Hertsmere Borough Council
Summons to all Members

Meeting of the Council

Wednesday, 7 October 2026
7.00 pm

Civic Offices, Elstree Way, Borehamwood, Hertfordshire, WD6 1WA

Agenda

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Contact Democratic Services Democratic.Services@hertsmere.gov.uk or on allan.witherick@hertsmere.gov.uk for any further information.

Chief Executive
Civic Offices, Elstree Way, Borehamwood, Hertfordshire, WD6 1WA

Council Agenda
Wednesday, 7 October 2026

Prayers will be said by Her Grace Visakha Dasi.

1. Communications and Apologies for Absence

a) Communications by the Mayor (if any) relating to business on the agenda.
b) Apologies for absence.
c) Any motions by Members relating to the order of business on the agenda.

2. Declarations of Interest

Members are required to declare any Disclosable Pecuniary Interests they or their spouse/partner have in any matter which is to be considered at this meeting. Members must also declare any other pecuniary or non-pecuniary interests they have in any matter to be considered at this meeting.

The responsibility for declaring an interest rests solely with the member concerned. Members must clearly state to the meeting the existence and nature of any Disclosable Pecuniary Interest, Other Pecuniary Interest or Non-Pecuniary Interest and the agenda item(s) to which it/they apply.

Disclosable Pecuniary Interests are prescribed by the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 as follows:

a. Employment, office, trade, profession or vocation
Any employment, office, trade, profession or vocation carried on for profit or gain.

b. Sponsorship
Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by a member in carrying out duties as a member, or towards your election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.

c. Contracts
Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority— (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.

d. Land
Any beneficial interest in land which is within the area of the relevant authority.

e. Licences
Any beneficial interest in land which is within the area of the relevant authority.

f. Corporate tenancies
Any tenancy where (to the member's knowledge) - (a) the landlord is the relevant authority; and (b) the tenant is a body in which the relevant person has a beneficial interest.

g. Securities
Any beneficial interest in securities of a body where – (a) that body (to the member's knowledge) has a place of business or land in the area of the relevant authority; and (b) either (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

In cases of Disclosable Pecuniary Interest, Members must withdraw from the meeting room while the matter is being considered.

3. **Minutes of the previous meeting**

In accordance with the Constitution the Minutes of the previous meeting shall be presented at the next normal meeting.

4. **Announcements by the Mayor**

To receive such announcements as the Mayor may decide to make to the Council.

5. **Decision Report: Hertsmere Local Plan Regulation 19**

The **ATTACHED** report sets out the next stage of the Local Plan preparation, referred to as the Regulation 19 Publication stage. This is the final stage of the process before submission of the Local Plan to the Secretary of State.

C/26/52
(Pages 1 - 1040)

6. **Any Other Business that the Mayor considers Urgent**

In accordance with Section 100B(4) of the Local Government Act 1972, amended by the Access to Information Act of 1985, no urgent business may be raised unless it has been approved by the Mayor. The item and reason for urgency must be announced at the start of the meeting.

7. **Dates of Future Meetings**

Future meetings are scheduled to take place at 7pm as follows:

- 25 November 2026
- 20 January 2027
- 24 February 2027
- 17 March 2027
- 19 May 2027
- 14 July 2027

Chief Executive

Civic Offices, Elstree Way, Borehamwood,
Hertfordshire, WD6 1WA

29 September 2026

Hertsmere Borough Council

Meeting name & Date	**Council** **7 October 2026**
Agenda item	**5**
Report title	**Hertsmere Regulation 19 Local Plan**
Report reference no.	**C/26/52**
Wards affected	All Wards
Cabinet Member of Lead Councillor	Cllr Nik Oakley, Portfolio Holder for Planning, Infrastructure and Transport
Report author, job title & email	Matt Kolaszewski, Head of Planning, Economic Development and Climate Change matt.kolaszewski@hertsmere.gov.uk George Pavey, Planning Strategy and Implementation Manager George.pavey@hertsmere.gov.uk Karol Jakubczyk, Planning Policy Team Leader Karol.Jakubczyk@hertsmere.gov.uk
List of Appendices	Appendix 1 – The Hertsmere Regulation 19 Local Plan Appendix 2 – Sustainability Appraisal Appendix 3 – Habitats Regulations Assessment Appendix 4 – Regulation 18 Consultation Statement Appendix 5 – Frequently Asked Questions
Reason for urgency	Not applicable.

