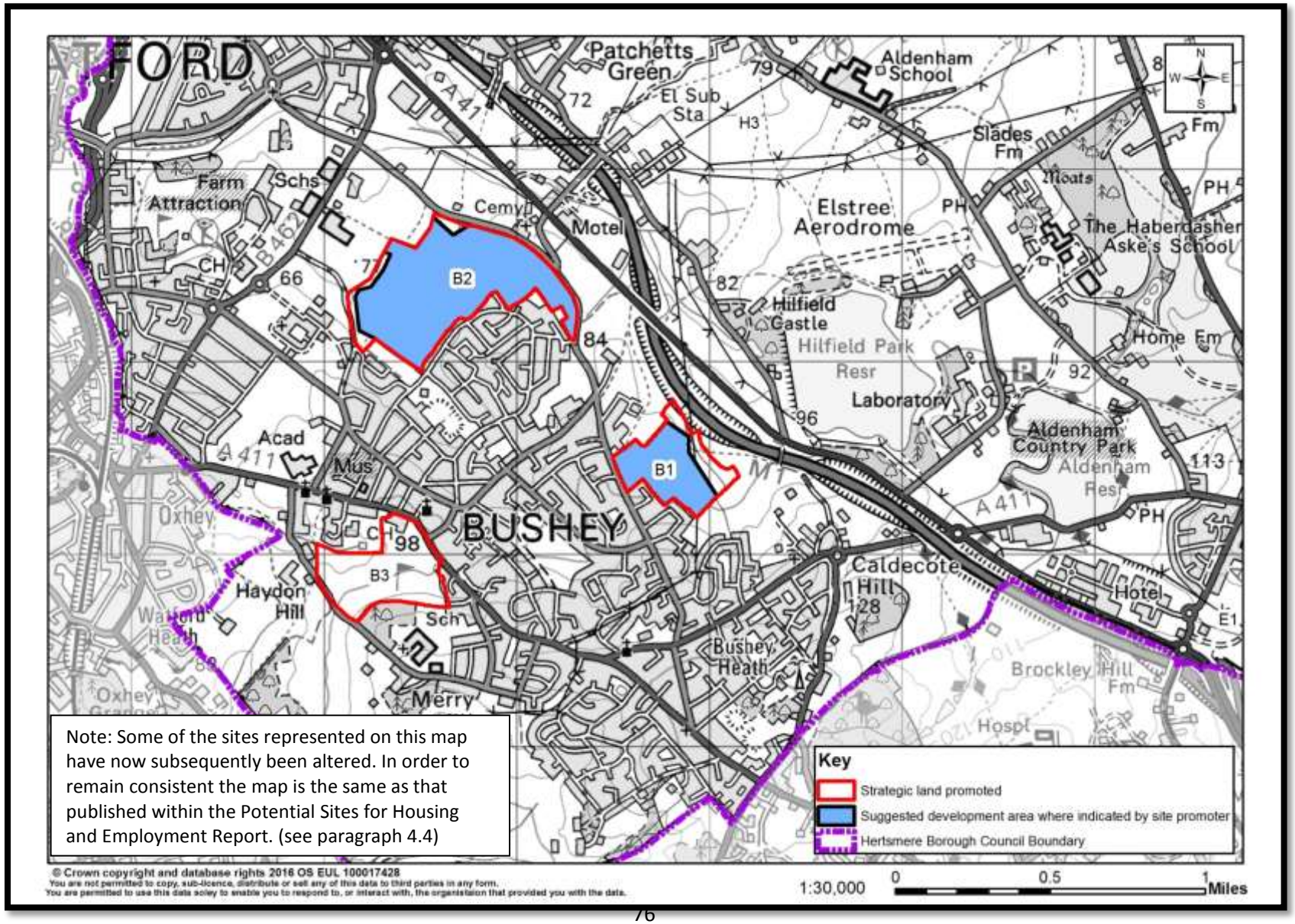
Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Support development of homes	• The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.	
Environment and wildlife • Low ecological sensitivity	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues**.**	
Services and facilities • Supported for development but will have an impact in the immediate vicinity and an effect on the infrastructure overall	• Elstree and Borehamwood Town Council
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

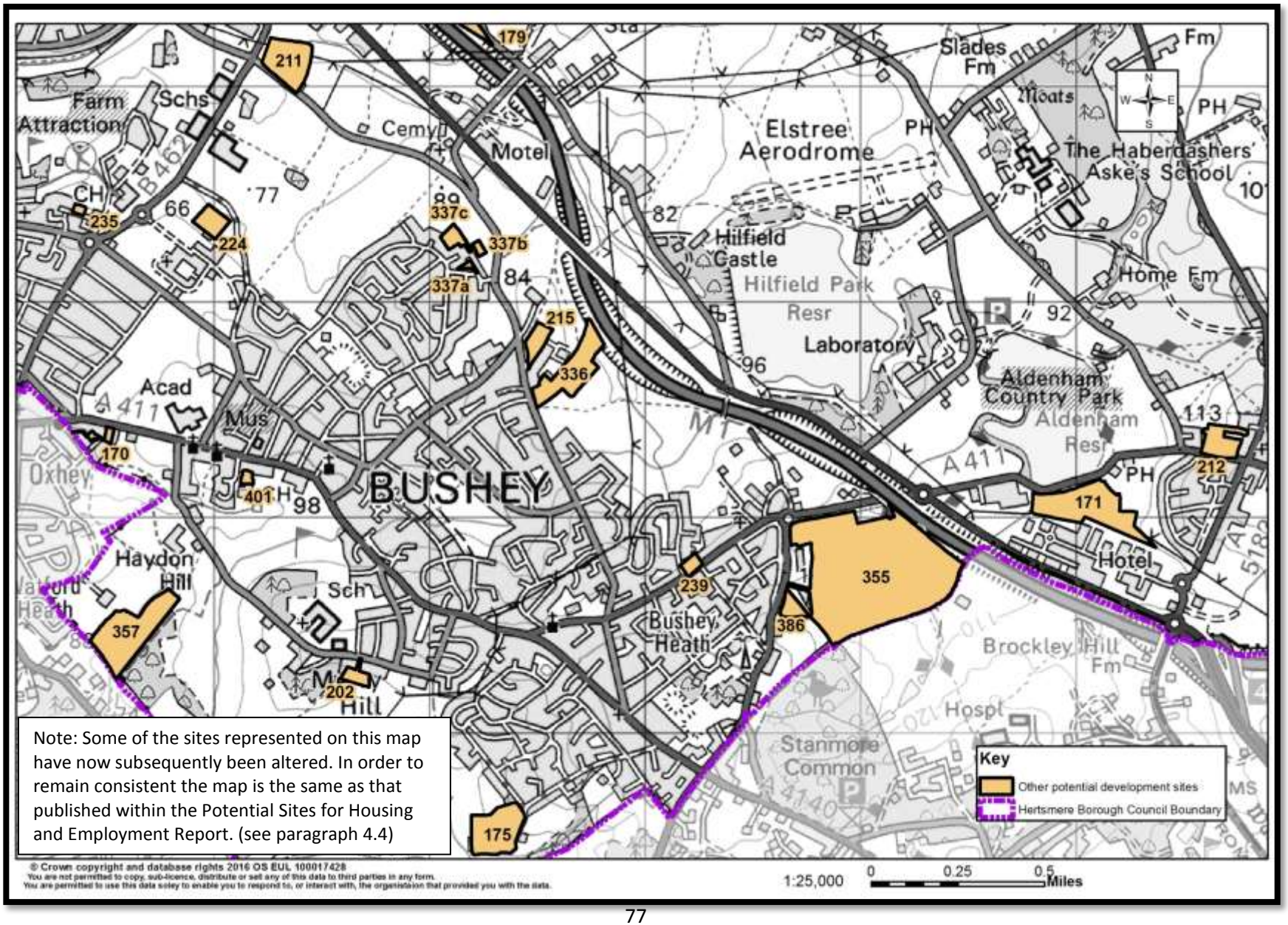
Other developer/landowners responses:
No comments received.

8. Summaries of feedback from site promoters, statutory bodies and local interest groups – Bushey

8.1 - Map of Bushey strategic housing sites



8.2 - Map of Bushey other potential development sites



8.3 - Feedback forms – Bushey

Strategic Housing Sites

Site address/ location	Land south-east of Hart's Farm Stables, Bushey	Site ref: B1 (HEL201)

Breakdown of general comments received:

Total number of comments	10
Statutory bodies and local interest groups	7
Developers/ landowners (includes site promoter)	3

Site Promoter: Barton Willmore

Statutory bodies and local interest groups

- Thames Water
- Hertfordshire County Council
- Environment Agency
- Highways England
- Bushey and District Footpaths Association
- Little Bushey Community
- Transport for London (TfL)

Other developers/ landowners

- Strutt and Parker
- Fisher German on behalf of TLC Group

Summary of site promoter's response:

Key Points Raised:

- Offer a 'design and build' solution for a new GP surgery
- Ground condition and flood issues addressed
- Various social, economic and environmental benefits identified
- Analysis of other strategic sites promoted in the area
- Emphasise need for a balanced portfolio of sites to meet housing need over plan period

Summary:

The promoter has sought to address a number of the points raised either in the PSHE report or subsequently by local residents. With regard to local GP provision, a design and build solution for a new GP surgery is offered and the track record of the developer in providing this elsewhere is highlighted.

The flooding and ground condition issues are not considered to be a constraint to development. It is clarified that development would take place outside of Flood Zone 2 and 3, other than public open space and outdoor recreation. A 'managed drainage solution' would be provided to alleviate the current lack of on-site attenuation which results in water flowing to the lowest point. In terms of ground conditions, the material is identified as spoil from the motorway construction and as inert waste, would be dealt with in the 'usual way'. The site promoter indicates that there are unlikely to be any deliverability or viability constraints affecting the land.

An alternative assessment of the contribution the site makes to the green belt, concludes it makes a weak contribution to purpose 2 and moderate contribution to purpose 3, compared to the scores in the council's assessment. The build out rates in the council's HELAA are not supported.

Various economic, social and environmental benefits are listed including the fact that new residents will help sustain existing shops and local services/facilities; significant funding towards new infrastructure; 350 market and affordable homes; 7.5ha public open spaces; and a permanently defensible green belt boundary in the form of the M1. The site is identified as being well connected in terms of public transport.

An analysis of the other strategic sites in Bushey is undertaken. In respect of B2, the absence of any track record in delivering strategic scale development is highlighted and lack of technical or environmental work to support the proposal is highlighted by the site promoter. The importance of the green belt in this location in preventing coalescence between Bushey and Watford is emphasised, having regard to the Stage 2 green belt assessment. In respect of B3, the absence of supporting information or HELAA submission is highlighted, with the deliverability of the site therefore questioned. The importance of the green belt in this location, with regard to the special character of the historic core of Bushey is also highlighted having regard to the green belt assessment.

HBC's comments: The availability of services and facilities, taking account of the needs for both existing and future residents, will be a key consideration and the promoter's response regarding the provision of a GP surgery is noted. Clearly, other services will be impacted including education provision and the council would wish to understand how this is being addressed, on or off-site.

Addressing flood risk will be key and the promoter has indicated development would take place outside of both FZ2 and 3. However, it would also be necessary to demonstrate that flood risk to existing properties in the area would not be exacerbated and wherever possible, it could be reduced through attenuation measures.

The comments on build out rates in the HELAA are noted. The HELAA cannot predict exactly when sites will come forward but takes account of published data on build out rates (such as in the NLP report and Letwin review in 2016 and 2018 respectively). The table in paragraph 2.45 is based on a certain number of years for first completion, following an allocation in the plan, rather than publication of the HELAA itself. The comments on the green belt assessment are also noted in relation to preventing coalescence between Bushey and Watford.

The promoter has commented on the credentials of other sites in the area being promoted. The council will assess the opportunities and constraints of all potential strategic growth locations and as part of the Sustainability Appraisal/SEA, all reasonable alternatives will need to be properly considered. This would include all other strategic sites, both in Bushey and across other parts of the borough.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Likely need for new secondary schools sites in Bushey regardless of level of development in the area • Number of homes insufficient for new primary school. Local schools are full and heavily oversubscribed • Requires 60 units of extra care housing, of which 12 should be accessible with disabilities • Likely need for upgrades to the wastewater network • A housing and infrastructure phasing plan required to determine capacity within the water network	• Hertfordshire County Council Growth and Infrastructure Unit • Thames Water • Environment Agency • Little Bushey Community
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) will continue to liaise with infrastructure providers and Hertfordshire County Council.	
Environment and wildlife • No protected species recorded • Grassland may have potential for reptiles/ badgers and trees will have potential for nesting birds • Low-moderate ecological sensitivity due to size of site • 'A haven for wildlife which would be destroyed.'	• Hertfordshire County Council Growth and Infrastructure Unit • Bushey and District Footpaths Association
HBC's comments: Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust, are being consulted through the Local Plan process. A Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development and mitigation and biodiversity offsetting will need to be considered to compensate for any habitat loss	

Physical considerations • Area known locally to flood • Development should be directed away from areas of flood risk with flood risk to existing communities reduced where possible • Potential for any development to improve existing flood risk in downstream areas • Flood Zone 3b (functional floodplain) should be safeguarded from development • Consider how flood storage can be protected and maximized across the borough • Construction fill / spoil within the site following construction of M1	• Environment Agency • Thames Water • Little Bushey Community • Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: The many responses from the local community on flooding and flood risk in the area have been carefully reviewed. The council recognises that development should not take place within FZ3b and would require any allocations to direct development away from the functional floodplain. Any development should not exacerbate existing flood risk in the area.	
Transport infrastructure • Sites (including B1) have potential to impact on Strategic Road Network (SRN) • Cumulative assessment of sites across plan period needed highlighting residual impact on the SRN • Increased traffic onto Little Bushey Lane • Lack of high quality public transport • B1 is not served by any bus routes • Scale of development means new bus services or service diversions unlikely to be supported. • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes • More sustainable sites elsewhere • Local traffic surveys undertaken underpin residents' concerns	• Hertfordshire County Council Growth and Infrastructure Unit • Highways England • Transport for London (TfL) • Little Bushey Community
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. Further traffic modelling for strategic allocations will be required to incorporate the surrounding strategic and local road network. This will enable the potential impact of development on both the A1 and other strategic routes, as well local roads, to be predicted. Officers will continue to engage with Highways England as part of the assessment of potential allocations having previously met with HE during 2018. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Green Belt • Gap between Bushey and neighbouring built-up areas preventing Bushey becoming part of a vast urban sprawl • No evidence of exceptional circumstances to justify changing green belt boundaries here • More sustainable green belt sites elsewhere	• Bushey and District Footpaths Association • Little Bushey Community
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	

Sports and recreation • Object strongly as there are two well used public footpaths here which need to be kept and, if possible, enhanced	• Bushey and District Footpaths Association
HBC's comments: The impact of development on the rights of way network will be considered carefully in consultation with HCC Rights of Way service. This will include both positive and negative effects such as the scope for routes to be created, improved and integrated within new development, as well as the impact on users of having to divert any existing routes.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Closest GP (Shopwick Surgery) at or beyond capacity. Bushey Health centre has capacity • No social and community facilities	• Strutt and Parker • Fisher German on behalf of TLC Group
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Green Belt • Most sensitive eastern parts of green belt Parcel Area 6 • Would narrow gap between Elstree and Bushey	• Strutt and Parker
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Environment and wildlife • Designated as Wetland Habitat Zone in Hertsmere Green Infrastructure Plan	• Strutt and Parker
HBC's comments: Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust, are being consulted through the Local Plan process. A Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development and mitigation and biodiversity offsetting will need to be considered to compensate for any habitat loss.	
Transport infrastructure • Access potentially unsafe • Only single point of access into the site • Impact on wider road network is not known • Significant public transport improvements would be required in the area.	• Strutt and Parker • Fisher German on behalf of TLC Group
HBC's comments: Traffic assessments will be expected to demonstrate that accesses are both safe and sufficient in number to serve strategic allocations. HCC design guidance sets out as a starting point, a general presumption that no more than 300 dwellings should be served from a single point of access to the wider network. As Highway Authority, HCC will be consulted throughout the plan preparation process.	

Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Physical consideration • Proximity of M1 and adjacent to A41 means that the site is blighted by Motorway noise issues and air quality issues • High Voltage Overhead power cables 'which cannot be moved'	• Strutt and Parker • Fisher German on behalf of TLC Group
HBC's comments: Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development. Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse and they will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	

Site address/ location	Land north of Farm Way, Bushey (Compass Park)	Site ref: B2 (HEL181)

Breakdown of general comments received:

Total number of comments	12
Statutory bodies and local interest groups	9
Developers/ landowners (includes site promoter)	3

Site Promoter: Strutt and Parker

Statutory bodies and local interest groups

- Thames Water
- Hertfordshire County Council
- Environment Agency
- Highways England
- Bushey and District Footpaths Association
- All Party Parliamentary Group on General Aviation
- National Grid
- Watford Borough Council
- Transport for London (TfL)

Other developers/ landowners

- Barton Willmore
- Fisher German on behalf of TLC Group

Summary of site promoter's response:

Key Points Raised:

- Summary of proposal including quantum and mix of homes
- Other facilities include 2FE primary school and new neighbourhood centre
- 'enhancements to local Secondary School provision'
- Site considered to have few constraints
- Concerns about perceived mapping error in PSHE report as relating to B2
- Recommends a 'split site' release from the green belt
- Analysis of all other strategic sites promoted in Hertsmere with B2
- Identified B2 as the most sustainable in own site comparison report

Summary:

The promoter has submitted a large amount of supporting information which (1) sets out the vision and indicative proposals for the development of the site (2) seeks to address technical issues and (3) compares the site to other strategic locations being promoted in the borough.

The site promoter considers there to be few constraints affecting site delivery, with the transportation report submitted concluding that B2 is 'highly accessible and remarkably sustainable' with the site also capable of reducing journeys for existing residents.

The site promoter also identified what it considers to be a mapping error in the PSHE report on the basis that a larger area has been highlighted for development than indicated in the revised masterplan submitted prior to the publication of the PSHE report.

Commentary on and an analysis of the Stage 1 and green belt assessments has been submitted which considers that due to the Royal Connaught Park scheme and other nearby development, the site is effectively bound by other development and has been 'leap-frogged' by the expansion of Bushey. As such, development of B2 provides an opportunity to strengthen a boundary which has been identified as weak in the Stage 2 report.

A sustainability analysis of both B2 and all other strategic sites concludes that B2 is the most sustainable site. A range of social, economic and environmental indicators are used with the site scoring higher than all other strategic locations including in terms of transport access and distances to local facilities.

HBC's comments: The site promoter has provided a significant amount of supporting information which can inform the council's consideration of the site but will need to be reviewed carefully and corroborated with relevant statutory and other bodies. This will include the latest masterplan submitted which shows a reduced area for development.

The council does not consider there to have been any mapping error in the PSHE report whose indicative development area for B2 was based on the masterplan previously submitted rather than a revised version provided in August 2018 after the call for sites closed. The issue was not itself raised in the original representations received on behalf of the site promoter. The PSHE report clarified that that the highlighted blue areas show "the suggested development area where indicated by site promoter" and "on larger sites, an increasing amount of land will not be used for housing but for supporting infrastructure including roads, shops, open space, schools and other community facilities." It is noted that a further revised masterplan has been submitted in March 2019 to the council, showing a reduced area for development.

The availability of general services and facilities for both existing and future residents will be key to assessing the suitability of the site, as the impact on the strategic and local road networks. Detailed modelling will also be required to assess the full impact development will have on the strategic and local road network although it is recognised that the information provided to date provides a useful starting point for assessing highways impact.

The comments on the contribution of the green belt in this location are noted and the council will need to carefully consider the impact on the strategic green belt arising from this site promotion. Exceptional circumstances would need to exist to justify changes to green belt boundaries in this location and there would be a requirement to minimise any harm through boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. The sustainability analysis provided and site comparison report are also noted including the conclusion that B2 is the most sustainable of all the strategic sites in the PSHE report. The council would question the analysis that B2 scores positively (green) against all of the criteria and in doing so, is the only strategic site to do so.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Likely need for new secondary schools sites in Bushey regardless of level of development in the area • Requires 60 units of extra care housing, of which 12 should be accessible with disabilities • Likely need for upgrades to the wastewater network • A housing and infrastructure phasing plan required to determine capacity within the water network	• Hertfordshire County Council Growth and Infrastructure Unit • Thames Water • Environment Agency • Watford Borough Council
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities', taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Environment and wildlife • Bats recorded to the south • Local Wildlife Site – damp neutral grassland is potential ecological constraint	• Hertfordshire County Council Growth and Infrastructure Unit • Bushey and District Footpaths Association

• LWS quality survey would be required to demonstrated degradation below LWC criteria • Low overall ecological sensitivity • 'A haven for wildlife'	
HBC's comments: Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust, are being consulted through the Local Plan process. A Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development and mitigation and biodiversity offsetting will need to be considered to compensate for any habitat loss	
Physical considerations • Development should be directed away from areas of flood risk with flood risk to existing communities reduced where possible • Potential for any development to improve existing flood risk in downstream areas • Flood Zone 3b (functional floodplain) should be safeguarded from development • Consider how flood storage can be protected and maximized across the borough • Underground cables within the site. Statutory safety clearances must not be infringed	• Environment Agency • Thames Water • Hertfordshire County Council Growth and Infrastructure Unit • National Grid
HBC's comments: The Council recognises that development should not take place within FZ3b and would require any allocations to direct development away from the functional floodplain. Development will need to avoid infringing on statutory safety clearances but National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Transport infrastructure • Limited access to bus services on Bournehall Road (306 and school service 823), with up to two buses per hour • Given the scale of proposed development, frequency enhancement must be explored in line with LTP4 • Sites (including B2) have potential to impact on Strategic Road Network (SRN) • Cumulative assessment of sites across plan period needed highlighting residual impact on the SRN • Traffic generated by new development on this site would contribute towards congestion already experienced at Bushey Arches and more widely in Watford • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Hertfordshire County Council Growth and Infrastructure Unit • Highways England • Watford Borough Council • Transport for London (TfL)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improvement public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Green Belt • No evidence of exceptional circumstances to justify changing green belt boundaries here • Site lies within an area making a significant contribution towards the separation between settlements. If this site is given further	• Bushey and District Footpaths Association • Watford Borough Council

consideration a quality landscaping scheme should be required to retain the sense of separation between the two built up areas	
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Aviation • Object as it will jeopardise the safety of existing and potential users of the aerodrome and possibly those living nearby • B2 area is the only suitable location for a forced landing in the event of an engine failure after take off	• All Party Parliamentary Group on General Aviation
HBC's comments: The Council will be guided by the Civil Aviation Authority on matters relating to aviation safety and would consult the CAA as part of any further assessment of B2.	
Sports and recreation • Object strongly as there is a well-used public footpath on the definitive map here which needs to be kept and, if possible, enhanced • Another path with the same status is heavily used by school children to and from school	• Bushey and District Footpaths Association
HBC's comments: The impact of development on the rights of way network will be considered carefully in consultation with HCC Rights of Way service. This will include both positive and negative effects such as the scope for routes to be created, improved and integrated within new development, as well as the impact on users of having to divert any existing routes.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Promoter has no obvious track record in site delivery on this scale	• Barton Willmore
HBC comments: Site delivery will be dependent on a range of factors and not specifically or solely dependent on the track record of a promoter or developer. Land ownership, site availability and addressing physical and environmental constraints will also be factors although clearly promoters and developers with a strong track record will be well placed to demonstrate delivery, in terms of build out rates and supporting infrastructure.	
Green Belt • The site prevents coalescence between Bushey and Watford • Development will result in the two settlements being almost indistinguishable from each other	• Barton Willmore • Fisher German on behalf of TLC Group
HBC comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Transport infrastructure • Site is too far away from existing public transport provision • Direct access to A41 via Sandy Lane is unsuitable for larger volumes of traffic	• Fisher German on behalf of TLC Group
HBC comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact	

development will have on the strategic and local road network.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes

Site address/ location	Former Bushey Golf and Country Club	Site ref: B3 (HEL181)

Breakdown of general comments received:

Total number of comments	10
Statutory bodies and local interest groups	7
Developers/ landowners (includes site promoter)	3

Site Promoter: Asset Management, Hertsmere Borough Council

Statutory bodies and local interest groups
- Thames Water
- Hertfordshire County Council
- Environment Agency
- Bushey and District Footpaths Association
- Hertfordshire Gardens Trust
- Sport England
- Transport for London (TfL)

Other developers / Landowners
- Barton Willmore
- Strutt and Parker
- Fisher German on behalf of TLC Group

Summary of site promoter's response:
No representations on PSHE report were received.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Likely need for new secondary schools sites in Bushey regardless of level of development in the area • Requires 60 units of extra care housing, of which 12 should be accessible with disabilities • Likely need for upgrades to the wastewater network • A housing and infrastructure phasing plan required to determine capacity within the water network • Sport England would potentially object; need to demonstrate golf course was surplus to requirements or replacement provision was made • Potential to meet current and future community golf provision needs in Hertsmere district and the wider area • Council's emerging playing pitch strategy plus discussions with England Golf can help inform any future community golf provision	• Hertfordshire County Council Growth and Infrastructure Unit • Thames Water • Environment Agency • Sport England

HBC's comments: Regarding the golf provision, the course closed in 2018 due to Bushey Country Club operating it at a significant financial loss. The Council owns the site and sought operators to take over the facility but there was a poor response because of a declining trend in golf usage and the significant competition for fitness facilities. There are a large number of other golf courses in the vicinity but the recent closure of another course in the borough (in Potters Bar) would suggest that there is an oversupply of golf courses compared to the level of demand which exists. As such, it is considered that the golf course at Bushey Country Club was surplus to requirements in terms of golfing provision.

More generally in relation to infrastructure, full consideration will be given to the availability of general services and facilities. This will need to take into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Environment and wildlife • Trees will have potential for nesting birds • Great crested newts and bats have been recorded in the area. • Various opportunities to enhance biodiversity	• Hertfordshire County Council Growth and Infrastructure Unit

HBC's comments: Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust, are being consulted through the Local Plan process. A Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development and mitigation and biodiversity offsetting will need to be considered to compensate for any habitat loss	
Transport infrastructure • Much of site is accessible to bus services, with two frequent bus services (142, 258 and school services B76, BM1 and Y1) • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Hertfordshire County Council Growth and Infrastructure Unit • Transport for London (TfL)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. Further traffic modelling for strategic allocations will be required to incorporate the surrounding strategic and local road network. This will enable the potential impact of development on both the A1 and other strategic routes, as well local roads, to be predicted. Officers will continue to engage with Highways England as part of the assessment of potential allocations having previously met with HE during 2018. Funding to enable any required new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Green Belt • No evidence of exceptional circumstances to justify changing green belt boundaries here • Land provides a gap between Bushey and neighbouring built-up areas and prevents Bushey becoming part of a vast urban sprawl • Insufficient evidence or need to take this particular parcel of land out of green belt	• Bushey and District Footpaths Association
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Heritage • Concerns about adverse effect on nearby heritage assets and historic core of Bushey • Includes conservation area, Grade II listed Bushey House, Herkomer House and especially the setting of the Bushey Rose Garden, which is on the Historic England Register • Heritage assets issues have not been addressed	• Hertfordshire Gardens Trust
HBC's comments: The impact on statutory and non-statutory heritage designations will need to be carefully considered as part of any assessment of potential options for the site. Although much of the site beyond the buildings/hardstanding is located further away from the centre of Bushey village and its heritage assets, the impact on their setting will be an important factor in determining the extent to which any development at the site could be accommodated. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	
Sports and recreation • No footpaths on this land but object strongly • Land is now used for walking and BADFA have suggestions as to how land can be opened up to walkers	• Bushey and District Footpaths Association
HBC's comments: Comments and suggestions are noted. The impact of development on the rights of way network will be considered carefully in consultation with HCC Rights of Way service. This will include both	

positive and negative effects such as the scope for routes to be created, improved and integrated within new development, as well as the impact on users of having to divert any existing routes.

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and Facilities • No Primary or nursery school and would be reliant on provision at Compass Park. Site B1 should not be released on its own or in advance of Compass Park • Closure of existing community facilities and loss of recreational land contrary to policy • Accessible to existing shops and medical centre	• Strutt and Parker • Barton Willmore • Fisher German on behalf of TLC Group
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities', taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The council's current planning requirements in relation to key community facilities are set out in Policy CS19 of the Core Strategy. The closure of the community facilities at the former golf club in Bushey and the extent to which they will need to be re-provided either on or in the vicinity of the site, will need to be carefully considered as part of any assessment of future options for the site. The council, as land owner, is commissioning masterplanning work which will be expected to take account of key planning policy requirements including an assessment of the need for particular community facilities in the area.	
Green Belt • Concur with Stage 2 Assessment conclusion that area plays key role in preserving setting and special character of historic core of Bushey and the performance of wider green belt	• Barton Willmore • Fisher German on behalf of TLC Group
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Heritage • Site is of historic importance in preserving the setting and special character of the historic core of Bushey, including its Conservation Area	• Barton Willmore
HBC's comments: The impact on statutory and non-statutory heritage designations will need to be carefully considered as part of any assessment of potential options for the site. Although much of the site beyond the buildings/hardstanding is located further away from the centre of Bushey village and its heritage assets, the impact on their setting will be an important factor in determining the extent to which any development at the site could be accommodated. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	

Other points • Unclear how council has been made aware of this site through the planning process as it has not been submitted via the same route as other sites • Neither use nor capacity of the site is dealt with and therefore it cannot be considered that the site is a deliverable	• Barton Willmore
HBC's comments: Along with a number of other Council-owned assets, the site was proposed by the Council's Asset Management department. Potential options for use of the site are still being considered by the Council and as part of this process a masterplan has now been commissioned.	
Transport infrastructure • Scale of the impact on existing Transport network is unknown	• Fisher German on behalf of TLC Group
HBC's comments: Further traffic modelling for strategic allocations will be required to incorporate the surrounding strategic and local road network. This will enable the potential impact of development on both the A1 and other strategic routes, as well local roads, to be predicted. Officers will continue to engage with Highways England as part of the assessment of potential allocations having previously met with HE during 2018. Funding to enable new or improved public transport to be delivered will also be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	

Strategic Employment Sites

Site address/ location	Land between A41 and M1, near Hilton Hotel, Bushey	Site ref: EMP2

Breakdown of general comments received:

Total number of comments	6
Statutory bodies and local interest groups	5
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- National Grid
- Watford Borough Council
- Highways England
- Transport for London (TfL)

Site Promoter: DP9 on behalf of NBP Limited

Summary of site promoter's response:

Key Points Raised:

- Only part of EMP2 (HEL208) is in a single ownership and capable of delivery for employment
- Opportunities for transport / infrastructure improvements in the area

Summary:

The promoter reaffirms the site is being promoted for B1(b), B1(c), B2 and B8 uses (with ancillary B1(a) offices). The area of land promoted has been reduced to only cover HEL208. Interest has already been shown in the site by potential occupiers.

The site could be accessed from the A41. There would also be foot and cycle improvements and opportunities to provide a shuttle bus service.

The promoter states that the site is located within an area that has little use for amenity recreation. The promoter highlights the findings of the Stage 1 green belt assessment. While agreeing with most of the findings, they argue the site would not cause coalescence between settlements as the M1 acts as physical barrier preventing further sprawl into the green belt.

HBC's comments: The support for employment uses on the site is noted and it is recognised that the remainder of the land in this location is in multiple ownerships, to the extent that it has been withdrawn from the local plan process due to site assembly problems.

With regards to the green belt assessment and the risk of coalescence, the stage 1 study concluded that the site forms part of a weakly performing parcel (14). It was therefore not considered further for assessment, as those parcels were recommended for further consideration in the stage 1 study.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Physical considerations • Overhead powerlines. Statutory safety clearances must not be infringed	• National Grid
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	

Transport infrastructure • Site is well connected by the existing road network • Impact on strategic road network • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Watford Borough Council • Highways England • Transport for London (TfL)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Employment land • Watford has a shortfall of employment land available to support B2 and B8 uses. Proposed use for employment would be supported to contribute towards economic growth in the wider area	• Watford Borough Council
HBC's comments: Support for employment is noted. It is recognised that urban local authorities such as Watford whose administrative boundaries are drawn tightly round the built up area, have less scope to identify new sites for economic development. The SW Herts authorities are working together on how best to address this and have previously commissioned an economic study (2016) which is currently being refreshed. There will be a need to consider how any unmet employment needs from Watford could be accommodated within the other SW Herts authorities through their respective Local Plans.	
Environment and wildlife • Eco site is within part of the site • Close to grassland LWS • Bats have been recorded in the area • Trees may have potential for nesting birds • May be potential for reptiles	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust, are being consulted through the Local Plan process. Eco-sites are acknowledged to have less status than designated wildlife sites but where they are identified, a Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development. Mitigation and biodiversity offsetting will need to be considered to compensate for any habitat loss.	

Other developer/landowners responses:
No comments received.

Other potential development sites

Site address/ location	Bushey Health Centre, London Road, Bushey	Site ref: HEL170

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Fisher German on behalf of TLC Group

Site Promoter: NHS Property Services Ltd

Summary of site promoter's response:
No representations on PSHE report received

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Low ecological sensitivity • Trees may have potential for nesting birds • Buildings may have potential for bats.	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Has the potential to deliver a small number of units quickly within the plan period	• Fisher German on behalf of TLC Group
HBC's comments: Comment on site delivery noted.	

Site address/ location	Hartsbourne Country Club, Bushey	Site ref: HEL175

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	2
Developers/ landowners (includes site promoter)	0

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Sport England

Site Promoter: Bidwells on behalf of Hartsbourne Properties Ltd

Summary of site promoter's response:
No representations on PSHE report received

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Low to moderate ecological sensitivity depending on whether trees are affected • Trees may have potential for nesting birds • Mature trees and buildings may have potential for bats	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	
Sports and recreation • Golf course and other facilities should be retained unless it can be demonstrated that the Golf course is surplus to requirements • Currently loss of the facility would not comply with paragraph 97 of the NPPF • Council's emerging playing pitch strategy should be used to inform decisions	• Sport England
HBC's comments: The promotion does not seek the closure of the golf course itself but aims to develop the area of the site comprising the clubhouse and associated buildings. The golf course itself would be retained.	

Other developer/landowners responses:
No representations received

Site address/ location	Land at Merry Hill Road, Bushey	Site ref: HEL202

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Fisher German on behalf of TLC Group

Site Promoter: Clarke and Simpson on behalf of owners

Summary of site promoter's response:

No representations on PSHE report received.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Low ecological sensitivity • Swifts have been recorded in the area • Adjacent to allotments which could support reptiles and slowworms • Close to Merry Hill Wood ecosite	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite although ecosites are acknowledged to have less status than designated wildlife sites. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Has the potential to deliver a small number of units quickly within the plan period	• Fisher German on behalf of TLC Group
HBC's comments: Comments on site delivery are noted.	

