

**HERTSMERE LOCAL PLAN
Development Plan Document**

**SITE ALLOCATIONS AND
DEVELOPMENT MANAGEMENT
POLICIES – MAIN MODIFICATIONS TO
SUBMITTED DRAFT**

**Sustainability Appraisal:
Addendum Report**

June 2016

**To be read in conjunction with the
Sustainability Appraisal for the Pre-
Submission Draft SADM Policies Plan
published July 2015.**

Quality Control

HERTSMERE LOCAL PLAN
Development Plan Document

SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES – MAIN MODIFICATIONS TO SUBMITTED
DRAFT

Sustainability Appraisal (Incorporating Strategic Environmental Assessment)

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Non-Technical Summary

This Non-Technical Summary is published in tandem with the report of the final update to the Sustainability Appraisal of the SADM Policies Plan; the accompanying Addendum Report relates to the Sustainability Appraisal of the Inspector's proposed Main Modifications to the submitted SADM Policies Plan DM Policies Plan. The NTS includes an overview of the SA process so that the findings of the final stage in the SA can be placed within their wider context.

The New Hertsmere Local Plan

The new Local Plan for Hertsmere will help to direct, plan and manage development in the Borough up to 2027. The Local Plan will consist of a number of documents which will supersede the current Local Plan adopted in 2003. This Site Allocations and Development Management Policies (SADM) Policies Plan is one of these documents, which sits alongside the adopted Hertsmere Core Strategy and the adopted Elstree Way Corridor Area Action Plan.

The Core Strategy sets out the broad planning framework for the Borough and was adopted in January 2013 following extensive consultation, sustainability appraisal and testing at Public Examination. The SADM Policies Plan must be in accordance with the Core Strategy.

The Hertsmere Core Strategy 2013

The Core Strategy sets out the Council's vision and strategy for the Borough for a period of fifteen years (to 2027) and includes a variety of overarching spatial policies to guide future development and land use in the Borough. The Council has committed to undertake a review of the Core Strategy within three years of its adoption in cooperation with neighbouring authorities, and in order to meet the required housing and employment level. The document sets the parameters for the SADM Policies Plan and deals with issues including identifying those settlements where new homes will be built, how much land needs to be set aside for business uses and the amount of off-street parking required for new development. The review of the strategic issues and commissioning of key evidence with neighbouring authorities began in late 2014 and will continue beyond the planned adoption of the SADM Policies Plan.

The Site Allocations and Development Management Policies Plan

The SADM Policies Plan will help to deliver the objectives of the Core Strategy. The 'Site Allocations' element will establish the principle that a suitable form of development can be located on a particular site. It will not give permission to any particular proposal, which will still need to be secured through the planning application process. Notwithstanding, the key test for any planning application is whether it accords with an adopted Plan. It is HBC's intention to allocate sites which have the potential to enable development to take place without undue delay.

The 'Development Management Policies' aspect of the Plan sets out the criteria that all planning applications are to be considered against. The policies will enable the delivery of the objectives and long term vision for the Borough as set out in the Core Strategy.

Sustainability appraisal (SA) and Strategic Environmental Assessment (SEA)

SA is mandatory under Sections 19(5) and 39(2) of the Planning and Compulsory Purchase Act 2004. It is used to ensure that the emerging plan helps to implement the principles of sustainable development through the integration of social, environmental and economic issues, and provides an opportunity to improve the plan or policy or to ensure that it is more effective in meeting the aims of sustainable development. An environmental assessment is also required under European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment' (the Strategic Environmental Assessment Directive). All stages of this SA meet the requirements of the Directive by incorporating Strategic Environmental Assessment (SEA) within the wider appraisal of the draft plan against environmental, social and economic objectives for the borough, and includes a consideration of alternatives to proposed site allocations and policies.

The Addendum to the Sustainability Appraisal Report (July 2015) has been prepared to inform and accompany the proposed Main Modifications to the Submitted Draft SADM Policies Plan. It updates the SA of the Submitted Draft SADM Policies Plan, and assesses the likely social, economic and environmental effects of the proposed

Main Modifications to the Plan. It should be read in conjunction with the Submission Draft SADM Policies Plan SA Report published in July 2015.

SA Methodology

The table below is reproduced from the Submission Draft SA report and summarises the stages in the SA.

SADM PP Stage 1: Pre-production – Evidence gathering
SA stages and tasks
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
A1: Identifying other relevant policies, plans and programmes, and sustainable development objectives. A2: Collecting baseline information. A3: Identifying sustainability issues and problems. A4: Developing the SA framework. A5: Consulting on the scope of the SA.
SADM PP Stage 2: Production – Prepare draft SADMP
SA stages and tasks
Stage B: Developing and refining options and assessing effects
B1: Testing the SADMP objectives against the SA framework. B2: Developing the SADMP options. B3: Predicting the effects of the draft SADMP. B4: Evaluating the effects the draft SADMP. B5: Considering ways of mitigating adverse effects and maximising beneficial effects. B6: Proposing measures to monitor the significant effects of implementing the SADMP.
Stage C: Preparing the Sustainability Appraisal Report
C1: Preparing SA Report.
Stage D: Consulting on draft SADMP and Sustainability Appraisal Report
D1: Public participation on the SA Report and the draft SADMP. D2: Assessing significant changes. D3: Making decisions and providing information.
SADM PP Stage 3: Adoption
SA stages and tasks
Stage E: Monitoring the significant effects of implementing the SADMP
E1: Finalising aims and methods for monitoring. E2: Responding to adverse effects.

The Council is now at 'Stage E' of this process.

Sustainability Objectives

The Core Strategy SA identified Sustainability Objectives for the Borough and all subsequent Plans and associated SA's have had regard to these objectives. The Objectives are summarised below.

Social Objectives
<i>1. To improve educational achievement, training and opportunities for lifelong learning and employability</i>
<i>2. To ensure ready access to essential services and facilities for all residents</i>
<i>3. To improve the quality and affordability of housing</i>
<i>4. To reduce poverty and social exclusion and promote equality of opportunities</i>
<i>5. To reduce and prevent crime, fear of crime and anti-social behaviour</i>
<i>6. To improve the population's health and reduce inequalities both geographically and demographically</i>
Environmental Objectives
<i>7. To make the most efficient use of previously developed land and existing buildings before Greenfield sites</i>
<i>8. To reduce contamination and safeguard soil quality and quantity</i>
<i>9. To protect and enhance landscape character, historic buildings, archaeological sites and cultural features of importance to the community</i>

<i>10. To maintain and enhance the quality of the countryside</i>
<i>11. To reduce dependence on private car and achieve a modal shift to more sustainable modes of transport</i>
<i>12. To protect and enhance wildlife habitats, which are important on an international national and local scale</i>
<i>13. To improve the quality of surface and ground waters</i>
<i>14. To minimise water consumption</i>
<i>15. To minimise the risk of flooding taking account of climate change</i>
<i>16. To improve local air quality</i>
<i>17. To reduce greenhouse gas emissions</i>
<i>18. To minimise the need for energy, increase energy efficiency and to increase the use of renewable energy</i>
<i>19. To reduce the generation of waste and encourage re-use and recycling of waste</i>
Economic Objectives
<i>20. To provide a prosperous, balanced and stable economy</i>
<i>21. To sustain and enhance the viability and vitality of town centres</i>

Sustainability Issues

The 2011 Core Strategy SA identified a series of 'sustainability issues' for the borough, most of which have been carried through into the SADM Policies Plan SA. Key issues are summarised below.

Local skills shortage – matching the skills of the local population to the available job opportunities is recognised as a key priority so that the plan has a beneficial impact on local employment levels.

High levels of car usage/reliance on the private car – compared to walking, cycling and public transport use in the Borough.

Vulnerability of landscape/agricultural use – approximately 80% of the Borough is Green Belt. Housing development and other growth is generally directed to the urban areas and previously developed land but parts of the Green Belt have also been identified for development.

Pressures on urban character – from the need to accommodate additional development over the plan period.

Increasing energy efficiency and renewable energy sources – the amount of energy obtained in the East of England from renewable sources is low (0.45%) compared with the UK average of 2%. (Noted that these are 2011 statistics)

Traffic congestion and growth – and associated impacts on increased congestion, deterioration in air quality, increases in greenhouse gas emissions and pressures on existing infrastructure capacity in Hertsmere.

Water supply and demand – water availability is a likely constraint to large-scale development in Hertsmere, influencing water availability for development as well as wildlife habitats and biodiversity.

Reducing waste and increasing recycling – This is a borough wide issue.

Pressure of ecological assets – development pressure can pose a threat designated and non-designated areas. Surveys of key species have revealed falling numbers at the regional level.

Lack of a range of housing that is affordable – Hertsmere is the second least affordable borough in Hertfordshire for a person on an average income. High demand for housing in the Borough is likely to continue to fuel rising house prices leading to a further widening of the income/house price gap.

Combating poverty and social exclusion – smaller pockets of deprivation in North Bushey, Potters Bar and the Battlers Green area of Radlett.

Reducing the fear of crime – crime and fear of crime rate highest in opinion surveys amongst Hertsmere's residents as areas requiring improvements in their local neighbourhood.

Sustainability of the Submitted Draft SADM Policies Plan, incorporating the Inspector's proposed Main Modifications

The final review of Proposed Modifications to the draft SADM Policies Plan against the SA Objectives confirms that the Plan builds appropriately on the Core Strategy and that the overall effect of the Plan remains broadly positive. The majority of changes made subsequent to submission of the SADM Policies Plan are not considered substantive and so are neutral in terms of their implications for the SA, whilst a number serve to strengthen specific policies and should have beneficial impacts. Although some uncertainties remain, no significant adverse impacts have been identified.

Alternatives

Strategic Options

Whilst the Local Plan Core Strategy sets out a series of overarching spatial policies for the Borough, given the evolution of the Plan, the size of Hertsmere (38 square miles) and its characteristics, the Core Strategy has addressed some aspects of planning in detail. In terms of housing, the Core Strategy provides for an accessible urban growth strategy which directs development to the main settlements, and in the case of employment land for example, it identifies specific areas and sites proposed for that use.

The strategic growth options that were considered for the 15 year period to 2027 are set out below:

Hertsmere Growth Options to 2027

Housing Growth	Housing Distribution	Employment Growth & Distribution
1. 2,300 dwellings; 2. 3,200 dwellings; 3. 3,900 dwellings; 4. 5,300 dwellings; and 5. 6,750 dwellings.	1: Maintain the current policy position (Borehamwood / Potters Bar first) 2: Flatten / remove hierarchy 3: Accessibility based approach 4: Market led / do nothing 5: Rural expansion 6: Substantial Urban Intensification	1: Do not allow the release of any existing designated employment land 2: Allow the release of existing employment land with no compensatory designations 3: Designate new business park / extension to an Employment Area 4: Safeguard land for a new business park / extension to an Employment Area within the built up areas of an existing settlement 5: Safeguard land for a new business park elsewhere 6: Safeguard land for an extension of the Stirling Way / Station Close / Otterspool Way / Centennial Park Employment Area 7: Safeguard land for an extension to existing employment area of Elstree Way, Borehamwood and Cranborne Road, Potters Bar.

Housing Growth and Distribution - Option 3 was the preferred option and has been taken forward in the SADM Policies Plan. It seeks to focus development in the most accessible locations in Hertsmere which are Potters Bar, Borehamwood and to a lesser extent Radlett and Bushey, and was the most sustainable option overall.

Employment Growth and Distribution - Option 7 was the most sustainable in economic terms because the proposed extensions of employment areas in Borehamwood and Potters Bar will help ensure that enough employment land is available over the Plan period.

Alternatives to the SADM Policies

The SADM Policies Plan is considered to accord with the Core Strategy, and its policies are broadly consistent with the SA of strategic options.

In addition, reasonable alternatives to individual policies and allocations have been systematically considered at earlier stages of this SA, as and when previous revisions to policy have been proposed.

Specifically, modifications to the Consultation Draft made prior to submission were appraised in Spring 2015. These included the amalgamation of two policies (SADM 9 and 10, both concerned with Biodiversity and

Habitats) and revisions to the policies listed below:

- SADM4 – Small sites for Affordable Housing
- SADM9 – Strategically Important Business Locations and Loss of Office Accommodation
- SADM12 – Landscape Character
- SADM17 – Watercourses
- SADM20 – Waste Storage in New Development
- SADM34 – Provision for Faith Communities
- SADM39 – The Road Hierarchy
- SADM42 – Aviation Safeguarding

In addition, site H11 Potters Bar bus garage was deleted and two new site allocations identified in Policy H1:

- H11 (replacement) – Elton House, Elton Way, Bushey (102 units)
- H12 – First Place Nurseries, Falconer Road, Bushey (10 units)

Other changes to proposals included:

- Policy SADM 25: Change to Green Belt at Heath Road deleted
- Policy SADM 33: Site C1 (Paddock Road Cemetery) deleted; new site C1 (Sunny Bank School Open Space) added as specific proposal.

The SA reports of the Consultation and Submitted Drafts of the SADM Policies Plan were published in March 2014 and July 2015 respectively.

The effects of not implementing the SADM Policies Plan

The SEA Regulations also require an Environmental Report (such as a SAR) to include information relating to the likely evolution of the environment without the implementation of the plan that is being assessed.