Public Report - this report is available to the public.

1 Recommendation

1.1 The Council resolves:

1.2 To publish the Hertsmere Local Plan under Regulation 19 of the Town & Country Planning Regulations (Local Plan) (England) 2012 for a period of 6-weeks starting on the 8th of October 2026.

1.3 To submit, on the basis it is sound and legally compliant, the Hertsmere Local Plan (Appendix 1) and key supporting documents (Appendices 3-4) and other supplementary documentation, to the Planning Inspectorate for the purpose of examination in public on or before the 31st of December 2026.

1.4 That prior to the submission of the Hertsmere Local Plan, consideration be given to any consultation response that requires a determination under Regulation 9(1) of the Environmental Assessment Plans and Programmes Regulations 2004.

1.5 Note the Frequently Asked Questions set out at Appendix 5.

2 Purpose of this report

2.1 Under the Planning and Compulsory Purchase Act 2004 (as amended), the Council is required to produce and publish an up-to-date Local Plan, a statutory document setting out Hertsmere's long-term strategy for development and growth for the borough.

2.2 Since the publication of the Local Development Scheme on 6th of March 2025 (as approved by Cabinet) the Council has been revising its Local Plan with the intention of submitting a Local Plan to the Secretary of State before the end of 2026. The Council agreed to hold a Local Plan Regulation 18 consultation between April 16th and May 29th 2026. The Council received over 4,000 responses; the responses have informed the preparation of the Local Plan in advance of Publication.

2.3 This report sets out the next stage of the Local Plan preparation, referred to as the Regulation 19 Publication stage. This is the final stage of the process before submission of the Local Plan to the Secretary of State. It involves the formal publication of the Local Plan that the Council proposes to submit so that interested persons can make representations about that document in respect of soundness and legal compliance. Any representations made are passed to the Inspector appointed by Secretary of State to examine the Local Plan and to consider them as part of the examination.

2.4 This report is seeking the publication and submission of the Hertsmere Regulation 19 Local Plan as set out at Appendix 1. It is also seeking to establish the delegation of certain actions during the submission and examination in order to ensure swift plan-making and to meet the Council's

approved LDS. As such, it is likely that the next function of full Council with regards to the Local Plan, will be at the point of adoption.

3 Reasons for recommendation

3.1 The Council is required, under Regulation 19 of the Town and Country Planning Regulations 2012, to publish the Hertsmere Local Plan for consultation prior to submission (Regulation 22) and public examination (Regulation 24) in order to meet the adopted LDS.

4 Alternative options

4.1 The Council could decide not to recommend that the Local Plan progresses to Regulation 19. This would mean that the Local Plan would not be submitted under the existing plan-making system and would need to be progressed under the new planning system, this carries significant risks. Such an approach would mean that the existing local planning policy vacuum would continue, and the borough would be subject, as it has been already, to speculative development where decisions will need to be taken in accordance with national policy. Further risks are also identified in paragraphs 5.25 to 5.28.

4.2 The Council could decide not to recommend that the Local Plan is submitted to the Planning Inspectorate by the 31st of December 2026. This would mean the same risks apply as set out in paragraph 4.1. Furthermore, it is not practically possible to accommodate any further decision-making milestones following the conclusion of the Regulation 19 publication period if the Council wishes to submit by the December 2026 deadline.