Site address/ location	Land on the north side of Little Bushey Lane near Hartspring lane, Bushey	Site ref: HEL211

Breakdown of general comments received:

Total number of comments	3
Statutory bodies and local interest groups	2
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- National Grid

Other developers/ landowners
- Fisher German on behalf of TLC Group

Site Promoter: Faybrook Ltd on behalf of HG Winfield

Summary of site promoter's response:

No representations on PSHE report received.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Physical considerations • Overhead powerlines. Statutory safety clearances must not be infringed.	• National Grid
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Environment and wildlife • Low ecological sensitivity • Trees have potential for nesting birds • North east corner borders to 'eco sites'	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite although ecosites are acknowledged to have less status than designated wildlife sites. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Green Belt • Negative impact on the green belt	• Fisher German on behalf of TLC Group
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Services and Facilities • Not in close proximity to local services and facilities	• Fisher German on behalf of TLC Group
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Environment and wildlife • Likely negative effect to the natural environment	• Fisher German on behalf of TLC Group
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Site address/ location	Land west of Rossway Drive	Site ref: HEL215

Breakdown of general comments received:

Total number of comments	2
Statutory bodies amd local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Fisher German on behalf of TLC Group

Site Promoter: Satellite Ltd

Summary of site promoter's response:

No representations on PSHE report received.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Low ecological sensitivity • Trees have potential for nesting birds.	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Transport infrastructure • Impact on wider road network is not known • Significant public transport improvements would be required in the area	• Fisher German on behalf of TLC Group
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites, in particular, but will also need to be considered to support the delivery of other sites.	

Site address/ location	Royal Connaught Park, Marlborough Drive	Site ref: HEL224

Breakdown of general comments received:

Total number of comments	3
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	2

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Fisher German on behalf of TLC

Site Promoter: Savills on behalf of Comer Homes

Summary of site promoter's response:

Key Points Raised:

- Principle for development has already been established
- Minimal harm to the green belt
- Improvement to the long-term sustainability and resilience of the wider development

Summary:

The size of the proposal has been indicated as 50 dwellings, rather than the 45 dwellings estimated in the PSHE document.

The site promoter believes the principle for development has already been established, they draw attention to a lapsed planning permission on the site (ref: TP/07/2075). The promoter states this was not deliverable at the time due to economic downturn.

Harm to the green belt is seen to be minimal and the promoter believes a number of VSC's exist. These include the delivery of green infrastructure. Furthermore the long-term sustainability and resilience of the wider development would be increased due to increased service charge revenue. The proposal would bring additional improvements to the wider Royal Connaught Park site including improvements to pedestrian and cycle infrastructure.

HBC's comments: The site has previously been allocated for development but the proposed area is outside of the footprint of what was granted consent in 2003. The 2007 planning application was not granted as the s106 agreement was never signed rather than permission lapsing. Notwithstanding the view of the promoter that harm to the green belt would be minimal, the impact of any further development in the green belt in this location will need to be fully assessed and exceptional circumstances would be required to justify boundary changes in this or any other location.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Potential to incorporate biodiversity enhancements with any proposal	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Green Belt • Negative impact on the green belt	• Fisher German on behalf of TLC Group
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Services and Facilities • Not in close proximity to local services and facilities	• Fisher German on behalf of TLC Group
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Wildlife and Environment • Likely negative effect to the natural environment	• Fisher German on behalf of TLC Group
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	

Site address/ location	Elstree Road (The Paddock), Bushey Heath	Site ref: HEL239

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Fisher German on behalf of TLC Group

Site Promoter: Bushey Museum Property Trust

Summary of site promoter's response:

No representations on PSHE specifically received on behalf of BMPT

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Low ecological sensitivity • Trees have potential for nesting birds	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Sports and recreation • Would result in the loss of open space	• Fisher German on behalf of TLC Group
HBC's comments: A new open spaces and recreation study is currently being conducted by Hertsmere which looks and the quality and provision of the borough's existing open spaces.	
Principle of development • Has the potential to deliver a small number of units quickly within the plan period	• Fisher German on behalf of TLC Group
HBC's comments: Comment on site delivery noted.	

Site address/ location	Hart's Farm, Little Bushey Lane	Site ref: HEL336

Breakdown of general comments received:

Total number of comments	3
Statutory bodies and local interest groups	2
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England

Site Promoter: Bell Cornwell LLP on behalf of McGovern Bros (Haulage) Ltd

Summary of site promoter's response:

Key Points Raised:

- The site can be considered individually or as part of B1
- The site is free of significant constraints
- Removing the site from the green belt does not conflict with the five purposes of the green belt

Summary:

The promoter states the site could be delivered individually or alongside B1 as part of a strategic alliance. The promoter believes HBC will have to release green belt land in order to meet its housing targets.

There is some PDL on the site. The site benefits from being flat and free of significant constraints. The land is screened from key strategic viewpoints. The promotor predicts the number of vehicle trips generated by the site will be small. Therefore, satisfactory vehicular access can be provided from Little Bushey Lane.
Potential noise issues from the M1 and the need for mitigation is acknowledged.

There is opportunity for the site to contribute towards the provision of a new primary school within the wider development, depending on the scale of the allocation as a whole.

Reference is made to the acceptability of development with regard to the five green belt purposes emphasising that development would not lead to coalescence.

Technical studies have also been submitted in conjunction with the representations. These include a Masterplan, Landscape and Visual Overview, Green Belt Assessment, Environmental Opportunities and Constraints Plan, and a Transport Strategy.

HBC's comments: The comments regarding the scope to deliver the site alongside B1 are noted although no information has been submitted indicating that arrangements are in place to secure such an arrangement.

It is recognised that a range of technical studies such as Landscape and Visual Overview have also been submitted and we recognise the work that has gone in to preparing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. The council has yet to decide where it will commission additional work but where this is not undertaken, it will look to corroborate the work that has already been submitted.

The comments on the Green Belt are noted. The impact of any development in the green belt will be fully assessed. Where exceptional circumstances do exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Trees have potential for nesting birds • Building may have potential for roosting bats • Northern part of the site is part of an Ecosite	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust, are being consulted through the Local Plan process. Eco-sites are acknowledged to have less status than designated wildlife sites but where they are identified; a Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development. Mitigation and biodiversity offsetting will need to be considered to compensate for any habitat loss.	
Transport Infrastructure • Impact on strategic road network	• Highways England
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	

Other developer/landowners responses:

No representation received.

Site address/ location	Land east of Farm Way, Bushey	Site ref: HEL337

Breakdown of general comments received:

Total number of comments	3
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	2

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Fisher German on behalf of TLC Group

Site Promoter: PPML Consulting Ltd on behalf of Annington Property Ltd

Summary of site promoter's response:

Key Points Raised:

- Parts of site have been safeguarded for housing under previous local plan policies
- The site is deliverable

Summary:

The main site is allocated as a safeguarded land for housing in the Site Allocations and Development Management Policies Plan under policy SADM2. This policy allows for the land to be released in the event that a review of the local plan indicates there is insufficient suitable land available within the defined urban areas. The promoter believes the council has already acknowledged this need, so the safeguarding should be removed.

The sites have no physical or environmental constraints that would be an impediment to development. The sites have access to Sutcliffe Close and have a sole landowner who intends to develop the site or sell with the benefit of planning permission for housing. The site should therefore be considered deliverable.

HBC's comments: The current safeguarded status of part of the land being promoted is noted and it is recognised that there is a need for additional housing sites which cannot solely be met within existing built up areas. Unless there are significant factors relating to the site or surrounding properties which have changed since the land was safeguarded, scope may exist to allocate the safeguarded land. The areas which are not safeguarded will need to be considered separately.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Trees have potential for nesting birds	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	

Other developer/landowners responses:

Substantive points raised	Responder/s
Principle of development • Has the potential to deliver a small number of units quickly within the plan period	• Fisher German on behalf of TLC Group
HBC's comments: Comment on site delivery is noted.	

Site address/ location	Land south of Elstree Road, Bushey Heath	Site ref: HEL355

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	2
Developers/ landowners (includes site promoter)	2

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England

Other developers/ landowners
- Strutt and Parker

Site Promoter: Fisher German on behalf of TLC
Group/owner

Summary of site promoter's response:

Key Points Raised:

- Approximately 473 units are proposed including 375 mixed retirement units
- Existing woodland and pastures are to be retained
- Constraints to development can be mitigated and funded
- Mix of community facilities would be provided

Summary:

The site was promoted originally for 180 dwellings in the PSHE document. However the site promoter is now proposing 375 mixed retirement units as they state there is a national need for this type of housing and an ageing population in Hertsmere. Up to 20 self-build plots and circa 78 affordable units are also proposed.

The proposal seeks to retain the areas of woodland on-site and the Elstree Road pastures. These would also be made accessible to the wider community. There are no significant constraints to development across the rest of the site. The site provides access to the A411 and the wider road network. A mix of community facilities would be provided within the development. The site has a sole landowner; therefore the promoter believes it can be brought forward quickly.

Potential noise issues from the M1 and the need for mitigation is acknowledged. Part of the site has historically been used as a landfill. The promoter has already commissioned ground investigations, these investigations have found levels of heavy metals and PAH's. The promoter acknowledges the need to mitigate before development can take place. The promoter states the level of development will generate sufficient revenue to fund remediation work.

Technical studies have also been submitted in conjunction with this document and include an Ecology Report, Masterplan, Landscape and Visual Assessment, Feasibility Study, Ground Investigation, Planning Need Assessment and Transport Statement.

HBC's comments: The evolving nature of proposals for the site means that the promotion now needs to be considered as a potential strategic allocation given that the number of homes being sought is considerably greater than the quantum previously suggested. The proposal refers to 375 mixed retirement units but it will be important that any potential strategic allocation delivers an acceptable housing mix across different tenures and types.

The environmental constraints affecting the site will need to be properly assessed including the ground condition given the former use of the site as landfill. The promoter has submitted a range of technical studies although we recognise that some of this work is preliminary only. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. The council has yet to decide where it will commission its own LVA work but where this is not undertaken, it will look to corroborate the work that has already been submitted.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Grassland LWS in NW corner of site and adjacent • Woodland ecosite on the western edge of the site • Roosting bats have been recorded in the area • Trees have potential for nesting birds • Priority butterfly species: White-letter hairstreak recorded in the area	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust All sites, are being consulted through the Local Plan process. A Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development and biodiversity offsetting will need to be considered to compensate for any habitat loss.	
Transport Infrastructure • Impact on strategic road network	• Highways England
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will also be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Physical constraints • Air Quality and noise pollution issues due to the site's proximity to the motorway	• Strutt and Parker
HBC's comments: Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.	
Environmental and Wildlife • Site is partially in wetland habitat zone	• Strutt and Parker
HBC's comments: Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust, are being consulted through the Local Plan process. A Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development and biodiversity offsetting will need to be considered to compensate for any habitat loss.	

Site address/ location	Oxhey Lane	Site ref: HEL357

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	2
Developers/ landowners (includes site promoter)	2

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Watford Borough Council

Other developers/ landowners
- Fisher German on behalf of TLC Group

Site Promoter: CBRE on behalf of Oxhey Lane Developments Ltd

Summary of site promoter's response:

Key Points Raised:

- Smaller options need to be considered to deliver housing need.
- Site would cause minimal harm to the green belt.
- Site is deliverable early in the plan period.

Summary:

The site promoter believes the current development options the Local Plan sets out cannot be fully relied upon to deliver Hertsmere's annual housing need of 600 homes. Therefore further development options need to be considered. The promoter suggests HBC should deliver housing capacity within the earlier part of the plan period by allowing for the managed release of smaller-scale, low-performing areas of the green belt which are ineffective at serving green belt purposes.

The green belt assessment has been critiqued as the promoter believes the parcel which the site is located in is too large and diverse to be assessed in its entirety against the purposes of the green belt. They say the site is within an area that is characterised by residential development.

The site would be deliverable in the early part of the plan period (first 5 years) with 200 dwellings to be provided. The promoter believes a significant the site is capable of providing a significant proportion of affordable housing.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

In response to the point that the parcel assessed is too large and diverse to be considered in its entirety against green belt purposes, it should be emphasised that the stage 2 assessment was a more fine-grained assessment involving smaller sub-areas. HEL357 comprises a large proportion of sub areas SA-71, SA-72 and SA73.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Green Belt • Unrelated to existing built up areas and would act to reduce the gap between Watford and Bushey • Loss of green belt land would likely be unjustified given the array of sites to be considered as part of this consultation	• Watford Borough Council
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional	

circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Wildlife and environment • Great Crested Newts have been spotted on the site • Adjacent to the Merry Hill grassland eco site • Adjacent to the "Pasture by Oxhey Grange" eco site	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust, are being consulted through the Local Plan process. A Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development and mitigation and biodiversity offsetting will need to be considered to compensate for any habitat loss.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Green Belt • Negative impact on the green belt	• Fisher German on behalf of TLC Group
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Services and Facilities • Not in close proximity to local services and facilities	• Fisher German on behalf of TLC Group
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Wildlife and Environment • Likely negative effect to the natural environment	• Fisher German on behalf of TLC Group
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Site address/ location	Gravel Allotments, Heathbourne Road, Bushey Heath	Site ref: HEL386

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Fisher German on behalf of TLC Group

Site Promoter: Gravel Allotments Trust

Summary of site promoter's response:

No representations received.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Low to moderate ecological sensitivity depending on whether trees are affected • Roosting bats and great crested newts have been recorded in the area. • Site could support slowworms and reptiles • Close to Fields by Heathbourne LWS and Wood E of Bushey Heath Eco site	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Has the potential to deliver a small number of units quickly within the plan period	• Fisher German on behalf of TLC Group
HBC's comments: Comment on site delivery is noted.	

Site address/ location	Kemp Place car park, Bushey	Site ref: HEL401

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Fisher German on behalf of TLC Group

Site Promoter: Asset Management, Hertsmere Borough Council

Summary of site promoter's response:
No representations on PSHE report received.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

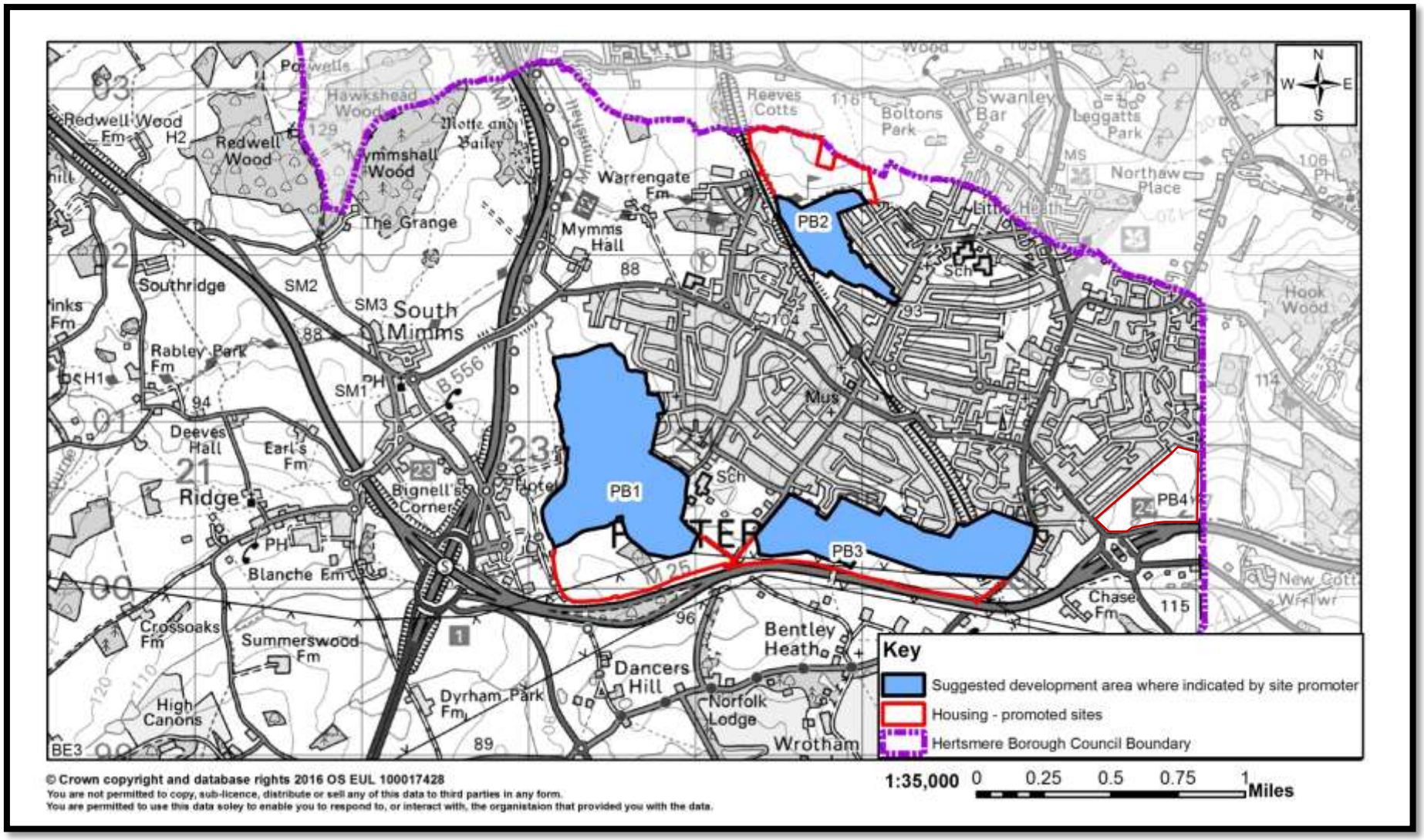
Substantive points raised	Responder/s
Environment and wildlife • Low ecological sensitivity • Bordering trees many have potential for nesting birds	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	

Other developer/landowners responses:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

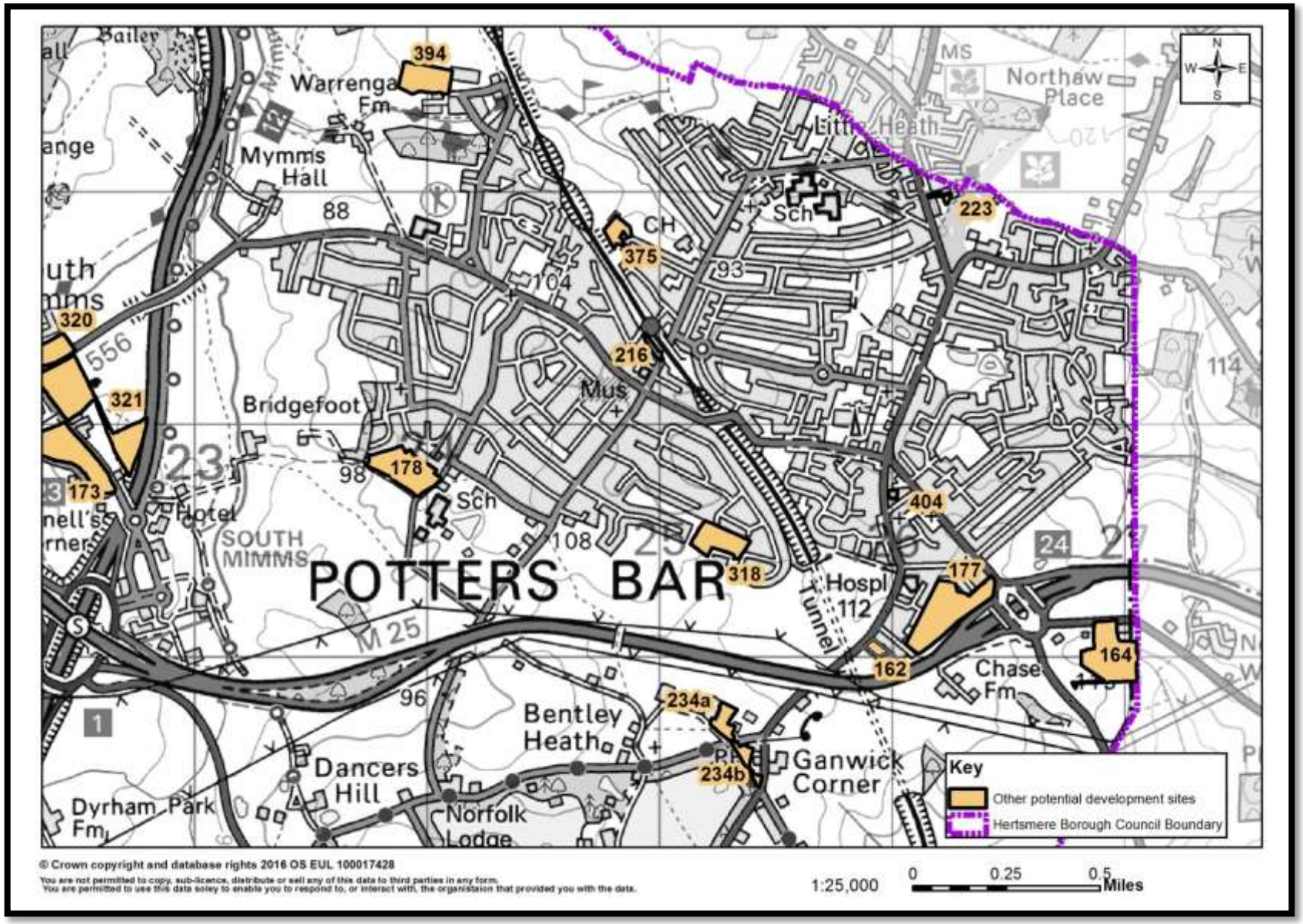
Substantive points raised	Responder/s
Principle of development • Unclear how the parking provision could be retained • Has the potential to deliver a small number of units quickly within the plan period	• Fisher German on behalf of TLC Group
HBC's comments: The PSHE report states that future development on council car parks would involve retention of surface car parking with development above. Ground level or undercroft car parking is a common feature of new developments across the borough. The comment on site delivery is noted.	

9. Summaries of feedback from site promoters, statutory bodies and local interest groups – Potters Bar

9.1 - Map of Potters Bar strategic housing sites



9.2 - Map of Potters Bar other potential development sites



9.3 - Feedback forms – Potters Bar

Strategic Housing Sites

Site address/ location	Land west of Dugdale Hill and Baker Street, Potters Bar	Site ref: PB1 / EMP5 (HEL361)

Breakdown of general comments received:

Total number of comments	11
Statutory bodies and local interest groups	9
Developers/ landowners (includes site promoter)	2

Site Promoter: Woolf Bond Planning on behalf of the Wrotham Park Estate

Statutory bodies and local interest groups

- Environment Agency
- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England
- London Borough of Barnet
- National Grid
- St Albans City and District Council
- Thames Water
- Transport for London (TfL)
- Welwyn Hatfield Borough Council

Other developers/ landowners

- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing means LPA figure may increase above 500dpa
- Masterplan for a mix of housing and storage / distribution
- Proposal also provides local centre, primary school, road, recreational and other infrastructure
- Site can be considered individually or alongside PB3

Summary:

The site promoter reiterates the Government's message that there is a significant demand for housing across the UK. Whilst the Council have stated a target figure of 500 dwellings per annum, the promoter considers this could increase with the government revised methodology calculating a need of over 700 dwellings per annum.

In relation to supporting services and infrastructure the promoter has made it clear that they are prepared to work with the council to deliver much needed infrastructure. The revised masterplan plans to provide community centre, sports facilities and play provision, primary school, care home, allotments and recreational amenity space.

The site promoter has also promoted PB3. They believe the site is a sustainable development opportunity in its own right or alongside PB3.

Technical studies have also been submitted in conjunction with this document and include a Landscape and Visual Overview, Flood Risk Assessment and Transport Appraisal.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The Council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground.

The council acknowledges the promoter intends to deliver some supporting services and infrastructure as part of the

promotion. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics.

As part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Upgrades to waste water network required including sewage works • A housing and infrastructure phasing plan required to determine capacity within the water network • Requires 60 units of extra care housing, of which 12 should be accessible with disabilities	• Environment Agency • Hertfordshire County Council Growth and Infrastructure Unit • Thames Water
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The South West Herts SHMA is currently in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters concerning the requirement for this category of housing.	
Physical considerations • Overhead powerlines. Statutory safety clearances must not be infringed.	• National Grid
HBC's comments: Statutory powerline safety clearances must not be infringed. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Transport infrastructure • Development will impact on the strategic road network (SRN) • Cumulative assessment of sites across plan period needed highlighting residual impact on the SRN • Traffic congestion is a problem in Barnet, particularly along major arterial roads such as the A1 and A1000, which cross into Hertsmere • Encourage forms of development and supporting infrastructure that minimise dependence on the private car • Site currently has very poor access to transport • It would be necessary for existing bus services to be extended through the site • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Hertfordshire County Council Growth and Infrastructure Unit • Highways England • London Borough of Barnet • Transport for London (TfL) • Welwyn Hatfield Borough Council

HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. The current masterplan indicates a mixed-use proposal. There is a need for both employment and residential development within the borough with the site included in the PSHE report as a strategic site for housing-led development and as an employment site. Each site will be assessed individually to determine whether it will be best suited to residential or employment. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Environment and wildlife • Generally low but high sensitivity LWS in site – designated for bat interest • Great crested newts have been recorded in the area. • Grass snakes and slow-worms recorded • Potential for biodiversity enhancements	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	
Heritage • Recent research shows Historic Battle of Barnet site may be further north than currently designated.	• London Borough of Barnet
HBC's comments: The site is significantly north of the area that is currently designated. It would be at the discretion of Historic England to redesignate the Battlefield site of the Battle of Barnet, should evidence exist.	
Green Belt • Development may impact on Barnet's green belt • Open countryside should be protected to prevent urban sprawl • In terms of green belt boundaries, the M25 provides a particularly strong southern / western boundary to an existing settlement • Concerns that analysis is overly negative given that M25 provides strong southern / western boundary to Potters Bar	• London Borough of Barnet • St Albans City and District Council
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Physical considerations ● Overhead powerlines	● Strutt and Parker
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Environment and wildlife ● Air Quality and noise pollution issues due to the sites proximity to the motorways ● Part of the site is in Flood Zones 2 and 3 ● Site contains woodland enhancement zone ● Large parts of the site are located within Flood zone 2 and 3. Sites with a lower flooding risk should be prioritised	● Strutt and Parker
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues. Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development. FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.	
Services and facilities ● Limited school capacity and shortage from 2022/23 ● Capacity at three existing GPs identified – Annandale, Highview and Parkfield – but no provision identified in any PB sites	● Strutt and Parker
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Transport infrastructure ● Nearby motorway junctions are under stress at or over-capacity and will not accommodate significant additional development	● Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	

Heritage ● Site contains landscape of rare historic character	● Strutt and Parker
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the Council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations. The council has yet to decide where it will commission its own LVA work but where this is not undertaken, it will look to corroborate the work that has already been submitted.	

Site address/ location	Potters Bar Golf Course	Site ref: PB2 (HEL251)

Breakdown of general comments received:

Total number of comments	12
Statutory bodies and local interest groups	9
Developers/ landowners (includes site promoter)	3

Site Promoter: Lichfields on behalf of CEG

Statutory bodies and local interest groups

- Environment Agency
- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England
- Little Heath Action Group
- North Mymms District Green Belt Society
- Sport England
- Thames Water
- Transport for London (TfL)
- Welwyn Hatfield Borough Council

Other developers/ landowners

- Aylward Planning on behalf of King & Co
- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing means LPA figure may increase above 500 dpa
- All development on the site will be located within flood zone 1
- Existing flood modelling work has already been agreed with EA
- Site already has good transport links without the need for improvements

Summary:

The site promoter reiterates the government message that there is a significant demand for housing across the UK. Whilst the council has stated a target figure of 500 dwellings per annum, the promoter believes this could increase with the revised standardised methodology calculating a need of over 700 dwellings per annum.

The site promoter responded to the constraints listed within the PSHE report and have acknowledged the noise pollution constraint. However they believe noise issues can be mitigated and that the issue does not need assessing until application stage. Landscape and Visual impact was listed as a constraint to development. The promoter has disputed landscape and visual impact as a constraint stating that this will be dependent on the design of the development when finalised.

The flood risk has been acknowledged by the site promoter who states that development will be limited to the areas of flood zone 1. A FRA and hydraulic modelling work has been undertaken and this work has been corroborated by EA.

The site promoter has highlighted the site's proximity to the Darkes Lane retail centre, railway station, bus services and employment areas. It is stated that this makes the site the most accessible strategic site in Potters Bar.

Within their response the site promoter has also commented on the sustainability appraisal (October 2018)

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the governments' standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.

As part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned. The council has noted that the submitted FRA and hydraulic modelling work has already been corroborated by the Environment Agency.

Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network and funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Site was rejected by previous Planning Inspector in 2000 as part of previous Local Plan due to green belt and flood concerns • Question number of homes required • 200 homes would reflect the existing settlement pattern • Other larger sites elsewhere such as PB1 provide better strategic opportunities	• Little Heath Action Group

HBC's comments: The February 2000 Inspector's report rejected the inclusion due to the loss of green belt land and important leisure facility. It was stated exceptional circumstances did not exist at the time to develop this green belt land. At the time the Inspector said an overriding need for more housing would qualify as an exceptional circumstance. While previous assessments of a site will be reviewed, it should be noted that housing requirements have changed since.

No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the governments' standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.

The potential capacity figures in the PSHE document were calculated using a standard methodology in the HELAA and was intended to be indicative. Further information on the breakdown of the capacity figures can be found within the HELAA document. It should be noted however that these figures may change as a number of the capacities were calculated based on there being no absolute constraints on some sites. In some instances, site

boundaries have also changed followed representations from site promoters.	
Services and facilities • Question the site's distance from local schools and GPs indicated by site promoter	• Little Heath Action Group
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Transport infrastructure • Good access to Darkes Lane bus services • (84, 303, 398 and 610/611) from the south of the site. • Few opportunities to divert existing buses into the site. • Development will impact on the strategic road network. • Cumulative assessment of sites (including PB2) across plan period needed highlighting residual impact on the SRN. • Consideration needs to be given to infrastructure implications of growth already proposed in vicinity of Potters Bar in Welwyn Hatfield • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner. • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes.	• Hertfordshire County Council Growth and Infrastructure Unit • Highways England • Transport for London (TfL) • Welwyn Hatfield Borough Council
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding. The council has a Memorandum of Understanding in place with Welwyn Hatfield BC concerning areas of common interest within the duty to cooperate.	
Environment and wildlife • Part of Potters Bar Golf Course Ecosite • Trees have potential for nesting birds • Priority butterfly species and grizzled skipper recorded in the area. • Low to moderate ecological sensitivity • Potential for biodiversity enhancement	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Green Belt • Site is within the green belt and forms part of narrow gap **between** Potters Bar and Little Heath/Brookmans Park • Contest HBC green belt assessment including not classifying Potters Bar as a large built up area	• Little Heath Action Group • North Mymms District Green Belt Society • Welwyn Hatfield Borough

• Would not result in creation of defensible boundary • Assessment of green belt needs recognise the development pressures from Welwyn Hatfield including area HS24	Council
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. The Stage 1 and 2 green belt assessment which has been prepared by Arup is available to view on the council's website. The council will continue to liaise with Welwyn Hatfield BC concerning proposed developments close to the boundary between two authority areas.	
Cross boundary co-ordination • Lack of real joint working with Welwyn Hatfield • Hertsmere has not objected to Welwyn Hatfield's plans for growth nearby • Two authorities need to reach common understanding about vulnerability of green belt	• Little Heath Action Group • North Mymms District Green Belt Society
HBC's comments: Hertsmere has been actively encouraging cross boundary co-ordination with other neighbouring boroughs. A joint SW Herts strategic plan is currently being worked on involving Hertsmere, Watford, Dacorum, Three Rivers and St Albans, as well as HCC. This is in addition to the joint work being done on a revised SW Herts SHMA and economic study which will be published in the forthcoming months. Duty to cooperate engagement with other neighbouring authorities outside of SW Herts continues. In 2017, the council signed a Memorandum of Understanding setting a framework for future co-operation on strategic planning cross boundary issues. We will continue to work closely with Welwyn Hatfield to ensure that issues of cross-boundary interest including infrastructure provision are properly addressed.	
Sport and recreation • Golf course should be retained unless it can be demonstrated that the golf course is surplus to requirements. Currently loss of the facility would not comply with Para 97 of the NPPF.	• Sport England
HBC's comments: A new open spaces and recreation study is currently being conducted by Hertsmere which looks and the quality and provision of the borough's existing open spaces and sport facilities. Where existing development is present, relevant needs assessments will be required to demonstrate any existing development or activity is surplus to requirements.	
Flood risk • Development should be directed away from areas of flood risk with flood risk to existing communities reduced where possible • Potential for any development to improve existing flood risk in downstream areas • Flood Zone 3b (functional floodplain) should be safeguarded from development • Consider how flood storage can be protected and maximize	• Environment Agency • Hertfordshire County Council Growth and Infrastructure Unit • Little Heath Action Group • Thames Water
HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary. It is noted that the promoter has engaged with the Environment Agency who have corroborated the technical work undertaken.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Heritage • Golfing heritage associated with the golf course • Site adjoins a conservation area	• Strutt and Parker
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations. Sport England will also continue to be consulted on the emerging plan.	
Services and facilities • Limited local services and facilities • Three GP surgeries identified as having some capacity – Annandale, Highview and parkfield – but additional facilities may be required for new housing • Limited school capacity and shortage from 2022/23	• Strutt and Parker
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Physical considerations • Large parts of the site are located within Flood zone 2 and 3. • Sites with a lower flooding risk should be prioritised • Inclusion of HEL375 would provide an emergency access route in the event of a flood	• Aylward Planning on behalf of King & Co • Strutt and Parker
HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.	
Transport infrastructure • Nearby motorway junctions are at capacity	• Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	

Site address/ location	Land south of Oakroyd Avenue and west of Barnet Road, Potters Bar	Site ref: PB3

Breakdown of general comments received:

Total number of comments	11
Statutory bodies and local interest groups	9
Developers/ landowners (includes site promoter)	2

Site Promoter: Woolf Bond Planning on behalf of the Wrotham Park Estate

Statutory bodies and local interest groups

- Environment Agency
- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England
- London Borough of Barnet
- National Grid
- St Albans City and District Council
- Thames Water
- Transport for London (TfL)
- Welwyn Hatfield Borough Council

Other developers/ landowners

- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing means LPA figure may increase above 500dpa
- Proposal also provides local centre, primary school, road, recreational and other infrastructure
- Site can be considered individually or alongside PB1

Summary:

The site promoter reiterates the Government's message that there is a significant demand for housing across the UK. Whilst the council have stated a target figure of 500 dwellings per annum, the promoter considers this could increase with the government revised methodology calculating a need of over 700 dwellings per annum.

In relation to supporting services and infrastructure the promoter has made it clear that they are prepared to work with the council to deliver much needed infrastructure. The revised masterplan plans to provide community centre, sports facilities and play provision, primary school, care home, allotments and recreational amenity space.