Were the SADMP not to be implemented, the Core Strategy and saved Local Plan policies would guide development until such time as a more detailed Plan could be adopted. Many aspects of the planning of the Borough would therefore be addressed but some detailed matters would not be, and it is possible that significant adverse strategic environmental impacts could arise in the absence of the SADM Policies Plan.

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Appendix A – Schedule of Inspector’s Main Modifications

1 Introduction

1.1 Status of the Sustainability Appraisal Addendum Report

- 1.1.1 The Local Plan for Hertsmere is a statutory planning document whose purpose is to help to direct, plan and manage development in the Borough up to 2027. It will consist of a number of documents which will supersede the current Local Plan adopted in 2003. The Site Allocations and Development Management (SADM) Policies Plan is one of three documents making up the Local Plan, and should be read in conjunction with the adopted Core Strategy (2013) and adopted Elstree Way Corridor Area Action Plan (2015).
- 1.1.2 The Sustainability Appraisal (SA) predicts and assesses the social, economic and environmental effects of the Plan. This Sustainability Appraisal Addendum report has been prepared to inform the updating of the Submission Draft SADM Policies Plan in the light of the Inspector's proposed Main Modification.
- 1.1.3 The sole purpose of the Addendum is to consider the sustainability implications of the Proposed Main Modifications. This Report should therefore be read in conjunction with the Pre-Submission Draft SADM Policies Plan SA Report published in July 2015. The Pre-Submission Draft SADM Policies Plan SA Report was relevant to the submitted version of the Plan as the submitted version of the Plan was unchanged from the pre-submission Draft version.

1.2 Summary of SA undertaken to date

- 1.2.1 A substantial body of work relating to the SA of the Core Strategy has been undertaken. An SA of the Core Strategy was undertaken in November 2011¹ and subsequently updated in response to modifications required to be made to the Core Strategy following the Independent Examination into its soundness². These policies have been found to be sustainable and it is not the purpose of the SADM Policies Plan SA to re-test adopted planning policy.
- 1.2.2 Subsequent iterations of SA have informed both the Consultation Draft SADM Policies Plan (March 2014) and the Submitted Draft (July 2015). Of particular relevance to the SADM Policies Plan are those Core Strategy policies relating to settlement hierarchy and the urban growth strategy.
- 1.2.3 The Submitted Draft SADM (July 2015) and SA document are available on HBC's website at:
<https://www.hertsmere.gov.uk/Planning--Building-Control/Planning-Policy/Local-Plan/SADM-Documents-Library.aspx>

Strategic Environmental Assessment

- 1.2.4 The SADM Policies Plan is also subject to Strategic Environmental Assessment (SEA), and the SEA Directive makes provision for the avoidance of duplication where plans and programmes form part of a hierarchy as follows:

"Where plans and programmes form part of a hierarchy, Member States shall, with a view to avoiding duplication of the assessment, take into account the fact that the assessment will be carried out, in accordance with this Directive, at different levels of the hierarchy...." Article 4(3)

- 1.2.5 The SADM Policies Plan SA is concerned with ensuring that the site allocations are assessed against baseline conditions and objectives, that the likely social, economic environmental impacts of policies are identified, and that consideration is given to reasonable alternatives. The SADM Policies SA Report meets the requirements for SEA; further detail relating to these requirements is set out in the Report of the pre-Submission SADM Policies Plan SA.

Habitats Regulations Assessment

- 1.2.1 Under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive), transcribed into UK legislation through regulation 48 of The Conservation (Natural Habitats &c) Regulations 1994 (as amended), local planning authorities are required to

¹ Hertsmere Borough Council, Revised Core Strategy Development Plan Document, Sustainability Appraisal Report, November 2011

² Hertsmere Revised Core Strategy, Proposed Main Modifications, Sustainability Appraisal Note, August 2012

assess the effects of land-use plans against the conservation objectives of designated European Sites and to ascertain whether there would be an adverse effect on the integrity of a site. The need for HRA was considered prior to preparation of the Core Strategy. It was concluded that as there are no European Sites in or adjacent to the Borough there is no requirement for HRA.

1.3 The New (replacement) Hertsmere Local Plan

1.3.1 Local Planning Authorities are required to produce a Local Plan (formerly called a Local Development Framework (LDF)). The new Local Plan will help direct, plan for and manage development in the Borough up to 2027 and replace the previous 2003 Local Plan. The Local Plan will be made up of a number of documents including the SADM Policies Plan, the Hertsmere Core Strategy and the Elstree Way Corridor Area Action Plan.

1.4 The Hertsmere Core Strategy 2013

1.4.1 The Core Strategy sets out the Council’s vision and strategy for the Borough for a period of fifteen years (to 2027) and sets out the broad planning framework for the Borough to guide future development and land use in the Borough. Amongst other things, the Core Strategy identifies those settlements where new homes will be built, how much land needs to be set aside for business uses and the amount of off-street parking required for new development. The SADM Policies Plan must be in accordance with the Core Strategy; the Key Diagram is reproduced at the end of this section.

1.4.2 The Council has committed to undertake a review of the Core Strategy within three years of its adoption in cooperation with neighbouring authorities, to include a reassessment of housing and employment development needs in particular.

1.5 The Site Allocations and Development Management Policies Plan

1.5.1 The SADM Policies Plan will help to deliver the objectives of the Core Strategy. The ‘Site Allocations’ element will establish the principle that a suitable form of development can be located on a particular site. It sets out criteria which the Council will use to judge development proposals and planning applications in Hertsmere; it also defines sites and areas where specific planning criteria or constraints will apply and provides the detail of how the Core Strategy, which was adopted by the Council in 2013, will be achieved.

1.5.2 The SADM Policies Plan will not give permission to any particular proposal, which will still need to be secured through the planning application process. Notwithstanding, the key test for any planning application is whether it accords with an adopted Plan. It is HBC’s intention to allocate sites which have the potential to enable development to take place without undue delay.

1.5.3 The ‘Development Management Policies’ aspect of the Plan sets out the criteria that all planning applications are to be considered against. The policies will enable the delivery of the objectives and long term vision for the Borough as set out in the Core Strategy.

1.5.4 The Core Strategy identified a series of objectives for the Borough from which the various policies within it flow. The SADM Policies Plan has the same objectives and interprets the Core Strategy policies in greater detail providing potential locations for development and a platform for the delivery of the objectives.

Core Strategy/ SADM Objectives
<p><i>1. To provide the spatial policies necessary to deliver the land use requirements of the Hertsmere Together Community Strategy.</i></p> <p><i>2. To protect the Green Belt and its role in preventing urban sprawl and the coalescence of towns.</i></p> <p><i>3. To maintain an adequate supply of suitable land, focused on brownfield sites within the principal towns, to accommodate expected development needs and supporting community infrastructure.</i></p> <p><i>4. To work towards meeting the community’s need for Affordable Housing.</i></p>

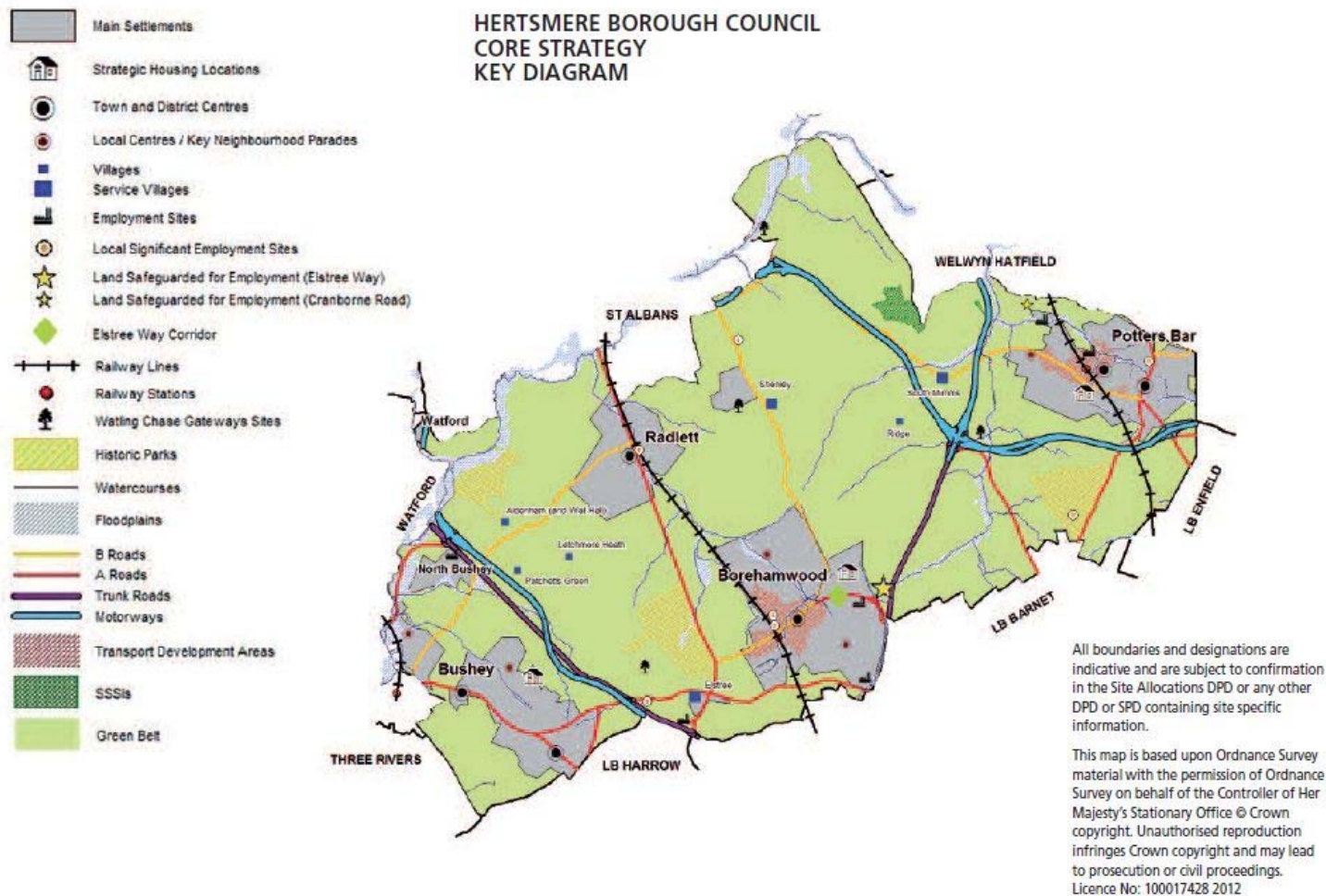
5. *To address issues arising from climate change, and all types of flooding and to take advantage of water and other natural recourses responsibly.*
6. *To improve environmental and streetscape quality in town centres and protect and enhance the built heritage of Hertsmere.*
7. *To protect and enhance the environment in Hertsmere by addressing local causes and impacts of pollution.*
8. *To raise levels of access by seeking development in locations not dependent on access by car and by requiring the provision of physically accessible transport interchanges and other buildings.*
9. *To promote safe and healthy communities, respecting the diverse needs of the whole Borough.*
10. *To support businesses of all sizes and to help promote local skills, focusing on areas of deprivation, education and training.*
11. *To provide a planning framework which promotes sustainable and competitive economic performance, in support of jobs growth requirements.*
12. *To safeguard and enhance the role of the town and district centres in Hertsmere, steering commercial developments, which attract a large number of people toward the most accessible locations.*
13. *To protect and enhance local biodiversity.*
14. *To secure efficient land use through well-designed development reflecting the size, pattern and character of settlements in Hertsmere.*
15. *To promote rural diversification and through the Watling Chase Greenways Strategy, sustainable access to the wider countryside.*

- 1.5.5 The settlement hierarchy set out in the Core Strategy identifies Borehamwood as the principal town, followed by Potters Bar, Bushey and Radlett, then Shenley, Elstree and South Mimms. Development is directed to these settlements by the policies in the Core Strategy. The Council continues to have a five-year land supply of housing sites and it is not envisaged that any strategic or significant housing development in the Green Belt would need to be considered within the plan period.
- 1.5.6 The focus for employment will continue to be in town centres and in and adjacent to the Borough's designated Employment Areas, at land allocated for employment development. No need has been identified to allocate new areas of land for employment purposes and the Council will seek to direct significant new industrial and warehousing development to designated brownfield locations in Borehamwood, Potters Bar and Bushey. Major new office developments will be directed to town centres and other locations with good public transport accessibility and sufficient infrastructure.
- 1.5.7 The objectives, policies and content of both the adopted Core Strategy and SADM Policies Plan have been subject to extensive consultation and community participation prior to adoption. Both have also been subject to SA to test consistency with the Council's sustainability objectives. These objectives reflect a range of important social, economic and environmental issues which would need to be met if the document is to be regarded as genuinely sustainable, as well as consistent with the wider aims of the Council's Community Strategy.

1.6 The Hertsmere Local Plan 2003

- 1.6.1 Once the SADM is adopted, it will replace the 2003 Hertsmere Local Plan saved policies. Policies in the SADM Policies Plan have been in use since the day of publication (31 July 2015) for Development Management purposes in accordance with paragraph 216 of the NPPF.

Hertsmere Core Strategy 2013: Key Diagram.



2 SA Methodology

2.1 Planning and Sustainable Development

2.1.1 The delivery of sustainable development underpins the UK planning system. The Government’s National Planning Policy Framework - March 2012 (NPPF), requires planning policies, development plans and decisions on development proposals to be consistent with the principles of sustainable development. Sustainable development involves ensuring that when activities such as development takes place, a balance is made between what are often very different social, environmental and economic needs.