5 Background

Policy Context

5.1 The National Planning Policy Framework (NPPF) sets out that the planning system should be genuinely plan-led. Up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social, and environmental priorities; and a platform for local people to shape their surroundings. The Council, in its role as a Local Planning Authority (LPA), is required by law to prepare and maintain a Development Plan for its area.

5.2 Section 19 of the Planning and Compulsory Purchase Act 2004 sets out that each local planning authority must identify their strategic priorities and have policies to address these in their development plan documents. The Development Plan should seek to meet the development needs of the area, including the housing needs. For decision-taking, the determination of planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise. This is what is known as a plan-led system.

Benefits of a Local Plan

5.3 Having an up-to-date adopted Local Plan will place the council in a strong decision-taking position, directing growth to sustainable locations, meeting needs in full, optimise opportunities, plan for infrastructure investment, and secure quality place-making. In contrast, the absence of an up-to-date adopted Local Plan places local planning authorities in a weak decision-taking position – with most of potential control being relinquished to speculative development and the Planning Inspectorate.

5.4 The absence of a plan does not stop development – growth continues to materialise in a largely unplanned manner. In that vacuum, decisions will be taken in accordance with national planning policy and guidance – taking account of housing supply and measured delivery. This is a harmful position in respect of the authority's resources and reputation. Likewise, the sustained absence of a Local Plan may ultimately result in government intervention.

5.5 Therefore, there is a strong incentive to continue progress on the Hertsmere Local Plan with the aim to submit before the new plan-making system takes over in 2027. Should the council not proceed with plan-making under the existing system then they could be exposed to a new system that requires significant changes to the emerging Local Plan.

5.6 Furthermore, failure to secure submission of the emerging Local Plan under the transition arrangements could expose Hertsmere to the significant risk of a sustained policy vacuum that extends plan-making timetables and into Local Government Reorganisation.

Local Plan Progress: 2025-2026

5.7 *Local Development Scheme:* At its meeting on the 6th of March 2025 the Cabinet approved an updated Local Development Scheme (LDS) which set out a timeline to produce the Hertsmere Local Plan. The adopted LDS set out a condensed and ambitious timetable aiming to progress a Local Plan through Regulation 18 and 19 before submission in 2026. The submission date before the end of December 2026 being the critical milestone to ensure that the Local Plan is progressed under the current plan-making system, as stated above.

5.8 There was a further report presented to the Council on the 26th of March 2025, this report set out a regeneration-led approach to the Local Plan and a request for increased funding to support the approach and the ambitious timeline of delivery. This approach was taken in-light of the then new NPPF which contained a series of changes including to the calculation of housing need and the introduction of 'grey belt'. The new housing need

calculation had significant implications for the Hertsmere Local Plan and required significant revisions to the evidence base and strategy.

5.9 In order to accommodate the uplift in growth, and to reflect the sequential approach set out in the NPPF, the Council proposed to take a progressive but balanced approach to town centre redevelopment and regeneration, with a focus to include the town centres of Borehamwood and Potter Bar plus other regeneration opportunities should they arise. This in turn ensured that brownfield land, and those areas within the most sustainable locations will be fully utilised prior to any consideration of sites for development sequentially within the Grey Belt and then within the Green Belt.

5.10 *Regulation 18 Consultation:* The Regulation 18 Consultation Document published in April 2026 set out a Spatial Strategy that reflected the regeneration approach agreed at Council. A 'long list' of candidate site allocations that aligned with the Spatial Strategy were included within the document to ensure that the Council openly consulted on all current options.

5.11 The 6-week consultation period was undertaken with the opportunity for residents, businesses, community groups and other organisations and individuals to comment on the Council's proposed approach to growth, development sites and emerging policies. As well as documentation being available online and hard copies, public information events were hosted. The Council recorded all representations duly made and the responses have been analysed and helped to shape the next stage of the Local Plan. A summary of the representations and further information regarding the Regulation 18 consultation is included at Appendix 4.