The promoter considers that the proposed development of the site would benefit the wider highway network. The new road linking Barnet Road with Baker Street would relieve existing capacity issues at junctions in the town.

The site promoter has also promoted PB1 and considers the site is a sustainable development opportunity in its own right or alongside PB1.

Technical studies have also been submitted in conjunction with this document and include a Landscape and Visual Overview, Flood Risk Assessment and Transport Appraisal.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the governments' standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground.

The council acknowledges the promoter intends to deliver some supporting services and infrastructure as part of the promotion. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Further discussions will need to take place between the promoter, HBC and other

statutory bodies, in relation to the site specifics.

As part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Upgrades to waste water network required including sewage works • A housing and infrastructure phasing plan required to determine capacity within the water network • Requires 60 units of extra care housing, of which 12 should be accessible with disabilities	• Thames Water • Hertfordshire County Council Growth and Infrastructure Unit • Environment Agency
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The South West Herts SHMA is currently in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters concerning the requirement for this category of housing.	
Physical considerations • Overhead powerlines. Statutory safety clearances must not be infringed	• National Grid
HBC's comments: Statutory powerline safety clearances must not be infringed and the National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Transport infrastructure • Good access to Barnet Road bus services from the east of the site • Other parts of the site would have poor access so would be necessary to divert existing services • Development will impact on the strategic road network (SRN). • Cumulative assessment of sites (including PB3) across plan period needed highlighting residual impact on the SRN • Consideration needs to be given to infrastructure implications of growth already proposed in vicinity of Potters Bar in Welwyn Hatfield • Traffic congestion is a problem in Barnet, particularly along major arterial roads such as the A1 and A1000, which cross into Hertsmere Encourage forms of development and supporting infrastructure that minimise dependence on the private car • Development should minimise impact upon the A1 Barnet bypass and Stirling corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Hertfordshire County Council Growth and Infrastructure Unit • Highways England • Welwyn Hatfield Council • London Borough of Barnet • Transport for London (TfL)

HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

Environment and wildlife • Grizzled skipper butterfly recorded • Potential for nesting birds and reptiles • Low ecological sensitivity • Potential for biodiversity enhancement	• Hertfordshire County Council Growth and Infrastructure Unit

HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.

Heritage • Recent research shows Historic Battle of Barnet site may be further north than currently designated	• London Borough of Barnet

HBC's comments: The site is significantly north of the area that is currently designated. It would be at the discretion of Historic England to change the designation of the registered battlefield site of the Battle of Barnet should evidence exist.

Green Belt • Development may impact on Barnet's green belt • Open countryside should be protected to prevent urban sprawl • Concerns that analysis is overly negative given that M25 provides strong southern / western boundary to Potters Bar	• London Borough of Barnet • St Albans City and District Council

HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

Sub area 15 performed weakly against purpose 2 and the stage 2 assessment specifically recognises that the M25 provides physical and visual buffer to prevent perceptual coalescence of settlements. Although the wider parcel (35) was previously identified as making a strong contribution to preventing encroachments into the countryside, the more granular assessment at stage 2 recognises the urbanising influences within the sub-area and that any release of land from the green belt would be unlikely to harm the performance of the wider strategic green belt.

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Physical considerations • Overhead powerlines	• Strutt and Parker
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Environmental constraints: • Air Quality and noise pollution issues due to the sites proximity to the motorways. • Part of the site is in Flood Zones 2 and 3	• Strutt and Parker
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Local services and facilities • Limited school capacity and shortage from 2022/23 • Capacity at three existing GPs identified – Annandale, Highview and Parkfield – but no provision identified in any PB sites	• Strutt and Parker
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Heritage • Site contains landscape of rare historic character • Conservation Area to the north forms part of landscape setting	• Strutt and Parker
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	
Transport infrastructure • Nearby motorway junctions are under stress at or over-capacity and will not accommodate significant additional development	• Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	

Site address/ location	Land south of Park Avenue and east of Southgate Road	Site ref: PB4

Breakdown of general comments received:

Total number of comments	7
Statutory bodies and local interest groups	6
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Environment Agency
- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England
- Thames Water
- Transport for London (TfL)
- Welwyn Hatfield Borough Council

Other developers/ landowners
- Strutt and Parker

Site Promoter: Knight Frank on behalf of the London Borough of Enfield

Summary of site promoter's response:
No representations were received.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Upgrades to waste water network may be required including sewage works • Herts Fire and Rescue Services remain interested in land within site for single re-provision of fire station • A housing and infrastructure phasing plan required to determine capacity within the water network • Requires 60 units of extra care housing, of which 12 should be accessible with disabilities	• Environment Agency • Hertfordshire County Council Growth and Infrastructure Unit • Thames Water
HBC's comments: The council will need to consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The South West Herts SHMA is currently in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters concerning requirements for this category of housing.	
Transport infrastructure • Most of the site is well served by public transport (298, 313 and 610/611 and school services 692 and 699) • Bus priority would play an important role in reducing reliance on single-occupancy car • Development will impact on the strategic road network (SRN). • Cumulative assessment of sites (including PB4) across plan period needed highlighting residual impact on the SRN • Consideration needs to be given to infrastructure implications of growth already proposed in vicinity of Potters Bar in Welwyn Hatfield • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Hertfordshire County Council Growth and Infrastructure Unit • Highways England • Transport for London (TfL) • Welwyn Hatfield Borough Council

HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

The council's acknowledges the impact of any growth near Potters Bar within Welwyn Hatfield, particularly on local infrastructure. We have previously emphasised the importance of any growth near Potters Bar being accompanied by investment in the town's infrastructure given the impact on local services. In 2017, the council signed a Memorandum of Understanding setting a framework for future co-operation on strategic planning cross boundary issues. We will continue to work closely with Welwyn Hatfield to ensure that issues of cross-boundary interest are properly addressed.

Environment and wildlife • Trees have potential for nesting birds • Low to moderate ecological sensitivity • Opportunities for ecological enhancement	• Hertfordshire County Council Growth and Infrastructure Unit

HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues

Physical considerations • Development should be directed away from areas of flood risk with flood risk to existing communities reduced where possible • Potential for any development to improve existing flood risk in downstream areas • Flood Zone 3b (functional floodplain) should be safeguarded from development • Consider how flood storage can be protected and maximized across the borough	• Environment Agency • Thames Water • Hertfordshire County Council Growth and Infrastructure Unit

HBC's comments: Potential access into the site is recognised to be within area of flood risk. FRA and Hydraulic modelling will be required should the promoter wish to pursue the site further. This work will need to be corroborated with the Environment Agency and mitigation work will be required where deemed to be necessary. Officers will also continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Physical considerations • Overhead powerlines • Air Quality and noise pollution issues due to the sites proximity to the motorways • Large parts of the site are located within Flood zone 2 and 3. Sites with a lower flooding risk should be prioritised	• Strutt and Parker
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Transport infrastructure • Nearby motorway junctions are under stress or at over-capacity and will not accommodate significant development	• Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Services and facilities • Limited school capacity and shortage from 2022/23 • Capacity at three existing GPs identified – Annandale, Highview and Parkfield – but no provision identified in any PB sites	• Strutt and Parker
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Site address/ location	Land South of Barnet Road, Potters Bar	Site ref: HEL162

Breakdown of general comments received:

Total number of comments	1
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	0

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: Knight Frank on behalf of LB Enfield

Summary of site promoter's response:

No representations on PSHE report were received.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Trees have potential for nesting birds • Low ecological sensitivity • Opportunities for biodiversity enhancement	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	

Other developer/landowners responses:

No representations received.

Other potential development sites

Site address/ location	Fenny Slade, The Ridgeway	Site ref: HEL164

Breakdown of general comments received:

Total number of comments	3
Statutory bodies and local interest groups	2
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England

Other developers/ landowners
- Bidwells

Site Promoter: Tetlow King on behalf of the owner

Summary of site promoter's response:
No representations on the PSHE report were received.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Wildlife • Southern part of site in Fenny Slade LWS • Trees may have potential for bats and birds • Low (dwelling plot) to high (LWS) ecological sensitivity	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	
Transport infrastructure • Development will impact on the strategic road network (SRN) • Cumulative assessment of sites (including HEL164) across plan period needed highlighting residual impact on the SRN	• Highways England
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	

Other developer/landowners responses:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Landownership and assembly • New site (5 acres) put forward to the west of site that could potentially adjoin with HEL164	• Bidwells
HBC's comments: The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground. However, measures will need to be taken by the site promoter/s to show that the scheme is deliverable and that all landowners are willing to work together on one collaborative scheme.	

Site address/ location	Dove Lane, Potters Bar	Site ref: HEL177

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	**2**
Developers/ landowners (includes site promoter)	**0**

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England

Site Promoter: Asset Management, Hertsmere Borough Council

Summary of site promoter's response:

No representations on PSHE report were received.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Trees may have potential for bats and birds • Low to moderate ecological sensitivity • Potential for biodiversity enhancements	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Environment and wildlife • Development will impact on the strategic road network (SRN) • Cumulative assessment of sites (including HEL177) across plan period needed highlighting residual impact on the SRN.	• Highways England
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	

Other developer/landowners responses:

No representations received.

Site address/ location	Rushfield, Dugdale Hill Lane, Potters Bar	Site ref: HEL178

Breakdown of general comments received:

Total number of comments	1
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	0

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: Asset Management, Hertsmere Borough Council

Summary of site promoter's response:

No representations on PSHE report were received.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • High ecological sensitivity • Dugdale Hill Meadows Grassland LWS • Trees will have potential for bats and birds • Retain hedgerows and as many trees as possible	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: The entire site is designated as a LWS and unless evidence can be provided to demonstrate that the site no longer merits the designation, the scope to consider any development is likely to be limited. Further work would need to be undertaken by the site promoter to fully assess the extent and sensitivity of wildlife and ecology onsite should it wish to continue to pursue the site. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

No representations received.

Site address/ location	75 Hatfield Lane, Potters Bar	Site ref: HEL223

Breakdown of general comments received:

Total number of comments	1
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	0

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: The Landowner

Summary of site promoter's response:

No representations on PSHE report were received. It should be noted that the site has since been withdrawn from the Local Plan process.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Adjacent to Morven Park Grassland Ecosite • Trees may have potential for bats and birds • Low ecological sensitivity but potential for biodiversity enhancements	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

No representations received.

Site address/ location	Well Cottage, Bentley Heath	Site ref: HEL234

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	2
Developers/ landowners (includes site promoter)	0

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- R.A.I.D (Residents Against Inappropriate Development)

Site Promoter: King and Co on behalf of owner

Summary of site promoter's response:

No representations were received.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Bats and great crested newts have been recorded in the area. • Low to moderate ecological sensitivity • Water courses, flooding and drainage • Important wildlife corridor for deer • Several ponds are designated Country Wildlife Sites with great crested newts sited • Bentley Heath Common and Dancers Hill Road are Registered Common Land • Horses and livestock rely on the hay generated here • Sets a precedent for further development	• Hertfordshire County Council Growth and Infrastructure Unit • R.A.I.D (Residents Against Inappropriate Development)
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	
Scale of development • Number of houses too high and will not reflect character of area	• R.A.I.D (Residents Against Inappropriate Development)
HBC's comments: The housing numbers stated within the report are based on a standard HELAA methodology agreed in consultation with neighbouring authorities. Further information on the breakdown of the capacity figures can be found within the HELAA document. It should be noted however that these figures may change as a number of the capacities were calculated based on there being no absolute constraints on some sites. In some instances, site boundaries have also changed followed representations from site promoters.	
Landscape and visual impact • Bentley Heath is a rural hamlet • Would lead to coalescence of these distinct local settlements connecting Bentley Heath, Ganwick Corner and Potters Bar	• R.A.I.D (Residents Against Inappropriate Development)
HBC's comments: Hertsmere will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Services and facilities • Outside of the main towns and shopping areas only has a few local amenities • Development should be concentrated on previously developed sites within towns	• R.A.I.D (Residents Against Inappropriate Development)

HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.

Full consideration will need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Transport infrastructure • Increase in traffic on Wagon Road, Dancers Hill Road, and routes to Potters Bar and Barnet • Further congestion and its impact on the nursery school and horse riders • Nearest station is Hadley Wood which cannot be reached by public transport	• R.A.I.D (Residents Against Inappropriate Development)

HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

Green Belt • Inappropriate and unnecessary development that results in the destruction of green belt • Bentley Heath is a hamlet with a rural feel • Eyesore –impact on openness • Contravenes green belt policy	• R.A.I.D (Residents Against Inappropriate Development)

HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

Other developer/landowners responses:
No representations received.

Site address/ location	Former Sunny Bank Primary School, Potters Bar	Site ref: HEL318

Breakdown of general comments received:

Total number of comments	3
Statutory bodies and local interest groups	2
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit
- Sport England

Site Promoter: Hertfordshire County Council Property

Summary of site promoter's response:

Summary:

Representation confirms HCC are making the site available for residential development.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Sports and recreation • Object to potential allocation of former playing fields • Playing fields need to be safeguarded or replaced on an alternative site	• Sport England
HBC's comments: A new open spaces and recreation study is currently being conducted by Hertsmere which looks at the quality and provision of the borough's existing open spaces and sports facilities.	
Environment and wildlife • Low ecological sensitivity • Bats may be roosting in the buildings • Potential for biodiversity enhancements	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

No representations received.

Site address/ location	Manor Road, Potters Bar	Site ref: HEL375

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: Aylward Planning on behalf of King & Co

Summary of site promoter's response:

Key Points Raised:

- Site can be considered individually or as part of PB2
- Onsite constraints can be mitigated
- Suitable access can be provided onto Manor Road. Pedestrian access could be provided to the railway station

Summary:

The site promoter suggests benefits should the site be considered with PB2 including an additional access point which could be provided to PB2 that lies outside of FLZ3. The site could be delivered individually or alongside PB2 as part of a strategic alliance.

Potential noise issues from the adjacent railway line and the need for mitigation are acknowledged. TPOs on the site are also noted with the masterplan shows the retention of the significant trees on site.

The access point onto Manor Road is proposed as a shared surface. The promoter believes the dimensions are compliant with the Hertfordshire Highways design guidance. It is also suggested that the telegraph pole that currently blocks the Manor Road access can be relocated. Pedestrian access could be provided to the railway station via the car park.

Technical studies have also been submitted in conjunction with the masterplan reps. These include a transport note, green belt note and an engineering note.

HBC's comments:

The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground. However, measures will need to be taken by the site promoter/s to show that the scheme is deliverable and that all landowners are willing to work together on one collaborative scheme.

Officers continue to liaise with the Environmental Health department in regards to noise issues surrounding sites being promoted for residential development.

All suggested accesses points will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Officers will liaise with Hertfordshire County Council regarding the suitability of the proposed access point on Manor Road.

As part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

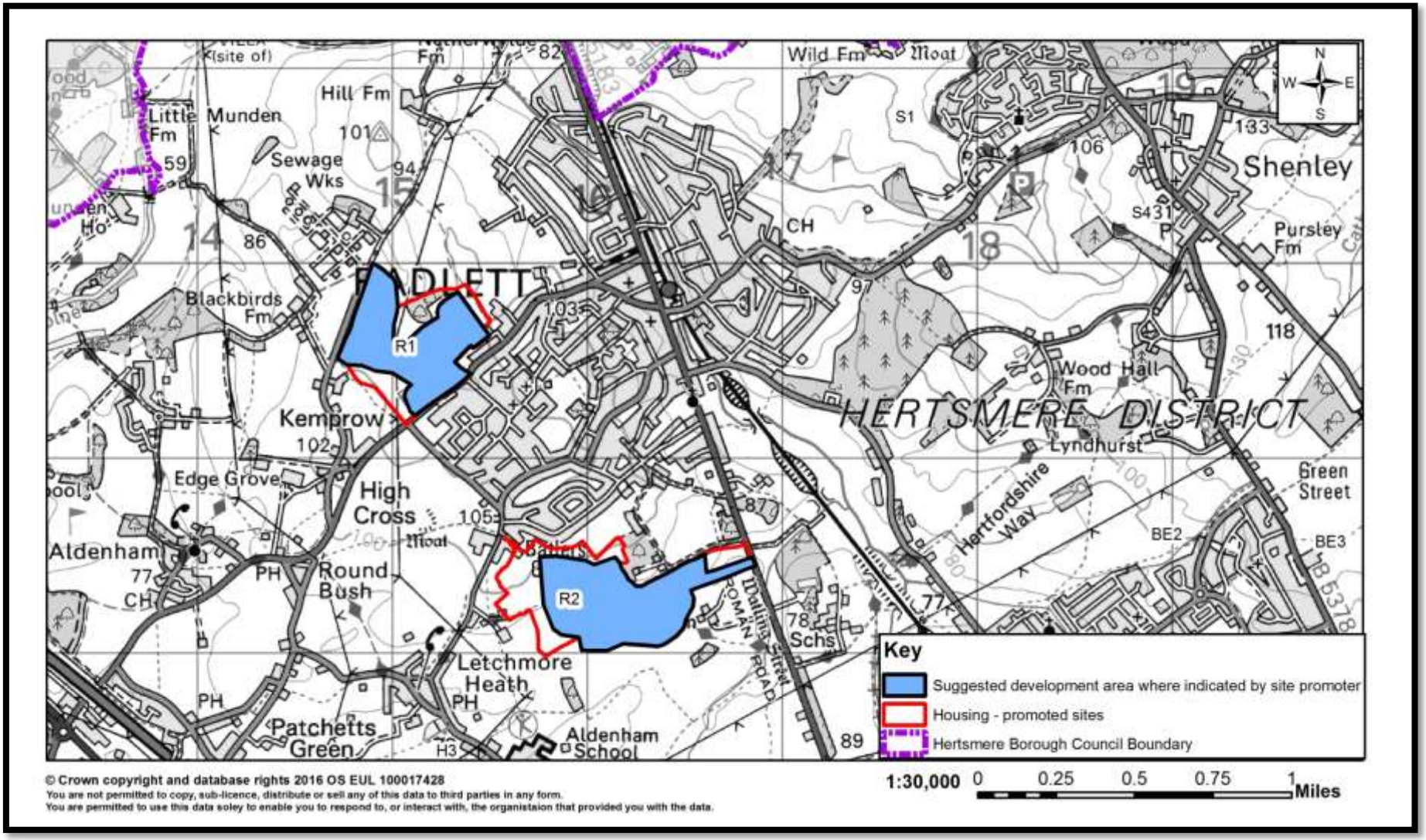
Substantive points raised	Responder/s
Environment and wildlife • Part of Potters Bar Golf Course Ecosite • Trees have potential for nesting birds • Bats have been recorded in the area • Low ecological sensitivity	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	

Other developer/landowners responses:

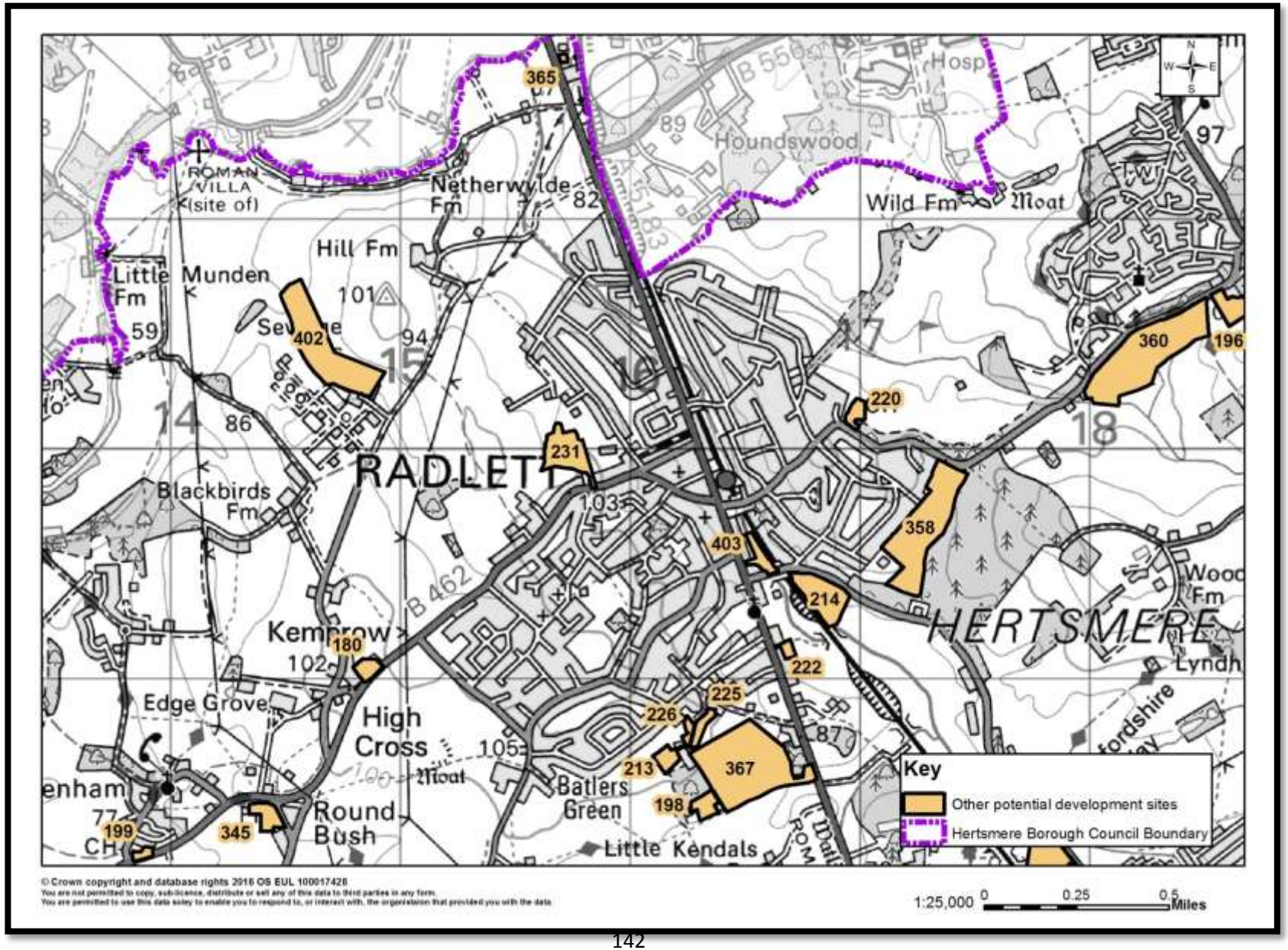
No representations received.

10. Summaries of feedback from site promoters, statutory bodies and local interest groups – Radlett

10.1 - Map of Radlett strategic housing



10.2 - Map of Radlett other potential development sites



10.3 - Feedback forms – Radlett

Strategic Housing Sites

Site address/ location	Land North-West of Watford Road, (Kemprow Farm, Crown Estate), Radlett	Site ref: R1 (HEL 379)

Breakdown of general comments received:

Total number of comments	11
Statutory bodies and local interest groups	6
Developers/ landowners (includes site promoter)	5

Site Promoter: Savills on behalf of the Crown Estate

Statutory bodies and local interest groups

- Thames Water
- Hertfordshire County Council Growth and Infrastructure Unit
- The Radlett Society and Green Belt Association (RSGBA)
- Aldenham Parish Council
- Highways England
- Environment Agency

Other developers/ landowners

- Star Planning
- Strutt and Parker
- Bell Cornwell
- Jane Osborn Associates – Oakridge Farms Ltd

Summary of site promoter's response:

Key Points Raised:

- Two options put forward depending on size of site
- Large demand for housing LPA figure will increase above 500dpa
- Radlett provides a vastly greater breadth of services relative to existing settlement size than is stated by LPA
- New GP facility to be considered
- Approximately 100 additional schools places required at all levels
- Opportunity to incorporate a new infant feeder school to link up with Fair Field Junior school
- Will not have a significant impact on the wider strategic highway network
- Perceived flaws and inconsistencies identified within the green belt Stage 2 study
- Existing woodland would form a good basis for green infrastructure

Summary:

The site promoter reiterates the Government's message that there is a significant demand for housing across the UK. Whilst the council have stated a target figure of 500 dwellings per annum, the promoter believes this is likely to increase with the government revised methodology calculating a need of over 700 dwellings per annum. The promoter also reiterates the need for a balanced approach to the scale of allocations to ensure deliverability and that the council's stated dwelling figures are overestimating the capacities of the sites. The LPA is considered to have overestimated the capacity of sites.

The promoter disputes the positon of Radlett within the indicated settlement hierarchy, particularly given that it is below Bushey emphasising: the make-up of facilities and services within Radlett being conducive to development; substantial retail offer, including two supermarkets, the Radlett centre, and the train station. Radlett is considered to provide a vastly greater breadth of services relative to existing settlement size, and given the site location and its proximity and services (in particular the train station); it is superior to what exist within other settlements.

Two alternative options have been presented, and the flexibility of this site has been emphasised. Option 1 is a 21ha site with approximately 250 dwellings and Option 2 is a 36ha site with capacity for approximately 390 dwellings. The benefit of Option 2 is the greater opportunity it offers to incorporate additional services, in particular educational and medical facilities.

The promoter has made it clear that it is prepared to work with the council to deliver much needed infrastructure. Although acknowledging the site is not of a sufficient size to require a new GP facility, the site promoter states that it should be considered in this location. The need for approximately 100 places each for primary, secondary and

nursery schools is highlighted with an opportunity to incorporate a new infant feeder school to link up with Fair Field Junior school, which itself could be expanded in the future. A 1FE primary school could also be justified.

It is indicated that the proposed development would not have a significant impact on the wider strategic highway network, with two accesses being provided, onto Watford Road and Oakridge Lane. However, the cumulative impact of additional development across the whole of the borough will need to be modelled.

Concerns over the Stage 2 green belt assessment are also addressed with the promoter perceiving there to be flaws and inconsistencies within the study. Technical studies have also been submitted in conjunction with this document and include a preliminary ecological appraisal, wildlife surveys and utilities survey, the key findings from these being that the existing woodland would form a good basis for green infrastructure. An 11m offset distance from the overhead power lines would be applied.

As part of the promoter's submission the following technical studies have been submitted; national character area profile, landscape character area report, Wall Hall citation from Historic England, Hertsmere Borough green infrastructure plan, and a landscape appraisal and green belt review.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The points raised about the positon of Radlett within the settlement hierarchy are noted and it is recognised that Radlett does have a range of services, including train connections into London and a significant local retail offer, which make it a relatively sustainable location for development. However, in terms of both population levels and geographical area, Radlett remains significantly smaller than both Potters Bar and Bushey and there is a view locally that Radlett remains a village, retaining its character as such. Bushey is acknowledged to be comprised of three distinct centres but it is largely contiguous as a place and has been grouped with Potters Bar in the settlement hierarchy below Borehamwood in the current Local Plan. The settlement hierarchy proposed in the technical study produced in 2018 continues to reflect this.

The promoter has put forward two separate options. The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground. Furthermore, in order to address central government's requirement to meet objectively assessed need for housing and employment, there will need to be a step change in the scale of development. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities.

The impact of any development in the green belt will be fully assessed and the council will seek to minimise any harm caused by loss of green belt. There are not considered to be discrepancies in relation to the Stage 1 and Stage 2 green belt assessments as they relate to this part of the borough. The Stage 2 assessment was a more fine grained assessment enabling an individual site or land promotion to be considered as a smaller sub-area. Although this resulted in some different assessments against green belt purposes than the wider parcel, the Stage 2 assessment also considered the strategic contribution which a sub-area made to the wider parcel.

Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

It is noted that the promoter indicates a willingness to incorporate additional educational and medical facilities on

the larger site. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics including the scale of the development, Fair Field Junior School, the waste treatment facility and transport. More generally, the council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will need be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Green Belt • Significant loss of green belt • Should only build on half of this site to avoid coalescence	• Aldenham Parish Council • The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by Arup is available to view on the council's website.	
Environment and wildlife • Generally low-moderate ecological sensitivity but higher close to LWS, which should be adequately buffered • PEA required to assess any farmland interest	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • LPA should liaise with Thames water to ensure housing does not outpace network upgrades • A housing and infrastructure phasing plan required to determine capacity within the water network • Would require 60 units of extra care housing, of which 12 should be accessible with disabilities • Accessibility to services as site not within walking distance • Oversubscribed medical facilities • Limited school capacity – consider relocation of Fair Field School	• Hertfordshire County Council Growth and Infrastructure Unit • Thames Water • Environment Agency • Aldenham Parish Council • The Radlett Society and Green Belt Association (RSGBA)

HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.

Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

The SW Herts SHMA is currently being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters concerning the requirement for this category of housing.

Physical considerations • Overhead powerlines	• The Radlett Society and Green Belt Association (RSGBA)

HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.

Transport infrastructure • Development will impact on the strategic road network (SRN) • Cumulative assessment of sites (including R1) across plan period needed highlighting residual impact on the SRN • Watford Road would need to be updated for pedestrians and cyclists • Much of site is within 400 metres walking distance of bus services (398 and 602) on Willow Way and Watford Road with up to two buses per hour • May be possible to enhance accessibility through diversion or frequency enhancement of these services • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Hertfordshire County Council Growth and Infrastructure Unit • Aldenham Parish Council • The Radlett Society and Green Belt Association (RSGBA) • Highways England

HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

Minerals and Waste • Development should consider the impact on the Blackbirds Lane Sewage Treatment work (STW) and the safeguarded waste site	• Hertfordshire County Council Growth and Infrastructure Unit • The Radlett Society and Green Belt Association (RSGBA)

HBC's comments: The council continues to liaise with HCC Minerals and Waste department in relation to the waste treatment sites following receipt of comments from the Growth and Infrastructure Unit. The council will be guided by HCC with regard to ongoing backfill of current minerals sites as well as development with implications for waste treatment facilities.

Affordable housing • Can only be contemplated if a majority of housing was Affordable	• Aldenham Parish Council • The Radlett Society and Green

Housing, particularly smaller family homes	Belt Association (RSGBA)
HBC's comments: The council recognises the need to provide affordable housing. South West Herts SHMA is currently in the process of being updated and addresses this need. The council will continue to seek to maximise the delivery of affordable homes in the borough.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Landscape and visual impact • Limited containment • Significant landscape and visual impact • Disproportionate addition • Countryside encroachment	• Star Planning • Bell Cornwell • Jane Osborn Associates
HBC's comments: LVA Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to preparing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. The council has yet to decide where it will commission its own LVA work but where this is not undertaken, it will look to corroborate the work that has already been submitted. Hertsmere will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Green Belt • Coalescence between Radlett and Kemprow • Encroachment into countryside • Stage 2 green belt assessment recommends no further consideration of the site	• Star Planning • Bell Cornwell • Jane Osborn Associates
HBC's comments: The impact of any development in the green belt will be fully assessed taking into account the findings of Arup's green belt assessment which is on the council's website. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Environment and wildlife • Local wildlife sites • Proximity of protected ancient woodland • TPOs • Loss of good quality, irrigated agricultural land which should remain for agricultural/food production • Part of land farmed by Oakridge Farms Ltd which has full control in perpetuity	• Star Planning • Strutt and Parker • Bell Cornwell • Jane Orbson Associates
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues. The quality of existing agricultural land will need to be properly considered in line with the requirements set out in the NPPF. It will also need to be demonstrated that the land is available for development with no agricultural tenancies preventing the land from coming forward.	
Services and facilities • Limited school capacity	• Star Planning • Strutt and Parker

• Constrained medical facilities • Less sustainably located than R2	• Bell Cornwell
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Physical considerations • Overhead power lines would prevent site being delivered • Mineral consultation area • Flooding on Watling Street potentially isolates parts of the community from emergency services • Traffic impact on AQMA which is under-addressed in Sustainability Appraisal • Adds to issues associated with AQMA along Watling Street • Proximity to sewage treatment works, a safeguarded waste site	• Star Planning • Strutt and Parker
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications. FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary. The council continues to liaise with HCC Minerals and Waste department in relation to the waste treatment sites following receipt of comments from the Growth and Infrastructure Unit. The council will be guided by HCC with regard to ongoing backfill of current minerals sites as well as development with implications for waste treatment facilities. Officers also continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.	
Scale of development • Assuming an average occupancy rate of 2.5 persons per dwelling, if developed this site could increase the population by 1250 people. This would represent a disproportionate increase in the size of the village	• Jane Orbson Associates
HBC's comments: In order to address central government's requirement to meet objectively assessed need for housing and employment, there will need to be a step change in the scale of development. This will require a range of locations beyond existing built up areas to be assessed and where appropriate, increased densities will need to be considered. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities.	
Transport infrastructure • Radlett is an unsustainable settlement and any new residents would be forced to adopt unsustainable travel patterns	• Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become	

established and capable of self-funding.

Site address/ location	Land South of The Ridgeway (Home Farm), Radlett	Site ref: R2 (HEL 346)

Breakdown of general comments received:

Total number of comments	10
Statutory bodies and local interest groups	7
Developers/ landowners	3

Site Promoter: Bell Cornwell

Statutory bodies and local interest groups

- Thames Water
- The Radlett Society and Green Belt Association (RSGBA)
- Letchmore Heath Village Trust
- Aldenham Parish Council
- Highways England
- Environment Agency
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners

- Star Planning
- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Radlett is a sustainable settlement for further development.
- 10 min walk from the station and 8 min walk to the nearest bus stop
- Access to the site will be via a new roundabout onto Watling Street and the access road will cross Affinity Water land.
- Proposal to include local community hub that will include a primary school, play area, and possibly a GP practice.
- Opportunity to create green corridor along the Hertfordshire Way long distance footpath
- Site is low lying and visually constrained
- Flexible approach to the capacity of the site, from 600 to 750 given the potential for the site to adjoin other smaller proposals.

Summary:
The site promoter considers Radlett to be one of the key settlements within the borough and a sustainable settlement for further development. The site is indicated as being located approximately 10 minute walk from Radlett station, reiterating that the site is easily accessible to a significant number of facilities with local bus stops within walking distance. This could be further enhanced if the site were taken forward.

The promoter has clarified issues surrounding access to the site, with a new roundabout being proposed, and the access from Watling Street being via land owned by Affinity Water. Concerns have been raised about the results of the high-level transport assessment given that it set out a position without any transport improvements.

The need for education and medical facilities is acknowledged and there is a willingness to discuss the possibilities of providing a new GP practice and a primary school. These facilities along with a play area would form the local community hub for the area. The Hertfordshire Way long distance footpath crosses the site and is seen as an opportunity to form a green corridor which along with woodland around the perimeter of the site would improve biodiversity.

Whilst the promoter accepts that there are site constraints in relation to heritage assets the settings of the listed buildings will be free of development. The site is also low lying and visually constrained with due consideration to the local geography and the development of a revised defensible green belt boundary the site will not have a significant impact on the green belt.

The promoter also mentions that there will be a flexible approach to the capacity of the site, from 600 to 750 given the potential for the site to adjoin other smaller proposals. As part of the promoter's submission the following technical studies have been submitted; technical highways note, landscape appraisal, and land registry information.