2.1.2 SA is mandatory under Sections 19(5) and 39(2) of the Planning and Compulsory Purchase Act 2004. It is used to ensure that the emerging plan helps to implement the principles of sustainable development through the integration of social, environmental and economic issues, and provides an opportunity to improve the plan or policy so that it is more effective in meeting the aims of sustainable development. The completion of an appropriate sustainability appraisal is one of the ‘tests of soundness’ by which Development Plan Documents will be judged when they are subject to an examination later on in the production process.

2.1.3 The Core Strategy SA identifies Sustainability Objectives for the Borough. All future Local Plan Documents and associated SAs need to have regard to, or be consistent with, these objectives. They are set out in Table 3.2 below:

Table 3.1: Sustainability Objectives

Social
<i>1. To improve educational achievement, training and opportunities for lifelong learning and employability</i>
<i>2. To ensure ready access to essential services and facilities for all residents</i>
<i>3. To improve the quality and affordability of housing</i>
<i>4. To reduce poverty and social exclusion and promote equality of opportunities</i>
<i>5. To reduce and prevent crime, fear of crime and anti-social behaviour</i>
<i>6. To improve the population’s health and reduce inequalities both geographically and demographically</i>
Environmental
<i>7. To make the most efficient use of previously developed land and existing buildings before Greenfield sites</i>
<i>8. To reduce contamination and safeguard soil quality and quantity</i>
<i>9. To protect and enhance landscape character, historic buildings, archaeological sites and cultural features of importance to the community</i>
<i>10. To maintain and enhance the quality of the countryside</i>
<i>11. To reduce dependence on private car and achieve a modal shift to more sustainable modes of transport</i>
<i>12. To protect and enhance wildlife habitats, which are important on an international national and local scale</i>
<i>13. To improve the quality of surface and ground waters</i>
<i>14. To minimise water consumption</i>
<i>15. To minimise the risk of flooding taking account of climate change</i>
<i>16. To improve local air quality</i>
<i>17. To reduce greenhouse gas emissions</i>
<i>18. To minimise the need for energy, increase energy efficiency and to increase the use of renewable energy</i>

<i>19. To reduce the generation of waste and encourage re-use and recycling of waste</i>
Economic
<i>20. To provide a prosperous, balanced and stable economy</i>
<i>21. To sustain and enhance the viability and vitality of town centres</i>

2.1.4 The Sustainability Objectives remain relevant to the SADM Policies Plan, and the policies and sites contained within it have been assessed against these Objectives.

2.1.5 The 2011 Core Strategy SA identified a series of ‘sustainability issues’ for the borough. These are set out below with relevant updates.

Table 3.2 Sustainability Issues

Sustainability Issues
<i>1. Local skills shortage – this is recognised as a key priority at a regional level to ensure that the skills of the local population are matched to the available job opportunities which can result in detrimental impact on employment levels.</i>
<i>2. High levels of car usage/reliance on the private car – compared to walking, cycling and public transport use in the Borough.</i>
<i>3. Vulnerability of landscape/agricultural use – approximately 80% of the Borough is Green Belt. Whilst the Council in the past has been able to achieve the vast majority of new dwellings on previously developed land, green belt is likely to come under considerable pressure for development with the potential housing target set for Hertsmere in the draft RSS14. (This issue remains relevant. However, the RSS has now been revoked and housing targets are set out at a Borough wide level in the Core Strategy and updated in the SADM DP. Housing development and other growth is generally directed to the urban areas by policies in both of these local documents.)</i>
<i>4. Pressures on urban character – from the need to accommodate additional development over the plan period.</i>
<i>5. Increasing energy efficiency and renewable energy sources – the amount of energy obtained in the East of England from renewable sources is low (0.45%) compared with the UK average of 2%. (Noted that these are 2011 statistics)</i>
<i>6. Traffic congestion and growth – and associated impacts on increased congestion, deterioration in air quality, increases in greenhouse gas emissions and pressures on existing infrastructure capacity in Hertsmere.</i>
<i>7. Water supply and demand – water availability is likely to be a constraint to large-scale development in Hertsmere influencing water supply for people and habitats and biodiversity. The trend for this is likely to worsen with the predicted increase in population.</i>
<i>8. Reducing waste and increasing recycling – Borough wide issue.</i>
<i>9. Pressure of ecological assets – development pressure can pose a threat designated and non-designated areas, particularly where they occur within built up areas. Surveys of key species have revealed falling numbers at the regional level.</i>
<i>10. Lack of a range of housing that is affordable – Hertsmere is reportedly the least affordable district in Hertfordshire for a person on an average income. High demand for housing in the Borough is likely to continue to fuel rising house prices leading to a further widening of the income/house price gap.</i>
<i>11. Combating poverty and social exclusion – smaller pockets of deprivation in North Bushey, Potters Bar and the Battlers Green area of Radlett.</i>
<i>12. Reducing the fear of crime – crime and fear of crime rate highest in opinion surveys amongst Hertsmere’s residents as areas requiring improvements in their local neighbourhood.</i>

2.1.6 These sustainability issues remain relevant to the assessment of the SADM Policies.

Saved Local Plan Policies

- 2.1.7 As noted above, some policies from the 2003 Local Plan have been 'saved' through the adoption of the Core Strategy. Whilst the policies of the Core Strategy have been subject to SA, it could only be implied that saved Local Plan policies have been subject to SA through the adoption process and there is no documented evidence of this taking place. As such, any saved Local Plan Policies that are carried through into the SADM Policies Plan have been fully assessed at earlier stages in the SA.

2.2 Assessment of Significance Methodology

- 2.2.1 Existing SA guidance recognises that the most familiar form of SA prediction and evaluation is generally broad-brush and qualitative, rather than quantitative. Such predictions are both valid and appropriate provided evaluation techniques rely on expert judgement, dialogue with stakeholders, geographical information systems, reference to legislation and regulations, etc.

- 2.2.2 The results of the assessment of the potential effects predicted to arise as a result of the implementation of the SADM Plan were set out in the assessment tables which form Appendix E of the July 2015 pre-Submission Draft Plan SA report. The assessment of effects used the following symbols:

+++	Strongly positive
++	Moderately positive
+	Slightly positive
0	No effect (or not relevant)
-	Slightly negative
--	Moderately negative
---	Strongly negative
+/-	Combination of positive and negative effects / neutral effect

- 2.2.3 For the purposes of analysing the results of the assessment, significant effects are those which result in 'strongly positive' or 'strongly negative' effects.

- 2.2.4 The limited number and effect of the proposed Modifications are such that these tables remain valid and have not been reproduced.

2.3 Requirement for Strategic Environmental Assessment

- 2.3.1 A strategic environmental assessment is also required under European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment' (the Strategic Environmental Assessment Directive). This environmental assessment is known as Strategic Environmental Assessment (SEA). In England the SEA Directive has been translated into The Environmental Assessment of Plans and Programmes Regulations 2004 ('the Regulations').

- 2.3.2 The requirements of the Directive are met by carrying out a Sustainability Appraisal, which promotes sustainable development through the integration of social, environmental and economic considerations into the plan preparation process. The SA Report must, however, show that the SEA Directive's requirements have been met and this is achieved through sign-posting the places in the SA Report where the information required by the directive is provided. This is provided in Table 2.1 of the July 2015 SA Report.

3 Main Modifications to SADM Policies Plan

3.1 The Pre-Submission Draft Site Allocations and Development Management Policies

3.1.1 The background to many of the policies is embedded in the 2003 Local Plan and the 2013 adopted Core Strategy. The SADM policies have now been found to be consistent with the Core Strategy and both this document, and the Pre-Submission Draft Site Allocations and Policies have already been subject to SA testing previously (in accordance with Section 39(2) of the Planning and Compulsory Purchase Act 2004 and the SEA Directive). This SA is solely concerned with appraising the Main Modifications.

Main Modifications to the Submission Draft

3.1.2 A total of 38 Main Modifications are proposed, together with a number of more minor Additional Modifications, mainly comprising consequential revisions to text, tables and Appendices and factual updates. A number of changes to the Policies Map are also proposed, in response mainly to representations on the submitted Policies Map or linked to proposed modifications to the SADM Policies Plan itself. This final iteration of the SA has focused solely on Main Modifications, and more particularly with proposed changes to Policy.

3.1.3 A number of Main Modifications are considered sufficiently minor as to be deemed to have no likely effect on the sustainability performance of the Policy. Whilst these are included in the list below, only those Policy Modifications which are shown in bold are considered to be substantive. All are included in this SA review, and the review findings are summarised at Section 4 of this Report.

3.1.4 A total of 30 policy modifications are proposed:

3.1.5 The deletion of 2 policies, listed below:

- **SADM 4 Small site for Affordable Housing (MM9)**
- **SADM 47 Retail and Commercial Development in Shenley (MM35)**

3.1.6 The deletion and replacement of 5 policies, listed below:

- **SADM 35 Open Space, Sports and Leisure Facilities (MM27)**
- **SADM 39 The Road Hierarchy (MM29)**
- **SADM 44 Primary Frontages (MM33)**
- **SADM 45 Secondary Frontages (MM34)**
- **SADM 48 Controlling Non-Retail Uses (MM36)**

3.1.7 Proposed Modifications to 23 policies, listed below:

- **SADM 1 Housing Allocations (MM4)**
- SADM 2 Safeguarded land for Housing (MM8)
- SADM 6 Employment Areas (MM11)
- SADM 7 Key Employment Site (MM12)
- SADM 8 Local Significant Employment Sites (MM13)
- **SADM 9 Strategically important Business locations and loss of office accommodation (MM14)**
- SADM 10 Safeguarded land for employment development (MM15)
- SADM 11 Biodiversity and Habitats (MM16)
- SADM 13 Trees landscaping and development (MM17)
- **SADM 16 Sustainable Drainage Systems (MM18)**
- SADM 23 Green Belt Boundaries (MM19)
- SADM 24 Village Envelopes (MM20)
- SADM 25 Key Greenbelt sites (MM21)
- **SADM 26 South Mimms Special Policy Area (MM22)**
- SADM 27 Development Standards in the Green Belt (MM23)

- SADM 30 Heritage Assets (MM30)
- SADM 31 Design Principles (MM25)
- **SADM 33 Key Community Facilities (MM26)**
- **SADM 36 Local Green Space (MM28)**
- **SADM 40 Transport Development Areas (MM30)**
- SADM 41 Highway and Access Criteria for New Development (MM31)
- SADM 43 Town and District Centres (MM32)
- **SADM 49 Night-time and evening uses (MM37)**

3.1.8 In addition to the 30 policy modifications listed above, a smaller number of Main Modifications do not directly amend Policy and are not therefore subject to further appraisal. Rather they update the Plan content where necessary to provide consistency and ensure overall coherence. These are listed below:

- Para 2.4, Table 1 and para 2.9 (MM1, MM2 and MM3)
- SADM1 Housing Allocations sites H11 (now subject to full planning consent) and H12 Site Specific requirements (MM5 and MM6) and change to estimated number of housing units (MM7)
- Para 3.2 (MM10)
- Monitoring framework (MM38)

4 Review of the SA of Proposed Modifications

4.1 Introduction

4.1.1 This final stage in the SA/ environmental assessment of the SADM Policies Plan has been undertaken in accordance with the methodology previously described in this document, and the scope of the review responds to the Inspector's Proposed Modifications. The review findings are summarised below in Plan sequence.

4.2 Sustainability Implications

Policy SADM1 Housing Allocations

4.2.1 The Proposed Modifications to Policy SADM1 include the deletion of site H9 – former Sunnybank School. The whole of the former Sunny Bank school site (including the existing Education Support Centre) would therefore remain in the Green Belt, the boundary to which is well established, clear and defensible, and any development proposals put forward for the site would be subject to adopted Green Belt policies. Hence any inappropriate development of either the PDL or adjoining open areas including the playing field would only be acceptable if very special circumstances can be demonstrated.

4.2.2 Part of Site H9 constitutes Green Belt PDL and was originally proposed in response to representations made by Hertfordshire County Council. It lies on the southern fringes of Potters Bar, where a shortfall of open space provision has been identified. The Proposed Modification is consistent with the Council's preferred approach and retains the ability for future negotiations to achieve a scheme that better meets local community needs, whilst protecting the quality of the local environment and the Green Belt.

4.2.3 Some future development at the site remains possible but a housing allocation is not required to meet the adopted Core Strategy housing target (Table 1 updates figures for recent completions and commitments and adjusts the total Policy Allocation accordingly, allowing for this proposed deletion). The policy therefore remains consistent with Policies CS1 and CS2 of the Core Strategy.

4.2.4 Whilst the removal of the allocation is potentially significant, it is understood that it was never Hertsmere's intention to enable the development for housing of the entire site. Nevertheless, in terms of implication for the SA the Policy's performance against Sustainability Objectives, the proposed deletion is likely to be beneficial overall. The circumstances outlined above suggest that it will not result in a shortfall of housing land in the Borough, and should strengthen environmental protection by ensuring that the open space is retained within the Green Belt.

SADM2 Safeguarded Land for Housing

4.2.5 The Proposed Modification does not make a substantive change to Policy but provides additional clarification as to the intention of this policy, so that future housing development is not prejudiced. Safeguarded sites would only come forward following a review of the Local Plan and hence there is no change to the SA, which concluded there would be no significant adverse effects.