Regulation 19 Local Plan

5.12 The Hertsmere Regulation 19 Local Plan is attached to this report at Appendix 1. It is expected that the Regulation 19 Local Plan is a plan that the Council considers is sound, legally compliant and consequently is ready for examination and would like to adopt as its Local Plan. As such the consultation provides a formal opportunity for the local community and others to comment on whether the plan has met the legal requirements and the tests of 'soundness'.

5.13 The Hertsmere Local Plan found at Appendix 1 follows a similar format to the Regulation 18 consultation document. It is set out in a clear and sequential format of 5 parts; these are summarised below:

- **Part 1 – Delivering a Better Future for Hertsmere:** Sets out the Council's positive vision for future growth and how supporting infrastructure will be delivered to meet needs and secure successful and sustainable place-making. In particular this sets out the Spatial Strategy for Hertsmere and how it seeks to distribute growth to secure successful and sustainable place-making.

- **Part 2 – Managing Development (Planning Policies):** This section sets out the policies that the Council will deploy to secure delivery of new development that meets the high-quality design requirements and infrastructure investment to secure successful and sustainable place-making across Hertsmere.
- **Part 3 – Hertsmere's Towns and Places:** This section sets out how the spatial strategy will reflect the wider vision for Hertsmere and how development will respect the existing settlements. It also sets out the site allocations that seek to meet the boroughs housing and employment needs across the plan-period.
- **Part 4 – Delivery and Monitoring:** The emerging Local Plan will conclude with a series of policies that address the delivery and implementation of planned-for growth.
- **Part 5 – Appendices:** This section sets out what is intended to be a full suite of appendices that will collectively provide clarity and further detail to the spatial strategy, planning policies, settlement and place policies and site allocations.

5.14 The Local Plan has been informed by a comprehensive evidence base which can be found on the Council's website (Supporting Studies (Local Plan evidence base) - Hertsmere Borough Council). The website will continue to be updated with relevant documents as and when they become available. Alongside the evidence base and the Local Plan document, three further documents have been provided:

5.15 *Sustainability Appraisal*: Found at Appendix 2, it is a requirement that a Sustainability Appraisal (SA) is undertaken and published for consultation alongside the Local Plan. The SA presents an appraisal of the plan and the reasonable alternatives and considers any 'significant effects'. It also sets out the work undertaken to date, with the overall aim to inform the plan-making process. Appendix 2 sets out a non-technical summary of the SA Report. The full report will be published at the publication stage.

5.16 *Habitats Regulations Assessment:* Undertaking a Habitats Regulations Assessment (HRA) is a requirement of plan-making with the objective of screening a Local Plan to identify if any aspects of the plan might result in impacts on protected habitats. This is called 'Likely Significant Effects' (LSE) on the integrity of the National Site Network (NSN) – the NSN comprises habitats such as Special Areas of Conservation or Ramsar sites amongst others. The Hertsmere Local Plan HRA can be found at Appendix 3.

5.17 *Regulation 18 Consultation Statement*: Contained at Appendix 4 is the Councils Regulation 18 Consultation Statement. This document sets out how the Council consulted on its emerging Local Plan at the Regulation 18 stage and summarises the responses received, before finally setting out how that feedback was considered in the preparation of the Local Plan.

Consultation and Submission

5.18 If approved at Council, the recommendation is to publish the Plan for 6-weeks between 8th of October and 19th of November 2026 in-line with the regulations and the Council's adopted Statement of Community Involvement (SCI).

5.19 As noted previously, the deadline under the transitional arrangements for a Local Plan to be submitted under the existing planning system means that submission must happen before the 31st of December 2026. The turnaround from the 19th of November to submission before this deadline is therefore incredibly tight. It is essential that the Council moves swiftly to submission and therefore this report proposes that submission is also agreed alongside publication.

5.20 The Council should consider that this Local Plan is capable of being found sound at an examination and therefore not seek to make any main modifications at this stage of the process. It is likely, as a result of the comments raised at Regulation 19, that minor changes will be identified and submitted to the Inspector alongside the Local Plan and submission documents.