HBC's comments: In order to address central government's requirement to meet objectively assessed need for housing and employment, there will need to be a step change in the scale of development. This will require a range of locations beyond existing built up areas to be assessed and where appropriate, increased densities will need to be considered. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities. A flexible approach to the capacity of the site is therefore encouraged.

The promoter has mentioned that there is potential to link up with other sites. The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground. However, measures will need to be taken by the site promoter/s to show that the scheme is deliverable and that all landowners are willing to work together on one collaborative scheme.

Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics, including the scale of development, proposals for a local community hub and transport. It is noted that the promoter is willing to discuss the provision of education and medical facilities.

Technical studies have been conducted by a number of the developers including the promoter of R2 and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Green Belt • Coalescence between Radlett and Letchmore Heath • No natural boundary to Radlett on this side of Watling Street • Would lead to ribbon development	• Aldenham Parish Council • The Radlett Society and Green Belt Association (RSGBA) • Letchmore Heath Village Trust
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Environment and wildlife • Loss of green corridor between Radlett and Elstree • Bat and barn owl records • Farmland birds recorded locally • Low to locally moderate ecological sensitivity due to Cobden Hill Dell LWS • Moses Dell Ecosite adjacent	• Aldenham Parish Council • Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust, are being consulted on all sites throughout the Local Plan process. Eco-sites are acknowledged to have less status than designated wildlife sites but where they are identified; a Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development. Biodiversity offsetting will need to be considered to compensate for any habitat loss.	

Services and facilities • LPA should liaise with Thames Water to ensure housing does not outpace network upgrades • Would require 60 units of extra care housing, of which 12 should be accessible with disabilities • Distance to shops and other local services • Limited school capacity • Oversubscribed medical facilities	• Thames Water • Environment Agency • The Radlett Society and Green Belt Association (RSGBA) • Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities', taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The SW Herts SHMA is currently being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters concerning the requirement for this category of housing.	
Adjacent sites • May be possible to develop the part which links with HEL367	• Aldenham Parish Council
HBC's comments: The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground.	
Transport infrastructure • Development will impact on the strategic road network (SRN) • Cumulative assessment of sites (including R2) across plan period needed highlighting residual impact on the SRN • Limited access from Watling Street • Lack of bus routes and stops; no bus routes along Common Lane or along Watling Street from Elstree • Few bus services in the area which could be extended or diverted through site which itself is unlikely to be sufficient to sustain a new service • Traffic impact on Common Lane • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• The Radlett Society and Green Belt Association (RSGBA) • Highways England • Letchmore Heath Village Trust • Transport for London (TfL)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Affordable Housing • Development could only be contemplated if it provided a clear majority of Affordable Housing, particularly small family homes	• The Radlett Society and Green Belt Association (RSGBA)

HBC's comments: The council recognises the need to provide affordable housing. South West Herts SHMA is currently in the process of being updated and addresses this need. The council will continue to seek to maximise the delivery of affordable homes in the borough.

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Landscape and visual impact • Limited visual and physical containment • Sprawl into and impact on countryside	• Star Planning
HBC's comments: LVA Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to preparing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. The council has yet to decide where it will commission its own LVA work but where this is not undertaken, it will look to corroborate the work that has already been submitted. The council will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Green Belt • The council's green belt assessment does not recommend this sub-area for further consideration	• Star Planning
HBC's comments: The impact of any development in the green belt will be fully assessed taking into account the findings of Arups green belt assessment. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent.	
Environment and wildlife • Loss of good quality agricultural land • Ancient woodland • Priority habitat and local wildlife site	• Star Planning • Strutt and Parker
HBC's comments: The quality of existing agricultural land will need to be considered in line with the requirements set out in the NPPF. Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust, are being consulted on all sites throughout the Local Plan process. Eco-sites are acknowledged to have less status than designated wildlife sites but where they are identified; a Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development. Biodiversity offsetting will need to be considered to compensate for any habitat loss.	
Services and facilities • Limited school capacity • Constrained capacity at Red House GP	• Star Planning • Strutt and Parker
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities', taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the	

Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Physical considerations • Flooding on Watling Street potentially isolates parts of the community from emergency services	• Strutt and Parker
HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.	
Transport infrastructure • Limited/problematic access • Site likely to be car dependent	• Star Planning • Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Heritage • Possible archaeological finds in area south west of Radlett	• Star Planning
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	

Other potential development sites

Site address/ location	Kemprow, between White House and Adelaide Lodge, Kemprow	Site ref: HEL180

Breakdown of general comments received:

Total number of comments	3
Statutory bodies and local interest groups	2
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Aldenham Parish Council
- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: Preston Bennett

Summary of site promoter's response:

Key Points Raised:
- Close proximity to frequent bus service, and two schools
- Within a 20 minute walk of Radlett centre
- The proximity of site R1 will not affect this site's deliverability
- The site will not protrude beyond the existing boundary of Kemprow, and the boundary of the site is relatively well contained

Summary:
The site promoter considers the site to be suitable for the potential residential development of 25 dwellings. The site is considered to be in a highly sustainable and accessible location given that it is located within close proximity of a bus stop at High Cross, which serves a frequent service to Watford, Potters Bar and Hatfield (398 and 602). Furthermore, the site is within a 20 minute walk (1.3 miles) of Radlett centre and within close proximity to Edge Grove school and Fair Field Junior school.

The promoter goes on to state that whilst strategic site R1 is located within close proximity it should not affect the deliverability of this site; given that the landscape is relatively self-contained, and there is significant green space between the two sites, thus preventing the coalescence of settlements and maintaining the character of the area and the green belt. Furthermore, the site won't encroach beyond the existing boundary of Kemprow.

Whilst the site promoter acknowledges that the site is located outside of the Radlett Plan boundary, it will be mindful of any proposals put forward. Also, the site was granted planning permission for a new dwelling (16/2406/FUL) in March 2017.

HBC's comments: Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The extant permission for one new dwelling on the site is noted.

The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Further consideration will also be given to the implications of proposed development on other suggested sites.

The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Do not support the proposal	• Aldenham Parish Council
HBC's comments: The comment is noted	
Environmental and wildlife constraints • Potential for reptiles and badgers • Retain as many trees as possible – historic orchard sites within vicinity • Potential to incorporate biodiversity enhancements • PEA and Preliminary Bat Roost assessment advised	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Services and facilities • Isolated area not linked to infrastructure	• Aldenham Parish Council
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Other developer/landowners responses:

No comments received

Site address/ location	Land at Brickfields (adjacent to Moses Dell), Watling Street	Site ref: HEL198

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- The Radlett Society and Green Belt Association (RSGBA)
- Aldenham Parish Council
- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: Vigor & Co

Summary of site promoter's response:
No representation on PSHE report received

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Landownership and assembly • Would consider this site if it was alongside HEL367 as it would 'round off' this part of Radlett • Not suitable for expansion	• Aldenham Parish Council • The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground.	
Transport infrastructure • No proper vehicular access	• The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. All suggested accesses point will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Green Belt • Nominally brownfield but away from existing development and would impact on the green belt	• The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website. The council notes that previous development has occurred on the site however this has result in all of the current brownfield land being developed. Therefore any further development would require release of green belt.	
Environment and wildlife • Locally high ecological sensitivity due to presence of woodland • No species recorded but likely high bat potential	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding	

environment and wildlife issues.
Other developer/landowners responses: No comments received

Site address/ location	Land at rear of The Ridgeway, Radlett	Site ref: HEL213

Breakdown of general comments received:

Total number of comments	5
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	2

Site Promoter: Siobhan Smith on behalf of site owner

Statutory bodies and local interest groups
- The Radlett Society and Green Belt Association (RSGBA)
- Aldenham Parish Council
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Star Planning

Summary of site promoter's response:
No representation on PSHE report received

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Capacity • Consider some development but not suitable for 25 dwellings	• The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: The housing numbers stated within the report are based on a standard HELAA methodology agreed in consultation with neighbouring authorities. Further information on the breakdown of the capacity figures can be found within the HELAA document. It should be noted however that these figures may change as a number of the capacities were calculated based on there being no absolute constraints on some sites. In some instances, site boundaries have also changed followed representations from site promoters.	
Services and facilities • Isolated area not adjoining any infrastructure and not supported for development	• Aldenham Parish Council
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Traffic infrastructure • Careful consideration of vehicular access needed given that Loom Lane is not suitable for extensive traffic	• The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. All suggested accesses point will be assessed for their suitability**.** Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Environment and wildlife • Locally moderate ecological sensitivity due to LWS to the east • Potential for reptiles	• Hertfordshire County Council Growth and Infrastructure Unit

HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Transport infrastructure • Extremely limited vehicular access via private access track/public right of way	• Star Planning
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. All suggested access points will be assessed for their suitability and will need to meet relevant highway authority standards. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Services and facilities • Poor overall accessibility compared to other sites in Radlett	• Star Planning
HBC's comments: The requirement to provide for the significantly increased level of housing needs identified through the government's standard methodology means that locations outside the current built-up area will need to be considered for development. Where allocations in locations that are currently less sustainable are to be considered, improvements to their sustainability, including access to sustainable transport and services, will also need to be secured. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Landownership and assembly • Site is in different ownerships so no certainty site can be delivered	• Star Planning
HBC's comments: Whilst land within multiple ownerships should not be seen as a significant constraint on development, measures will need to be taken by the site promoter/s to show that the site is deliverable and that all landowners are willing to work together on one collaborative scheme.	

Site address/ location	Land South of Theobald Street, Radlett	Site ref: HEL214

Breakdown of general comments received:

Total number of comments	5
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	2

Statutory bodies and local interest groups

- Aldenham Parish Council
- Hertfordshire County Council Growth and Infrastructure Unit
- The Radlett Society and Green Belt Association (RSGBA)

Other developers/ landowners

- Savills

Site Promoter: Star Planning on behalf of Richborough Estates

Summary of site promoter's response:

Key Points Raised:

- Will round off the settlement and consolidate the existing settlement form
- Makes a low contribution to the green belt and should be considered for release
- Access to the site across highway land is not a constraint to development
- Proposal will be offset from the watercourse (9m) and railway
- Will retain existing trees and overhead powerlines to be put underground

Summary:

The site promoter considers the site to be suitable, achievable and subject to green belt status changing, achievable for housing purposes, identifying Radlett as a sustainable location for growth. The proposal is considered to be one which would result in the rounding off the settlement and consolidation of the existing settlement form.

In relation to the green belt the promoter identifies the site as currently making a low contribution to the purposes of the green belt and should be considered for release. In support of this, it is highlighted that development would not result in coalescence and will maintain a substantial gap, with well contained strong physical features.

The need for access across highway land into the site is acknowledged but the promoter states this is achievable, with the field gate which opens onto Theobald Street to be used, albeit with improvements to create a new junction with Theobald Street.

The promoter identifies constraints with the site including TPOs, the floodplain in the south west corner of the site, the overhead lines, the railway and the neighbouring telecommunication mast. However, these constraints can be mitigated by offsetting the development from the watercourse (9m) and railway, retaining the existing trees and placing the overhead powerlines underground.

The promoter has indicated that there remains some additional capacity within Radlett to meet the school need generated from this site without any need for the expansion of existing schools.

As part of the promoter's submission the following technical studies have been submitted; access appraisal, flood risk note, landscape and visual technical note. Initial discussions have also taken place with HCC in relation to the access and land ownership.

HBC's comments: The promoter suggests that the current constraints present on the site can be mitigated including the watercourse, and overhead powerlines. FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary. Although the scheme includes proposals for putting the powerlines underground, this will need to be agreed with all relevant bodies including National Grid. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.

The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1

and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website. The council accepts that site has been identified for green belt release in combination with other areas, yet reiterates the importance of carefully considering all factors that influence development.

Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics, including proposals to offset the watercourse and railway, the overhead powerlines, and transport. It is however encouraging those discussions have taken place with HCC in relation to access issue raised within the HELAA.

The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.
Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Do not support current proposal but suggest row of bungalows fronting Theobald Street • Bounded by railway and developed land so some logic in release for development	• Aldenham Parish Council • The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: Hertsmere will seek to minimise the landscape and visual impact of any new development and ensure that development reflects the local townscape. The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Environment and wildlife • Locally high ecological sensitivity due to LWS • No species recorded but reptiles likely	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Physical constraints • Overhead power lines	• The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Services and facilities • Close proximity to centre of Radlett	• The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when	

allocating any new sites, and determining the scale, location and make-up of these allocations.

Full consideration will be given to the availability of general services and facilities', taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Radlett Neighbourhood Plan • Bungalows would meet policy in emerging Radlett Neighbourhood Plan	• Aldenham Parish Council
HBC's comments: Should the Radlett neighbourhood plan be adopted, planning applications for development in Radlett will be assessed against the neighbourhood plan, as well as the Hertsmere Local Plan of which it would form a part and which contains policy requirements not covered in the neighbourhood plan.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • The current suggestion of 90 homes is too high. HBC should ensure that targets used are deliverable 77 homes sounds more suitable. • Small scale and not a proportionate extension	• Savills
HBC's comments: The housing numbers stated within the report are based on a standard HELAA methodology agreed in consultation with neighbouring authorities. Further information on the breakdown of the capacity figures can be found within the HELAA document. It should be noted however that these figures may change as a number of the capacities were calculated based on there being no absolute constraints on some sites. In some instances, site boundaries have also changed followed representations from site promoters.	
Green Belt • Stage 2 green belt study fails to take into account other constraints in this parcel	• Savills
HBC's comments: The impact of any development in the green belt will be fully assessed taking into account the findings of Arup's green belt assessment and any other relevant considerations. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. The Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Sports and recreation • King George V playing fields – parish seek to protect	• Savills
HBC's comments: A new open spaces and recreation study is currently being conducted by Hertsmere which looks and the quality and provision of the borough's existing open spaces and sports facilities. The impact of development on the rights of way network will be considered carefully in consultation with HCC Rights of Way service. This will include both positive and negative effects such as the scope for routes to be created, improved and integrated within new development, as well as the impact on users of having to divert any existing routes.	
Physical considerations • The railway line and access restrict opportunities for expansion	• Savills
HBC's comments: The comments are noted.	

Site address/ location	Porters Park golf Club, Shenley Hill, Radlett	Site ref: HEL220

Breakdown of general comments received:

Total number of comments	5
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	2

Site Promoter: Porters Park Golf Club Properties Ltd

Statutory bodies and local interest groups
- The Radlett Society and Green Belt Association (RSGBA)
- Aldenham Parish Council
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Star Planning

Summary of site promoter's response:
No representation on the PSHE report received

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Do not support proposal	• Aldenham Parish Council
HBC comment's: The comment is noted.	
Sports and recreation • Effect on existing golf club unclear • Concern over compatibility of use with residential development so close to golf	• The Radlett Society and Green Belt Association (RSGBA) • Aldenham Parish Council
HBC's comments: New open spaces and recreation study is currently being conducted by Hertsmere which looks at the quality and provision of the borough's existing open spaces and sports facilities. It is understood that the intention would be to reprovide the clubhouse facilities and to retain the golf facility. Further discussions will be needed with the golf club to establish their detailed intentions.	
Green Belt • Relocation of clubhouse onto green belt land would be unacceptable • Coalescence with Shenley	• The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: The impact of any development in the green belt will be fully assessed. Were facilities to be relocated this development would be assessed accordingly. The NPPF 2019 indicates that the provision of appropriate facilities for outdoor sport may not be inappropriate development provided they preserve the openness of the green belt and do not conflict with the purposes of including land within it. In such circumstances, or where inappropriate development is proposed and exceptional circumstances exist which could justify changes to green belt boundaries, the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Transport infrastructure • Narrow access on bend could increase traffic accident risk	• The Radlett Society and Green Belt Association (RSGBA) • Aldenham Parish Council
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact	

development will have on the strategic and local road network. All proposed accesses will be assessed for their suitability.	
Environment and wildlife • Locally high ecological sensitivity due to LWS • No species recorded although bat potential in buildings	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Sports and recreation • Effect on existing golf club – loss of facilities within clubhouse building	• Star Planning
HBC's comments: A new open spaces and recreation study is currently being conducted by Hertsmere which looks and the quality and provision of the borough's existing open spaces and sports facilities. It is understood that the intention would be to reprovide the clubhouse facilities. Further discussions will be needed with the club to establish their intentions.	
Green Belt • Likely require further development elsewhere in the green belt	• Star Planning
HBC's comments: The impact of any development in the green belt will be fully assessed. The NPPF 2019 indicates that the provision of appropriate facilities for outdoor sport may not be inappropriate development provided they preserve the openness of the green belt and do not conflict with the purposes of including land within it. In such circumstances, or where inappropriate development is proposed and where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Services and facilities • More accessible sites available	• Star Planning
HBC's comments: The requirement to provide for the significantly increased level of housing need identified through the government's standard methodology means that locations outside the current built-up areas will need to be considered for development. Where allocations in locations that are currently less sustainable are to be considered – improvements to their sustainability including access to sustainable transport and services will also needed to be secured. The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Site address/ location	r/o 5-15 Cobden Hill, Radlett	Site ref: HEL222

Breakdown of general comments received:

Total number of comments	5
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	2

Statutory bodies and local interest groups
- The Radlett Society and Green Belt Association (RSGBA)
- Aldenham Parish Council
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Star Planning

Site Promoter: Vigor and Co on behalf of site owner

Summary of site promoter's response:
No representations on PSHE report received

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Radlett Neighbourhood Plan • Do not support this proposal which would be contrary to the policy in the emerging Radlett NP	• Aldenham Parish Council • The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: Should the Radlett neighbourhood plan be adopted, planning applications for development in Radlett will be assessed against the neighbourhood plan, as well as the Hertsmere Local Plan of which it would form a part and which contains policy requirements not covered in the neighbourhood plan.	
Planning history • Previous refusal	• Aldenham Parish Council • The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: The council accepts that outline planning permission has been previously refused on the site (TP/92/0009) due to its impact on the green belt boundary and conservation area. It should be noted that the site has subsequently been removed from the green belt. Any future proposals for the site will be considered on their merit and assessed against current policy and planning legislation.	
Landownership and assembly • Understood to be land ownership issues	• The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: Whilst land within multiple ownerships should not be seen as a significant constraint on development, measures will need to be taken by the site promoter/s to show that the site is deliverable and that all landowners are willing to work together on one collaborative scheme.	
Transport infrastructure • Located at the rear of existing properties • Difficult access making it impractical	• Aldenham Parish Council • The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. All suggested accesses point will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Environment and wildlife • Bats recorded in area. Potential reptiles associated with railway • Locally high ecological sensitivity due to habitat	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology	

onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Heritage • Site is located within Radlett South Conservation Area	• Star Planning
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	
Transport infrastructure • Access into the site via existing driveway of 4m width and so sub-standard. Suitable for no more than 1 or 2 homes	• Star Planning
HBC's comments: All suggested accesses point will be assessed for their suitability and will be required to meet relevant highway authority standards.	
Services and facilities • More accessible sites available	• Star Planning
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities', taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Site address/ location	SE of track between Loom Lane and Brickfields and NW of track between loom lane and Brickfields, Radlett	Site ref: HEL225 and HEL226

Breakdown of general comments received:

Total number of comments	5
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	2

Site Promoter: Trustees of the Phillimore Trust

Statutory bodies and local interest groups
- The Radlett Society and Green Belt Association (RSGBA)
- Aldenham Parish Council
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Star Planning

Summary of site promoter's response:
No representation on PSHE report received

Statutory bodies and local interest groups:
N.B Respondents will be mentioned if they say anything that relates to any of the substantive points listed. This will result in some respondents being listed next to a sub point that they have not raised.

Substantive points raised	Responder/s
Principle of development • Do not support this proposal • Sites are possible but do not support indicative numbers	• Aldenham Parish Council • The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: The housing numbers stated within the report are based on a standard HELAA methodology agreed in consultation with neighbouring authorities. Further information on the breakdown of the capacity figures can be found within the HELAA document. It should be noted however that these figures may change as a number of the capacities were calculated based on there being no absolute constraints on some sites. In some instances, site boundaries have also changed followed representations from site promoters.	
Environment and wildlife • Locally high ecological sensitivity due to habitat • Breeding birds and reptiles potentially present. Bat foraging • Loss of woodland	• Hertfordshire County Council Growth and Infrastructure Unit • The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Transport infrastructure • Requires upgrades to access routes • Access via Loom Lane which is very narrow	• The Radlett Society and Green Belt Association (RSGBA) • Aldenham Parish Council
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. All suggested access points will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	

Other developer/landowners responses:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Green Belt • One of the best performing sites against Green Belt purposes	• Star Planning
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Transport infrastructure • Limited access requiring use of right of way which would impact on protected trees	• Star Planning
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. All suggested accesses point will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network. The existence of protected trees is noted. Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Landownership and assembly • Ability to provide a suitable access is in considerable doubt because of land ownership matters	• Star Planning
HBC's comments: Whilst land within multiple ownerships should not be seen as a significant constraint on development, measures will need to be taken by the site promoter/s to show that the site is deliverable and that all landowners are willing to work together on one collaborative scheme.	
Services and facilities • Poor accessibility; higher scoring sites should be preferred	• Star Planning
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities', taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Heritage • Possible archaeological finds of significant in the area	• Star Planning
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	

Site address/ location	r/o Starveacres, 16 Watford Road, Radlett	Site ref: HEL231

Breakdown of general comments received:

Total number of comments	7
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	4

Site Promoter: Phillips Planning Service on behalf of site owner

Statutory bodies and local interest groups
- The Radlett Society and Green Belt Association (RSGBA)
- Aldenham Parish Council
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Star Planning
- Jane Osborn Associates – Oakridge Farms Ltd
- Savills

Summary of site promoter's response:

Key Points Raised:
- Support inclusion of site
- Sustainable location which will not encroach into surrounding countryside
- Site has been safeguarded in Local Plans since 2003

Summary:

The site promoter supports the inclusion of the site emphasising the sustainable location within walking distance of local services on Watling Street including the train station, as well local schools on Watford Road and Gills Hill Lane. It is suggested that development of the site would not extend the overall limits of the built up area of Radlett due to its location, landscaping and relationship with surrounding land uses. The continued safeguarded status of the site for housing, in successive Local Plan documents, is also highlighted.

HBC's comments: The council confirms that the majority of site is safeguarded for housing under the existing Local Plan. Policy SADM2 states this site is identified as safeguarded land for housing and therefore reserved for housing in the future. It goes on to state that this land will only be released for housing if the local plan indicates that there is insufficient suitable land available. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics including existing policy designations, and transport.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Support the site and would like to see a retirement village, as per Policy HD2 of emerging Radlett NP • Should be considered for elderly-based development and affordable, small homes given relatively proximity to centre of Radlett	• Aldenham Parish Council • The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: Should the Radlett neighbourhood plan be adopted, planning applications for development in Radlett will be assessed against the neighbourhood plan, as well as the Hertsmere Local Plan of which it would form a part and which contains policy requirements not covered in the neighbourhood plan. The South West Herts SHMA is currently in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC, site promoters and Aldenham PC concerning requirements for this category of housing.	
Transport infrastructure • Additional traffic generated • Would require a roundabout to access Watford Road • Would require widening Watford Road between Gill's Hill Avenue and	• The Radlett Society and Green Belt Association (RSGBA)

High Firs	
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. All suggested access point will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Environment and wildlife • Locally moderate to high ecological sensitivity due to habitat diversity • Potential for reptiles depending on grassland condition • Bats potential in buildings	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Recognise majority of site is outside green belt and safeguarded for housing • After Newberries car park, the next priority for development should be the safeguarded land (HEL 231) at Starveacres	• Star Planning • Jane Osborn Associates – Oakridge Farms Ltd • Savills
HBC's comments: The majority of the site has been designated as safeguarded land for housing under Policy SADM2 in the current Local Plan. The policy states that the safeguarded land would be released for housing in the event that a review of the Local Plan indicates that there is insufficient suitable land available. Virtually all the site is located outside of the green belt. The council recognises the need to minimise the loss of green belt by ensuring all suitable sites within the urban area are utilised.	
Capacity • Estimated housing number of 91 considered to be excessive. 50 to 60 homes more realistic	• Star Planning
HBC's comments: The housing numbers stated within the report are based on a standard HELAA methodology agreed in consultation with neighbouring authorities. Further information on the breakdown of the capacity figures can be found within the HELAA document. It should be noted however that these figures may change as a number of the capacities were calculated based on there being no absolute constraints on some sites. In some instances, site boundaries have also changed followed representations from site promoters.	
Services and facilities • 90 homes not enough for an additional store • Should consider a community hub with village hall • There is opportunity for a much needed GP surgery and pharmacy	• Savills
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes	

the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Environmental and wildlife • TPOs along access into the site	• Star Planning
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Transport infrastructure • Would create a crossroads with Gills Hill Lane to be agreed with the Highway Authority	• Star Planning
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. All access points into sites will be fully assessed for their suitability.	

Site address/ location	Land South of Shenley Road, Radlett	Site ref: HEL358

Breakdown of general comments received:

Total number of comments	6
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	3

Site Promoter: Boyer

Statutory bodies and local interest groups
- The Radlett Society and Green Belt Association (RSGBA)
- Aldenham Parish Council
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Star Planning
- Savills

Summary of site promoter's response:

Key points raised:
- Large demand for housing LPA figure will increase above 500dpa.
- 180-200 homes could be developed within the first 5 years
- Strip of land between Shenley Road and the site, owned by HCC, will not affect deliverability
- Makes less important contribution to the green belt
- Potential to expand Newberries Primary School

Summary:
The site promoter reiterates the Government's message that there is a significant demand for housing across the UK. Whilst the council have stated a target figure of 500 dwellings per annum, the promoter believes, this is likely to increase with the government revised methodology calculating a need of over 700 dwellings per annum. The promoter states a development of 180-200 homes could be delivered within the first 5 years.

The promoter goes onto reference the comments regarding the strip of land between Shenley Road and the site, and confirms that this land is owned by Hertfordshire County Council and therefore does not impact deliverability. Reference by the council in the PSHE report to the fact that the Hertfordshire RIGS group has indicated the existing designation should be removed is welcomed.

The site is highlighted as making a less important contribution to the green belt than other sites, as well as capable of delivering a number of benefits including the potential expansion of Newberries Primary School, and pedestrian/cycle linkages. Technical documents have been submitted by the site promoter including a heritage statement, preliminary ecological appraisal, accessibility appraisal, arboricultural report, landscape and visual assessment, flood risk assessment and RIGS baseline assessment.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The promoter mentions that the site could deliver up to 200 homes within the first 5 years and that the strip of land abutting Shenley Road, which is owned by HCC, should not affect deliverability. Whilst land within multiple ownerships should not be seen as a significant constraint on development, measures will need to be taken by the site promoter/s to show that the site is deliverable and that all landowners are willing to work together on one collaborative scheme. In regards to deliverability the council acknowledge that not all sites will be delivered within the first 5 years of the adopted plan period but the council will wish to ensure that sites are built out within the time scales shown in the corresponding Local Plan allocation. We will look to include provisions within our plan for alternative sites to be brought forward where allocated sites are not being implemented. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics including landownership, RIGS designation, planning history, Newberries Primary School, and transport.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Support this proposal as first choice for development but would question density • Site has been previously considered and rejected; no reason to change conclusion	• Aldenham Parish Council • The Radlett Society and Green Belt Association RSGBA
HBC's comments: The potential capacity figures in the PSHE document was calculated using a standard methodology in the HELAA and was intended to be indicative. The site was previously promoted as part of Hertsmere's Local Plan in 2000. The site was refused release for development on green belt grounds, and because other sites were considered more readily appropriate to meet the housing need at the time. Whilst consideration will be given to previous assessments it should be noted that housing requirements and the national planning policy framework have changed significantly. Any future proposals for the site will be considered on their merit and assessed against current policy and planning legislation. Furthermore, the impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Landscape and visual impact • Natural boundary • Overdevelopment	• The Radlett Society and Green Belt Association (RSGBA) • Aldenham Parish Council
HBC's comments: LVA Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to preparing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. The council has yet to decide where it will commission its own LVA work but where this is not undertaken, it will look to corroborate the work that has already been submitted. The council will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Transport infrastructure • Access via Shenley Hill • Link road to Theobald Street • Pedestrian and cycle enhancements sought • Access via Williams Way may not be possible because of existing land ownership	• Aldenham Parish Council • The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. All suggested accesses point will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Radlett Neighbourhood Plan	

• Pedestrian links to Watling Street are highlighted in Radlett Neighbourhood Plan (policies GA1, GA2)	• Aldenham Parish Council
HBC's comments: This comment is noted. Should the Radlett neighbourhood plan be adopted, planning applications for development in Radlett will be assessed against the neighbourhood plan, as well as the Hertsmere Local Plan of which it would form a part and which contains policy requirements not covered in the neighbourhood plan.	
Services and facilities • Proximity to Newberries School • Lack of school capacity • Low accessibility	• The Radlett Society and Green Belt Association (RSGBA) • Aldenham Parish Council
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Green Belt • Important green belt land	• The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website. There are not considered to be discrepancies in relation to the Stage 1 and Stage 2 green belt assessments as they relate to this part of the borough. The parcels considered in Stage 1 typically covered a much larger area with Parcel 42 extending from Coursers Road down to the A1 near Potters Bar. The Stage 2 assessment was a more fine grained assessment enabling an individual site or land promotion to be considered as a smaller sub-area. Although this resulted in some different assessments against green belt purposes than the wider parcel, the Stage 2 assessment also considered the strategic contribution which a sub-area made to the wider parcel.	
Environment and wildlife • Badgers and roosting bats recorded • Potential for reptiles in rough grass • Low ecological sensitivity but geological sensitivity • Regionally important geological site – Hertfordshire puddingstone • Potential for biodiversity enhancements and potential for preservation/display of section of puddingstone	• Hertfordshire County Council Growth and Infrastructure Unit • The Radlett Society and Green Belt Association (RSGBA)
HBC's comments: Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust, are being consulted on all sites throughout the Local Plan process. Eco-sites are acknowledged to have less status than designated wildlife sites but where they are identified; a Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development. Biodiversity offsetting will need to be considered to compensate for any habitat loss. The technical work which has been carried out by the developer in relation to the RIGS status of the site is noted. The council has previously consulted relevant bodies in relation to this designation and further discussions, with relevant organisations and interested groups, will be required in order to corroborate the work conducted by the promoter.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • The scale of development is effectively of a strategic scale • Any land excluded from the Green Belt and allocated for housing purposes should be limited in size and scale to accommodate no more than up-to 100 dwellings • Not sufficient in isolation • The current suggestion of 230 homes is too high. HBC should ensure that targets used are deliverable 180 homes sounds more suitable.	• Star Planning • Savills
HBC's comments: In order to address central government's requirement to meet objectively assessed need for housing and employment, there will need to be a step change in the scale of development. This will require a range of locations beyond existing built up areas to be assessed and where appropriate, increased densities will need to be considered. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities. The housing numbers stated within the report are based on a standard HELAA methodology agreed in consultation with neighbouring authorities. Further information on the breakdown of the capacity figures can be found within the HELAA document. It should be noted however that these figures may change as a number of the capacities were calculated based on there being no absolute constraints on some sites. In some instances, site boundaries have also changed followed representations from site promoters.	
Services and facilities • Limited school capacity	• Star Planning
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities', taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Landscape and visual impact • Natural extension to existing settlement	• Savills
HBC's comments: LVA Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to preparing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. The council has yet to decide where it will commission its own LVA work but where this is not undertaken, it will look to corroborate the work that has already been submitted.	
Green Belt • Wooded copse provides new defensible boundary	• Savills
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Site designations	• Star Planning

• Regionally important geological site – Hertfordshire puddingstone • Development would increase pressure on the RIGS status of adjacent plantation site	
HBC's comments: Technical studies have been conducted by the developer in relation to the RIGS status of the site, and the council have previously consulted relevant bodies in relation to this designation. Further discussions, with relevant organisations and interested groups, are required in order to corroborate the work conducted by the promoter.	
Transport infrastructure • Multiple site access difficulties including ownership constraints • Rural nature of Shenley Road does not lend itself to creation of an access with potential visibility restrictions	• Star Planning
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. All proposed access points will be assessed for their suitability. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	

Site address/ location	Land adjacent to Bridgefoot Cottages, Watling Street	Site ref: HEL365

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: DLA Town Planning on behalf of site owner

Summary of site promoter's response:
No representation on PSHE report received

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Moderate ecological sensitivity due to habitat • No species recorded but potential for reptiles	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	

Other developer/landowners responses:
No comments received

Site address/ location	Land West of Watling Street, Radlett	Site ref: HEL367

Breakdown of general comments received:

Total number of comments	6
Statutory bodies and local interest groups	3
Developers/ landowners (includes site promoter)	3

Statutory bodies and local interest groups

- Aldenham Parish Council
- Highways England
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners

- Star Planning
- Strutt and Parker

Site Promoter: Neame Sutton

Summary of site promoter's response:

Key points raised:

- Large demand for housing LPA figure will increase above 500 dpa
- To maintain 5 year land supply, important to include small sites to ensure deliverability rather than just sites of more than 250 homes
- Radlett is a sustainable location for growth and a key service centre and the site is visually and physically connected
- Challenge findings of HELAA and Stage 2 green belt assessment
- Previous proposed site entrance was deemed acceptable in an earlier planning application.
- Development could be achieved without biodiversity harm

Summary:

The site promoter reiterates the government's message that there is a significant demand for housing across the UK. Whilst the council have stated a target figure of 500 dwellings per annum, the promoter believes this is likely to increase with the government revised methodology calculating a need of over 700 dwellings per annum. The promoter emphasises the importance of including smaller sites within the local plan for the borough to ensure early delivery of housing to meet the demand and maintain a rolling 5 year land supply.

The promoter considers Radlett to be a sustainable location for growth and a key service centre, highlighting that the site abuts the urban area of Radlett and is visually and physical connected.

The council's HELAA and green belt assessment are challenged. In respect of the HELAA questioning the access into the site, the promoter has highlighted that access was deemed to be considered acceptable for a previous application on the site. The promoter has indicated that is has control over the land and therefore the access should not be considered as a constraint. The green belt assessment is considered to be flawed and inconsistent, particularly in terms of the scoring applied as well as the sub-area covering a larger area than the promoted site.

A number of technical reports/documents from a previous, withdrawn application for sports facilities have been submitted including an ecological appraisal commissioned by the promoter which point to development being achieved without biodiversity harm. The site is therefore considered by the promoter to be a suitable and sustainable location for housing adjacent to one of the mot sustainable settlements in the borough.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the governments' standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

In terms of access into the site, the previous application was for sport and recreation uses and was itself withdrawn prior to determination. As such, it is not considered to provide a yardstick for whether an access can be achieved for a residential development with access remaining limited at present to use with either landowner permission or private access rights.

The arboricultural impact assessment/method statements are noted but were undertaken for a previous proposal, namely the planned sports ground at HEL367. It is unclear whether the findings are still relevant for a residential development at the site.