SADM4 Small Sites for Affordable Housing

4.2.6 This Policy is proposed for deletion. It was added subsequent to publication of the Consultation Draft, retained the intention of adopted policy CS4 Affordable Housing in seeking a financial contribution towards affordable housing from developments of between 5 and 10 residential units, and performed well against social Sustainability Objectives.

4.2.7 However, the decision of the Court of Appeal of 11 May 2016 has the effect of re-introducing the Ministerial Policy Statement of 28 November 2014, which is a similar position to that which applied at the time the plan was submitted. Adopted Core Strategy policy CS4, however, remains. Local evidence supports the contribution made to affordable housing provision by small sites. Nevertheless, the Inspector has indicated that in order for the Plan to be found sound this policy must be deleted.

4.2.8 Whilst there is clearly a valid reason for this Modification, the conclusion of this SA is that there is likely to be a minor adverse effect in terms of the quantity of affordable housing in the Borough.

SADM6 Employment Areas

- 4.2.9 The Proposed Modification does not make any substantive change to Policy but simply eliminates an element of duplication between the Core Strategy and the SADM. There is no change to the SA, which identified a potential positive effect in terms of promoting a prosperous, balanced and stable economy, benefits to the vitality and viability of town centres, and the efficient use of PDL.

SADM7 Key Employment Site

- 4.2.10 The Proposed Modification does not make a substantive change to Policy but provides additional clarification as to the intention of this policy and eliminates an element of duplication between the Core Strategy and the SADM. There is no change to the SA, which identified no significant adverse effects.

SADM8 Local Significant Employment Sites

- 4.2.11 The Proposed Modification simply states that the site boundaries are shown on the Proposals Map but does not amend Policy. Hence there is no consequential change to the SA, which indicated that any adverse impacts arising from development would be minor.

SADM9 Strategically Important Business Locations and Loss of Office Accommodation

- 4.2.12 This policy, added subsequent to publication of the Consultation Draft, seeks to resist the loss of office floor space in key business locations and on larger sites throughout the borough. However, the Government has confirmed that permitted development rights for the change of use of offices to residential use are permanent. There is no exemption for 'strategically important' offices. As the possibility of extending permitted development rights to the re-development of office sites for residential use remains under consideration it would not be sound to include reference to this in the plan at the present time.
- 4.2.13 HBC has the power to remove permitted development rights through the introduction of an Article 4 Direction and new supporting text is proposed in tandem with this Modification which states that the Council will consider this option where appropriate.
- 4.2.14 Whilst there is clearly a valid reason for this Modification, the conclusion of this SA is that, whilst there is a potential for adverse effect in terms of the availability of employment land in the Borough, there is also a potential benefit if housing land is released. The availability of powers to control change if necessary should ensure that overall any adverse impact would be minor.

SADM10 Safeguarded Land for Employment Development

- 4.2.15 The Proposed Modification does not make a substantive change to Policy but provides additional clarification as to the intention of this policy, so that future employment development is not prejudiced. Safeguarded sites would only come forward following a review of the Local Plan and hence there is no change to the SA, which concluded there would be no significant adverse effects.

SADM11 Biodiversity and Habitats

- 4.2.16 The Proposed Modification does not amend Policy but simply deletes a reference to updating the Proposals Map in the event of a site boundary review. Hence there is no change to the SA, which indicated a moderate to significant beneficial effect.

SADM13 Trees and Landscaping

- 4.2.17 The Proposed Modification does not make a substantive change to Policy but simply provides additional clarification. There is no change to the SA, which concluded that the Policy is likely to result in a minor/ moderate beneficial effect.

SADM16 Sustainable Drainage Systems

- 4.2.18 The Proposed Modification does not make a substantive change to Policy but clarifies how and when SUDS will be required. There is no change to the SA, which concluded that the Policy is likely to result in a beneficial effect.

SADM23 Green Belt Boundary

- 4.2.19 The Proposed Modification has no material effect on Policy, which overall remains neutral in terms of its likely effects. In terms of the SA's conclusions, the retention of the former Sunny Bank School within the GB is likely to be a minor beneficial change.

SADM24 Village envelopes

- 4.2.20 The Proposed Modification does not make a substantive change to Policy but clarifies how and when it will be applied. There is no change to the SA, which concluded that, overall, the Policy is unlikely to result in significant adverse effects.

SADM25 Key Green Belt Sites

- 4.2.21 A number of adjustments to the development envelopes of the KGBS's are proposed, all of which are identified on the Proposals Map. The proposed Modifications simplify the Policy wording and provide clarification as to where development within the Green Belt may be appropriate.
- 4.2.22 Overall, the SA is unchanged and there are no significant adverse effects identified relating to the designation of KGBS's as a result of this policy modification.

SADM26 South Mimms Special Policy Area

- 4.2.23 South Mimms is an important strategic facility and the policy is likely to generate employment. The Proposed Modification builds on previous revisions, which clarify and strengthen environmental and traffic safeguards, but is not considered substantive in terms of Policy effects. There is therefore no change to the SA, which concluded that, overall, the Policy is unlikely to result in significant adverse effects.

SADM27 Development Standards in the Green Belt

- 4.2.24 The Proposed Modification has no material effect on Policy, which overall remains positive in terms of its likely effects, particularly in regard to impact on landscape character and protection for the countryside.

SADM30 Heritage Assets

- 4.2.25 The Proposed Modification has no material effect on Policy, which overall remains positive in terms of its likely effects, particularly in regard to the protection of cultural heritage.

SADM31 Design principles

- 4.2.26 The Proposed Modification has no material effect on Policy, which overall remains positive in terms of its likely effects, particularly in regard to improving the quality of the public realm.

SADM33 Key Community Facilities

- 4.2.27 The Proposed Modification clarifies the Policy intention, including a requirement for evidence of need where a new school site is proposed, but is not considered substantive in terms of Policy effects.
- 4.2.28 The deletion of Sunny Bank School from the Table of specific proposals for key community facilities must be balanced by the retention of existing facilities at the site. In terms of the SA, the overall policy implications are likely to be neutral, and no significant effects are identified.

SADM35 Open Space, Sports and Leisure Facilities, SADM36 Local Green Space

- 4.2.29 As a result of his consideration of the submitted SADM Plan the Inspector asked the Council to re-consider Policies SADM35 Major Green Space and SADM36 Local Green Space and the sites to which they apply. His reasons are set out in a note dated 29.12.15 (Ex2f on the Examination website) which can be found on the HBC website at:

<http://www.hwa.uk.com/site/wp-content/uploads/2015/11/Inspectors-note-on-Local-Green-Space.pdf>

- 4.2.30 The Inspector's note set out a number of concerns about the nature of the evidence submitted in justification for the identification of 59 Local Green Spaces to which policy SADM36 applied,

and commented in particular on the proposed designation of The Paddock at Bushey Heath, the main issue being compliance with the provisions of Paragraph 77 of the NPPF. It also identified a separate concern relating to the term 'exceptional circumstances' in both policies.

- 4.2.31 To address these concerns, policy SADM35 is proposed to be replaced with a re-titled policy SADM 35 Open Space, Sports and Leisure Facilities. The proposed replacement policy removes the term 'exceptional circumstances', which is conventionally reserved for use where Green Belt boundaries are under consideration and frames the Policy in more positive terms by articulating a comprehensive policy which seeks both to enhance and protect Open Space.
- 4.2.32 The Proposed Modification to SADM36 replaces the word 'exceptional' with the term 'very special'. Changes have also been made to Appendix G: SADM 35 Open Space, Sports and Leisure Facilities and SADM 36 Local Green Space to accord with modifications to policy; as a result of the council's reconsideration of Policies SADM35 Major Green Space and SADM36 Local Green Space and the sites to which they apply the Council proposed that the majority of sites previously identified as Local Green Space be re-defined as Open Space. These changes are included in the proposed Modification to Appendix G. In addition, the Inspector has indicated that The Paddock at Bushey Heath be deleted from the list of Local Green Space and re-designated as an Open Space.
- 4.2.33 In SA terms a number of positive effects were previously identified in regard to the suite of policies relating to open space provision. These included improving the population's health, protecting landscape character, reducing the fear of crime and maximising biodiversity opportunities. Although the re-designation of sites as Open Space under replacement policy SADM35 means that uncertainty may increase, the intention is that any future development on these sites should be in accordance with the requirements of Paragraph 74 of the NPPF.
- 4.2.34 The Proposed Modification to SADM36 also replaces the word 'exceptional' with the term 'very special'. This change is not considered substantive.

SADM39 The Road Hierarchy

- 4.2.35 Policy SADM 39 has been deleted and replaced. The deleted policy was added subsequent to publication of the Consultation Draft, after Hertsmere BC raised the issue of whether the SADM DPD should contain a policy which seeks the effective use of the road hierarchy (either through modification of an existing draft policy or a new policy), particularly if the effect of such a policy were to bring about positive sustainability benefits.
- 4.2.36 The SA report of the Consultation Draft commented that such a policy would not need to address strategic planning matters such as the location of new growth and development in the Borough which are addressed elsewhere, but could provide clarity about how new development should relate to the road hierarchy, and aid the Development Management process.
- 4.2.37 The replacement Policy articulates a more precise rationale for assessing the acceptability of proposed development in relation to road characteristics and the capacity of affected roads to accommodate increased traffic generation, rather than relying simply on the principles set out in the Local Transport Plan for each category of road.
- 4.2.38 However, in terms of sustainability, the proposed Modification is not considered substantive in terms of Policy effects. There is therefore no change to the SA, which concluded that the Policy is unlikely to result in significant adverse effects, and that in terms of reduced congestion and associated reductions in emissions and improved air quality are predicted, positive effects could arise in regard to human health where improvements to existing highway access can be secured. There is also the potential for improved public safety and modest economic benefits.

SADM40 Transport Development Areas

- 4.2.39 The Proposed Modification clarifies the policy intention, which seeks to focus higher density development in 'higher accessibility' zones at Borehamwood and Potters Bar. In terms of Policy effects the proposed Modification is not considered substantive; the SA predicted a number of positive effects including improved access to services and facilities, reduced dependence on the private car, and potentially reduced adverse impacts on air quality and greenhouse gas emissions,

as well as making a positive contribution to the local economy and the vitality and viability of town centres.

SADM41 Highway and Access Criteria for New Development

- 4.2.40 The Proposed Modification has no material effect on Policy; it simply provides additional clarity. In terms of Policy outcomes the proposed Modification is not considered substantive; the likely effects therefore remain similar to those previously predicted for SADM 40, and no significant adverse effects are identified.

SADM43 Town and District Centres

- 4.2.41 The Proposed Modification clarifies the Planning Requirements specified for the redevelopment of Radlett Service Station/Regency House, Former Radlett Fire Station, and Burrell & Co), and the need for consistency with CS19 Key community facilities. The Policy effect of the proposed Modification is not considered substantive, and in terms of SA, which predicted significant positive effects on the local economy and wellbeing, the results are unchanged.

SADM44 Primary Frontages, SADM45 Secondary Frontages

- 4.2.42 Both these policies have been deleted and replaced. The replacement Policies both articulate a more precise rationale for assessing the acceptability of non-retail uses within both Primary and Secondary Street Frontages. Applied together, they aim to safeguarding the viability of retail frontages and maintaining vitality in the street scene.
- 4.2.43 Previous SA reports considered these policies to be complimentary and as such they were assessed together as likely to deliver positive social and economic effects. By providing greater clarity, including definitive thresholds for decision makers, the combined effect of the Proposed Modifications should be to strengthen their performance against SA objectives, particularly in terms of maintaining a thriving, mixed economy, and prosperous town centres.

SADM47 Retail and Commercial Development in Shenley

- 4.2.44 This Policy is proposed for deletion because it duplicates Core Strategy Policy CS29, which is considered sufficient. Whilst a number of positive effects are identified, notably in regard to access to services and facilities, utilising PDL and reducing car dependence, the duplication of adopted CS policy does not add meaningfully to the overall sustainability of the SADM Policies Plan. No significant adverse effects are predicted as a result of the deletion of SADM47.

SADM48 Controlling Non-Retail Uses

- 4.2.45 The Proposed Modification builds on earlier amendments which strengthen controls on hot food take-aways in particular, and articulates clear and precise criteria for controlling non-A1 retail uses within the Borough's key shopping areas. In terms of Policy outcomes the proposed Modification is not considered substantive, and the likely effects would remain broadly as predicted previously.
- 4.2.46 Overall the policy delivers positive effects similar to those identified in relation to SADM 44, 45 and 46 in terms of both social and economic objectives, and no significant adverse effects were identified. In addition, this policy aims to restrict the proliferation of hot food take-aways in the vicinity of secondary schools, which could give rise to health benefits as and when it is applied.

SADM49 Night-time and Evening Uses

- 4.2.47 SADM 49 is proposed for deletion and replacement. The new text takes a positive approach to assessing the acceptability of night time and evening uses within the Borough but also sets out detailed and precise criteria which should safeguard residential amenity.
- 4.2.48 In terms of Policy outcomes the proposed Modification is not considered substantive, and the likely effects would remain broadly positive, as predicted previously. In particular, the policy should help maintain the vitality and viability of town centres.