5.21 If an Inspector identifies in due course that there may be a need for main modifications to the Plan in order to resolve issues that would otherwise make the plan unsound or not legally compliant, then the nature and likely extent of the modifications will be fully discussed at the examination hearing sessions and may result in a subsequent further round of public consultation.

5.22 It should be noted that the examination process starts on submission of the Plan and it is therefore important that time and resources are invested at this stage in the process to ensure that the Plan is dealt with as quickly and efficiently as possible. Key to this is ensuring that all the necessary practical arrangements have been put in place.

5.23 Work has already commenced in this respect with the recent appointment of an independent Programme Officer who will administer the process and act as a key point of contact between the appointed Inspector, Council Officers and interested parties who wish to appear at the examination.

5.24 It is difficult to estimate the timeline of an examination due to the number of factors that impact on the timeline, however given the number of Plans expected to be submitted to the Planning Inspectorate by the end of December it is likely that hearing sessions are unlikely to commence until the summer/autumn of 2027.

Plan-making Conclusion

5.25 The national planning system remains plan-led. The government has clearly stated that this will continue as part of their proposals to review the planning system, this is maintained and set out in the latest iteration of the NPPF. Consequently, having an up-to-date adopted Local Plan will place the council in a strong decision-taking position, directing growth to sustainable locations, meet needs in full, optimise opportunities, plan for infrastructure investment, and secure quality place-making. In contrast, the absence of an up-to-date adopted Local Plan places local planning authorities in a weak decision-taking position – with most of potential

control being relinquished to speculative development and the Planning Inspectorate.

5.26 The absence of a plan does not stop development – growth continues to materialise in a largely unplanned manner. In that vacuum, decisions will be taken in accordance with national planning policy and guidance – taking account of housing supply and measured delivery. This is a harmful position in respect of the authority's resources and reputation and is unlikely to address the current issue of removing the decision-taking designation (Section 62A). Likewise, the sustained absence of a Local Plan may ultimately result in further state intervention and direction to continue Plan-making irrelevant of decisions made at Cabinet and Council.

5.27 Therefore, there is a strong incentive to progress the Local Plan through to submission before the new plan-making system takes over in 2027. Should the council not proceed with plan-making under the existing system then they could be exposed to a new system that requires significant changes to the emerging Local Plan.

5.28 Furthermore, failure to secure submission of the emerging Local Plan under the transitional arrangements could expose Hertsmere to the significant risk of a sustained policy vacuum that extends beyond into the new council anticipated under local government reorganisation.

6 Financial and budget framework implications

6.1 Local Plan examinations are likely to see an increase in expenditure due to Inspector and Programme Officer costs. The financial section of the report to Council on 25th March 2026[1] sets out in detail the budgetary arrangements for the Local Plan. It notes that the expected budget is anticipated to cover the costs of an examination alongside all other associated and ongoing costs.

7 Legal Powers relied on and any legal implications

7.1 The Council, in its role as a Local Planning Authority (LPA), is required by Section 15 of the Planning & Compulsory Purchase Act 2004 to prepare and maintain a "Development Plan" for its area. The Development Plan deals with how land is to be used and developed, and other related matters, and LPAs are required by law and the Government's National Planning Policy Framework (NPPF) to identify the strategic priorities for the development and use of land in its area and set out policies to address those priorities in the Development Plan. It is important as it provides the framework for considering planning applications and other matters, such as taking planning enforcement action and negotiating infrastructure provision. An up-to-date Local Plan is likely to result in a reduced number

[1] Agenda for Council on Wednesday, 25 March 2026, 7.00 pm

of speculative planning applications, a better rate of success at planning appeals and improved planning performance, thereby reducing the risk of central government intervention. An up to date and sound Local Plan will also enable the Council to demonstrate a five-year housing land supply and support the presumption in favour of sustainable development as set out in the NPPF in the determination of planning applications.