The comments on the green belt assessment are noted. The Stage 1 assessment identified a series of much larger parcels across the borough but the Stage 2, in identifying smaller sub-areas including SA-42, was considered by Arup to represent an appropriate and more granular level of assessment. HEL367 comprises a significant proportion of SA-42 and the process for identifying sub-areas is considered to be sound and is set out in the methodology.

Although there is a degree of subjectivity in attributing individual scores against green belt purposes, the score of 0 against purpose 1 reflects the green belt assessment methodology in only treating Borehamwood and Potters Bar as 'large built up areas' and is considered to be a valid approach. The score of 5 on page 192 of the annex does not relate to the sub-area but the wider parcel (19), with the commentary providing an analysis of the sub-area against the wider contribution of parcel 19.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Landscape and visual impact • Support proposals as it would round off the boundary of Radlett	• Aldenham Parish Council
HBC's comments: Hertsmere will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Environment and wildlife • Ecological links between bordering semi-natural habitats and LWS should be maintained • Moderate/high ecological sensitivity locally due to LWS. PEA required in determining farmland bird interest	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	
Transport infrastructure: • Development will impact on the strategic road network (SRN) • Cumulative assessment of sites across plan period needed highlighting residual impact on the SRN	• Aldenham Parish Council • Highways England
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	

Other developer/landowners responses:

N.B Respondents will be mentioned if they say anything that relates to any of the substantive points listed. This will result in some respondents being listed next to a sub point that they have not raised.

Substantive points raised	Responder/s
Green Belt • One of the best performing sites against green belt purposes	• Star Planning
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Services and facilities • Poor accessibility to services • Limited school capacity • Constrained capacity at Red House GP	• Star Planning • Strutt and Parker
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities', taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Environmental and wildlife constraints • Good quality agricultural land • Priority habitat and wildlife site • TPOs and biodiversity	• Star Planning • Strutt and Parker
HBC's comments: The quality of existing agricultural land will need to be considered in line with the NPPF. Both Natural England and HCC Ecology, as well local bodies such as Herts and Middlesex Wildlife Trust, are being consulted on all sites throughout the Local Plan process. Eco-sites are acknowledged to have less status than designated wildlife sites but where they are identified; a Preliminary Ecological Appraisal will be required to determine the level of interest and impact of any development. Biodiversity offsetting will need to be considered to compensate for any habitat loss.	
Landscape and visual impact • Divorced from urban area	• Star Planning
HBC's comments: Hertsmere will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Landownership and assembly • Third party ownership of current access	• Star Planning
HBC's comments: Whilst land within multiple ownerships should not be seen as a significant constraint on development, measures will need to be taken by the site promoter/s to show that the site is deliverable and that all landowners are willing to work together on one collaborative scheme.	
Transport infrastructure • Deliverability concerns due to levels and ground conditions • Unsustainable travel patterns with reliance on car	• Star Planning • Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the	

larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

The requirement to provide for significantly increased levels of housing need identified through the government's standard methodology means that locations outside the current built up area will need to be considered for development. Where allocations in locations that are currently less sustainable are to be considered, improvements to their sustainability, including access to sustainable transport and services, will also need to be secured.

Physical considerations • Flooding on Watling Street potentially isolates parts of the community from emergency services • Deliverability concerns due to levels and ground conditions	• Star Planning

HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.

The comments concerns levels and ground conditions are noted. The promoter will need to demonstrate that the site is deliverable.

Site address/ location	Aldenham Depot	Site ref: HEL402

Breakdown of general comments received:

Total number of comments	3
Statutory bodies and local interest groups	2
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Aldenham Parish Council
- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: Hertsmere Borough Council

Summary of site promoter's response:
No representation on PSHE report received.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Already some commercial development on the site and support use of the site	• Aldenham Parish Council
HBC's comments: The comment is noted. The potential impact that any development would have on neighbouring sites of a differing land use (and vice-versa) will be taken into consideration when considering land use allocations. The council will seek to avoid "Bad Neighbour" situations from arising which, unless adequate mitigation can be put in place, would either prejudice the operation of existing commercial or other activities or would lead to poor environmental conditions within the new allocation.	
Environment and wildlife • Moderate ecological sensitivity • Badger recorded in vicinity • Potential for reptiles	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:
No comments received.

Site address/ location	Newberries Car Park, Radlett	Site ref: HEL403

Breakdown of general comments received:

Total number of comments	5
Statutory bodies and local interest groups	2
Developers/ landowners (includes site promoter)	3

Statutory bodies and local interest groups
- Aldenham Parish Council
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Star Planning
- Jane Osborn Associates – Oakridge Farms Ltd

Site Promoter: Asset Management, Hertsmere Borough Council

Summary of site promoter's response:
No representations on PSHE report received.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Support for the proposal suggested by the HBC working party headed by Cllr Morris	• Aldenham Parish Council
HBC's comments: The council notes that there is support for the proposal headed by Cllr Morris.	
Environment and wildlife • Low to moderate ecological sensitivity • No species recorded or likely	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

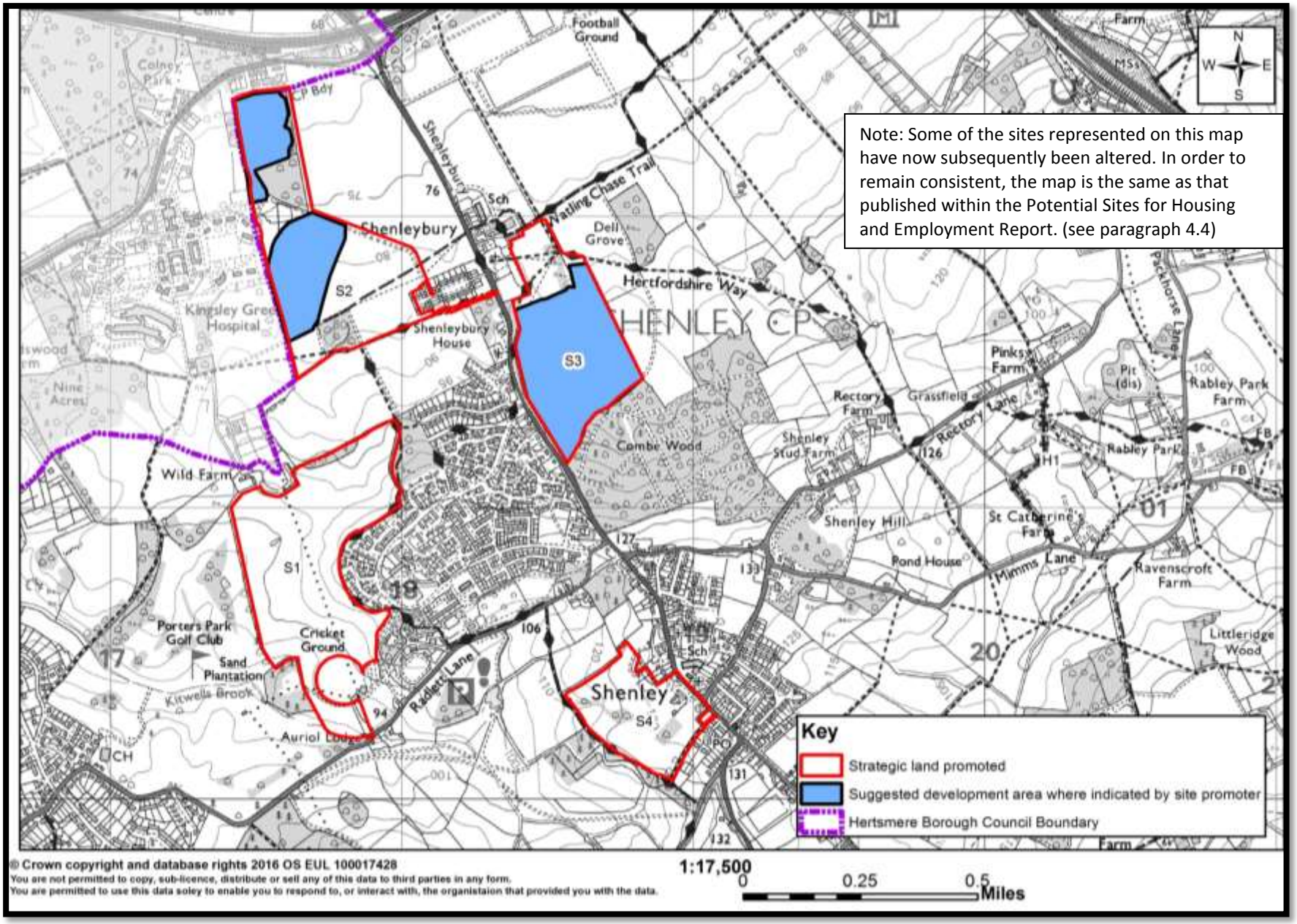
Substantive points raised	Responder/s
Principle of development • Should be first priority for development ahead of any green belt land • Loss of car parking	• Jane Osborn Associates – Oakridge Farms Ltd • Star Planning
HBC's comments: The site is located outside of the green belt. The council recognises the need to minimise the loss of green belt by ensuring all suitable sites within the urban area are utilised. As stated within the PSHE report the proposal will retain surface parking with development being located above.	
Physical considerations • Site lies within functional floodplain and is not considered developable • Access via Watling Street would not be achievable during times of flooding Tykes Water • Sequential test requires other sites to be considered first • Proximity of railway line reduces area which would be environmentally acceptable for development	• Star Planning

HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary. A significant part of this site has been demonstrated, to the satisfaction of the Environment Agency, to lie outside flood zone 3b.

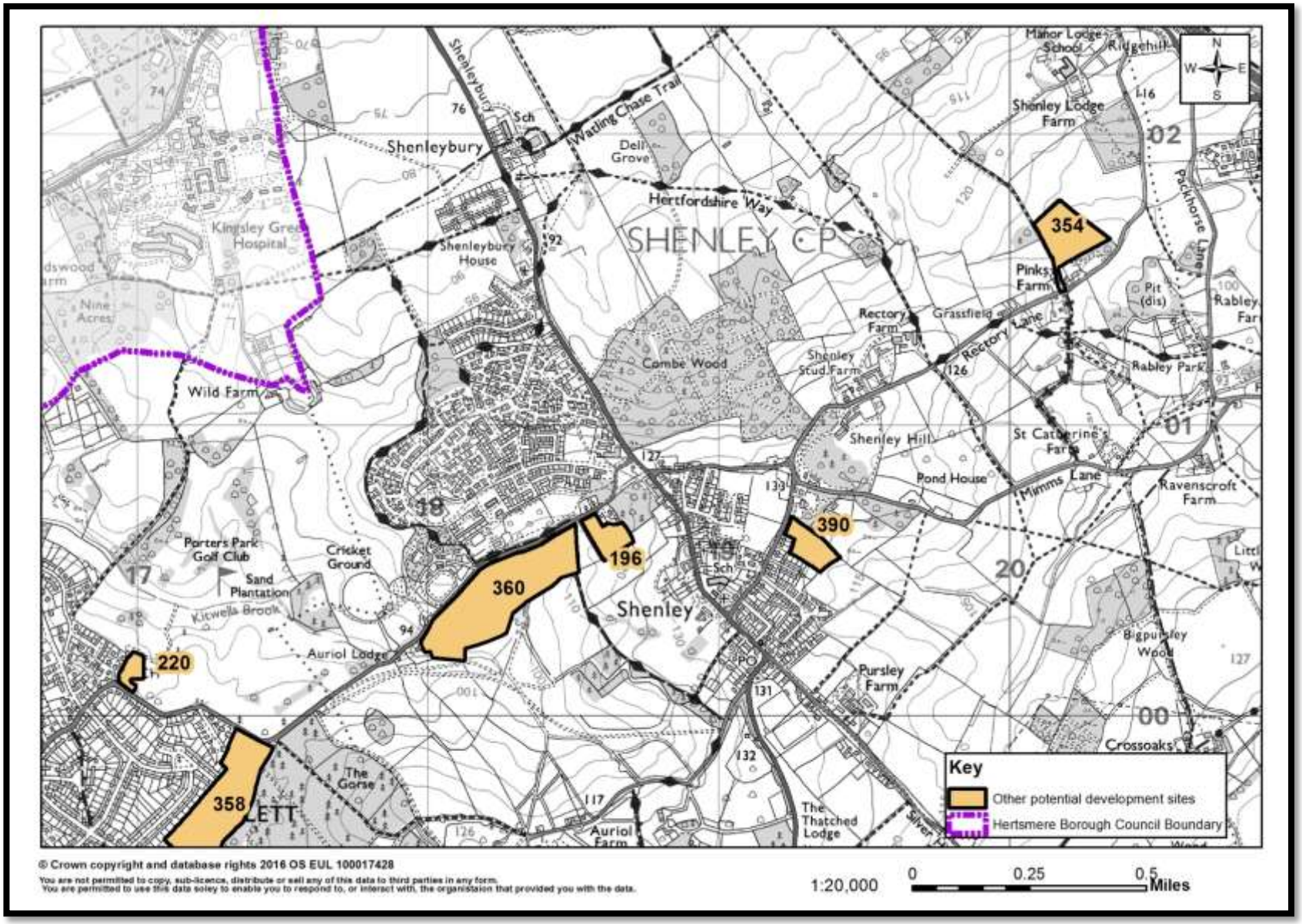
Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.

11. Summaries of feedback from site promoters, statutory bodies and local interest groups – Shenley

11.1 - Map of Shenley strategic housing sites



11.2 - Map of Shenley other potential development sites



11.3 - Feedback forms – Shenley

Strategic Housing Sites

Site address/ location	Land West of Porters Park Drive, Shenley	Site ref: S1 (HEL 370)

Breakdown of general comments received:

Total number of comments	11
Statutory bodies and local interest groups	8
Developers/ landowners(includes site promoter)	3

Site Promoter: Woolf Bond on behalf of Heronslea Group

Statutory bodies and local interest groups

- Aldenham Parish Council
- Environment Agency
- Hertfordshire County Council Growth and Infrastructure Unit
- Hertfordshire Gardens Trust
- Highways England
- Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
- Thames Water
- Transport for London (TfL)

Other developers/ landowners

- Savills
- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing means LPA figure may increase above 500dpa
- 210 homes are proposed with supporting recreation facilities and community centre
- Satisfactory means of vehicle access can be provided from Porters Park Drive
- Site is within walking distance of existing facilities in Shenley
- Development would be acceptable in relation to five green belt purposes

Summary:
The site promoter reiterates the Government position that there is a significant demand for housing across the country. Whilst the Council have stated a target figure of 500 dwellings per annum, the promoter believes, this is could increase with the government revised methodology calculating a need of over 700 dwellings per annum.

The size of the proposal has been indicated as 210 homes, considerably lower than 530 estimated in the PSHE document. The masterplan shows the development to be located between the cricket ground and Porters Park with large parcels of land being retained but not developed.

Reference is made to the acceptability of development with regard to the five green belt purposes emphasising that development would not lead to coalescence. The site promoter suggests development can be accessed from Porters Park drive using a ghost junction. There would be no access provided to Radlett Lane at the southern boundary. Attention is drawn to the half-hourly bus services along Porters Park Drive and the proximity to existing facilities on the Porters Park estate.

Technical studies have also been submitted in conjunction with this representation, including a Landscape and Visual Overview, Masterplan and a Highways and Sustainability tech note.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The submission of a masterplan indicating housing numbers lower than the estimates in the PSHE document is

acknowledged. The housing numbers stated within the report are based on a standard HELAA methodology agreed in consultation with neighbouring authorities. Further information on the breakdown of the capacity figures can be found within the HELAA document. It should be noted however that these figures may change as a number of the capacities were calculated based on there being no absolute constraints on some sites. The proposal for a sole access point from Porters Park Drive is also acknowledged and this will need to be fully assessed for its suitability.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Landscape and visual impact • Development on the site would adversely affect the character of Shenley Park and conservation area.	• Hertfordshire Gardens Trust • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: Hertsmere will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Services and facilities • Would require 60 units of extra care housing, of which 12 should be accessible with disabilities • Upgrades to waste water network required including sewage works • A housing and infrastructure phasing plan required to determine capacity within the water network	• Environment Agency • Hertfordshire County Council Growth and Infrastructure Unit • Thames Water
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The South West Herts SHMA is currently in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters regarding requirements for this category of housing.	
Physical considerations • Risk of flooding on areas of the site including potential access points	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group

HBC's comments: All suggested access point will be assessed for their suitability. FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.	
Transport infrastructure • Development will impact on the strategic road network (SRN). • Cumulative assessment of sites across plan period needed highlighting residual impact on the SRN • Site is not currently served by sustainable transport methods • Would add additional cars to an already busy road network • May be appropriate to divert bus services through the site • Possible access from site is on a blind bend in the road • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Aldenham Parish Council • Hertfordshire County Council Growth and Infrastructure Unit • Highways England • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • Transport for London (TfL)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. All suggested access point will be assessed for their suitability. It should be noted that the promoter's representation proposes access from Porters Park drive only. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Green Belt • Reduces gap between Radlett and Shenley • Encroachment into the countryside • Land is in agricultural use rather than just open fields	• Aldenham Parish Council • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Environment and wildlife • Adjacent to Cow Banks Woods LWS, Porter Park Golf Course LWS and Wild Farm Moat small ecosite • Locally moderate to high ecological sensitivity due to LWS • TPO protected trees around site perimeter	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Location • Site disregarded in SPC-commissioned AECOM report	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: AECOM's report was commissioned by Shenley Parish Council and Shenley Neighbourhood Plan Steering Group as part of the evidence base for the emerging Shenley neighbourhood plan. The council has noted the report's findings and will continue to work with the Neighbourhood Plan steering group to	

facilitate the progression of the neighbourhood plan.

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Shenley is 'unsustainable' as a settlement • Limited capacity with schools and GPs and no capacity to expand within village • No undertaking to address either health or education requirements • Distance from local services	• Strutt and Parker
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Physical constraints • Areas of the site including potential access points are located within Flood zone 2 and 3. Sites with a lower flooding risk should be prioritised	• Strutt and Parker
HBC's comments: All suggested access point will be assessed for their suitability. FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.	
Green Belt • Narrowing of Shenley/Radlett gap • Scores low in the green belt assessment	• Savills • Strutt and Parker
HBC's comments: The impact of any development in the green belt will be fully assessed taking into account the findings of Arup's green belt assessment which is available on the council's website. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent.	

Site address/ location	Land west of Shenleybury Cottages (Harperbury Hospital)	Site ref: S2 (HEL389)

Breakdown of general comments received:

Total number of comments	11
Statutory bodies and local interest groups	8
Developers/ landowners (includes site promoter)	3

Site Promoter: Pegasus Group on behalf of Bloor Homes and Department of Health.

Statutory bodies and local interest groups

- Environment Agency
- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England
- Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
- Sport England
- St Albans Footpaths Society
- Thames Water
- Transport for London (TfL)

Other developers/ landowners

- Savills
- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing means LPA figure may increase above 500 dpa
- Proposal should be considered as a Garden Village, separate from Shenley
- Two to three points of vehicular access into the site
- Local centre, new GP, primary school and community hall to be considered as part of the development
- 60ha country park

Summary:
The site promoter reiterates the Government's message that there is a significant demand for housing across the UK. Whilst the Council have stated a target figure of 500 dwellings per annum, the promoter believes this could increase with the government revised methodology calculating a need of over 700 dwellings per annum.

The site promoter considers their proposal to be a new garden village rather than an addition to Shenley, maintaining separation with Radlett and Shenleybury. A new school and GP are proposed so any development would not put further strain on existing facilities in Shenley. Existing public transport provision is described as 'good' and the site promoter states that public transport services will be 'adapted, and access enhanced by diverting services into the site'.

The masterplan submitted with the response is proposing up to 1400 new homes on the site (of which 888 would be in Hertsmere and all of which would be in addition to the existing St Albans permission) as well as a revised red line boundary. The proposal for this site is now larger than what was shown in the PSHE report.

Technical studies have also been submitted in conjunction with the site promoter's response and include a sustainability appraisal, green belt review and an economic benefits review. The green belt review considers that the council's own assessment should have considered land around the hospital which lies outside of the borough. The review undertaken on behalf of the site promoter considers that a number of identified parcels can be released for development.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The council acknowledges the promoter intends to deliver some supporting services and infrastructure as part of the promotion. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are

essential alongside growth. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

The impact of any development in the green belt will be full assessed taking into account the findings of Arup's green belt assessment which is available on the council's website. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Would require 60 units of extra care housing, of which 12 should be accessible with disabilities • Upgrades to waste water network required including sewage works • A housing and infrastructure phasing plan required to determine capacity within the water network	• Environment Agency • Thames Water
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The SW Herts SHMA is currently in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters regarding requirements for this category of housing.	
Sports and recreation • Site includes land currently used by St Albans Rangers. Allocation of site would only be acceptable if all facilities were replaced with equivalent or better facilities.	• Sport England
HBC's comments: A new open spaces and recreation study is currently being conducted by Hertsmere which looks at the quality and provision of the borough's existing open spaces and sports facilities.	
Rights of Way • Public rights of way on site	• St Albans Footpaths Society

HBC's comments: The impact of development on the rights of way network will be considered carefully in consultation with HCC Rights of Way service. This will include both positive and negative effects such as the scope for routes to be created, improved and integrated within new development, as well as the impact on users of having to divert any existing routes.

Cross boundary coordination • As some parcels lie within St Albans, cross borough coordination is needed	• St Albans Footpaths Society • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group

HBC's comments: Hertsmere has been actively encouraging cross boundary co-ordination with other neighbouring boroughs. A joint SW Herts strategic plan is currently being worked on involving Hertsmere, Watford, Dacorum, Three Rivers and St Albans, as well as HCC. This is in addition to the joint work being done on a revised SW Herts SHMA and economic study which will be published in the forthcoming months. Duty to cooperate engagement with other neighbouring authorities outside of SW Herts continues. The Council has a Memorandum of Understanding in place with Welwyn Hatfield Borough Council and has met with all of its north London neighbouring authorities to consider areas of common interest within the duty to co-operate.

Green Belt • Existing Brownfield land at Harperbury should be prioritised • Loss of green belt and coalescence between Shenley and 'Harperbury Village''	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • St Albans Footpaths Society

HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

Physical considerations • Air Quality and noise pollution issues due to the sites proximity to the M25	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group

HBC's comments: Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.

Transport infrastructure • Development will impact on the strategic road network (SRN) • Cumulative assessment of sites across plan period needed highlighting residual impact on the SRN • Adjacent site has committed to provide a car based shuttle, may be cost effective to enhance this service • Funding in place from the recent Harperbury permission for a bus link to London Colney and Radlett for 11 years but no guarantee of any service beyond then. As time elapses enforcement of this condition likely to become more and more difficult • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Hertfordshire County Council Growth and Infrastructure Unit • Highways England • St Albans Footpaths Society • Transport for London (TfL)

HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

Environment and wildlife • Orchard Priority Habitat - Historically significant surviving example of an Orchard serving a hospital on site • Ecological sensitivity moderate to high	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Shenley is 'unsustainable' as a settlement • Limited capacity with schools and GPs and no capacity to expand within village • No community facilities proposed	• Strutt & Parker
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. Funding to enable new or improved public transport to be delivered will also be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Sports and recreation • St Albans Rangers currently lease part of the sites. Development would cause issues with the future of the facility.	• Strutt & Parker
HBC's comments: A new open spaces and recreation study is currently being conducted by Hertsmere which looks and the quality and provision of the borough's existing open spaces and sports facilities.	
Physical considerations • Air Quality and noise pollution issues due to the sites proximity to the M25	• Strutt & Parker
HBC's comments: Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.	
Green Belt • Proximity of site to Kingsley Green Hospital would result in Shenley effectively joining up to the hospital • Gap between Shenley and Radlett significantly reduced	• Savills
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional	

circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Landownership and assembly • Land in separate ownerships	• Strutt & Parker
HBC's comments: Whilst land within multiple ownerships should not be seen as a significant constraint on development, measures will need to be taken by the site promoter/s to show that the site is deliverable and that all landowners are willing to work together on one collaborative scheme.	

Site address/ location	Land east of Black Lion Hill (Rectory Farm), Shenley	Site ref: S3 (HEL271)

Breakdown of general comments received:

Total number of comments	8
Statutory bodies and local interest groups	7
Developers/ landowners	1

Site Promoter: Savills of behalf of Comer Homes

Statutory bodies and local interest groups

- Environment Agency
- Forestry Commission
- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England
- Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
- Thames Water
- Transport for London (TfL)

Summary of site promoter's response:

Key Points Raised:

- Development of 400- 500 homes
- If developed, the site would have a limited impact on existing residents
- Scope for a primary school on site or potential to relocate existing primary school

Summary:

The promoter argues the development will balance the village by placing development either side of the main road in what is regarded as the 'least sensitive' part of Shenley. Furthermore, it is considered that development in this location would limit the amount of traffic travelling through existing parts of the village, being within walking distance of existing local facilities in Shenley. Access would be via an improved roundabout on Black Lion Hill. The promoter also highlights the existing bus service that passes the site.

The promoter suggests a new primary school could be delivered on site with attention drawn to how the site can be linked to the existing utilities networks without off site disruption. As the land ownership is greater than what is shown on the site plan, the land owner would be able to buffer the development with woodland.

In regards to the deliverability of the site the promoter points towards their historic record.

Technical studies have also been submitted as part of the promotion document and include a masterplan, landscape and visual context review and a highways, flood risk, drainage and utilities technical note.

HBC's comments:

The council acknowledges the promoter intends to deliver some supporting services and infrastructure as part of the promotion. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

As part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • LPA should liaise with Thames Water to ensure housing does not outpace network upgrades • Would require 60 units of extra care housing, of which 12 should be accessible with disabilities • Limited capacity in local schools and GPs • Primary school 1 mile away up steep hill • Local shops and other services also require walk up steep hill	• Environment Agency • Hertfordshire County Council Growth and Infrastructure Unit • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • Thames Water
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The SW Herts SHMA is currently in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters regarding requirements for this category of housing.	
Transport infrastructure • No train station in Shenley. • Would add additional cars to an already busy road network • Good bus service on Black Lion Hill (602, 657 and 358) which is accessible from most of the site although • Parish Council considers bus services to be infrequent and unreliable • Should minimise impacts on local and strategic highways networks including the TLRN • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes • Site is a bottom of a hill so walking or cycling to the village centre will be unattractive	• Environment Agency • Hertfordshire County Council Growth and Infrastructure Unit • Highways England • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • Transport for London (TfL)
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Environment and wildlife • Combe Wood LWS and Dell Grove LWS adjacent • Farmland birds recorded nearby • High ecological sensitivity due to LWS woodland • Concerned about potential impact on the ancient woodland (Combe Wood) and reiterate the point the ancient woodland is irreplaceable	• Hertfordshire County Council Growth and Infrastructure Unit • Forestry Commission

and compensation measures should not be considered	
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Heritage • Impact on Grade 2* listed St Botolph's church	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	

Other developer/landowners responses:
No representations received.

Site address/ location	Land north of Woodhall Lane, Shenley	Site ref: S4 (HEL348 & HEL349)

Breakdown of general comments received:

Total number of comments	10
Statutory bodies and local interest groups	**6**
Developers/ landowners	**4**

Site Promoter: One of the land owners on behalf of both.

Statutory bodies and local interest groups

- Environment Agency
- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England
- Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
- Thames Water
- Transport for London (TfL)

Other developers/ landowners

- Heronslea Group
- Savills
- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Site is located within the preferred location for housing in the emerging Shenley Neighbourhood Plan
- Housing with new community centre and co-working/meeting space
- The site is in close proximity to existing facilities in Shenley
- New community facilities are proposed around a new village square
- The site should be considered infill development

Summary:

The Site promoter highlights how their site is the preferred option in the emerging Shenley Neighbourhood Plan. They state the number of homes proposed should be in accordance with recommendation of the AECOM report commissioned for the emerging Shenley Neighbourhood Plan. The 380 homes stated in the PSHE document is considered unachievable.

The site promoter wishes to build 'rural homes' on the site in order to preserve the character of Shenley and suggests development on the site should be considered as infill.

The location of the site within the historic centre of the village and its proximity to the existing facilities in Shenley is raised, allowing for people to walk to these services. As a result the site promoter has questioned the sites accessibility score citing the sites proximity to existing services in Shenley. Furthermore, the masterplan for the site shows the provision of a new community centre (which could house some services) located next to a new village square.

The lack of constraints such as covenants, easements, and public rights of, services, landfill or contamination on the site is also highlighted.

HBC's comments: The relationship of the site to the emerging Shenley Neighbourhood Plan is noted. AECOM's report was commissioned by Shenley Parish Council and Shenley Neighbourhood Plan Steering Group as part of the evidence base for the emerging Shenley neighbourhood plan. The council has noted the report's findings and will continue to work with the neighbourhood plan steering group to facilitate the progress of the neighbourhood plan. The potential capacity figures in the PSHE document was calculated using a standard methodology in the HELAA and was intended to be indicative. It is acknowledged that these figures may change particularly where they were calculated based on there being no absolute constraints.

The proposal for new community facilities and rural style homes is noted. The council acknowledges the promoter intends to deliver some supporting services within the community centre. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Further discussions will

need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics.

As part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Site is in close proximity to existing services in Shenley • Would require 60 units of extra care housing, of which 12 should be accessible with disabilities • Upgrades to waste water network required including sewage works • A housing and infrastructure phasing plan required to determine capacity within the water network	• Environment Agency • Hertfordshire County Council Growth and Infrastructure Unit • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • Thames Water
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The South West Herts SHMA is currently in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters regarding requirements for this category of housing.	
Scale of development • Support the development of the site but not the quantum indicated in the PSHE report • Number of homes should be in accordance with recommendations of the AECOM report commissioned by Shenley Neighbourhood Plan Steering Group and emerging neighbourhood plan • 200-250 homes would be supported	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: AECOM's report was commissioned by Shenley Parish Council and Shenley Neighbourhood Plan Steering Group as part of the evidence base for the emerging Shenley neighbourhood plan. The council has noted the report's findings and will continue to work with the neighbourhood plan steering group to facilitate the progress of the neighbourhood plan. Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.	
Transport infrastructure • Development will impact on the strategic road network (SRN) • Cumulative assessment of sites across plan period needed highlighting residual impact on the SRN • Site is in a sustainable location for public transport access with services (657 and school service 358) on London Road • Frequency is limited to one bus per hour. Site would benefit from an enhanced service.	• Hertfordshire County Council Growth and Infrastructure Unit • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • Transport for London (TfL)

• No train station in Shenley • Would add additional cars to an already busy road network • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Heritage • Site adjacent to conservation area • High density would be harmful to the conservation area.	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	
Location • The site is located within an area that was recommended by AECOM's Shenley Site Allocation Report 2018	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: AECOM's report was commissioned by Shenley Parish Council and Shenley Neighbourhood Plan Steering Group as part of the evidence base for the emerging Shenley neighbourhood plan. Hertsmere Borough Council has noted the report's findings and will continue to work with the neighbourhood plan steering group to facilitate the progress of the neighbourhood plan.	
Environment and wildlife • Most of the site located on Meadow Ecosite • Woodhall Spinney LWS adjacent • Butterfly and Local Bird Interest associated with LWS • Locally high ecological sensitivity	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Shenley is 'unsustainable' as a settlement • Limited capacity with schools and GPs and no capacity to expand within village • No community facilities proposed	• Strutt and Parker
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.	

Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

Landownership • Land in separate ownerships • One of the parties understood not to be wanting to be involved in land assembly	• Heronslea Group • Strutt and Parker
HBC's comments: Whilst land within multiple ownerships should not be seen as a significant constraint on development, measures will need to be taken by the site promoter/s to show that the site is deliverable and that all landowners are willing to work together on one collaborative scheme.	
Heritage • Site adjacent to conservation area • Site adjacent to archaeological site, as well as Woodhall Spinney with its wildlife value	• Heronslea Group • Savills • Strutt and Parker
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	
Transport infrastructure • A smaller development would be more suitable at this location due to highway and access constraints • Suggest that capacity of any new junction limit could not accommodate more than 100 homes • Vehicular access could harm local character in this location	• Heronslea Group • Savills
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. All suggested access point will be assessed for their suitability.	

Other potential development sites

Site address/ location	Land adj Wilton End cottage, Radlett Lane, Shenley	Site ref: HEL196

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	**2**
Developers/ landowners (includes site promoter)	**2**

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Shenley Parish Council and Shenley Neighbourhood Plan Steering Group

Other developers/ landowners
- Strutt and Parker

Site Promoter: Sworders on behalf on Landowner

Summary of site promoter's response:

Key Points Raised:
- Site is deliverable in the first 5 years of the plan period
- Existing services are accessible from the site
- Up to 35 units proposed on the site
- Within village envelope identified in draft Shenley Neighbourhood Plan

Summary:

Due to its location, the promoter believes development on the site would join up the new and old parts of Shenley. Furthermore, the existing amenities and services in Shenley are easily accessible from the site.

The promoter states that the site is deliverable in first few years of the plan period as there are no major constraints on site. Due to the proximity to the village, it is envisaged a lower density scheme would be appropriate for 28 – 35 units on site rather than the 45 estimated in the HELAA.

Attention is drawn to the site's location within the preferred area for development in the emerging Shenley neighbourhood plan. A masterplan was submitted with the site promoter's representations informed by some high level technical studies.

HBC's comments: A key factor in the determination of sites will be the deliverability of the scheme. Hertsmere acknowledges the site promoters statement regarding deliverability in the first few years of the plan period. The envisaged lower density housing numbers are also acknowledged.