5 Summary and Conclusions

- 5.1.1 The role of the SADM Policies Plan is to set out site allocations and policies for determining planning applications. It will be the basis for decision making on new development and the use of land. The SA methodology is consistent with that used for the purpose of appraising the adopted Core Strategy, and previous versions of the SADM Policies Plan. To avoid repetition, this Addendum Report comprises a review of the Main Modifications only to the SADM Policies Plan, and should be read in conjunction with the report of the Submission version of SADM Policies Plan, published in July 2015.
- 5.1.2 Section 4 of this report provides a brief commentary on the likely effects of the Inspector's Proposed Modifications to policy, and is broadly positive in terms of the performance of the Plan against SA objectives. At this stage in the Plan process the majority of changes are considered to have no substantive effect on likely outcomes in terms of sustainability.
- 5.1.3 Where replacement policies are proposed these generally articulate clear decision making criteria which may be expected to strengthen policy, and the broad thrust of the Plan remains focused on the re-use of previously developed land. Hence the effects of these modifications on social, economic and environmental outcomes is likely to be positive.
- 5.1.4 No new site allocations are proposed but there are two significant changes to site specific policy; the deletion of Site H9 – the former Sunnybank School site - from SADM1 and the re-designation of a number of sites, including The Paddock at Bushey Heath, as 'Open Space' under SADM 35. The Modification to SADM 1 is likely to be beneficial and whilst the effect of the Modification to SADM 35 is less certain, overall, no significant adverse effects are predicted.

Monitoring

- 5.1.5 The SEA Directive states that *"member states shall monitor the significant environmental effects of the implementation of plans and programmes.....in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action"* (Article 10.1). In addition, the Environmental Report should provide information on a *"description of the measures envisaged concerning monitoring"* (Annex I (i)) (Stage E).
- 5.1.6 In line with the SEA Directive, the SADM Policies Plan includes an appropriately amended Monitoring Framework. This will enable policy effects to be monitored and will provide data relating to the delivery of housing and employment allocations. In this way, the effects of implementing the Plan can be kept under review and remedial action taken when and where necessary.

***Appendix 1:
Schedule of Inspector's Proposed Modifications***

Hertsmere Local Plan - Development Plan Document

Site Allocations and Development Management Policies Plan

Inspector's proposed Main Modifications (May 2016)

This schedule sets out the Inspector's proposed Main Modifications to the Submission Site Allocations and Development Management Policies Plan (SADM) which he considers are required to make the plan sound. The proposed modifications are listed in document order of the SADM.

MM. No.: the unique reference number for each proposed Main Modification.

Policy / Paragraph Number: The specific policy or paragraph within the SADM to which the modification applies.

Inspector's Proposed Modifications:

- Where text is recommended for deletion it is shown by strikethrough as: ~~deleted text~~.
- Where text is recommended for addition it is underlined as: additional text.
- Where the modification involves policy text it is bolded as: **SADM 35**

The Council has proposed making some changes to the adopted Policies Map when the SADM Plan is adopted. The Policies Map is not part of the plan but is a separate Local Development Document. Consequently, the Inspector is not in a position to recommend modifications to it. Proposed changes to the submission Policies Map are published separately for consultation.

In addition, the Council may make Additional Modifications to the plan to correct errors or to include factual text which, if ... '(taken together) do not materially affect the policies that would be set out in the document.' These are not included in this schedule.

Chapter 2 - Housing

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:			
MM1	Para 2.4	Table 1 provides an update on the housing supply in Hertsmere, including site allocations and contributions from other sources. It shows a supply of 4,445 <u>4,177</u> dwellings over 15 years, which is more than sufficient to meet the Core Strategy housing target (3,990 dwellings, 2012-2027). Over half of the supply has been completed or has planning permission.			
MM2	Table 1			Source of Supply	No. of Units (Net)
				Completions 2012/13 to 2014/15 (3 Years)	912
				Commitments to 2026/27 (12 Years)	
				Planning Permissions - schemes under construction	341 379
		*		Planning Permissions - schemes not yet started	963 1,077
		*		Sites under consideration ¹	41
				<i>Identified Sites</i>	
		*		Allocations in Policy SADM1 ^{2,3}	<u>654</u> 685
		*		Elstree Way Corridor ⁴	<u>666</u> 813
		*		Town Centre Sites (under Policy SADM43) ⁵	92
		*		Other	<u>115</u> 89
		*		<i>Discount</i> ⁶	-152 -168
				<i>Windfall</i>	
				Small Scale Urban Windfall ⁷	252
				Rural Windfall ⁷	119
				Large Scale Urban Windfall ⁸	174

				Total Completions and Commitments					4,177 4,445
MM3	Para 2.9	<p>The principle of residential development at the sites in Policy SADM1 is acceptable, subject to compliance with any site specific requirements identified. The sites have been selected having regard to their availability, deliverability and viability. The estimated number of dwellings in Policy SADM1 has is no more than <u>an indication of what may come forward on the site, being neither a requirement nor a constraint: the aggregate of the estimates helps to understand overall housing supply.</u> Individual estimates have taken into account:</p> <ul style="list-style-type: none"> • information contained within the SHLAA; • identified development constraints; and • indicative schemes put forward by agents or site owners through the call for sites and which have been discussed with officers informally or through a formal planning pre-application meeting; and • <u>any planning permissions.</u> 							
MM4	Policy SADM1 – Site H9		H9	Former Sunny Bank School, Potters Bar	Housing development should respect and as appropriate protect and enhance the character of the surrounding area, in particular the setting of The Royds Conservation Area and the relationship with the Green Belt and its landscape. Development should provide a continuation of the existing established building lines so as to fit with the established grain of development in the surrounding area. Dwellings should be either detached or semi-detached with spacious plots including front and rear gardens. Building heights should not exceed two storeys. Large flatted blocks will not be acceptable. Measures to mitigate any intrusive noise and pollution emanating from the M25 must be provided. Accesses may be taken from Field View Road, Sunnybank Road and/or Meadow Way although it is expected that the primary access will be via Field View Road. Pedestrian and cycle access should be			31	

					<p>provided through the site to the remaining education facility.</p> <p>The layout should include a minimum of 1.4ha of open space which will thereafter be treated as Local Green Space for planning policy purposes (Proposal C1 in SADM33). The developer will be required to make a contribution towards the cost of implementation and maintenance of this open space. The space must be usable, well-designed and safely and conveniently accessible from the surrounding housing area. It should enable formal sports use unless satisfactory off-site replacement playing field provision is secured or demonstrated not to be required. The developer will be required to produce a master plan indicating how the whole site is proposed to be laid out. Inter alia, this will show how the existing educational support centre (which may be retained) can be integrated in the layout and brought forward for housing at a later date.</p>		
MM5	Policy SADM1 - Site H11 (Site specific requirements)	Flatted development using existing access onto Elton Way. Full parking standards to be met. Carefully designed and usable communal amenity space required. The Council has approved planning application 14/0911/FUL for 102 units and prefers this to a conversion of the existing building on the site. <u>The adequacy of waste water capacity is to be assessed: adequate capacity should be made available before development is occupied.</u>					
MM6	Policy SADM1 – Site H12 (Site specific requirements)	Removal of former swimming pool building (currently used by the Nursery) and associated hardstanding. Development of residential units to be situated nearer to Falconer Road thereby reducing the impact on the openness of the Green Belt. Needs to meet requirements of Core Strategy Policy CS19 Key Community Facilities in respect of the current nursery use.					
MM7	Policy SADM1 (Total Units from	Total <u>estimated</u> units from housing allocation sites: 685 <u>654</u>					

	Housing Allocations)	
MM8	Policy SADM2	<p>These sites will only be released for housing in the event that a review of this <u>the Local</u> Plan indicates that there is insufficient suitable land available, within the defined urban area and/or consistent with Local Plan and national planning policy, to meet longer term housing needs. Until that time the sites will be treated as if they are in the Green Belt: there will be a presumption against inappropriate development. <u>Any proposal should not prejudice future housing development.</u></p>
MM9	Para 2.25 - 2.27 and Policy SADM 4	<p>2.25 A Written Ministerial Statement in November 2014 set out changes to national policy in relation to planning obligations under s106 of the Town and Country Planning Act 1990 (as amended). These have been reflected in amendments to the national Planning Practice Guidance. The changes seek to remove the requirement for developer contributions (including Affordable Housing) on sites of 10 units or less, the stated aim being to help increase housing supply by lowering the construction cost of small scale new build housing.</p> <p>2.26 There is, however, an acute need for affordable housing provision in Hertsmere, a situation to which the adopted Core Strategy responds; the site size threshold of 5 reflects independent recognition of both the magnitude of local housing need and the deliverability of small sites including the required affordable housing provision. The Inspector examining the Core Strategy concluded that it would accord with the NPPF by helping to meet the need for Affordable Housing, without compromising delivery or viability. This has been reflected in the number of schemes which have come forward for 5-10 units since January 2013. The evidence supports the Council in continuing to require an Affordable Housing contribution from sites of 10 units or less.</p> <p>2.27 Some additional flexibility in relation to contributions to Affordable Housing provision on small sites (of between 5 and 10 units) is however proposed. Contributions will therefore be sought in the form of cash payments, commuted until after completion of units within the development. This flexibility does not apply to Rural Exception sites under Core Strategy Policy CS5.</p> <p>Policy SADM4 – Small Sites for Affordable Housing On sites of between 5 and 10 residential units (inclusive), the Council will seek financial contributions to support the delivery of Affordable Housing. Contributions will be sought in the form of commuted payments, calculated on the basis set out in the Affordable Housing SPD and any subsequent update.</p>

Chapter 3 – Employment and Economy

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM10	Para 3.2	<p>The Government has relaxed controls on the conversion of buildings to residential <u>use</u> through changes to permitted developments rights, as part of its current drive to promote new homes. The periods when changes can be introduced are temporary: tThis affects change of use from offices (Use Class B1(a)) and warehouses (Use Class B8) <u>including changes from Class B uses to residential</u>. Each change is subject to prior approval: i.e. consideration of a limited set of factors. The Government has also consulted on the possibility of the changes of control being permanent, as well as changes from light industry (Use Class B1(c)) to residential. Nevertheless, the Government confirms that councils should be able to protect strategically important office space in their local areas and should continue to support economic development. The new permitted development rights have been introduced in exceptional circumstances and are short term measures in comparison with the 15 year span of the development plan. It is therefore prudent for the Council to retain <u>pursue</u> policies which seek to prevent the loss of key employment floorspace.</p>
MM11	Policy ADM6	<p>The following sites identified on the Policies Map are allocated as Employment Areas:</p> <ul style="list-style-type: none"> a) Elstree Way, Borehamwood; b) Stirling Way, Borehamwood; c) Cranborne Road, Potters Bar; d) Station Close, Potters Bar; and e) Otterspool Way, Bushey <p>Further policy requirements for these sites are set out in Policy CS8 and Policy CS10 of the Core Strategy.</p> <p><u>The boundaries of the sites which are allocated as Employment Areas in accordance with Policy CS8 are shown on the Policies Map. Land uses within these areas will be limited by the provisions of Policies CS8 and CS10.</u></p>
MM12	Policy ADM7	<p>The following site identified on the Policies Map is allocated as a Key Employment Site:</p> <ul style="list-style-type: none"> a) Centennial Park, Elstree <p>Infilling, additions or redevelopment for employment purposes will be acceptable provided they comply with Policy ADM27. Further policy requirements are set out in Policy CS8 of the Core Strategy.</p>

Chapter 4 - Open Land and the Environment

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM16	Policy SADM11	<p>Second sentence of policy:-</p> <p>These sites and their boundaries are reviewed by the responsible organisations from time to time: the Policies Map will be updated when necessary over the plan period to reflect any such decisions.</p>
MM17	<p>Para. 4.11</p> <p>Policy SADM13</p>	<p>4.11 When there is a proposal for a development at a site where there are existing trees, consideration needs to be given to the impact of the proposals on the natural environment, including trees, hedgerows and other forms of landscaping. <u>It is expected that any healthy, high quality trees on a development site will be retained. High quality trees are those which are assessed as being Category A or Category B as defined in British Standard BS 5837:2012 (or any successor document). An arboricultural assessment is required wherever trees are present on a development site in line with the guidance in the Biodiversity, Trees and Landscaping SPD Part C.</u></p> <p>Planning permission will be refused for development which would result in the loss, or likely loss, of:</p> <ul style="list-style-type: none"> i) <u>healthy, high quality trees</u> subject to a Tree Preservation Order; or ii) any healthy, high quality trees and/or hedgerows that make a valuable contribution to the amenity or environment of the area in which they are located. <p><u>If development is approved which would result in the removal of trees and/or hedgerows, equivalent and appropriate replacement planting will be required.</u></p> <p>All development affecting trees, hedgerows and other plants or landscaping should comply be consistent with the Biodiversity, Trees and Landscape SPD and BS5837 (or any subsequent guidance). This includes the requirement for appropriate landscaping schemes and, if necessary, replacement trees.</p> <p>Where possible, the Council will make additional Tree Preservation Orders to ensure that existing trees, or groups of trees, which are healthy and contribute to the amenity of the area, are retained and protected.</p>