7.2 The Development Plan can consist of one or more Local Plan documents that cover the LPA's area. The Development Plan can also include Local Plans prepared with other LPAs that cover a wider area such as the adopted Minerals and Waste Plans plus the emerging South-West Hertfordshire Joint Strategic Plan and also any adopted Neighbourhood Plans.

7.3 At present the Local Plan for Hertsmere comprises the following documents:

- The Core Strategy (adopted January 2013),
- Elstree Way Corridor Area Action Plan (EWC AAP) (adopted July 2015);
- Site Allocation and Development Management (SADM) Plan (adopted November 2016);
- Radlett Neighbourhood Plan (May 2021)
- Shenley Neighbourhood Plan (May 2021)
- Hertfordshire County Council Minerals and Waste Local Plans

7.4 Government Regulations and NPPF Paragraph 34 require that Local Plan policies should be reviewed at least once every five years to see if they are still "up to date" when compared to government policy and other matters.

7.5 Further, it is noted in NPPF Paragraph 49 that local planning authorities may give weight to relevant policies in emerging plans according to not only the state of preparation of the emerging plan but also the extent to which there are unresolved objections to relevant policies and the degree of consistency of the relevant policies in the emerging plan to the NPPF.

8 Efficiency gains and value for money

8.1 Having a Local plan in place will increase efficiency in the processing of planning applications by streamlining policy and reducing the risk of planning appeals and inquiries with related costs.

8.2 Having an up-to-date Local Plan can stimulate investment and increase economic activity in the borough which will help support growth.

9 Risk management implications

9.1 Key risks associated with the preparation of the Local Plan have been reviewed and these are included within the LDS Risk Register. There are significant complexities and challenges associated with the preparation of a Local Plan, which is a Council's most important planning document; the changes to the Local Plan risk register reflect these challenges and it will continue to be kept under review. The Local Plan is also an identified risk on the strategic risk register (ref. SO31).

9.2 The key strategic risks to the new Local Plan include:

- **Resources** - Failure to deliver against key project milestones due to an inability to effectively resource the development of the plan both in terms of new staffing and external commissioning within the timeframes set out. There are also risks associated with the inability of external organisations to progress their plan input to meet challenging timeframes due to their own competing resource pressures and priorities.
- **Plan Soundness** - Failure to deliver a sound plan for examination within the timeframe as set out against the soundness tests established under NPPF Paragraph 36, namely positively prepared, justified, effective and consistent with national policy.
- **Legal challenge** - Challenge against non-compliance of legal and procedural requirements, particularly within the context of an evolving strategy and site allocation process.
- **Financial risk** – There is never a guarantee that financial expenditure will result in a sound plan being delivered and progress on plan outputs will need to be closely monitored against the cost of plan production.
- **Delivery Timeline –** delays to decision-making process, democratic timetabling and unfavourable decisions. This is inclusive of recommendations not being agreed at key decision-making moments which will have significant impacts on the ability to meet overall Local Plan timescales.

10 Personnel implications

10.1 These are addressed throughout the report and in the financial and budget implications section.

11 Equalities implications

11.1 Section 149 of the Equality Act 2010 sets out duties which the Council should have regard to regarding people with protected characteristics. These are: Age, Disability, Gender, Race, Religion, Sexual Orientation, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity. Members should have due regard to the duties at section 149, namely the need to:

(a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and

(c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

11.2 The draft Local Plan will set out specific policies to meet the housing needs of older people, disabled adults, and Gypsies, Travellers and Travelling Show people. All of these are a protected characteristic in terms of age, disability and race under the Equality Act 2010. Setting out a timetable to producing a Local Plan is a step towards meeting their needs through a Local Plan.

12 Corporate Plan and policy framework implications

12.1 The Local Plan is one of the most significant strategic documents the Council produces. As such it is a key mechanism to deliver the aims and ambitions of the Council's corporate plan and vison.