The comment concerning the site's location in relation to the emerging Shenley neighbourhood plan is noted. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

As part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Transport infrastructure	• Shenley Parish Council and

• No train station in Shenley • Would add additional cars to an already busy road network • Access is via narrow country lane	Shenley Neighbourhood Plan Steering Group
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. All suggested access points will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Location • The site is located within an area that was recommended by AECOM's Shenley Site Allocation Report 2018	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: AECOM's report was commissioned by Shenley Parish Council and Shenley Neighbourhood Plan Steering Group as part of the evidence base for the emerging Shenley neighbourhood plan. Hertsmere Borough Council has noted the report's findings.	
Environment and wildlife • Shenley Park Woodland and Meadow LWS adjacent • Locally high ecological sensitivity	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Shenley is 'unsustainable' as a settlement • Limited capacity with schools and GPs and no capacity to expand within village	• Strutt & Parker
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Site address/ location	Land north of Fox Hollows, Rectory Lane, Shenley	Site ref: HEL354

Breakdown of general comments received:

Total number of comments	3
Statutory bodies and local interest groups	**2**
Developers/ landowners	**1**

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Shenley Parish Council and Shenley Neighbourhood Plan Steering Group

Other developers/ landowners
- Strutt and Parker

Site Promoter: David Watson Architects on behalf of the Landowner

Summary of site promoter's response:
No representation on the PSHE report was received.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • No local amenities at the site or scope to provide them.	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: Full consideration will be given to the availability of general services and facilities', taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Transport infrastructure • Site is not currently served by sustainable transport methods • Site is accessed via a narrow country lane	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: The requirement to provide for the significantly increased level of housing need identified through the government's standard methodology means that locations outside current built up areas will need to be considered for development. Some of these may not currently be in the most sustainable locations. Where allocations in such areas are to be considered, improvements to their sustainability, including access to sustainable transport and services, will also need to be secured. Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. All suggested access point will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Environment and wildlife • Shenley Chalk LWS and Rabley Pits LWS adjacent • Badgers recorded in the area • Grassland of unknown quality • Moderate ecological sensitivity	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with	

both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Shenley is 'unsustainable' as a settlement • Limited capacity with schools and GPs and no capacity to expand within village	• Strutt & Parker

HBC's comments: Full consideration will be given to the availability of general services and facilities', taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Site address/ location	Land south of Radlett Lane, Shenley	Site ref: HEL360

Breakdown of general comments received:

Total number of comments	6
Statutory bodies and local interest groups	**3**
Developers/ landowners	**3**

Statutory bodies and local interest groups

- Aldenham Parish Council
- Hertfordshire County Council Growth and Infrastructure Unit
- Shenley Parish Council and Shenley Neighbourhood Plan Steering Group

Other developers/ landowners

- Strutt and Parker
- Savills

Site Promoter: Boyer Planning on behalf of Wood Hall Estate/Fairfax Acquisitions

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing means LPA figure may increase above 500dpa
- Acknowledgement of site's green belt designation, however green belt releases are needed to meet housing need
- Site is of sufficient size and suitably located to provide some of the infrastructure required for Shenley
- Build out rate within first five years could be greater than that indicated by council

Summary:

The site promoter reiterates the Government's message that there is a significant demand for housing across the country. Whilst the council have stated a target figure of 500 dwellings per annum, the promoter considers this could increase with the government revised methodology calculating a need of over 700 dwellings per annum.

The site promoter supports the findings of the HELAA and green belt assessment. As green belt releases will be required to meet housing need, they believe these conclusions provide sufficient justification for the site to be considered further.

The need for additional health and education facilities in Shenley is noted and the site is considered to be suitable to provide 'some of these facilities' to justify release of the land from the green belt. The build out rate for the site, set out in the HELAA, which suggests that only 50 homes could be built in the first five years, is questioned with the promoter considering the site could deliver most of the homes on the site within that period.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the governments' standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

The council acknowledges the promoter intends to deliver some supporting services and infrastructure as part of the promotion. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Green Belt • Reduces gap between Radlett and Shenley • Encroachment into the countryside	• Aldenham Parish Council • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: The impact of any development in the green belt will be fully assessed taking into account the findings of Arup's green belt assessment which is available to view on the council's website. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent.	
Transport infrastructure • Site is not currently served by sustainable transport methods • Would add additional cars to an already busy road network	• Aldenham Parish Council • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: The requirement to provide for the significantly increased level of housing need identified through the government's standard methodology means that locations outside current built up areas will need to be considered for development. Some of these may not currently be in the most sustainable locations. Where allocations in such areas are to be considered, improvements to their sustainability, including access to sustainable transport and services, will also need to be secured. Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Environment and wildlife • Shenley Park Woodland and meadow LWS adjacent**.** Stanley Lord meadow adjacent • Potential for farmland birds. Bats may roost on treeline • Moderate to locally high ecological sensitivity	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Local services and facilities • Shenley is 'unsustainable' as a settlement • Limited capacity with schools and GPs and no capacity to expand within village • Poor pedestrian and physical connectivity to the village	• Strutt & Parker • Savills

HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.

Full consideration will need to be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Site address/ location	Land adjacent to 52 Harris Lane, Shenley	Site ref: HEL390

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	**2**
Developers/ landowners (includes site promoter)	**2**

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Shenley Parish Council and Shenley Neighbourhood Plan Steering Group

Other developers/ landowners
- Strutt and Parker

Site Promoter:
Woolf Bond Planning LLP

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing means LPA figure may increase above 500dpa
- The site will not impact the character of the existing village
- 40-50 homes assessed as having minimal impact on local roads
- Would add to viability of existing village services

Summary:
The site promoter reiterates the Government's message that there is a significant demand for housing across the UK. Whilst the Council have stated a target figure of 500 dwellings per annum, the promoter believes this is could increase with the government revised methodology calculating a need of over 700 dwellings per annum.

The promoter states the site is within walking distance from local services and bus routes in Shenley. The site would be concealed by the landscape and it is argued that development therefore will not impact on the character of the village. It is acknowledged that most of the hedgerow fronting Harris Lane would need to be removed. They also believe the site could be released from the green belt without compromising the objectives of the green belt so long as the southern part of Shenley is inset in the green belt.

Technical studies have also been submitted in conjunction with this representation, including a Landscape and Visual Overview and a Highways and Sustainability technical note.

HBC's comments:
No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place is essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

As part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances,

additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Transport infrastructure • Would add additional cars to an already busy road network	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	
Scale of development • The numbers of any housing on the site should be no more than 10 to keep the rural feel of Shenley • Visual impact of high density development would be detrimental	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: In order to address central government's requirement to meet objectively assessed need for housing and employment, there will need to be a step change in the scale of development. This will require a range of locations beyond existing built up areas to be assessed and where appropriate, increased densities will need to be considered. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities. However, the quantum and pattern of existing development will be considered when allocating any new sites and determining the scale and make up of these allocations. The council will look to minimise the landscape and visual impact of any new development and developers will be required to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Green Belt • Would cause further sprawl of Shenley given contribution of site to green belt criteria	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by Arup is available to view on the council's website.	
Environment and wildlife • Potential for birds associated with grasslands • Moderate to locally high ecological sensitivity due to grassland areas	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues	

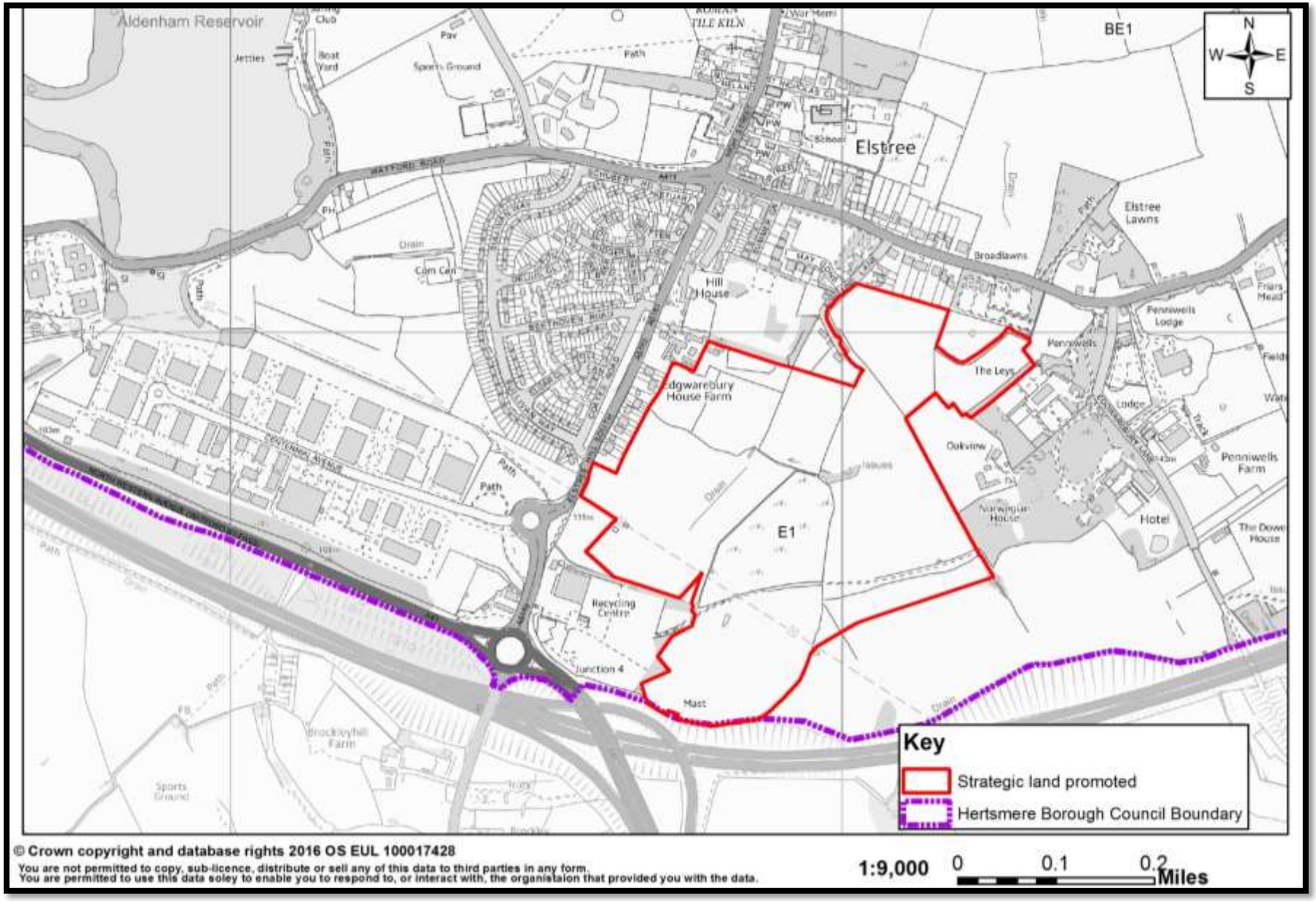
Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

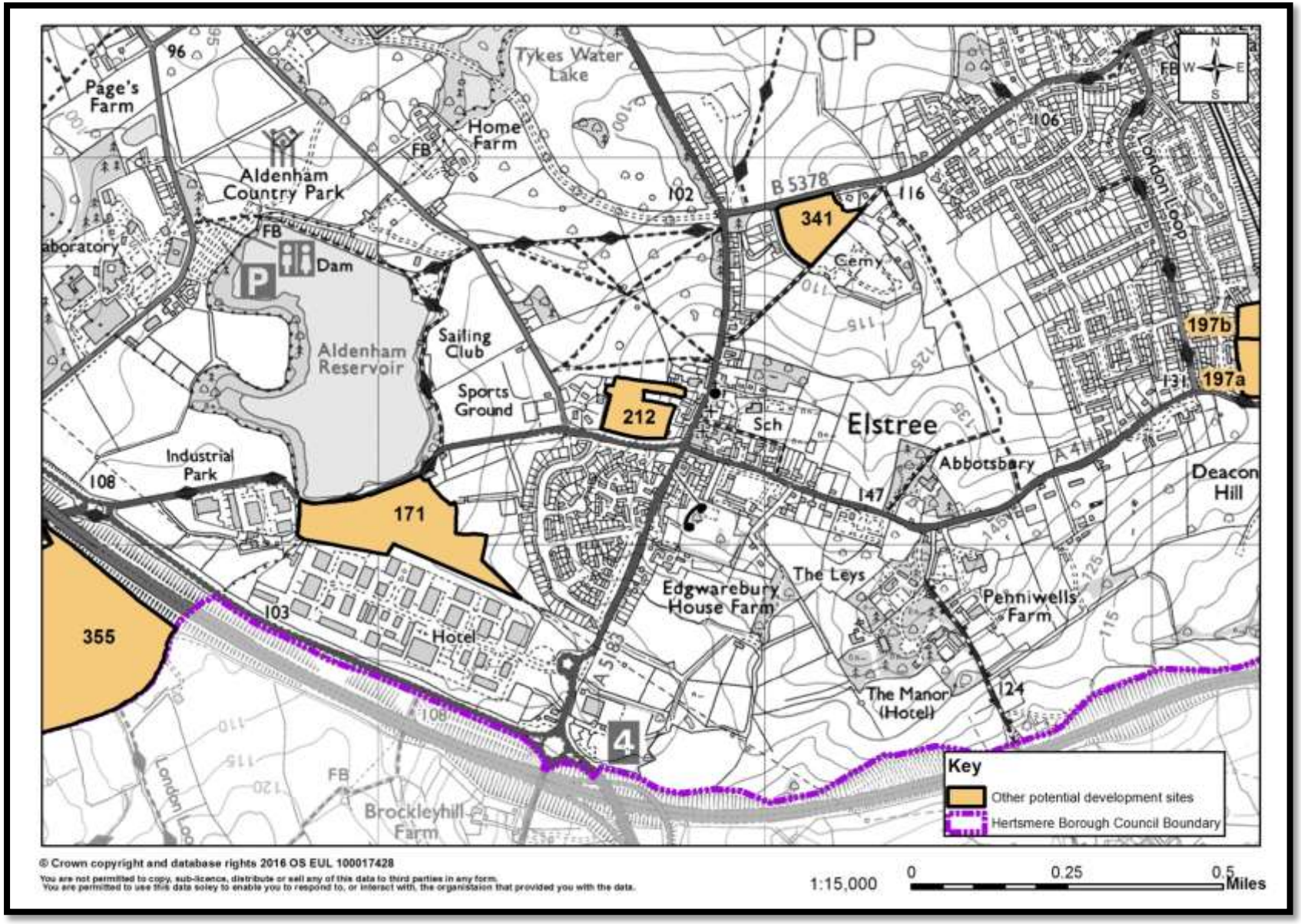
Substantive points raised	Responder/s
Local services and facilities • Poor access to public transport • Shenley is 'unsustainable' as a settlement • Limited capacity with schools and GPs and no capacity to expand within village • No community facilities proposed	• Strutt & Parker
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. The requirement to provide for the significantly increased level of housing need identified through the government's standard methodology means that locations outside current built up areas will need to be considered for development. Some of these may not currently be in the most sustainable locations. Where allocations in such areas are to be considered, improvements to their sustainability, including access to sustainable transport and services, will also need to be secured.	
Landscape and visual impact • Landscape character should be conserved • Part of Watling Chase Community Forest gateway and 'small scale landscape conservations zone'	• Strutt & Parker
HBC's comments: Hertsmere will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	

12. Summaries of feedback from site promoters, statutory bodies and local interest groups – Elstree Village

12.1 - Map of Elstree Village strategic housing sites



12.2 - Map of Elstree Village other potential development sites



12.3 - Feedback forms – Elstree Village

Strategic Housing Sites

Site address/ location	Land East of Elstree Hill South (Edgwarebury House Farm)	Site ref: E1 (HEL274)

Breakdown of general comments received:

Total number of comments	10
Statutory bodies and local interest groups	8
Developers/ landowners (includes site promoter)	2

Site Promoter: Hertfordshire County Council

Statutory bodies and local interest groups
- National Grid
- Savills
- Highways England
- Environment Agency
- London Borough of Barnet
- Hertfordshire County Council Growth and Infrastructure Unit
- The Woodcock Hill Village Green Members
- Transport for London (TfL)

Other developers/ landowners
- Strutt and Parker

Summary of site promoter's response:

Summary:

The site promoter confirms that the site is within its ownership and that feasibility work is to be undertaken to prove deliverability.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Physical considerations • Overhead powerlines. Statutory safety clearances must not be infringed	• National Grid
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Transport infrastructure • Sites (including E1) have potential to impact on Strategic Road Network (SRN) • Cumulative assessment of sites across plan period needed highlighting residual impact on the SRN • Given the potential scale and distance from some parts of the sites to a bus stop bus access needs to be improved to the east of the site and it may be appropriate to divert services through the site • Access to site limited • Impact on congestion • Significant concerns when assessed against a number of HCC transport policies • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Transport for London (TfL)Highways England • London Borough of Barnet • Hertfordshire County Council Growth and Infrastructure Unit • The Woodcock Hill Village Green Members
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact	

development will have on the strategic and local road network. Further discussions are required with HCC in order to assess the possible access to the site.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

Environment and wildlife • Loss of countryside • Impact on Scratchwood nature reserve • Low/moderate ecological sensitivity • PEA required to assess grassland and hedgerow quality	• Hertfordshire County Council Growth and Infrastructure Unit • London Borough of Barnet
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Green Belt • Quality and integrity of open countryside should be protected to prevent urban sprawl • Any development in the green belt should be of a design and form that minimises the impact on the surrounding area	• London Borough of Barnet
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Minerals and waste • Land at Elstree Hill South Recycling centre is safeguarded in the Waste Core Strategy and Development management Policies – development should not prejudice the operation of these facilities • Close to REVIVA Site	• The Woodcock Hill Village Green Members Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: The council continues to liaise with HCC Minerals and Waste department in relation to the waste treatment sites following receipt of comments from the Growth and Infrastructure Unit. The council will be guided by HCC with regard to ongoing backfill of current minerals sites as well as development with implications for waste treatment facilities.	
Services and facilities • Likely need for upgrades to the wastewater network • A housing and infrastructure phasing plan required to determine capacity within the water network • Requires 60 units of extra care housing, of which 12 should be accessible with disabilities	• Environment Agency Thames Water
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructures in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

The South West Herts SHMA is currently in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with site promoters and HCC concerning requirements for this category of housing.

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Physical considerations • Overhead powerlines • Proximity to M1 and waste recycling centre with associated air quality and noise issues	• Strutt and Parker
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications. Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.	
Transport infrastructure • Access to site is problematic • Significant concerns when assessed against a number of HCC transport policies	• Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. All proposed access points will be assessed for their suitability. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Heritage • Adjoins listed buildings and conservation area	• Strutt and Parker
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	
Services and facilities • No scope to enlarge Schopwick Surgery • Limited school capacity at St Nicholas CoE school	• Strutt and Parker
HBC's comments: Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructures in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	

Strategic Employment Sites

Site address/ location	Land North of Centennial Park, Elstree	Site ref: EMP1/HEL171

Breakdown of general comments received:

Total number of comments	9
Statutory bodies and local interest groups	8
Developers/ landowners (includes site promoter)	1

Site Promoter: Taylor Wimpey

Statutory bodies and local interest groups

- Elstree and Borehamwood Town Council
- Aldenham Country Park Trust (ACPT)
- Haberdasher Aske's Schools
- Highways England
- Hertfordshire County Council Growth and Infrastructure Unit
- National Grid
- The Woodcock Hill Village Green Members
- Transport for London (TfL)

Summary of site promoter's response:

Key points raised:

- Large demand for housing LPA figure will increase above 500 dpa;
- Council overestimating capacities of sites and far greater need for residential than for employment.
- The site is in close proximity to an existing bus service (306 and 823).
- The site is bordered by the Elstree Hill Open Space, the A41 and Aldenham Reservoir to the North and Centennial Park to the south.
- Within a flood zone 1 so will need specific flood risks assessments.
- The site offers a key opportunity to accommodate residential development.

Summary:

The site promoter reiterates the Government message that there is a significant demand for housing across the UK. Whilst the council have stated a target figure of 500 dwellings per annum, the promoter believes this is likely to increase with the government revised methodology calculating a need of over 700 dwellings per annum. The site is considered to provide a key opportunity for residential development given Hertsmere's acute need for housing. Although this site has also been promoted for employment, it is stated that there is far greater need for housing in the area given the current provision and level of demand.

The promoter suggests that the site is suitable for 150 dwellings as there are no insurmountable technical or environmental constraints and the site is within single ownership. The site is identified as being in close proximity to an existing bus service (306 and 823), with a bus stop directly outside the proposed access, and a range of facilities within walking/cycling distance.

The site is bordered by the Elstree Hill Open Space, the A41 and Aldenham Reservoir to the north, and Centennial Park to the south. The promoter also highlights the opportunity to provide walking/cycling links with Elstree Hill Open Space and Compass Park, and complement the existing recreational areas; including potential to enhance aquatic and woodland habitats and create a new nature reserve.

The promoter reiterates the point that the site is enclosed by permanent well defined features. By adopting a landscape-led approach (with an emphasis on green infrastructure) the development would mitigate against impacts to the character of the area, settlement and wider green belt by ensuring that the site is contained by a robust and enduring green belt boundary. This is as opposed to other schemes proposed which would have a negative impact on the character of Elstree conservation area and lead to coalescence.

The site is acknowledged to be within flood zone 1 and so flood risk is not considered to be a factor which would affect deliverability. As part of the promoter's submission the following technical studies have been submitted; landscape and visual impact assessment (including green belt appraisal), arboricultural report, tree plan, ecology report, flood risk assessment, and transport assessment and travel plan.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology calculating the housing need with the updated national planning practice guidance, stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections. The housing numbers stated within the report are based on a standard HELAA methodology agreed in consultation with neighbouring authorities. Further information on the breakdown of the capacity figures can be found within the HELAA document. It should be noted however that these figures may change as a number of the capacities were calculated based on there being no absolute constraints on some sites. In some instances, site boundaries have also changed followed representations from site promoters.

The site promoter has stated that there preference is for a residential led scheme. The council acknowledges this yet reiterates the point that there is a need for both employment and residential development within the borough. Each site will therefore be assessed individually to determine whether it will be best suited to residential or employment. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.

The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

The council acknowledges that the site is within close proximity to existing open spaces and LWS, and recognises the opportunities that this provides. However, consideration will have to be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. A new open spaces and recreation study is currently being conducted by Hertsmere which looks and the quality and provision of the borough's existing open spaces and sports facilities. Also the impact of development on the rights of way network will be considered carefully in consultation with HCC Rights of Way service.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • Preferred development is for employment • Preference for residential (WHVGM) to 'ensure survival of Aldenham Country Park'	• The Woodcock Hill Village Green Members Elstree and Borehamwood Town Council
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.	
Transport infrastructure • Sites (including EMP1) have potential to impact on Strategic Road Network (SRN) • Cumulative assessment of sites across plan period needed highlighting residual impact on the SRN	• Transport for London (TfL)Highways England

• Traffic generated by new development on this site would contribute towards congestion already experienced at Bushey Arches and more widely in Watford • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Environment and wildlife • Moderate to locally high ecological sensitivity • Likely ecological constraints due to wetland area • PEA required to assess grassland interest and potential for protected species	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Sports and recreation • Funds for maintenance of dam at Aldenham Country Park • The reservoir is used by many students learning to sail	• The Woodcock Hill Village Green Members • Aldenham Country Park Trust (ACPT) • Haberdasher'Aske's Schools
HBC's comments: A new open spaces and recreation study is currently being conducted by Hertsmere which looks and the quality and provision of the borough's existing open spaces and sports facilities. However, the promotion of the site for development is understood to not be linked to any proposal for works related to the dam and/or reservoir.	
Physical considerations • Overhead powerlines. Statutory safety clearances must not be infringed.	• National Grid
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	

Other developer/landowners responses:
No comments received.

Site address/ location	Land adjacent to Elstree Road, A41 and Dagger Lane	Site ref: EMP4 (HEL238)

Breakdown of general comments received:

Total number of comments	6
Statutory bodies and local interest groups	5
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Highways England
- Hertfordshire County Council Growth and Infrastructure Unit
- National Grid
- The Woodcock Hill Village Green Members
- Transport for London (TfL)

Site Promoter: DLA Town Planning Ltd

Summary of site promoter's response:

Key points raised:

- High demand for new employment land within Hertsmere, which is not going to be met through brownfield sites alone
- In close proximity to other successful employment locations
- Elstree is not a town and the site should not be considered against green belt purpose 2
- Reasonably well located in respect to public transport and the promoter is willing to discuss the possibility for developer contributions
- Multiple possible access locations
- Includes a variety of sizes and types of units including the provision of a central facilities block
- A range of protected species on the site and a programme of mitigation measures is recommended

Summary:
The site promoter highlights the need for new employment land within Hertsmere and that this will exceed the amount available on brownfield land leading to a need to release green belt. The promoter reiterates that the site is located in close proximity to other successful employment locations (including Lismirrane Industrial Park and Centennial Park). The site is well contained by robust boundaries and has a significant urban influence thereby limiting the impact caused by encroaching into the countryside. The developer also reiterates that as Elstree is not a town the site should not be considered against green belt purpose 2 (preventing coalescence).

The site is considered to be reasonably well located in respect to public transport and the promoter is willing to discuss the possibility for developer contributions to improve these services. This includes new routes for cyclists and pedestrians, diverting and improving the existing bus route (306) that goes past the site, and providing a shuttle bus to the station.

The proposal includes a variety of sizes and types of units including the provision of a central facilities block. The site is also in close proximity to Aldenham Country Park and will maintain existing landscaping features there by providing opportunities for a high quality working environment.

The promoter states that there are multiple possibilities in relation to access to the site, and this flexibility can help to mitigate against potential issues. The promoter has identified that there are a range of protected species interests and a programme of mitigation measures is recommended. A variety of technical works have also been provided including a transport addendum note, a landscape appraisal, a preliminary ecological appraisal, and transport feasibility note.

HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment. The South West Herts employment study 2016 clearly shows however that there is need for further employment land in Hertsmere. This document is currently being revised and will be published in the forthcoming months.

The council notes that the site is located in close proximity to existing employment sites. The potential impact that any development would have on neighbouring sites of a differing land use (and vice-versa) will be taken into consideration when considering land use allocations. The council will seek to avoid "Bad Neighbour" situations from

arising which, unless adequate mitigation can be put in place, would either prejudice the operation of existing commercial or other activities or would lead to poor environmental conditions within the new allocation.

The methodology for the green belt assessment was agreed with neighbouring authorities and sets out the rationale for defining Hertsmere settlements with regard to purpose 2. However, there remains the scope for representations to be made on the Regulation 19 Local Plan prior to submission of the plan for examination.

Nonetheless, the impact of any development in the green belt will need to be fully assessed and where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.

The promoter indicates that there are multiple possible access locations. All suggested accesses point will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development Not recommended for further consideration	• The Woodcock Hill Village Green Members
HBC's comments: the comment is noted	
Transport infrastructure • Sites (including EMP4) have potential to impact on Strategic Road Network (SRN) • Cumulative assessment of sites across plan period needed highlighting residual impact on the SRN • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Transport for London (TfL)Highways England
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become	

established and capable of self-funding.

Physical considerations • Overhead powerlines. Statutory safety clearances must not be infringed.	• National Grid
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Environment and wildlife • Likely ecological constraints given nature of site and LNR and LWS in proximity • Ensure LNR disturbance is not increased • PEA required to assess grassland quality • Impact on existing open habitat link between Hilfield and Aldenham reservoirs – potential affect bird use of Hilfield	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:
No comments received.

Other potential development sites

Site address/ location	Land North of Watford Road, Elstree	Site ref: HEL212

Breakdown of general comments received:

Total number of comments	3
Statutory bodies and local interest groups	2
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Elstree and Borehamwood Town Council
- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: Barton Willmore

Summary of site promoter's response:

Key points raised:

- Circa 60 plus extra care/retirement units
- Sustainable location on the edge of Elstree village
- Site contains a TPO (this could be incorporated into the scheme), and an area of archaeological potential
- Site is not liable to flooding, has suitable vehicular access, no evidence of pollutants, and is of a small size thus readily deliverable
- Huge demand for housing within which provision need to be made for the growing elderly population
- Less well performing piece of green belt land

Summary:

The site promoter considers the site suitable for circa 60 plus extra care/retirement units and is considered to be in a sustainable location on the edge of Elstree village located near to community facilities. The development will include the provision of a central facilities building, care services, mini bus, a managed landscaped environment, and specifically designed units which are wheelchair accessible. The site is located close to Elstree crossroads and AQMA; however a mini bus service will be provided, there are bus stops nearby, and given that it will be extra care/retirement units, car usage will be significantly lower than for a residential development.

Whilst the promoter acknowledges that the site is within the green belt, contains a TPO (this could be incorporated into the scheme), and an area of archaeological potential, it is considered to be relatively unconstrained as it is not liable to flooding, has suitable vehicular access, no evidence of pollutants, and is of a small size and thus readily deliverable. It is recognised that the impact on Grade II Aldenham House to the North of the site may have to be considered.

The promoter reiterates that there is a huge demand for housing and that within this demand provisions need to be made for the growing elderly population. The promoter considers the site to be situated in a less well performing piece of green belt, as it is a less essential part of the wider green gap and has limited contribution to preventing encroachment. As part of the promoter's submission the following technical studies have been submitted; archaeological desk based assessment, and a preliminary ecology appraisal.

HBC's comments: In order to address central government's requirement to meet objectively assessed need for housing and employment, there will need to be a step change in the scale of development. Part of this need has been identified for elderly housing and care provision. The South West Herts SHMA is currently in the process of being updated. The Local Housing Needs Assessment addresses the need for elderly people's housing and will inform discussions with HCC and the promoter regarding the provision of this category of housing

The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

Comments concerning the suitability of the site for the development proposed are noted. With regard to highway issues, Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Officers will continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.

Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics including care/retirement housing, TPOs, and transport.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be mentioned if they say anything that relates to any of the substantive points listed. This will result in some respondents being listed next to a sub point that they have not raised.

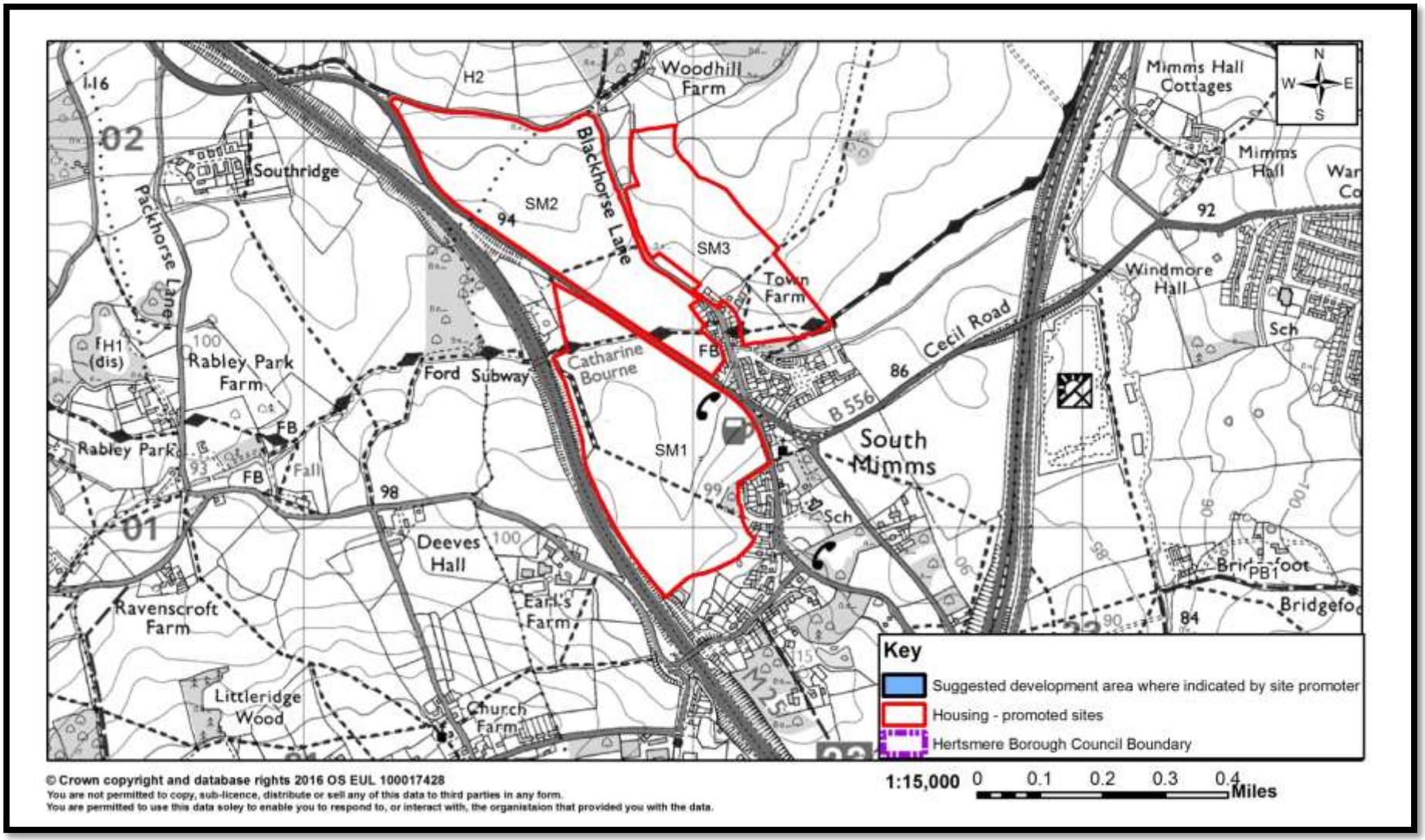
Substantive points raised	Responder/s
Sports and recreation • Concerns about the future of the horse sanctuary	• Elstree and Borehamwood Town Council
HBC's comments: A new open spaces and recreation study is currently being conducted by Hertsmere which looks and the quality and provision of the borough's existing open spaces and sports facilities. The existence of the horse sanctuary is acknowledged. Further discussions are needed with the promoter to establish what the impact on this use will and how this can be mitigated.	
Environment and wildlife • Low ecological sensitivity • Retain as many trees as possible and buffer remaining • Assess trees for nesting birds	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

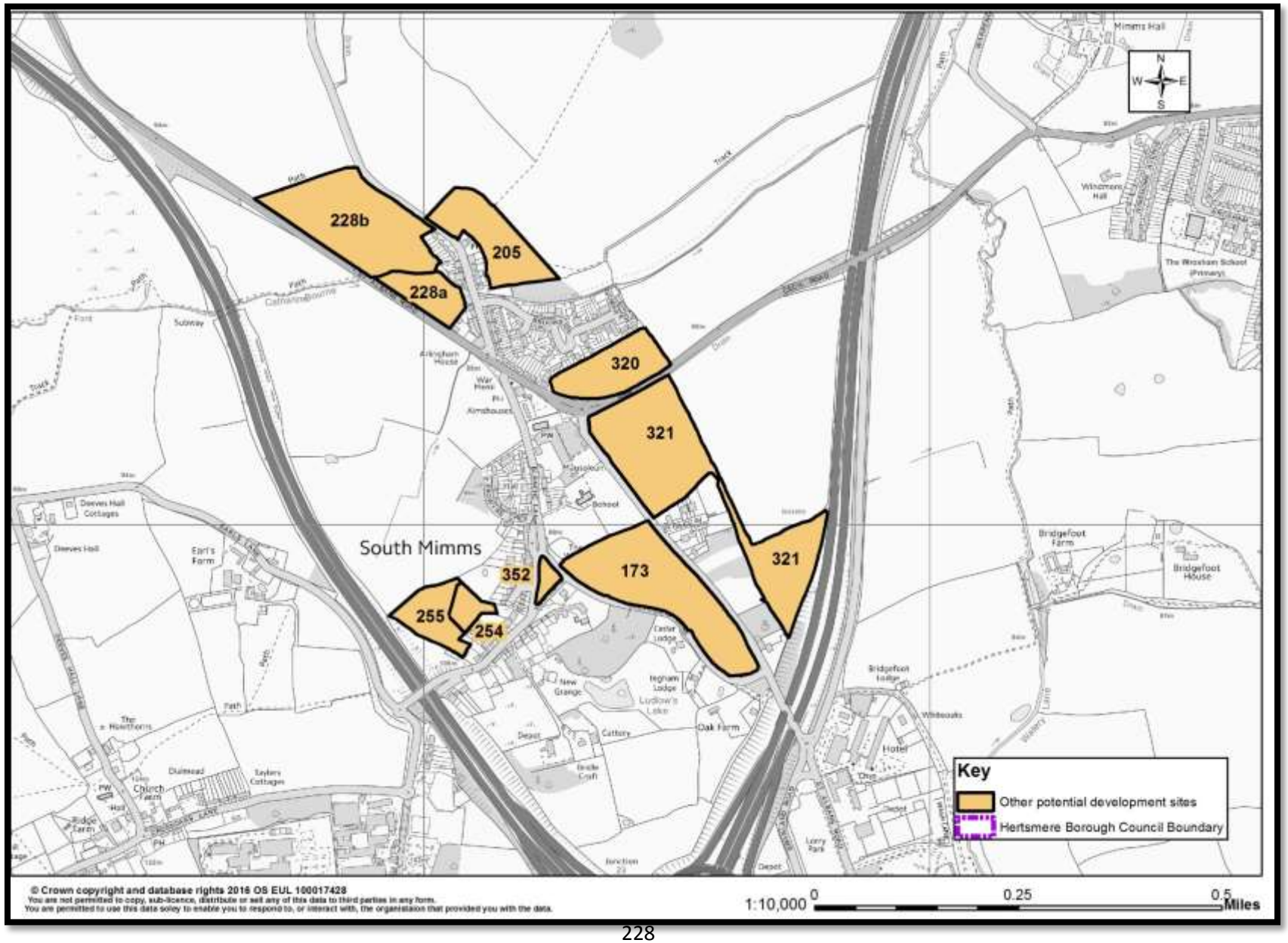
No comments received.