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM18	Policy SADM16	<p>The design of new development should include sustainable drainage measures. In particular, the Council will require the introduction of sustainable drainage (SuDS) on all <u>major developments of 10 residential units or 1,000 square metres of floorspace (or more), (as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 and any subsequent order...</u></p> <p>Major proposals should also comply with the principles and standards set out by the Lead Local Flood Authority for SuDS.</p>
MM19	Policy SADM23	<p>The amended boundary of the Green Belt, to which Policy CS13(Core Strategy) and Policy SADM23<u>27</u> apply, is shown on the Policies Map</p>
MM20	Policy SADM24	<p>Village envelopes are shown on the Policies Map for parts of Elstree, Shenley and South Mimms. The areas defined by the village envelopes are part of the Green Belt, within which limited infilling <u>will be permitted may be appropriate.</u> Such infilling will be considered appropriate if it complies with Core Strategy Policy CS13 and other relevant plan policies.</p>
MM21	<p>First new para. after 4.80</p> <p>Second new para. after 4.80</p> <p>4.85</p>	<p><u>Focusing essential development within a defined part of the site will help to limit the impact on the openness and character of the Green Belt, and contribute to the overall maintenance of the Green Belt. The submission of long term plans indicating future investment and development is encouraged. The definition of the 'infilling areas' has been based on long terms plans respecting the Green Belt location, wherever possible. In cases where comprehensive development of the site is proposed, a planning brief should be prepared in consultation with the local planning authority.</u></p> <p><u>The Key Green Belt Sites are listed in Appendix F. Information about listed buildings, Registered Parks and Gardens and archaeological remains on these sites is provided, together with guidance on how these assets are to be taken into account.</u></p> <p>There are three Key Green Belt Sites which are subject to redevelopment. The Bushey Academy, formerly known as Bushey Hall School, is being redeveloped and the infilling envelope boundary has been re-drawn accordingly. The governors of Hertswood Lower School, formerly known as Nicholas Hawksmoor School, are seeking new</p>

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM21 (cont.)	<p data-bbox="302 991 551 1054">First new para. after 4.85</p> <p data-bbox="302 1278 584 1342">Second new para. after 4.85</p>	<p data-bbox="616 272 1991 767"><u>(redeveloped) school premises and St Margaret's School in Bushey is promoting redevelopment together with some school buildings on the south side of Merry Hill Road. Proposals may also come forward for the Haberdashers' Aske's schools. The infilling envelopes for these sites may be amended in the future when the extent of the redevelopment proposals is clearer. Smaller adjustments to the infill boundaries at Bio Products Laboratory and Bushey Meads School have also been made to take account of known development proposals. A number of existing publicly funded secondary schools are within the Green Belt; the important role these facilities play in supporting the needs of the community is recognized. In several cases there are known development needs which have been taken into account in defining current infill boundaries. The Bushey Academy has been redeveloped, and plans put forward for expansion at Bushey Meads School; the infilling envelope boundaries have been re-drawn accordingly. Proposals to provide new (redeveloped) school premises on a single site for Hertswood Academy are being developed; the infilling envelope has been amended to reflect the anticipated requirements of the Academy arising from any future expansion to 10 forms of entry should an enlarged building footprint be sought. The Academy has confirmed that (subject to funding and ministerial approvals) they would seek to expand the school to meet any increased local demand.</u></p> <p data-bbox="616 810 1991 1018"><u>The private education sector is also well represented in Hertsmere's Green Belt; the schools perform valuable educational, economic and community functions and in some cases safeguard the future of important heritage assets. Some of these establishments may need to undertake improvement and expansion in the future. St Margaret's School in Bushey is promoting redevelopment together with some school buildings on the south side of Merry Hill Road. Proposals may also come forward for others, including Haberdashers' Aske's schools and the Aldenham School.</u></p> <p data-bbox="616 1061 1991 1198"><u>Adjustments have been made to the Bio Products Ltd infill site boundary to reflect known development proposals. Further proposals for expansion within the site may come forward in future. The infill envelopes for these and other Key Green Belt sites may be amended through any future review of this document once the extent of development needs has been established and an appropriate form of development agreed.</u></p> <p data-bbox="616 1241 1464 1378">The following Key Green Belt Sites are identified on the Policies Map: a) Aldenham School, Letchmore Heath; b) Bio Products Laboratory, Dagger Lane, Aldenham; c) Blackbirds Sewage Works, Oakridge Lane, Aldenham;</p>

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM21 (cont.)	Policy SADM25 (as submitted)	<p>d) The Bushey Academy, formerly Bushey Hall School, London Road, Bushey; e) Bushey Meads School, Coldharbour Lane, Bushey; f) Dame Alice Owen's School, Sawyers Lane, Potters Bar; g) Electricity Transforming Station, Hilfield Lane, Elstree; h) Elstree Aerodrome, Hogg Lane, Elstree; i) Haberdashers' Aske's School (Boys), Aldenham Road, Elstree; j) Haberdashers' Aske's School (Girls), Aldenham Road, Elstree; k) Cancer Research UK, formerly Imperial Cancer Research Fund, Blanche Lane, Potters Bar; l) National Institute for Biological Standards and Control (NIBSC), Blanche Lane, Potters Bar; m) Hertswood Lower School, formerly Nicholas Hawksmoor School and Sports Centre, Cowley Hill, Borehamwood; n) Queen's School, Aldenham Road, Bushey; o) Purcell School, Aldenham Road, Bushey; p) St Margaret's School, Merry Hill Road, Bushey; q) Willows Farm Village, London Colney.</p> <p>Continuation of the existing use is supported.</p> <p>Infilling or redevelopment may be appropriate within the defined 'envelope' area in each site, taking full account of the following factors: (i) the impact on the openness of the Green Belt and the purpose of including land within it; (ii) the impact of proposals on any playing fields; (iii) the impact on wildlife and the ecological network; (iv) the impact on any heritage asset; (v) the impact on the amenity of adjacent properties; (vi) the proposal being ancillary to, or supporting an existing or approved use on the site; (vii) the impact of the relocation or introduction of a hard surfaced area such as car park or playground; and (viii) whether the proposal would lead to any significant increase in motorised traffic generation.</p> <p>The submission of long term plans for Key Green Belt Sites indicating future investment and development is</p>

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM21 (cont.)	Policy SADM25 (as modified)	<p>encouraged. In cases where comprehensive development of the site is proposed, a planning brief should be prepared in consultation with the local planning authority.</p> <p><u>At Key Green Belt Sites development will be directed towards the 'envelope' defined on the Policies Map.</u></p> <p><u>Any proposal for infilling or redevelopment within the 'envelope' must be ancillary to or support an existing or approved use on the site. This development will be permitted provided it:</u></p> <p>a) <u>does not significantly harm the openness of the Green Belt and the purpose of including land within it;</u> <u>and</u> b) <u>meets the criteria set out below.</u></p> <p><u>Outside the defined 'envelope' any development should be "appropriate" in terms of the NPPF and preserve the openness of the Green Belt.</u></p> <p><u>All proposals must satisfy the following criteria:</u></p> <p><u>i. the proposed development should protect, conserve or enhance any relevant heritage assets in accordance with Policy SADM 30;</u></p> <p><u>ii. the relocation or introduction of a hard surfaced area such as car park or playground should not have unacceptable impacts;</u></p> <p><u>iii. the development should not result in a significant increase in motorised traffic; and</u></p> <p><u>iv. there should be no significant adverse impact on:</u></p> <p><u>a. designated open space and sports and leisure facilities;</u></p> <p><u>b. wildlife sites and ecological network; and</u></p> <p><u>c. the amenity of adjacent properties.</u></p> <p>Green Transport Plans should accompany planning applications for any significant development at these sites.</p>

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM22	Policy SADM26 (fourth paragraph)	Proposals will not be supported permitted which: (i) exacerbate existing traffic or environmental conditions; (ii) have an adverse impact on the safe and effective operation of <u>the existing or expanded Highways England and Connect Plus facilities and</u> the strategic road network; (iii) prejudice the rationalisation and improvement of the area, or (iv) are located in the flood plain of Mimmshall Brook.
MM23	Policy SADM27 (first sentence)	The Council will assess all applications for development in the Green Belt, <u>as defined on the Policies Map, in accordance with Core Strategy Policy CS13 and</u> to ensure they comply with the following principles:
MM24	Policy SADM30 (Historic Parks and Gardens)	For proposals relating to registered or locally important historic parks and gardens the Council will consider: (i) <u>whether the proposal conserves and, where possible, enhances the significance, character or appearance of the heritage asset and its setting;</u> (ii) <u>the potential harm to the historic asset; and</u> (iii) <u>the scale, design, character and materials of the proposed development.</u> <u>Proposals relating to registered or locally important historic parks and gardens should:</u> (i) <u>avoid any harm to the historic asset; and</u> (ii) <u>where possible, enhance its significance, character, appearance and setting.</u> <u>The scale, design, character and materials of the proposed development must respect the appearance and landscape of the park or garden.</u>

Chapter 5 – Building Sustainable Communities

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM25	Policy SADM31 Design Principles Final paragraph	All development should comply <u>be consistent</u> with Hertsmere's Planning and Design Guide SPD (and any successor document).

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:			
MM26 (Cont.)	SADM33	Reference	Site	Proposal	Site Requirements
		C1	Former Sunny Bank School, Potters Bar	Provision of new public open space	1.4ha of open space (thereafter to be treated as Local Green Space for planning policy purposes) to be provided within site H9 (SADM1). The space must be usable, well designed and safely and conveniently accessible from the surrounding housing area. It should enable formal sports use unless satisfactory off-site replacement playing field provision is secured or demonstrated not to be required. Developer will be required to make a contribution towards the cost of implementation and maintenance of this open space.
		C2 C1	Hertswood Lower School, Cowley Hill, Borehamwood	Provision of new and/or refurbished school facilities	The site is to be used for the consolidation of Hertswood Academy and associated key community facilities and any other educational facilities that may be necessary to serve the immediate local area.

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
		<p>Site Requirements for Hertswood Lower School (Cont.)</p> <p>Buildings should be concentrated in one part of the site. Open space and landscaping should provide a soft edge with and visual links to the wider Green Belt. A transport statement is required to show how the cumulative impact on the highways network can be adequately mitigated.</p> <p>The proposal is linked to the residential development of Hertswood Upper School, Proposal H6 (see Policy SADM1), This includes the relocation of Hertswood Upper School, playing fields, the Hertswood Centre and The Ark Theatre to the Hertswood Lower School site.</p> <p>Proposals should minimise any reduction in the overall quantity of playing field provision and its effect; improvements to the quality and accessibility of playing field and sports provision will be required as part of any agreed mitigation strategy. Programme of development on the two sites to be considered against Policy CS19 (key community facilities) and agreed, in particular, to ensure that (i) the proper level of school facilities, including playing fields <u>and indoor sports facilities</u>, is available throughout the development period, (ii) there are local facilities available to allow the satisfactory operation of theatre activities <u>and indoor sports facilities</u> throughout the development period, and (iii) the provision of the replacement theatre premises <u>and indoor sports facilities</u> is made at the earliest possible opportunity. The playing fields <u>and indoor sports facilities</u> are to be made available for community use on a basis to be agreed with the Council.</p>
MM27	SADM 35 (To be deleted)	<p>SADM35 — Major Green Space</p> <p>Development proposals, which would result in the loss of a Major Green Space identified on the Policies Map or detract from its open character, will not be permitted unless exceptional circumstances can be demonstrated.</p> <p>Where exceptional circumstances can be demonstrated, proposals will not be considered acceptable unless they:</p> <p>(i) are ancillary to the use of the space or to any buildings on that land;</p> <p>(ii) will enhance activities associated with the open nature of the space;</p> <p>(iii) are appropriate in scale; and</p> <p>(iv) will contribute positively to the setting and quality of the space.</p>

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM27 (Cont.)	Replacement policy SADM35	<p><u>Policy SADM35 – Open Space, Sports and Leisure Facilities</u> <u>Where appropriate all development affecting open space and sports and leisure facilities should seek to improve the quality, quantity, and/or accessibility of the space/facility through appropriate financial contribution and/or direct provision.</u></p> <p><u>As a minimum, development must not exacerbate existing deficits of open space and sports and leisure facilities in the locality and within the Borough. Proposals which will result in the loss of, or negatively impact upon the designated open space / facility will only be considered appropriate where:</u></p> <ol style="list-style-type: none"> 1. <u>The development proposal is a small scale ancillary use which supports or enhance the quality and/or accessibility of the provision; or</u> 2. <u>Equivalent or improved provision can be created in the most appropriate and accessible location available; or</u> 3. <u>There is substantiated evidence of significant surplus of provision within the catchment of the existing space / facility, both quantitatively and qualitatively.</u> <p><u>Any development on a designated open space / facility should not cause significant harm to the character, appearance and visual amenity of the local area. Development will not be supported where it would cause significant harm to the integrity of the green infrastructure network.</u></p>
MM28	SADM 36	<p>Policy SADM36 – Local Green Space Development proposals, which would result in the loss of a Local Green Space defined on the Policies Map or would have a negative impact on the features which make it locally significant, will not be permitted unless exceptional <u>very special</u> circumstances can be demonstrated.</p>