13. Summaries of feedback from site promoters, statutory bodies and local interest groups – South Mimms

13.1 - Map of South Mimms strategic housing sites



13.2 – Map of South Mimms other potential development sites



13.3 - Feedback forms – Elstree Village

Strategic Housing Sites

Site address/ location	Land North and West of South Mimms Village	Site ref: SM1, SM2 & SM3 (HEL385a,b&c)

Breakdown of general comments received:

Total number of comments	12
Statutory bodies & local interest groups	6
Developers/ landowners (includes site promoter)	6

Site Promoters:
King and Co
JB Planning
Hertfordshire County Council – property planning team
Woolf Bond Planning LLP

Statutory bodies & local interest groups
- Thames Water
- Environment Agency
- Highways England
- Hertfordshire County Council Growth and Infrastructure Unit
- Transport for London (TfL)
- Forestry Commission

Other developers/ landowners
- Strutt and Parker
- Daniel Watney LLP

Summary of site promoters' response: JB Planning for sites SM2 and SM3

Key Points Raised:

- Would bring further vitality to the village and provide opportunities for enhancing the local services on offer
- Greater housing need in Hertsmere than can be accommodated within its existing settlements
- Close proximity to Redwell SSSI and further wildlife surveys are to be conducted
- Development avoiding elevated parts of Shenley Ridge
- Does not have any heritage assets though there are some located in the near vicinity
- Question conclusions of HBC green belt assessment
- Access to the site could be achieved from Cecil Road to the east or St Albans Road to the west
- The majority of SM2 is not within flood zone 3
- Opportunity for a relief road to be created with bus routes extended into the site

Summary:

The site promoter considers sites SM2 and SM3 to be free from significant constraints, available for development and capable of delivery. The development would bring further vitality to the village and provide opportunities for enhancing the local services on offer. The proposal has been prepared in conjunction with parties acting for Wrotham Park Estates and BW Field and Partners.

A mixed use scheme is proposed which will incorporate the character of South Mimms, whilst delivering additional homes and jobs. The promoter reiterates the point that there is a greater housing need in Hertsmere than can be accommodated within its existing settlements and these sites can be delivered with relative ease.

The promoter remarks that the majority of SM2 is not within flood zone 3 with only the area immediately adjacent to the Catherine Bourne being within the flood zone and most of the land at low risk of flooding. Furthermore, it is stated that the joint assessment of SM1, SM2 and SM3 distorts the overall assessment of each site in the HELAA. The sites are within close proximity to Redwell SSSI and further wildlife surveys are to be conducted. The landscape character is also considered as part of the proposal with development avoiding elevated parts of Shenley Ridge. The site is however recognised to be located within a ground water protection zone. There are no heritage assets though there are some located in the near vicinity including the Grade 1 Church of St Giles and the Grade 2 Blackhorse Pub.

Whilst the site promoter highlights that HBC's green belt assessment considers the sites to be well performing green belt land, it disputes the assessment in that it does not reflect local circumstances and the opportunities available. The promoter also highlights that access to the site could be achieved from Cecil Road to the east or St Albans Road

to the west but that the opportunity exists for a relief road to be created with bus routes extended into the site.

Summary of site promoter's response: King and Co for sites HEL228a and HEL228b along with SM2 and SM3

Key Points Raised:

- Council should reconsider their scoring approach
- Site should not be considered completely inaccessible and HEL228a scores well
- Noise impact form the M25 will be mitigated
- Flood risk can be easily mitigated with opportunity to enhance Catherine Bourne
- Committed to work with St Giles School and ensure school facilities are provided for
- Opportunity for enhancing village centre and extending it along St Albans Road with a new road network
- Dispute the green belt assessment

Summary:
The site promoter concludes that the council should reconsider their scoring approach and that parcel SM2 and SM3 should be positively allocated. It should be noted that the representation promotes both the sites that King and Co are promoting (HEL228a and b) as well as promoting the larger combined proposal in conjunction with parties acting for Wrotham Park Estates and Gascoyne Cecil Estates. Furthermore, local public consultation has already taken place.

The promoter mentions that the site should not be considered completely inaccessible and HEL228a scores well. The key access to the site will be from St Albans road and the promoter accepts that Blackhorse Lane is of local character but this will not be a principal route. The noise impact form the M25 will be mitigated by screening and taking advantage of the topography and a 100m buffer although this maybe a significant problem with SM1. The flood risk impact can be easily mitigated and the presence of Catherine Bourne presents an opportunity to enhance the watercourse and make it a prominent feature of the proposed open space.

The promoter also gave consideration to the opportunities provided in promoting the larger scheme with the potential for further supporting facilities, a mix of dwellings (including affordable) and potential employment creation.

The promoter states its commitment to ensuring school facilities will be provided for and that developers will work with St Giles School. They would also be agreeable to GP provisions provided it is consistent with the aspirations of the local community. The proposals also provide an opportunity for enhancing South Mimms village centre and extending it along St Albans Road with a new road network. As well as increasing the size of the existing park and providing new natural environments with pedestrian linkages, the green belt assessment is disputed with the site considered to be scoring too high on purpose 3 in terms of openness.

Summary of site promoter's response: Woolf Bond Planning LLP for site SM2

Summary:
The site promoter has confirmed that the site is within their ownership and that they welcome the opportunity to work with the council and adjoining land owners as part of a place making scheme to provide sustainable growth through the provision of additional homes and supporting infrastructure.

Summary of site promoter's response: Property Planning team at Hertfordshire County Council (HCC) for site SM1

Summary:
The site promoter has confirmed that the site is within their ownership and that feasibility work is to be undertaken to prove deliverability to include residential units and a new multi-response hub for the Fire and Rescue Service (Fire, Ambulance and Police).

HBC's Comments: The council is aware that there will need to be a step change in the scale of development in order to address central government's requirement to meet objectively assessed need for housing and employment. This will require a range of lcoations beyond existing built up areas to be assessed and where appropriate, incresed densities will need to be considered. The council has previously consulted on different development appropaches to meet this need and village growth is one of the development approaches currently being considered. However, no decision has yet been made on what growth strategy the Local Plan will adopt.

The council notes that a collaborative scheme has been put forward by several of the promoters in relation to sites SM2 and SM3 and that the promoteres have suggested that the development would bring further vitality to the village and provide opportunities for local services. The Council does not actively discourage multiple sites being promoted as part of one collaborative scheme and we recognise that this may open up further opportunities for developing better outcomes on the ground. Whilst land within multiple ownerships should not be seen as a significant constraint on development, measures will need to be taken by the site promoter/s to show that the site is deliverable and that all landowners are willing to work together on one collaborative scheme.

Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. Furthermore, a standardised methodology was adopted for the high level scoring of the sites so to enable cross comparison.

Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.

LVA Technical studies have been produced by a number of the developers and we recognise the work that has gone in to preparing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. The council has yet to decide where it will commission its own LVA work but where this is not undertaken, it will look to corroborate the work that has already been submitted. Ultimately, the council will seek to minimise the landscape and visual impact of any new development and developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.

An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the Council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.

The impact of any development in the green belt will be fully assessed taking into account the findings of Arup's green belt assessment. The council considers the methodology and findings of the assessment to be robust. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent.

It has been mentioned that the majority of SM2 is not within flood zone 3, and that Flood risk can be easily mitigated with opportunity to enhance Catherine Bourne. Nevertheless, FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.

Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road

corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. All suggested accesses point will be assessed for their suitability. Further modelling will be required to assess the full impact development will have on the strategic and local road network. The site promoter has indicated that there is a possibility for an opportunity for a relief road to be created with bus routes extended into the site.

Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding. Furthermore, Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.

Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics including accessibility, service and facilities including the possibility of extending St Giles School, flood management, and transport.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substansive points raised	Responder/s
Services and facilities • Upgrades to waste water network required	• Environment Agency • Thames Water
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Transport infrastructure • Sites (including SM1, SM2 and SM3) have potential to impact on Strategic Road Network (SRN) • Cumulative assessment of sites across plan period needed highlighting residual impact on the SRN • Closest bus service (84 & 398) on St Albans Road, parts of site will therefore be over 400m away. Consideration should be given to diverting services through site and improving frequency. • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	• Transport for London (TfL) • Highways England • Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become	

established and capable of self-funding.

Environment and wildlife • Retain and enhance boundary/hedgerow network and stream/river corridor and wetland features • PEA may be required to assess farmland birds, indirect impact on SSSI, and grassland value • PRA for any buildings associated with Town Farm • Indirect impacts from recreational pressure need to be considered • Concerned about potential impact on the ancient woodland (Mymmshall Wood and Redwell Wood) and reiterate the point the ancient woodland is irreplaceable and compensation measures should not be considered	• Forestry Commission • Hertfordshire County Council Growth and Infrastructure Unit

HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Poor accessibility • Limited school capacity with 'very small' St Giles CoE school • No GP provision	• Strutt and Parker

HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.

Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Environment and wildlife • Ancient woodland and SSSI to the north of site	• Strutt and Parker

HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.

Scale of development • Concerns that the proposal could lead to 1,110 homes being constructed	• Strutt and Parker

HBC's comments: In order to address central government's requirement to meet objectively assessed need for housing and employment, there will need to be a step change in the scale of development. This will require a range of locations beyond existing built up areas to be assessed and where appropriate, increased densities will need to be considered. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities. The council has previously consulted on different development

approaches to meet this need and village growth is one of the development approaches currently being considered. However, not decision has yet been made on what growth strategy the local plan will adopt.	
Green Belt • Meet green belt purposes strongly and provide an important contribution to wider strategic green belt	• Daniel Watney LLP
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Physical considerations • Subject to flood risk within Flood Zone 3	• Daniel Watney LLP
HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.	
Landownership and assembly • Multiple ownerships	• Daniel Watney LLP
HBC's comments: Whilst land within multiple ownerships should not be seen as a significant constraint on development, measures will need to be taken by the site promoter/s to show that the site is deliverable and that all landowners are willing to work together on one collaborative scheme.	
Transport infrastructure • Concerns against various HCC transport policy requirements • Motorway Junctions are under stress	• Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	

Other potential development sites

Site address/ location	Greyhound Lane, South Mimms	Site ref: HEL173

Breakdown of general comments received:

Total number of comments	4
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	3

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Strutt and Parker
- Daniel Watney

Site Promoters: DLA Town Planning on behalf of Oakbridge Homes

Summary of site promoter's response:
No representation on PSHE report received.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • High ecological sensitivity due to nature of habitats (grasslands, reptiles) and location between LWS ecological survey required	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Services and facilities • Limited facilities in the village • Limited school capacity	• Strutt and Parker
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Environment and wildlife • Wetland habitat	• Strutt and Parker
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Heritage	

• One of a number of sites in South Mimms within the Conservation Area or within setting of listed buildings	• Daniel Watney
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	
Physical considerations • Flood zone 2 and 3 triggering sequential test • Proximity to A1(M) and associated air quality and noise issues	• Strutt and Parker
HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary. Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.	
Transport infrastructure • Motorway Junctions are under stress and over capacity	• Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	

Site address/ location	Land at Town Farm, Blackhorse Lane	Site ref: HEL205

Breakdown of general comments received:

Total number of comments	3
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	2

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Daniel Watney

Site Promoters: JB Planning on behalf of Gascoyne Cecil Estates, in consultation with B W Field and Partners and Wrotham Park Estate

Summary of site promoter's response:

Key points raised:

- Representation forms part of wider of SM2 and SM3 (the latter incorporating HEL205)
- Part of land allocation which would bring further vitality to the village
- Opportunity for mixed use development
- SM3 performs strongly in terms of sustainability
- Question the green belt stage 2 assessment findings
- Potential for a relief road if significant development occurs through SM2 and SM3

Summary:
The site promoter has responded on a number of sites which collectively make up SM2 and SM3 as part of a potential consortium with two other land owners. The response recognises that there has been relatively little development in South Mimms village and so the allocation of land for development has the opportunity to enhance local services.

The submission identifies a series of opportunities and constraints and a number of technical studies have been commissioned. Parts of HEL205 are within Flood Zone 2 and 3 given their immediate proximity to Catherine Bourne and are at risk of surface water and groundwater flooding, which would require development to be sited away from that part of the site. Notwithstanding this HEL205 is considered to be free from significant constraints. There is recognition that Blackhorse Lane is narrow and 'misuse' of the lane should be discouraged; it is suggested that the creation of a new road network as part of the development SM2 and SM3 as a whole, has the potential to provide the access for these sites including a new 'relief road'.

The findings of the Stage 2 green belt assessment are noted including the recommendation that SA-26 should not be taken forward for further consideration. Although its conclusions are considered reasonable in their totality, the promoter highlights SA-26 as a particularly large sub-area which does not reflect local circumstances and opportunities available to 'enhance the landscape and create new defensible green belt boundaries'.

As part of the promoter's submission the following technical studies have been submitted; landscape briefing note, preliminary ecological appraisal, initial transport and infrastructure review, archaeological desk based assessment, and noise mapping assessment.

HBC's comments: The promoter has suggested that this site could form part of a larger developable area in conjunction with other sites. The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground.

The promoter has suggested that there is potential for a link road and for the development to provide additional facilities for South Mimms. Development on a larger scale would ensure that the economies of scale exist to deliver the required supporting services and facilities.

FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated

with the Environment Agency. Mitigation work will be required where deemed to be necessary.

The impact of any development in the green belt will be fully assessed taking into account the findings of Arup's green belt assessment. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics including green belt release, and transport.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environmental and wildlife • Locally moderate due to habitats SSSI • Retain boundary features and grassland, enhance Bourne • Will need PEA to assess grassland value and possible PRA for buildings associated with Town Farm	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Heritage • One of a number of sites in South Mimms within the Conservation Area or within setting of listed buildings	• Daniel Watney
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	

Site address/ location	St Albans Road, South Mimms	Site ref: HEL228a and HEL228b

Breakdown of general comments received:

Total number of comments	3
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	2

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/ landowners
- Daniel Watney LLP

Site Promoters: King and Co and Aylward Planning

Summary of site promoter's response:

Key Points Raised:
- Contiguous with the development limit and provide the opportunity for well-considered family homes
- Impact of flooding from Catherine Bourne can be easily mitigated and the design solution provides space for water and seeks to deliver open parkland
- A representation was provided in relation to SM1, SM2 and SM3 and the possibility for these sites to form a cohesive scheme.

Summary:
The site promoter welcomes the potential allocation of these sites and considers them to be contiguous with the development limit and to provide the opportunity for well-considered family homes. The site is bisected by a watercourse, and the design solution provides space for water and seeks to deliver open parkland to enhance the enjoyment of the Catharine Bourne. The promoter has put forward both a pure residential and a scheme which includes employment uses. The promoter considers the site to highly accessible and entirely refutes the comments made in the HELAA. The promoter would agreeable to providing GP facilities and highlights the potential for the expansion of St. Giles school.

A representation was provided in relation to SM1, SM2 and SM3 and the possibility for these sites to form a cohesive scheme. This representation also covers both HEL228a and HEL228b and a full summary can be read in the proforma for sites SM1, SM2 and SM3. Overall, the representation considered the site to be accessible and provide an opportunity for enhancing South Mimms village centre, with the impact of flooding from Catherine Bourne and noise form the M25 being easily mitigated.

HBC's comments: The promoter has mentioned the possibility of creating a cohesive scheme that includes this site amongst others. The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics including flood management and transport.

The promoter mentions that the site is dissected by the Catherine Bourne. FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Retain boundary features and enhance stream corridor	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with	

both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Heritage • One of a number of sites in South Mimms within the Conservation Area or within setting of listed buildings	• Daniel Watney LLP
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	

Site address/ location	Land r/o Altus, 4 Blanche Lane East and West	Site ref: HEL254 and HEL255

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoters: The Landowner

Summary of site promoter's response:
No representation on PSHE report received.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environmental and wildlife constraints: • Potential for reptiles depending on grassland condition • Will need PEA to assess grassland value and protected species potential	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:
No comments received

Site address/ location	Land formerly part of Earl and Cross Keys Farm north and south site, Cecil Road	Site ref: HEL320 and HEL321

Breakdown of general comments received:

Total number of comments	4
Statutory bodies & local interest groups	2
Developers/ landowners (includes site promoter)	2

Statutory bodies & local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit
- Highways England

Other developers/ landowners
- Strutt and Parker

Site Promoters: Daniel Watney LLP on behalf of the Charity of Alderman James Hickson

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing LPA figure will increase above 500dpa
- The sites have potential accommodate 150 plus new homes
- Numerous local services despite being a village
- Suitable for release from the green belt, as they only moderately meet the requirements of the green belt
- Need for homes within South Mimms in order to safeguard its long term future would enable the creation of a village core
- Provide much needed residential development without overwhelming the existing village
- The southernmost parcel of land not proposed for development, 20m buffer has also been included along the eastern boundary
- Provide a sustainable expansion to the village

Summary:
The site promoter reiterates the Government's message that there is a significant demand for housing across the UK. Whilst the Council have stated a target figure of 500 dwellings per annum, the promoter believes, this is likely to increase with the government revised methodology calculating a need of over 700 dwellings per annum. Hertsmere therefore has significant housing need which needs to be accommodated by the release of the green belt. The sites have potential to accommodate 150 plus new homes (HEL320 (58) and HEL321 (98)).

The promoter considers South Mimms to have numerous local services despite being a village including a primary school, business space and a church. Furthermore, South Mimms Services have additional facilities and the village is in close proximity to both the highway network and train station (11 minute bus). Both HEL320 and HEL321 are suitable for release from the green belt, as they only moderately meet the requirements of the green belt.

The promoter identifies a need for homes within South Mimms in order to safeguard its long term future as a viable community. The development will therefore help to enhance the village as the current configuration makes the village feel spread out and would enable the creation of a village core. These sites would therefore provide much needed residential development without overwhelming the existing village.

The site is the most appropriate of the smaller sites (located on the edge of the village envelope) and has no ecological, arboricultural, heritage or archaeological constraints sufficient to prohibit development. The promoter does however mention the presence of one scheduled monument in the wider area and the presence of multiple trees, with the southernmost parcel of land not proposed for development to encourage biodiversity and preserve the local setting. A 20m buffer has also been included along the eastern boundary.

The site would therefore provide a sustainable expansion to the village. A number of technical studies have been completed including a topographical survey, landscape and visual appraisal, preliminary ecological appraisal, arboricultural survey, archaeology assessment and utilities assessment.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum

as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

The council notes the promoter's view that additional homes will support village services. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

The promoter has indicated that a 20m buffer will be included along the eastern boundary. Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substansive points raised	Responder/s
Environment and wildlife • Enhancement of boundary features, size limits landscaping potential • Significant potential for conservation of adjacent LWS	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Transport infrastructure • Impact on strategic road network	• Highways England
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substansive points raised	Responder/s
Services and facilities • Limited accessibility • Lack of services • Limited school capacity	• Strutt and Parker
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Environment and wildlife • Wetland habitat	• Strutt and Parker
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Physical considerations • Flooding zone2 and 3 • Proximity to A1	• Strutt and Parker
HBC's comments: FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary. Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.	
Transport infrastructure • Motorway junctions are under stress	• Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network.	

Site address/ location	Land at White House, Greyhound Lane	Site ref: HEL352

Breakdown of general comments received:

Total number of comments	3
Statutory bodies & local interest groups	1
Developers/ landowners (includes site promoter)	2

Statutory bodies & local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Other developers/landowners
- Daniel Watney LLP

Site Promoters: The Landowner

Summary of site promoter's response:
No representation received.

Staturtory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

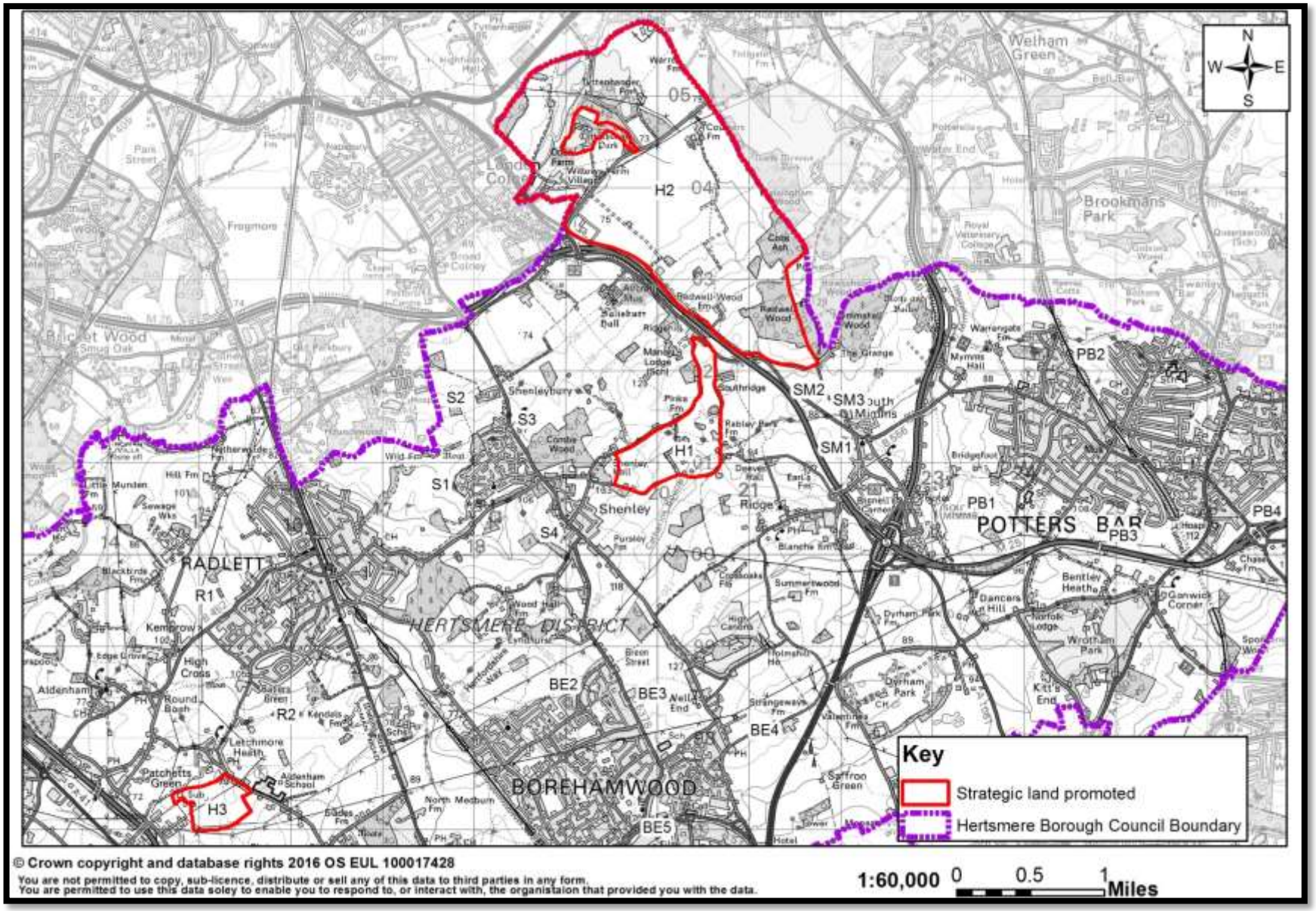
Substansive points raised	Responder/s
Environment and wildlife • Retain boundary trees, yet limited scope for enhancement due to size	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

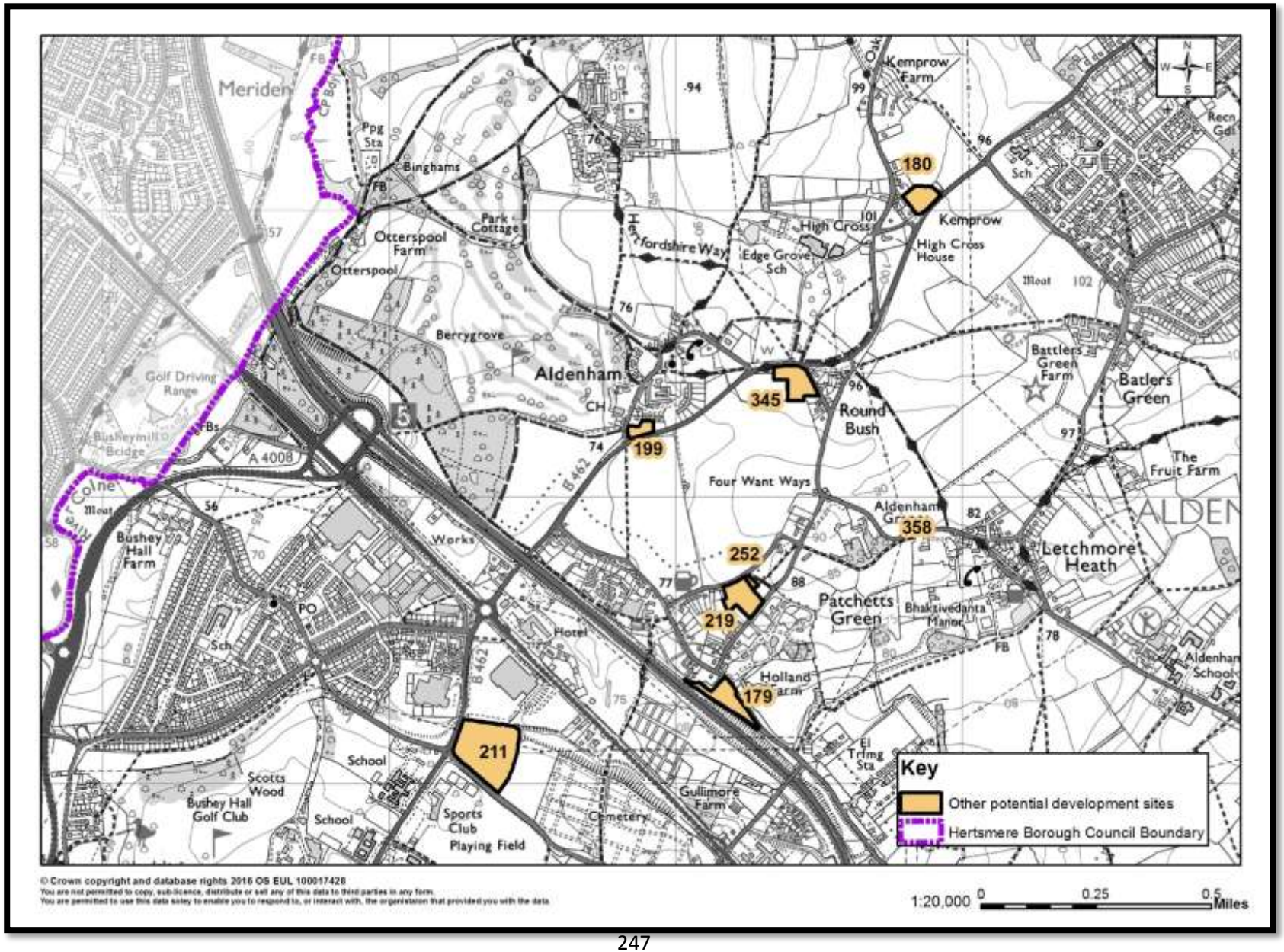
Substansive points raised	Responder/s
Heritage • One of a number of sites in South Mimms within the Conservation Area or within setting of listed buildings	• Daniel Watney LLP
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	

14. Summaries of feedback from site promoters, statutory bodies and local interest groups – Other locations and garden village

14.1 – Map of Other locations and garden village strategic housing sites



14.2 – Map of other locations other potential development sites



14.3 - Feedback forms – Elstree Village

Strategic Housing Sites

Site address/ location	Rabley Green, East of Shenley	Site ref: H1 (HEL221)

Breakdown of general comments received:

Total number of comments	11
Statutory bodies and local interest groups	8
Developers/ landowners (includes site promoter)	3

Site Promoter:
Aurora Properties Ltd

Statutory bodies and local interest groups
- Shenley Parish Council
- Thames Water
- Watford Borough Council
- Hertfordshire County Council Growth and Infrastructure Unit
- Campaign for Colney
- Highways England
- Environment Agency
- Transport for London (TfL)

Other developers/ landowners
- Strutt and Parker
- Turley

Summary of site promoter's response:
No representation on PSHE report received.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Principle of development • There is little need for new homes in the south of the UK • Housing being promoted to generate additional council tax receipts	• Campaign for Coleny • Shenley Parish Council
HBC's comments: A housing white paper document (Fixing our broken housing market 2017) sets out the need for new homes, and the government's plans to reform the housing market and boost the supply. In order to address central government's requirement to meet objectively assessed need for housing and employment, there will need to be a step change in the scale of development. This will require a range of locations beyond existing built up areas to be assessed and where appropriate, increased densities will need to be considered. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities.	
Landownership and assembly • Landowners in parts of H1 have advised their land is not available for development	• Campaign for Colney • Shenley Parish Council
HBC's comments: Whilst land within multiple ownerships should not be seen as a significant constraint on development, measures will need to be taken by the site promoter/s to show that the site is deliverable and that all landowners are willing to work together on one collaborative scheme.	