	Policy SADM39 (replacement)	<p><u>category of road in the road hierarchy based on the amount of traffic generated and its effect on safety and the environment.</u></p> <p><u>The traffic generated from new development must be compatible with the location, design and capacity of the current and future operation of the road(s) within the road hierarchy. In reaching a judgement, the Council will have regard to:</u></p> <ul style="list-style-type: none"> - <u>any planned improvements on the road;</u> - <u>the cumulative effects of incremental developments;</u> - <u>advice from the local highway authority, including guidance on the relative priorities given to particular types of traffic and/or modes of transport; and</u> - <u>the protection of rural character.</u> <p><u>The type and nature of accesses will be controlled according to the category of road. In particular, new access will not be permitted on to a Primary Trunk Road or a Main Distributor Road unless there are special circumstances.</u></p>
MM30	Policy SADM40	<p><u>In accordance with policy CS24, major trip generating development should be focused principally on town centres and on the Transport Development Areas at Borehamwood and Potters Bar which are shown defined on the Policies Map.</u></p>
MM31	Policy SADM41	<p>The Council will support development provided that:</p> <p>Development will be permitted where:</p> <ul style="list-style-type: none"> (i) it can be accessed by a range of transport modes including, where appropriate, public and other sustainable transport modes; (ii) it provides safe and convenient links through the site and within the site and enables access to adjoining routes and services for all users; (iii) it will not harm the safety of any users of the highway network, cause or add significantly to road congestion or unduly harm the flow of vehicles; (iv) the proposed design and layout give priority to pedestrians, cyclists and other non-vehicle users and provide for safe and convenient: <ul style="list-style-type: none"> a) movement, circulation, parking, manoeuvring and picking up or dropping off; b) accommodation of larger vehicles including emergency and servicing vehicles and/or coaches where required and

		<p>c) site access for all users (including adequate visibility splays);</p> <p>(v) off-street car and cycle parking is provided in accordance with Core Strategy Policy CS25 and <u>is consistent with</u> the Parking Standards SPD; and</p> <p>(vi) for major trip generating schemes, the applicant provides a Transport Statement or Transport Assessment (prepared in compliance with guidance issued by the Council and local highway authority), which demonstrates that the scheme accords with the policies in the Local Plan.</p> <p>Where development may be expected to have negative impacts, appropriate mitigation measures will be required at the developer's expense.</p>
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Chapter 7 – Town Centres and Shopping

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM32	SADM43 TC2 Radlett Service Station/Regency House, Former Fire Station and Burrell & Co	Retail/commercial uses on ground floor fronting Watling Street. Community uses required on part of the site to replace former community use, <u>subject to the provisions of Core Strategy Policy CS19 Key Community Facilities.</u>

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM33	Para 7.8	<p>Primary frontages are the core shopping areas of the Borough's centres and contribute significantly to the overall level of vitality. The approach in these areas is therefore to support the retention of A1 shops as far as possible. The change of use of A1 shops to A2 and (up to 150 square metres and subject to prior approval, which includes consideration of the sustainability of a key shopping area) A3 uses is currently permitted development; the Council recognises that these additional uses within primary frontages are capable of supporting retail vitality and footfall subject to there not being an over concentration of such uses. The Council considers an over concentration of A3 uses to be harmful to the sustainability of primary frontages within a key shopping area. Generally an over-concentration would be regarded as having more than the following proportion of A3 units within primary frontages: 15% in Borehamwood and Darkes Lane Potters Bar, 20% in Radlett and Bushey Village and 25% in Bushey Heath. (financial and professional services) is currently permitted development with no need for prior approval, so the Council seeks to retain a combined proportion of 70% A1 and A2 uses at ground floor level within all of the Borough's primary frontages. This proportion reflects the current proportion of these uses within the primary frontages, based on a December 2015 retail survey. Where the current proportion of A1 and A2 uses within a particular primary frontage is already below 70%, proposals for the further loss of A1 or A2 units within that frontage will not be permitted unless the unit has been effectively marketed for class A1 and/or A2 uses and</p>

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM33 (Cont.)	Replacement Policy SADM44	<p><u>In the primary shopping frontages (defined on the Policies Map) the Council will seek to ensure that class A1 (retail shops) predominate in ground floor units. A development proposal which reduces the combined proportion of class A1 and A2 retail uses at ground floor level below 70% within that centre's primary frontage will not be permitted.</u></p> <p><u>Changes of use which will result in any loss of class A1 (retail shops), or A2 (financial and professional services) uses will only be permitted where it can be demonstrated that:</u></p> <p><u>(i) the development proposal supports the overall retail function of the primary frontage and, in the case of class A3 uses within key shopping areas, does not lead to an over-concentration of such units within the primary frontage; and</u></p> <p><u>(iii) the site has been effectively marketed for class A1 and/or A2 uses.</u></p> <p><u>Proposals for class A4 (drinking establishments) and A5 (hot food takeaways) uses will not be permitted if the combined proportion of these two types of uses exceed 5% within primary frontages in Borehamwood, Radlett and Potters Bar; or exceed 10% within primary frontages in Bushey Village and Bushey Heath.</u></p> <p><u>Development proposals for betting shops and pay-day loan shops will not be permitted if they result in an over-concentration of these uses within any primary frontage. Development proposals for uses with a non-active frontage at ground floor level will also not be permitted in primary frontages.</u></p>

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM34	<p>Paragraph 7.9</p> <p>Policy SADM45 (To be deleted)</p> <p>Policy SADM45 (Replacement Policy)</p>	<p>Secondary frontages have a much greater mix of uses. The Council will seek to maintain and encourage A1, A2 and A3 uses. Other main town centre uses, as defined in the NPPF, will also be acceptable provided that they make a positive contribution to the frontage and the centre generally. Acceptable uses include A4 (<u>drinking establishments</u>) and A5 (<u>hot food takeaways</u>) and will be those that create activity and interest along the frontage and which are well integrated in design terms, <u>although to avoid an over-concentration of A5 premises, this should not lead to the creation of three or more consecutive A5 units.</u> Where premises are currently vacant and a proposed use would not result in an active frontage, the Council will have regard to how long the premises have been vacant and seek evidence of active marketing for 'A' class uses over a significant period of time. Where a betting or pay day loan shop is proposed in a particular location (other than in a primary frontage, where they will not be supported), the Council will seek to avoid an over-concentration of these uses. As a guide, three or more units of each type in close proximity to each other would be regarded as an over-concentration.</p> <p>In the secondary shopping frontages (defined on the Policies Map) the Council will seek to maintain and encourage class A1 (retail shops), A2 (financial and professional services) and A3 (restaurants and cafes) uses in ground floor units. Proposals for other main town centre uses, including A4 (drinking establishments), A5 (hot food take away) and D2 (assembly and leisure) will be supported provided that they would not harm the vitality or viability of the frontage and the centre generally.</p> <p>The new use will be expected to maintain an active frontage at street level.</p> <p><u>In the secondary shopping frontages (defined on the Policies Map) the Council will seek to maintain and encourage class A1 (retail shops), A2 (financial and professional services) and A3 (restaurants and cafes) uses in ground floor units.</u></p> <p><u>Changes of use which result in any loss of class A1 (retail shops), A2 (financial and professional services), or A3 (restaurants and cafes) uses will only be permitted where it can be demonstrated that the development proposal does not undermine the overall retail character of the secondary frontage.</u></p> <p><u>Proposals for other main town centre uses, including A4 (drinking establishments), A5 (hot food takeaway) and D2 (assembly and leisure) will be permitted where they would not harm the vitality or viability of the frontage and the centre generally, and would not lead to an overconcentration of such uses. New uses will be expected to maintain an active frontage at street level.</u></p> <p><u>Development proposals will not be permitted if they will result in an over-concentration of betting shops and pay-day loan shops within any secondary frontage.</u></p>

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM36 (Cont.)	SADM48 (Replacement Policy)	<p>traffic, parking, general disturbance or problems of disorder and nuisance;</p> <p>(iv) the likely impacts of the proposal, whether individually or cumulatively, on the retail image of the area in which it is located; and</p> <p>(v) in the case of hot food take-aways, which may fall partly or wholly within Class A5, their proximity to local secondary age schools.</p> <p><u>Applications for non-A1 retail uses within the Borough's key shopping areas (defined in Table 3 shopping hierarchy) will be permitted where it can be demonstrated that:</u></p> <p>(i) <u>the nature of the use would not have a significant detrimental impact on the functioning of the centre, parade or frontage and the local area generally;</u></p> <p>(ii) <u>the concentration or clustering of such uses would not have a significant detrimental impact on the functioning of the centre, parade or frontage and the local area generally;</u></p> <p>(iii) <u>the proposal would not result in unacceptable levels of noise, odours, traffic, parking demand, general disturbance or disorder and nuisance; and</u></p> <p>(iv) <u>the proposal would not have an unacceptable negative impact on the retail image of the area in which it is located.</u></p> <p><u>Outside of key shopping areas, applications for non-A1 retail uses will be permitted provided that the proposal would not result in unacceptable levels of noise, odour, traffic, parking demand, general disturbance, or disorder and nuisance.</u></p> <p><u>Where the proposal is for a hot food takeaway (use class A5), and the premises would be clearly visible from any entrance or access point to a secondary school, it must be demonstrated that the proposed use would not undermine any existing or proposed healthy eating policy at that school.</u></p>
MM37	SADM49 - Night-time and Evening Uses	<p>The Council will in addition consider the following factors in determining planning applications for.</p> <p><u>Applications for evening economy uses, including entertainment, late night retailing and eating and drinking</u></p>

MM No.	Policy / Paragraph Number:	Inspector's Proposed Modification:
MM37 (Cont.)		<p>establishments these uses will be permitted where:</p> <p>(i) whether the proposal supports the creation of a balanced evening economy; (ii) the likely effects of the proposal, whether individually or cumulatively, in terms of noise, traffic, parking, signage and lighting, general disturbance or problems of disorder and nuisance; (iii) the design of the development, as it relates to public safety, crime prevention and the reduction of anti-social behaviour; (iv) arrangements for mitigating pollution, including noise, odours and emissions; (v) access arrangements for people of all ages and abilities; (vi) whether adequate levels of parking and public transport would be available during the hours of operation; and (vii) whether the day-time use would detract from the character and amenity of the surrounding shops and services (i.e. by providing a blank frontage due to closure during the day rather than maintaining an active street frontage).</p> <p><u>(i) the proposal supports the creation of a balanced evening economy;</u> <u>(ii) the likely effects of the proposal, whether individually or cumulatively, would not result in unacceptable impacts in terms of noise, traffic, parking, signage and lighting, general disturbance or problems of disorder and nuisance;</u> <u>(iii) the design of the development is acceptable, as it relates to public safety, crime prevention and the reduction of anti-social behaviour;</u> <u>(iv) arrangements are agreed for mitigating pollution, including noise, odours and emissions;</u> <u>(v) the proposal incorporates access arrangements for people of all ages and abilities;</u> <u>(vi) adequate levels of parking and public transport would be available during the hours of operation; and</u> <u>(vii) the day-time use would not detract from the character and amenity of the surrounding shops and services (i.e. by providing a blank frontage due to closure during the day rather than maintaining an active street frontage).</u></p>

Chapter 8 – Implementation and Monitoring Framework

MM38	Table 4: Monitoring Framework	Insert Table 4 as in SC131 (below)	
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Table 4: Monitoring Framework

Monitoring indicators and targets in italics are those already being used to monitor relevant Core Strategy policies but are included in the table for completeness.

Policy	Aspiration	Ref.	Indicator	Complements Core Strategy Indicator	Target	Responsible Agencies	Implementation / Delivery Mechanism
SADM1	To deliver all proposals	AMF 1	Development progress, noting the proportion of total dwelling capacity given planning permission and completed	MF6	To complete 100% of the total dwelling capacity by 2027	Hertsmere BC	Individual planning applications Monitoring through the AMR
<u>SADM2</u>	<u>Meet requirement for release of Safeguarded Land</u>	<u>AMF2</u>	<u>Planning applications in Safeguarded land areas</u>	<u>MF6</u>	<u>No net loss of safeguarded housing land</u>	<u>Hertsmere BC</u>	<u>Individual planning applications</u> <u>Monitoring through the AMR</u>
<u>SADM3</u>	<u>Retention of affordable housing units in any redevelopment schemes</u>	<u>AMF4</u>	<u>Number of affordable housing units on sites prior to and following redevelopment.</u>		<u>No net loss of affordable housing units through redevelopment</u>	<u>Hertsmere BC</u>	<u>Individual planning applications</u> <u>Monitoring through the AMR</u>

<u>SADM5</u>	<u>Retention of existing Gypsy and Traveller sites</u>	<u>AMF5</u>	<u>Number of pitches on sites listed in Table 2</u>	<u>MF12, MF13</u>	<u>Retention of all authorised sites and pitches</u>	<u>Hertsmere BC, Site owners</u>	<u>Monitoring through the AMR</u>
<u>SADM5</u>	<u>Provision of new pitches identified in Policy SADM5</u>	<u>AMF6</u>	<u>Provision of authorised pitches at sites GT1, GT2 and GT3</u>	<u>MF12, MF13</u>	<u>Delivery of authorised pitches identified.</u>	<u>Hertsmere BC, Site owners</u>	<u>Individual planning applications</u> <u>Monitoring through the AMR</u>
<u>SADM6, SADM7, SADM8</u>	<u>Retention of a supply of designated land for B-class and other permitted uses</u>	<u>MF14,</u> <u>MF15</u>	<u>Provision of employment land to retain at least 110ha of designated employment sites</u> <u>To retain Local Significant Employment Sites</u> <u>Monitoring of % of non-B class uses within designated employment areas and Local Significant Employment Sites</u>		<u>No net loss of employment land unless evidence supports otherwise</u> <u>No net loss of Local Significant Employment Sites</u> <u>Permission of non B uses in employment areas be limited to CS10 appropriate uses</u>		