Services and facilities • A housing and infrastructure phasing plan required to determine capacity within the water network • Would require 60 units of extra care housing, of which 12 should be accessible with disabilities • Remote location and lack of physical infrastructure • Upgrades to waste water network required including sewage works • May require allocation of employment land around 'SA106: Shenley Sewage Treatment Works'	• Shenley Parish CouncilThames Water • Environment Agency • Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. It is unclear where employment land around SA106 is sited, nevertheless full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructures in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The SW Herts SHMA is in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters regarding requirements for this category of housing.	
Scale of development • To necessitate the investment required to deliver the required infrastructure significantly more than village scale development will be required • Concerns over levels of growth with London Colney more than trebling in size	• Campaign for Colney • Watford Borough Council
HBC's comments: In order to address central government's requirement to meet objectively assessed need for housing and employment, there will need to be a step change in the scale of development. This will require a range of locations beyond existing built up areas to be assessed and where appropriate, increased densities will need to be considered. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities. Concerns about the potential impact on London Colney are noted. The Council will continue to seek to work collaboratively with neighbouring authorities where there are areas of common interest.	
Green Belt • Low density development would result in perpetual loss of green belt • Higher density development would reduce loss of greenfield land but not be in keeping with 'garden village' concept • Would destroy the green belt • Site should not be considered further to prevent coalescence of Shenley village and proposed Tyttenhanger garden village	• Campaign for Colney • Watford Borough Council
HBC's comments: The quantum and pattern of development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.	
Environmental and wildlife • Ecologically sensitive due to scale of site • LWS and RIGS sites should be avoided unless interest has degraded	• Hertfordshire County Council Growth and Infrastructure Unit

below relevant criteria threshold • Bats, badgers and great crested newts recorded. Priority species white-letter hairstreak butterfly recorded • Preliminary ecological appraisal recommended • Consideration for appropriate biodiversity offsetting	
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	
Physical constraints • Chalk mines underneath the majority of the site • Much of land in sub area h. is located in and adjacent to Flood Zone 2 and 3	• Shenley Parish Council
HBC's comments: Officers continue to liaise with the HBC Environmental Health and HCC Waste and Minerals departments in regards to chalk mines and other issues surrounding any historic landfill sites being promoted for residential development. FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.	
Planning process and engagement • A long term vision for the area should be set out • Needs to be considered in the wider context as to how this will impact on the wider area and what the long term implications could be. • Early consideration would need to be given to the housing density and how this is delivered • Concerns over how consultation was conducted and how the council has engaged with local community	• Campaign for Colney • Watford Borough Council
HBC's comments: The quantum and pattern of development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Hertsmere has been actively encouraging cross boundary co-ordination with other neighbouring boroughs. A joint SW Herts strategic plan is currently being worked on involving Hertsmere, Watford, Dacorum, Three Rivers and St Albans, as well as HCC. This is in addition to the joint work being done on a revised SW Herts SHMA and economic study which will be published in the forthcoming months. Duty to cooperate engagement with other neighbouring authorities outside of SW Herts continues. The council has a Memorandum of Understanding in place with Welwyn Hatfield Borough Council and has met with all of its north London neighbouring authorities to consider areas of common interest within the duty to co-operate. Hertsmere is currently at the third stage of its Local Plan preparation process with the publication of the draft Local Plan scheduled for 2020. The public engagement in 2018 generated responses from over 2,000 people and 90 organisations/groups. Over 1,200 people attended staffed exhibitions and more than 40,000 newsletters were distributed to households across the local area. There was also extensive coverage within the local press and on our social media feeds and the council is pleased with the level of engagement on its Local Plan to date. We will continue to keep consultation arrangements under review to ensure that any changes are made where these are considered necessary.	
Minerals and waste • Contains a section of the sand and gravel belt as well as the Mineral Safeguarding Area • 'Shenley Sewage Treatment Works' adjacent to southern border • Land identified/safeguarded for waste management purposes • Screening required for more sensitive residential development	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: The council continues to liaise with HCC Minerals and Waste department in relation to the	

waste treatment sites following receipt of comments from the Growth and Infrastructure Unit. The council will be guided by HCC with regard to ongoing backfill of current minerals sites as well as development with implications for waste treatment facilities. The potential impact that any development would have on neighbouring sites of a differing land use (and vice-versa) will be taken into consideration when considering land use allocations. The council will seek to avoid "Bad Neighbour" situations from arising which, unless adequate mitigation can be put in place, would either prejudice the operation of existing commercial or other activities or would lead to poor environmental conditions within the new allocation.	
Transport infrastructure • Development will impact on the strategic road network (SRN). • Cumulative assessment of sites (including H1) across plan period needed highlighting residual impact on the SRN • Does not have access to the rail network or specialised bus lanes to provide convenient access to services and facilities in the wider area. • If rail and other public transport infrastructure are not provided from the outset then a culture of private vehicle travel will be engrained which will add to exiting congestion problems • Traffic flow will be displaced to larger service centres which act as trip generators • Very poor public transport – significant investment required • Bus access needs to be financially sustainable therefore may need to be delivered with other sites • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes.	• Transport for London (TfL) • Watford Borough Council • Hertfordshire County Council Growth and Infrastructure Unit • Highways England
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Landownership and assembly • Land owned by Tyttenhanger Estate will not be brought forward • Multiple land ownerships meaning no direct access into site	• Turley • Strutt and Parker
HBC's comments: Whilst land within multiple ownerships should not be seen as a significant constraint on development, measures will need to be taken by the site promoter/s to show that the site is deliverable and that all landowners are willing to work together on one collaborative scheme.	
Deliverability • 5 to 10 year lead in before first occupation	• Strutt and Parker
HBC's comments: A key factor in the determination of sites will be the deliverability of the scheme. We acknowledge that not all sites will be delivered within the first 5 years of the adopted plan period but the council will wish to ensure that sites are built out within the time scales shown in the corresponding Local Plan allocation. We will look to include provisions within our plan for alternative sites to be brought forward where allocated sites are not being implemented.	
Physical considerations • Proximity to M25	• Strutt and Parker
HBC's comments: Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development.	
Services and facilities • Accessibility to services • Oversubscribed medical facilities • Limited school capacity	• Strutt and Parker
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Transport infrastructure • Under stress motorway junctions nearby are at or over capacity • Unsustainable travel patterns generated by garden villages compared to garden suburbs	• Strutt and Parker
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	

Site address/ location	Tyttenhanger Estate (North of M25/B556) and Land East of M25 Junction 22 (employment)	Site ref: H2 (HEL382/ HEL332)

Breakdown of general comments received:

Total number of comments	20
Statutory bodies and local interest groups	18
Developers/ landowners (includes site promoter)	2

Site Promoter:
Turley on behalf of The Tyttenhanger Estate (subsequent to the end of the consultation this has changed to Urban and Civic)

Statutory bodies and local interest groups

- St Albans City and District Council
- Highways England
- Hertfordshire and Middlesex Wildlife Trust
- Herts Bird Club (HBC)
- Hertfordshire Natural History Society (HNHS)
- St Albans and District Footpath Society
- Colney Heath Parish Council
- London Colney Parish Council
- Campaign for Colney
- Thames Water
- Environment Agency
- South East Herts RSPB
- Watford Borough Council
- Welwyn Hatfield Borough Council
- Hertfordshire County Council Growth and Infrastructure Unit
- Shenley Parish Council and Shenley Neighbourhood Plan Steering Group
- Transport for London (TfL)
- Forestry Commission

Other developers/ landowners

- Strutt and Parker

Summary of site promoter's response:

Key Points Raised:

- Large demand for housing LPA figure will increase above 500 dpa, council overestimating capacities of sites.
- The site will be able to provide approximately 3,000 homes within the plan period and will bring economic and wider benefits to the South West Hertfordshire Joint Strategic Plan Area
- The strategic scale of the proposal will allow for the provision of a full array of community services and facilities
- Ensures existing older settlements are not overburdened by disproportionately scaled extensions
- Direct access to the M25 via junction 22 and Coursers Road
- Site will include a dedicated high-speed arterial bus link, comprehensive new public transport networks, and improvements to Coursers Road and the 'Bell' roundabout
- Phasing of mineral extraction will be scheduled to fit in with the residential development work

Summary:

The site promoter reiterates the Governments message that there is a significant demand for housing across the UK. Whilst the council have stated a target figure of 500 dwellings per annum, the promoter believes, this is likely to increase with the government revised methodology calculating a need of over 700 dwellings per annum. The promoter suggests that the site will be able to provide approximately 3,000 homes within the plan period and will bring economic and wider benefits to the South West Hertfordshire Joint Strategic Plan Area. It should be noted that discussions are ongoing with a development partner with significant master developer experience.

The promoter cites support in the NPPF for the provision of new settlements and suggests that a new garden village at Tyttenhanger is ideally placed to accommodate a significant proportion of this new housing and economic growth, and that the strategic scale of the proposal will allow for the provision of a full array of community services and facilities (leisure, health and education) including a primary and secondary school, and wide mixture of homes (including affordable). The proposal will be for a sustainably planned new community, and ensure existing older settlements are not overburdened by disproportionately scaled extensions. Recognising the green belt status of the

land, issues of coalescence would be 'appropriately managed' through sensitive design and structural landscaping and the defensible barrier of the M25 to the outward growth of London is referenced. Significant changes associated with the ongoing minerals extraction are also highlighted and it is stated that the phasing of mineral extraction will be scheduled to fit in with the residential development work. In terms of delivery, the promoter recognises that the entire village would not be deliverable by 2036 but considers that delivery of 2,500 to 3,000 within the Plan period is achievable, potentially starting by 2024.

The site will have direct access to the M25 via junction 22 and Coursers Road. A modern high speed public transport system and a high degree of trip internalisation are also promoted as measures to address subsequent impacts on the strategic road network. This will include a dedicated high-speed arterial bus link, comprehensive new public transport networks, and improvements to Coursers Road and the 'Bell' roundabout.

The promoter considers that the site is consistent with Hertsmere's economic aspirations, and will build on the existing economic market including the established sectors and M1/M25 growth corridor. The site is located close to a number of major institutions including Warner Brother's Leavesden studios and the head office of the National Pharmacy Association.

The following documents were submitted as part of the promoter response; preliminary ecological appraisal, green belt review, landscape and visual position paper, mineral report, transport strategy, mineral and development phasing plan, ecology risk register, infrastructure plan, and understanding the need for housing in Hertsmere report. Finally it should be noted that since the end of the consultation event the site promoter has changed to Urban and Civic.

HBC's comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.

The proposal is for a new garden village with at least 4,000 homes. The previous Issues and Options consultation set out different development approaches that could be adopted in order to meet the council's new housing requirements. There was general support for the creation of a garden village and the council accepts that this could be a suitable method of housing delivery. The council is yet to formalise its housing delivery strategy and is therefore currently exploring all of the previously stated development approaches.

The site promoter highlights the wider benefits this proposal could bring to the South West Herts joint strategic plan area. The council can confirm that a joint SW Herts strategic plan is currently being worked on involving Hertsmere, Watford, Dacorum, Three Rivers and St Albans, as well as HCC. This is in addition to the joint work being done on a revised SW Herts SHMA and economic study which will be published in the forthcoming months. The council recognises that there are both significant opportunities and constraints in delivering a development of this scale and is clear that delivery of the scheme will require continual engagement with both the South West Herts group, infrastructure providers and other nearby local authorities. To that end, a duty to cooperate engagement with other neighbouring authorities continues, the council has a Memorandum of Understanding in place with Welwyn Hatfield Borough Council, and the council has met with all of its north London neighbouring authorities to consider areas of common interest within the duty to co-operate.

A formal housing figure has yet to be decided but there will need to be a step change in the scale of development across the borough, in order to address central government's requirement to meet objectively assessed need for housing and employment. This will require a range of locations beyond existing built up areas to be assessed and where appropriate, increased densities will need to be considered. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities on site.

Full consideration would have to be given to the future availability of general services and facilities taking into account the needs of residents in both early and later development phases. For the borough as a whole, work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018).

A key factor in the determination of sites will be the deliverability of the scheme. We acknowledge that not all sites will be delivered within the first 5 years of the adopted plan period but the council will wish to ensure that sites are built out within the time scales shown in the corresponding Local Plan allocation. We will look to include provisions within our plan for alternative sites to be brought forward where allocated sites are not being implemented. For H2, further detailed discussions would need to take place between the site promoter, Hertsmere, and HCC with regards to the mineral extraction phasing.

The current proposals seeks changes to the existing Bell roundabout and the construction of additional road links through the site with associated bus routes. An initial transport strategy has been submitted but additional modelling will be required to assess the full impact development will have on the strategic and local road network. Hertfordshire County Council has developed its own 'COMET' traffic model for the county and as expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. Funding to enable new or improved public transport to be delivered will be a key requirement of any new garden village. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

The information contained in the preliminary technical appendix previously submitted has been carefully reviewed but a significant amount of additional technical work will need to be commissioned if the site is to be considered further. The council would require this work to be undertaken in consultation with the relevant statutory bodies and agencies.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • High ecological sensitivity • Nature and wildlife conservation • Tyttenhanger gravel pits • BTO red listed species - Tree sparrows (last colony in Hertfordshire) • Many other red and amber-listed species at Tyttenhanger for all or part of year • 18 'priority species' birds identified • Other species including great crested newts, purple emperor and white admiral butterfly, brown hare and badger, farmland and wetland birds, bats and water vole • Redwell Wood SSSI and various LWS • Multiple habitats across the site such as Tyttenhanger gravel pits • Colney Heath nature reserve • Loss of good quality agricultural land and habitats • Proposal will need to be accompanied by appropriate ecological surveys that demonstrate how development can be accommodated without causing losses to the sensitive ecological area • Biodiversity offsetting may be required • Impacts on local nature reserves, wildlife sites and SSSIs present need to be properly assessed • Opportunities for the enhancement of major habitats, creation of additional grassland areas and the retention of boundary features • Planning permission should be refused where significant harm to biodiversity cannot be avoided • Concerned about potential impact on the ancient woodland (Mymmshall Wood, Coppice Wood and Redwell Wood) and reiterate the point the ancient woodland is irreplaceable and compensation	• Forestry Commission • Hertfordshire and Middlesex Wildlife Trust • Herts Bird Club • Hertfordshire Natural History Society • South East Herts RSPB • London Colney Parish Council • Colney Heath Parish Council • Welwyn Hatfield Borough Council • Hertfordshire County Council Growth and Infrastructure Unit • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group

measures should not be considered.	
HBC's comments: The council notes that the site contains significant wildlife constraints due to its overall size and the quality and variety of habitats located within the Tyttenhanger Estate. Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues. Due to the size and scale of H2, discussions will also have to take place in relation to the location, density and scale of the development proposed. Environmental and wildlife constraints will be a key consideration in these discussions.	
Sports and recreation • Impact on use of land for leisure purposes • Impact on public rights of way • Site would change from wild and open space to an urban green space	• Herts Bird Club • St Albans and District Footpaths Society • London Colney Parish Council • South East Herts RSPB
HBC's comments: A new open spaces and recreation study is currently being conducted by Hertsmere which looks and the quality and provision of the borough's existing open spaces. The council notes that the site includes Willows Activity Farm and the Willows Lakes within the overall ownership of the Tyttenhanger Estate. However, the initial masterplan does not seek development around the lakes and Willows Activity Farm does not form part of the proposals. Further discussion will need to take place to determine the implications of the proposed garden village on these facilities. There are various rights of way crossing the site and the impact of development on the rights of way network will be considered carefully in consultation with HCC Rights of Way service. This will include both positive and negative effects such as the scope for routes to be created, improved and integrated within new development, as well as the impact on users of having to divert any existing routes. Further detailed discussions need to take place in relation to the land north of Coursers Road, which includes Willows activity farm and the Willows Lakes.	
Transport infrastructure • High level of congestion and limited capacity for additional traffic • Detailed attention needed to address potential implications on the road network especially A414 • Dependency on Coursers Road and M25 (which is not designed for local traffic) • Heavily dependent upon Bell roundabout • Cycle routes required • Development will impact on the strategic road network (SRN). • Cumulative assessment of sites (including H2) across plan period needed highlighting residual impact on the SRN. • Traffic impact in and around London Colney including A1081 bypass and London Colney High Street • Travel more likely to be to St Albans • Potential for increased use of 'rat-runs' to Shenley, St Albans and Radlett • Access and traffic modelling required • Lack of consideration for cumulative impact of sites in neighbouring boroughs • Questions the practicality and benefits that the new link road to Potters Bar will provide • Unlikely to be reduced out-commuting as a result of providing business premises • No evidence to suggest why Potters Bar station would be preferred to the Thameslink route • Anecdotal data shows St Albans station has many more passengers than Potters Bar • Traffic flow will be displaced to larger service centres which act as trip	• Transport for London (TfL) • St Albans and District Footpaths Society • Highways England • London Colney Parish Council • Colney Heath Parish Council • St Albans City and District Council • Watford Borough Council • Welwyn Hatfield Borough Council • Shenley Parish Council and Shenley Neighbourhood Plan Steering Group

generators • Poor rail and limited bus links with the site and not directly connected to the rail network to provide convenient access to services and facilities in the wider area • Current bus services approximately one bus every two hours • Substantial scale of development would justify the level of investment required to establish new services • Development will be over reliant on private car and will likely result in increase in car commuting • If rail and other public transport infrastructure are not provided from outset a culture of private vehicle travel will be engrained • Considerable bus capacity required, beyond practical walking/cycling distance • Raises a number of duty to cooperate issues • Centre of The Watling Chase Community Forest –Shenley Parish provides the majority of the forest land • Development should minimise impact upon the A1 Barnet bypass and Stirling Corner • Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. The scheme includes proposals for the existing bell roundabout and the construction of additional road links through the site with associated bus routes. An initial transport strategy has been submitted but traffic modelling will need to be undertaken with the appropriate baselines agreed with statutory bodies. Funding to enable new or improved public transport to be delivered will be a key requirement of any new garden village. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Green Belt • Coalescence with Shenley, Potters Bar, South Mimms, London Colney and Colney Heath • Arup's green belt assessment considers the site to makes contributions to safeguarding the countryside and preventing towns from merging. • Arup's green belt assessment only recommends an area of 157ha which is insufficient to provide 4000 homes. • Discrepancies between Stage 1 and Stage 2 green belt assessment not clear; Stage 1 recommended garden village should not be considered. • Would create an 'island' within the green belt • Would destroy the green belt • Lack of defendable boundaries • The contribution to countryside protection purpose is understated in comparison to other sites • Low density development would result in perpetual loss of green belt • Higher density development would reduce loss of greenfield land but not be in keeping with 'garden village' concept	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • St Albans and District Footpaths Society • London Colney Parish Council • Colney Heath Parish Council • St Albans City and District Council • Campaign for Colney • Herts Bird Club • Watford Borough Council
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries, the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website. This recommends that development be located South of Coursers Road	

on the western side of the site. Further discussions will need to take place with the developer in order to establish the exact location of development and green belt release, and how any new green belt boundaries will be defined. There are not considered to be discrepancies in relation to the Stage 1 and Stage 2 green belt assessments as they relate to this part of the borough. The stage 1 report did not specifically recommend that a garden village should not be considered but along with many other parts of the borough, the relevant parcel considered (42) was considered to be strongly performing green belt. The parcels considered in Stage 1 typically covered a much larger area and parcel 42 extended from Coursers Road down to the A1 near Potters Bar. The Stage 2 assessment was a more fine grained assessment enabling an individual site or land promotion to be considered as a smaller sub-area including (section 5) a detailed assessment of land which was promoted for a garden village following the call for sites.	
Minerals and waste • Current use of site for mineral extraction is welcomed • Active sand and gravel quarry with planning permission for extraction until 2032 • Restoration involves phased infill – promoter may wish to commission a ground investigation for stability • Anaerobic digester and in-vessel composting plants located on site • Land at Redwell wood farm is safeguarded as a strategic site in the Waste Core Strategy and Development Management Policies Development Plan (2012) – development should not prevent the use of this land • Screening required for more sensitive residential development • Site is within/close to an area of search was identified by the HWRC Annex to the Local Authority Collected Waste (LACW) Spatial Strategy 2016 – consideration should be given to allocating 1ha for the provision of a HWRC • Minerals planning consents required that site will be converted back in to open fields post mineral extraction	• Colney Heath Parish Council • Hertfordshire County Council Growth and Infrastructure Unit • St Albans and District Footpaths Society • Colney Heath Parish Council
HBC's comments: The council continues to liaise with HCC Minerals and Waste department in relation to the waste treatment sites following receipt of comments from the Growth and Infrastructure Unit. The council will be guided by HCC with regard to ongoing backfill of current minerals sites as well as development with implications for waste treatment facilities.	
Scale of development • Houses and jobs figures quoted are very high and will be difficult to support • Proposed sites in PSHE report would equate to more than double the housing requirement • Clarification required in relation to minimum densities and capacity assessment method • To necessitate the investment required to deliver the required infrastructure significantly more than village scale development will be required • Concerns over levels of growth with London Colney more than trebling in size • Consider there is little need for new homes in the south of the UK • Housing being promoted to generate additional council tax receipts • Too low density (min density should be 40-50dph) – area needs to be significantly reduced (about 200ha) and residents, jobs and services increased • Density needs to be looked at from point of land efficiency, cost of infrastructure, loss of green belt and public transport feasibility	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • St Albans and District Footpaths Society • Colney Heath Parish Council • St Albans City and District Council • Watford Borough Council • Campaign for Colney

HBC's comments: The previous Issues and Options consultation set out different development approaches that could be adopted in order to meet the council's new housing requirements. There was general support for the creation of a garden village and the council accepts that this could be a suitable method of housing delivery but PSHE report only set out details of all the sites being promoted rather than advocating that all of this land is required to meet the housing need in the borough. An appropriate balance needs to be found in terms of densities within new strategic allocations as it is recognised that traditional garden suburb/village layouts do not necessarily delivery the most efficient use of land. It has been suggested that there is little need for new homes in the south of the country but this is not borne out by a range of indicators: national population and household forecasts showing continued growth, the continued gap between demand and supply as evidenced in house prices in the area being around 14 times greater than household income and a housing register which currently has almost 500 households with a local connection. The proposals as currently submitted would also not appear to result in a trebling of the size of London Colney. In order to address central government's requirement to meet objectively assessed need for housing and employment, there will need to be a step change in the scale of development. This will require a range of locations beyond existing built up areas to be assessed but clearly development on a larger scale can provide the economies of scale to deliver the required supporting services and facilities. Full consideration would have to be given to the future availability of general services and facilities taking into account the needs of residents in both early and later development phases.	
Planning process • A long term vision for the area should be set out • Needs to be considered in the wider context as to how this will impact on the wider area and what the long term implications • Careful consideration needs to be taken in relation to designations in neighbouring boroughs • Early consideration would need to be given to the housing density and how this is delivered	• Welwyn Hatfield Borough Council • Watford Borough Council
HBC's comments: Alongside the new Local Plan, work is being undertaken on a joint strategic plan for south west Herts. This will allow for long term, cross-boundary planning to be undertaken. In addition to the south west Herts working, the council signed a memorandum of understanding with Welwyn Hatfield Borough Council in 2017 setting a framework for future co-operation on strategic planning cross boundary issues.	
Services and facilities • Upgrades to waste water network required including sewage works • Education and healthcare provision and current lack of supply • Relationship with surrounding settlements in particular London Colney • Detailed attention needed to address potential infrastructure implications • Concerns about additional vehicle movements from H2 to proposed new secondary school on land in St Albans district • Concerns that allocation of a site for GP practice may not lead to a GP practice willing to move in, as happened at Napsbury • A housing and infrastructure phasing plan required to determine capacity within the water network • Would require 60 units of extra care housing, of which 12 should be accessible with disabilities	• Welwyn Hatfield Borough Council • St Albans and District Footpaths Society • Thames Water • London Colney Parish Council • St Albans City and District Council
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan and it is very much acknowledged that the site presently has no services, notwithstanding its relative proximity to London Colney. Full consideration will be given to the availability of general services and facilities within the site, taking into consideration the needs of residents in both the initial and later development phases. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility	

Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities and Hertsmere will be seeking a significant level of on-site facilities including a viable village centre with retail offer and community facilities, primary and secondary education and healthcare provision which addresses the requirements of the CCG. The SW Herts SHMA and Economy Study are being updated and will inform discussions concerning requirements for specific categories of housing and employment provision.

Public engagement • Welcome distribution of newsletter in London Colney • Acknowledgement of impact on London Colney parish is appropriate and necessary • Concerns over the lack of clarity and that results of previous consultations are not supported by evidence • Concerns over how consultation was conducted and how the council has engaged with local community • Information not easily accessible or publically available – engagement events only showed proposals in that area • Greater consideration of and engagement with neighbouring borough residents (London Colney and Colney Heath) is required • Documents are not clear about scope of proposal. Significant difference between 4,000+ and up to 6,000 homes	• Campaign for Colney • London Colney Parish Council • Colney Heath Parish Council • St Albans City and District Council

HBC's comments: Hertsmere is currently at the third stage of its Local Plan preparation process with the publication of the draft Local Plan scheduled for 2020. The public engagement in 2018 generated responses from over 2,000 people and 90 organisations/groups. Over 1,200 people attended staffed exhibitions and more than 40,000 newsletters were distributed to households across the local area. There was also extensive coverage within the local press and on our social media feeds and the council is pleased with the level of engagement on its Local Plan to date. We will continue to keep consultation arrangements under review to ensure that any changes are made where these are considered necessary.

Hertsmere has been actively encouraging cross boundary co-ordination with other neighbouring boroughs. A joint SW Herts strategic plan is currently being worked on involving Hertsmere, Watford, Dacorum, Three Rivers and St Albans, as well as HCC. This is in addition to the joint work being done on a revised SW Herts SHMA and economic study which will be published in the forthcoming months.

The council accepts that further discussions will need to take place between the site promoter, HBC and other relevant bodies in order to establish the exact housing figure and densities on the site.

Landscape and visual impact • Strong unspoilt rural character • Strong sense of visual containment • Reduce the physical and perceived distances between settlements • Will result in ribbon development	• Colney Heath Parish Council • London Colney Parish Council

HBC's comments:
Section 5 of the stage 2 green belt assessment considers potential garden village locations and the role of the green belt within the overall area promoted for H2. Given the size of the area, it does not perform in a uniform way in terms of its contribution to the strategic green belt and it has been split into different sections. In particular, the importance of different areas in preventing coalescence is highlighted including London Colney - Colney Heath; Shenley - London Colney; London Colney, Potters Bar, Welham Green - Brookmans Park. However, the report also identifies parts of the site which due to its topography has a greater sense of visual self-containment and separation from the wider countryside and concludes that part of the large Area-c could be released with more limited harm to the wider green belt, albeit requiring strengthening of the south west and north west boundaries.

A baseline landscape and visual 'position paper' has been submitted and this has been reviewed along with the other information contained in the preliminary technical appendix previously submitted. Although the report

acknowledges the potential for there to be locally material effects, a more detailed landscape and visual impact assessment will need to be provided to enable the impact of any garden village in this location to be assessed. Hertsmere will seek to minimise the landscape and visual impact of new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Employment • Increased numbers of commuters coming in from elsewhere • Concerns that any employment land will result in warehouses and HGVs	• London Colney Parish Council
HBC's comments: There is a need for both employment and residential development within the borough. As indicated in the submitted masterplan, the proposed garden village would need to set aside land for employment generating activity but it is recognised that in addition to increasing the economic self-containment of a new settlement, it can generate a level of in-commuting. Greater clarity will need to be provided by the site promoter in terms of the type of accommodation and businesses being sought for the proposed innovation hub.	
Physical considerations • Buffer zone between M25 and edge of new town required to reduce impacts of air quality and noise from motorway • Noise pollution – night time noise above WHO recommended levels and day time noise above 55dB • Composting plant and anaerobic digester plant generate foul odours • 2.5ha buffer zone for composting unit • High voltage powerlines – safety area requirements • Flood plain at northern end of site • Air pollution from M25	• Shenley Parish Council and Shenley Neighbourhood Plan Steering Group • London Colney Parish Council • Colney Heath Parish Council
HBC's comments: Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development. Statutory powerline safety clearances must not be infringed and the National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications. FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Physical considerations • High voltage powerlines • Proximity to M25 and associated air quality and noise issues • Flooding	• Strutt and Parker
HBC's comments: Officers continue to liaise with the Environmental Health department in regards to air quality and/or noise issues surrounding sites being promoted for residential development. Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications. FRA and Hydraulic modelling will be required at locations at risk of flooding. This work will need to be	

corroborated with the Environment Agency. Mitigation work will be required where deemed to be necessary.

Transport infrastructure • Unsustainable travel patterns will be generated • Nearby motorway junctions are under stress at or over-capacity	• Strutt and Parker

HBC's comments: The site is acknowledged to be in a location which currently has very poor public transport accessibility. It would be necessary to demonstrate that this could be addressed from the earliest phase of any development, alongside measures which maximise the level of self-containment and reduce trips out of the site. Hertfordshire County Council has developed its own 'COMET' traffic model for the county and as expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites and this site currently fails to meet a high proportion of its transport policy requirements. Further modelling will be required to assess the full impact development will have on the strategic and local road network with the baseline to be agreed in consultation with HCC and Highways England.

The scheme includes proposals for changes to the existing Bell roundabout, and the construction of additional road links through the site with associated bus routes. An initial transport strategy has been submitted however this will need to be discussed further and the work corroborated. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites and this will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.

Heritage • Listed buildings • Archaeological sites	• Strutt and Parker

HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.

Services and facilities • Site may be ultimately sustainable but there will be initial pressure on local services • Logistics of delivering primary and secondary schools	• Strutt and Parker

HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. It is very much acknowledged that the site presently has no services and it will need to be demonstrated how this will be addressed within both the initial and later development phases. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities and Hertsmere will be seeking a significant level of on-site facilities including a viable village centre with retail offer and community facilities, primary and secondary education and healthcare provision which addresses the requirements of the CCG.

Deliverability • Timescales for development with five to ten year lead in to first occupation	• Strutt and Parker

HBC's comments: A key factor in the determination of sites will be the deliverability of the scheme and it is acknowledged that some of the new garden village would not be delivered within the plan period. The site promoter has indicated that a significant proportion could be delivered within the period of the plan but the council will need to be satisfied that the commencement and build out rates are realistic, having regard to the current activities taking place on the site.

Site address/ location	Land West of Aldenham School, Letchmore Heath	Site ref: H3 (HEL343)

Breakdown of general comments received:

Total number of comments	11
Statutory bodies and local interest groups	8
Developers/ landowners (includes site promoter)	3

Site Promoter: Nascot Properties

Statutory bodies and local interest groups
- Thames Water
- Aldenham Parish Council
- Letchmore Heath Village Trust
- Hertfordshire County Council Growth and Infrastructure Unit
- Radlett Society and Green Belt Association
- National Grid
- Environment Agency
- Highways England

Other developers/ landowners
- Strutt and Parker
- Bhaktivedanta Manor

Summary of site promoter's response:
No representation on PSHE report received

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Landscape and visual impact • Due the size of the development it would have a significant detrimental effect on the character and function of the village • Goes against principle previously indicated by HBC in earlier consultation	• Aldenham Parish Council • Letchmore Heath Village Trust
HBC's comments: Hertsmere will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements. Furthermore, the council have published an updated settlement hierarchy which will form part of the evidence base when analysing and assessing sites. It is acknowledged that the site falls outside of the development approaches previously consulted on through the Issues and Options report. No decision has yet been made as to the growth strategy that the Local Plan will adopt.	
Heritage • Impact on historic buildings including Bhaktivedanta Manor	• Aldenham Parish Council
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	
Transport Infrastructure • Access to site and congestion • No capacity on existing roads • Without massive and unwelcomed infrastructure and road investment Aldenham Road could not cope • No existing bus service • Scale of development unlikely to be at level required for new services to be provided • Development will impact on the strategic road network (SRN). • Cumulative assessment of sites (including H3) across plan period needed highlighting residual impact on the SRN • Village already experiences 400 car per hour at peak times	• Letchmore Heath Village Trust • Hertfordshire County Council Growth and Infrastructure Unit • Highways England • Radlett Society and Green Belt Association

• Should maximise use of alternatives to the car especially in areas close to the London boundary or on strategic routes	
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Services and facilities • Lack of facilities bar a pub and village hall – no shops • Local needs only accessible by road • LPA should liaise with Thames Water to ensure housing does not outpace network upgrades • Will need to contain 2FE primary school site – increase in dwellings makes new primary school more sustainable • Would require 60 units of extra care housing, of which 12 should be accessible with disabilities	• Hertfordshire County Council Growth and Infrastructure Unit • Letchmore Heath Village Trust • Thames Water – Savills
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council. The SW Herts SHMA is in the process of being updated. The Local Housing Needs Assessment addresses the need for extra care housing and will inform discussions with HCC and site promoters regarding requirements for this category of housing.	
Physical considerations • Overhead powerlines. Statutory safety clearances must not be infringed.	• National Grid
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Environment and wildlife • Good quality agricultural land • Moderate to locally high ecological sensitivity • Impact on LWS should be fully considered	• Letchmore Heath Village Trust • Hertfordshire County Council Growth and Infrastructure Unit • Radlett Society and Green Belt Association
HBC's comments: The comment about the quality of agricultural land is noted and will need to be considered in line with the requirements in the NPPF. Consideration will also be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Physical considerations • Overhead power cables limit deliverability	• Strutt and Parker
HBC's comments: Statutory powerline safety clearances must not be infringed. The National Grid has provided the council with a list of the potential development sites which powerlines traverse. National Grid will continue to be consulted in the allocation of sites and the subsequent submission of planning applications.	
Transport infrastructure • Impact on local road network • Country lanes	• Strutt and Parker • Bhaktivedanta Manor
HBC's comments: Hertfordshire County Council has developed its own 'COMET' traffic model for the county. As expected, this model shows that housing and employment growth in our area will put additional pressure on a number of key road corridors. The county council has also carried out a high level transport assessment for all the larger potential housing and employment sites. Further modelling will be required to assess the full impact development will have on the strategic and local road network. Funding to enable new or improved public transport to be delivered will be a requirement of strategic sites. This will be expected to cover funding requirements for several years until routes or route improvements become established and capable of self-funding.	
Services and facilities • Poorly located in terms of proximity to local services and isolated location • No state-funded mainstream school facilities and level of housing would not sustain a new primary school • Solely proposes housing and no community facilities • Overload local infrastructure	• Strutt and Parker • Bhaktivedanta Manor
HBC's comments: The council will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations. Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.	
Heritage • Site adjacent to a conservation area and listed buildings	• Strutt and Parker
HBC's comments: An initial analysis of the possible impact of development on heritage assets has been conducted by LUC as part of the ongoing Sustainability Appraisal and the Council has a rolling programme of conservation area appraisals as well as recently updating its list of the locally listed buildings. Historic England will continue to be consulted on the emerging plan given its interest in statutory designations.	
Green Belt • Impact on openness	• Bhaktivedanta Manor
HBC's comments: The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is	

available to view on the council's website.	
Visual impact and character • Completely out of sync with the area that offers respite from urban settings	• Bhaktivedanta Manor
HBC's comments: Hertsmere will seek to minimise the landscape and visual impact of any new development. Developers will be expected to minimise and/or mitigate the landscape and visual impact of new development with appropriate screening and enhancements.	
Scale of development • Too many dwellings proposed	• Bhaktivedanta Manor
HBC's comments: In order to address central government's requirement to meet objectively assessed need for housing and employment, there will need to be a step change in the scale of development. This will require a range of locations beyond existing built up areas to be assessed and where appropriate, increased densities will need to be considered. Development on a larger scale will ensure that the economies of scale exist to deliver the required supporting services and facilities. The housing numbers stated within the report are based on a standard HELAA methodology agreed in consultation with neighbouring authorities. Further information on the breakdown of the capacity figures can be found within the HELAA document. It should be noted however that these figures may change as a number of the capacities were calculated based on there being no absolute constraints on some sites. In some instances, site boundaries have also changed followed representations from site promoters.	

Other potential development sites

Site address/ location	Hillfield Lane, Patchetts Green	Site ref: HEL179

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: Faybrook Limited

Summary of site promoter's response:
No representation on PSHE report received

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Local bat roost recorded • Opportunity to retain roadside tree belt and pond • Moderate to high ecological sensitivity depending on grassland value - PEA required	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:
No comments recieved

Site address/ location	Land at Church Lane, Aldenham	Site ref: HEL199

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: Barton Willmore on behalf of Mikproud Assets Ltd

Summary of site promoter's response:

Key Points Raised:

- Suitable for the development of 15 residential dwellings
- Due to its size it can be delivered quicker than large strategic sites

Summary:
The site promoter considers the site to be suitable for the development of 15 residential dwellings, and would make an important contribution to meet Hertsmere's emerging housing need in a sustainable location. The promoter considers the site to be appropriate for small and medium sized housebuilders, and due to its size it can be delivered quicker than large strategic sites.

HBC's comments: A key factor in the determination of sites will be the deliverability of the scheme. We acknowledge that not all sites will be delivered within the first 5 years of the adopted plan period but the council will wish to ensure that sites are built out within the time scales shown in the corresponding Local Plan allocation. The council accepts that sites of a smaller scale provide an opportunity for quicker delivery. We will look to include provisions within our plan for alternative sites to be brought forward where allocated sites are not being implemented.

Statutory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Potential for reptiles • No apparent ecological constraints consider enhancing bordering hedgerow and biodiversity offsetting	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:
No comments recieved

Site address/ location	Pegmire Lane, Patchetts Green	Site ref: HEL219 and HEL252

Breakdown of general comments received:

Total number of comments	2
Statutory bodies & local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies & local interest groups
- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: The Landowners

Summary of site promoter's response:
No representation on PHSE received

Staturtory bodies and local interest groups:
N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Potential for reptiles depending on grassland condition • Retain boundary hedgerows and trees where appropriate • Moderate ecological sensitivity. PEA needed to properly assess grassland and protected species potential	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:
No comments recieved

Site address/ location	Aldenham Glebe, Roundbush Nursery, Round Bush	Site ref: HEL345

Breakdown of general comments received:

Total number of comments	2
Statutory bodies and local interest groups	1
Developers/ landowners (includes site promoter)	1

Statutory bodies and local interest groups

- Hertfordshire County Council Growth and Infrastructure Unit

Site Promoter: Bidwells on behalf of the Diocesan Board of Finance

Summary of site promoter's response:
No representation on PSHE report received

Statutory bodies and local interest groups:
N.B Respondents will be mentioned if they say anything that relates to any of the substantive points listed. This will result in some respondents being listed next to a sub point that they have not raised.

Substantive points raised	Responder/s
Environment and wildlife • Low ecological sensitivity • Roosting bats in vicinity • Historic orchard locations within the site – potential for community orchard or incorporate biodiversity enhancements • Advise PEA and Preliminary Bat Roost Assessment	• Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.	

Other developer/landowners responses:
No comments recieved

15. Appendices

Appendix 1 – Map of New sites promoted post publication of the PSHE report