SADM9	Retention of strategic office accommodation (where floorspace exceeds 500 sq m) outside Employment Areas	AMF 27	Applications for change of use of strategic office accommodation from office to residential use.	M14, M15	No net loss of strategic office floorspace to residential use	Hertsmere BC	Individual planning applications/prior approvals. Monitoring through the AMR
<u>SADM10</u>	<u>Requirement for release of Safeguarded Land</u>	<u>MF17</u>	<u>Applications in Safeguarded Land Area, in Cranborne Road Potters Bar and/or Safeguarded land Rowley Lane Borehamwood</u>		<u>For applications in Safeguarded land only approved for B uses, only allowed following Plan review</u>		
<u>SADM11</u>	<u>Protection of biodiversity in development proposals</u>	<u>AMF8</u>	<u>Assessment of proposals; applicants to complete Biodiversity Impact Assessment Calculator (BIAC) where appropriate</u>	<u>MF18</u> <u>MF21</u>	<u>No grant of planning permission for development proposals contrary to specialist biodiversity advice.</u>	<u>Hertsmere BC</u>	<u>Individual planning applications</u> <u>Monitoring through the AMR</u>
<u>SADM13</u>	<u>Protection of the Borough's environmental assets - trees</u>	<u>MF19</u>	<u>Number of trees subject to Preservation Orders felled or damaged</u>		<u>No net loss of protected trees</u>		

<u>SADM14</u> <u>SADM15</u>	<u>Reduction in flood risk</u>	<u>MF26</u>	<u>% of permissions granted contrary to EA advice</u>		<u>No permissions to be granted contrary to EA advice</u>		
<u>SADM19</u>	<u>Future mineral extraction in Mineral Consultation Area to be protected</u>	<u>AMF9</u>	<u>% of permissions granted contrary to HCC advice</u>		<u>No permissions to be granted contrary to HCC advice</u>	<u>Hertsmere BC</u>	<u>Individual planning applications</u> <u>Monitoring through the AMR</u>
<u>SADM23</u> , <u>SADM24</u> , <u>SADM25</u>	<u>The protection of the Green Belt</u>	<u>MF4</u> <u>MF5</u>	<u>Total area of Green Belt</u> <u>Number of approvals which resulted in a material departure</u>		<u>No net loss of Green Belt Land</u> <u>No material departures approved in the Green Belt</u>		
<u>SADM26</u>	<u>Prepare a development brief</u>	<u>AMF10</u>	<u>Development brief prepared</u>		<u>Development brief prepared</u>	<u>Hertsmere BC</u>	<u>Development brief prepared</u>
<u>SADM28</u>	<u>Diversification to protect agricultural land</u>	<u>AMF11</u>	<u>Development on Grade 1 or 2 agricultural land</u>		<u>No loss of Grade 1, or 2 agricultural land</u>	<u>Hertsmere BC</u>	<u>Individual planning applications</u> <u>Monitoring through the AMR</u>
<u>SADM2630</u>	<u>To maintain a list of locally important buildings that have value</u>	<u>AMF 3 12</u>	<u>Number of locally listed buildings</u>	<u>MF22, MG23, MF24, MF25</u>	<u>No loss of locally important buildings through the grant of planning permission</u>	<u>Hertsmere BC</u>	<u>Individual planning applications</u> <u>Monitoring through the AMR</u>
<u>SADM30</u>	<u>The protection of the borough's built heritage – listed buildings</u>	<u>MF23</u>	<u>Supply of listed buildings</u>		<u>No net loss of listed buildings</u>		

SADM29-33	To deliver both the proposals	AMF 4 <u>13</u>	Development progress		Both sites Site in full active use for key community facilities	Hertsmere BC	Individual planning applications Monitoring through the AMR
SADM34	To encourage provision for faith groups	AMF14	Planning applications	MF28	No net loss of provision for faith groups	Hertsmere BC	Individual planning applications Monitoring through the AMR
SADM30-35	To maintain the supply of Major Green Open Space	AMF 5 <u>15</u>	Hectares of Major Green Open Space		No net loss of Major Green Open Space	Hertsmere BC	Individual planning applications Monitoring through the AMR
SADM31-36	To maintain the supply of Local Green Space	AMF 6 <u>16</u>	Hectares of Local Green Space		No net loss of Local Green Space	Hertsmere BC	Individual planning applications Monitoring through the AMR
SADM33-38	To increase the supply of public open space	AMF 7 <u>17</u>	Hectares of new public open space in schemes of more than 50 dwellings		New public open space	Hertsmere BC	Individual planning applications Monitoring through the AMR
SADM41	To ensure adequate car parking in new development	MF36	Average car parking provision approved on residential schemes		Average car parking requirement approved through planning applications consistent with car parking standards		
SADM42	To prevent danger to aviation from new development	AMF19	Planning permissions granted		No permissions to be granted contrary to safeguarding advice	Hertsmere BC	Individual planning applications Monitoring through the AMR
SADM36 43	To deliver both proposals	AMF 8 <u>20</u>	Development progress		To complete 100% of total dwelling capacity from these sites by 2027	Hertsmere BC	Individual planning applications Monitoring through the

					(see Table 1)		AMR
<u>SADM44</u>	<u>To ensure A1 uses predominate in Primary frontage</u>	<u>AMF21</u>	<u>Number of A1 units relative to total units in primary frontage</u>	<u>MF37</u> <u>MF39</u>	<u>A1 units to predominate</u>	<u>Hertsmere BC</u>	<u>Individual planning applications. Surveys. Monitoring through the AMR</u>
<u>SADM45</u>	<u>Promoting attractive and viable town centres- secondary frontages</u>	<u>MF37</u>	<u>Monitoring of total units and vacancy rates</u>		<u>Average vacancy rate to be below national average</u>		
<u>SADM46</u>	<u>To protect A1 shops in local centres, Key neighbourhood parades, neighbourhood centres, neighbourhood parades and individual shops</u>	<u>AMF22</u>	<u>Vacant units</u>	<u>MF38</u>	<u>Vacancy rates to be below national average</u>	<u>Hertsmere BC</u>	<u>Individual planning applications. Survey, Monitoring through the AMR</u>
<u>SADM48</u> <u>SADM49</u>	<u>To control non-retail uses and encourage a balanced evening economy</u>	<u>MF37,</u> <u>MF39,</u> <u>MF40</u>	<u>Total units and vacancy rates in main town centres</u> <u>Ratio between A1, A3, A4 and A5 uses in each town and district centre</u> <u>Supply of A3, A4, A5 and D2 use in</u>		<u>Average vacancy rate in town and district centres to be below national average</u> <u>At least 60% of units within town and district centres to be A1</u> <u>To maintain a healthy balance of A3, A4, A5 and</u>		

		<i>each town and district centre</i>		<i>D2 uses relative to the role of the town centre</i>		
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Appendices and Policies Map

All of the enlarged Policies Map extracts for the Site Allocations in Appendix A should be treated as such. Upon adoption they will become part of the adopted Policies Map and constitute a separate Local Development Document. Appendices B to G are retained. For clarification, the amended format for Appendix F does not require a Main Modification.

The only Main Modification (MM39) to the Appendices is to substitute a completely revised table of Open Spaces in Appendix G, as below:-

MM39: Delete the whole of Appendix G and substitute:

Appendix G: Policy ~~SADM35 Major Green~~ Open Space and Policy SADM36 Local Green Space

SADM35 Open Spaces

Boundaries are shown on the Policies Map

Site ref.	Site Location
Borehamwood	
BW 001	Land at Tomkins Close and Bairstow Close
BW 003	Organ Hall Open Space
BW 004	Land at Wetherby Road
BW 008	Old Haberdashers Sports Ground
BW 009	Haggerston Park
BW 010	Brook Meadow
BW 011	Leeming Park
BW 012	Land at Gateshead Road/Beech Drive
BW 013	Aberford Park

BW 014	Playing fields at Aycliffe Road
BW 015	Thirskcliffe Nature Park
BW 016	Walshford Green
BW 017	Land at Ayot Path and Walshford Way
BW 018	Land at Ayot Path and Stapleton Road
BW 019	Land R/O Stapleton Road
BW 020	Clarendon Park
BW 022	Furzehill Road Allotments
BW 023	Meadow Park and Football Ground
BW 024-9	Potters Wood and land at Studio Way
BW 030	Tempsford Green
BW 031	Maxwell Hillside Park (south)
BW 032	Maxwell Hillside Park (north)
BW 033	Land on corner of Byron Avenue/Vale Road
BW 034	Playing field at Woodside and Cowley Hill Primary Schools & Crown Road Amenity Green
BW 035	Land at Shakespeare Drive
BW 036	Kelly Court (Studio Way estate)
BW 037a	Kenilworth Park
BW 038	Farriers Way Open Space and Playground at Fell Path
BW 039	Land at Grantham Green
BW 040	Ripon Park
BW 041	Playing field at Yavneh College/Monksmead School
BW 043	Playing field at Kenilworth school
BW 044	Land R/O 100 Aycliffe Road
BW 045	Playing field at Parkside Primary School
BW 046	Playing field at Summerswood Primary School
BW 047	Playing field at St Teresa's Primary School
BW 048	Playing field at Saffron Green Primary School
BW 049	Playing field at Meryfield Community Primary School
BW 186	Land at Wordsworth Gardens
BW 190	Land at 24-50 Milton Drive

BW 191	Land at 29-57 Milton Drive
BW 198	Land at Lemsford Court
BW 204	Land at Cleveland Crescent
BW 214	Land at Lakeside
BW 236	Playground at Fell Path
BW 239	Land at Hunter Close
BW 249	Land at Windsor Close
Bushey	
BU 002	The Moatfield Playing fields
BU 003	King George Recreation Ground
BU 004	Playing field at Bournehall Primary School
BU 005	Playing field at Little Reddings Primary School
BU 006	Playing field at Merry Hill School
BU 022	Land and Cemetery at St James' Church
BU 043	Boundary Green (Land at Brick Kiln Close)
Bushey Heath	
BH 001	Hillmead Nature Park
BH 003	Windmill Recreation Ground/Allotments
BH 004	Land at R/O 2-44 Richfield Road
BH 005	Playing field at Bushey Heath Primary School
BH 007	<u>The Paddock, Elstree Road</u>
BH 006	Covered reservoirs
BH 028	Land between 22 and 24 Prowse Avenue
Elstree Village	
EV 009	Playing field at St Nicholas' Primary School
North Bushey	
NB 001	Millbrook Road Open Space (Land at Forest Walk)
NB 004	Land at Scottswood Close
NB 006	Playing field at Highwood Primary School
NB 009	Playground at Hartswood Close
Potters Bar	

PB 003	Land at Willow Way
PB 004	Land R/O Willow Way and Mutton Lane
PB 005	Allotments at High View Gardens
PB 013	Land at Abingdon Place
PB 014	Potters Bar Cricket and Bowls Club
PB 015	Parkfield and Ladbroke JMI School
PB 016	Oakmere (including War Memorial)
PB 020	Land at Church Road/Osborne Road
PB 021	Playing field at Lochinver House School
PB 022	Playing field at Mount Grace School
PB 025	Land at Cranborne Crescent
PB 026	Elm Court Community Centre
PB 027	Playing field at Cranborne Primary School
PB 029	Allotments at Aberdale Gardens
PB 030	Land at Berkeley Close
PB 031	Land at Rushfield
PB 034	Former allotment gardens at Elmroyd Avenue
Radlett	
RT 001	Land at Williams Way
RT 002	Land at Canons Close
RT 011	Square at Phillimore Place
RT 014	Playing field at Fairfield Junior School
RT 017 - 020 & 022	Phillimore Recreation Ground, Allotments Elm Walk, & Wood at Fir Spring
RT 021	Scrubbitts Wood (north)
RT 023	Scrubbitts Wood (south)
RT 024	Land Rear of Christ Church, Watling Street
RT 029	Lauteral Green (Tykeside Gardens)
RT 030	Land opposite Station Road, Watling Street
Shenley	

SH 001	Land west of Andrew Close
SH 014	Land at Cockle Way
SH 016	Land at Ribston Close
SH 017	Land at Grace Avenue
SH 023	Green at Mead Road
SH 027	Playing Fields at Shenley Primary School
SH 029	Newcome Road Play Area (Anderson Road)
South Mimms	
SM 002	The Glebeland (Playground at Blanche Lane)
SM 003	Playing fields at St Giles' School
SM 011	Brookside Play Area

SADM36 Local Green Spaces

Boundaries are shown on the Policies Map

Site ref.	Site Location
BH 002	Mary Forsdyke Garden
BH 007	The Paddock, Elstree Road
BU 001	Bushey Rose Garden
BU 015	War Memorial at Sparrows Herne
BW 185	War Memorial at Shenley Road
EV 013	War Memorial at Elstree Hill North
SH 026	Pond and War Memorial at London Road
SM 004	Cemetery, St Giles' Church
SM 005	War Memorial at St Albans Road
BW 021	All Saints Graveyard
EV 010	Cemetery, St Nicholas' Church
RT 025	Cemetery, Watling Street

NB. Site BH007 - The Paddock, Elstree Road, is deleted as a Local Green Space. It becomes an 'Open Space' under Policy SADM35