13 Asset management implications

13.1 A number of Council-owned assets have been suggested for consideration as allocations in the Local Plan. These sites have been treated and assessed in the same way as those promoted by other landowners/developers. These sites will continue to be considered until a decision is made at the next stage of the Local Plan.

14 Health and Safety implications

14.1 None for the purposes of this report.

15 Background documents used to prepare this report

Document Title:	Filed at:
National Planning Policy Framework	https://www.gov.uk/government/publications/national-planning-policy-framework--2https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf
Planning Practice Guidance	https://www.gov.uk/government/collections/planning-practice-guidance
Town and Country Planning (Local Planning) (England) Regulations 2012	https://www.legislation.gov.uk/uksi/2012/767/contents
Cabinet Report February 2025	Regeneration for Growth Incorporating Local Plan Update and Approval of Revised Local Development Scheme
Council report March	Local Plan Update: Regeneration for Growth

Document Title:	Filed at:
Cabinet Report 13th August 2025	Agenda for Cabinet on Wednesday, 13 August 2025, 6.00 pm
Council Report March 2026	Local Plan Update: Gateway Review March 2026
Council Report April 2026	Consultation: Regulation 18 Local Plan Process

Hertsmere Local Plan

Delivering a better future

Hertsmere Local Plan
Regulation 19 Draft Plan

October 2026

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PART 1

Delivering a better future for Hertsmere

About Hertsmere's Local Plan

Section
A Vision for Hertsmere
The Planning Framework
How the Plan has been prepared
How to Use the Plan
Strategic and Non-Strategic Policies
Next steps

A Vision for Hertsmere

1.1 The Hertsmere Local Plan provides the statutory planning framework for managing growth, investment and change across the Borough.

1.2 Hertsmere is a highly valued place, with distinctive towns and villages, strong communities, important green and historic environments, good links to London and wider Hertfordshire, and a successful local economy. The Borough faces significant challenges over the plan period, including housing need, affordability, pressure on infrastructure, climate change, town centre change, Green Belt constraints, changing work patterns and the need to support healthier, more sustainable communities.

1.3 The Plan's central purpose is to shape growth positively, meet the Borough's needs, directing development to the right places, securing high-quality design, supporting infrastructure, protecting what is valued, and enabling regeneration and renewal. In summary to deliver successful and sustainable places.

1.4 It is important the Hertsmere has a positively prepared and up-to-date Local Plan, as without one, development pressures are more likely to be managed through appeal-led decisions rather than through a locally prepared, evidence-led strategy.

1.5 The commitments of the Hertsmere Local Plan are:

- Meeting housing needs, including affordable housing;
- Making the best use of brownfield and urban land;
- Focusing regeneration and renewal in the most sustainable settlements;
- Supporting town centres and local centres;
- Securing infrastructure alongside growth;
- Protecting the Green Belt as far as possible, while recognising national policy requirements;
- Responding to the climate emergency;
- Improving health, wellbeing, open space and access to nature;
- Supporting jobs, culture, the visitor economy and local enterprise;
- Delivering high-quality design and stronger local identity.

The Planning Framework

1.6 The Hertsmere Local Plan forms part of the statutory development plan for the Borough and will be used to determine planning applications, alongside other relevant and adopted development plan documents and neighbourhood plans.

1.7 Decisions will be taken in accordance with the development plan unless material considerations indicate otherwise. Broadly these will consider:

- National planning policy and guidance;
- The Hertsmere Local Plan;
- The Policies Map;

- Neighbourhood plans;
- Supplementary planning documents;
- Evidence base documents.

1.8 The Local Plan must be considered and read in its entirety. Policies should not be applied in isolation, and proposals may need to satisfy several strategic, development management, settlement-specific and site-specific policies.

1.9 The Hertsmere Policies Map forms part of the Local Plan and identifies geographically specific policy designations, allocations, boundaries and constraints.

Figure 1.1: The Planning Policy Hierarchy

National legislation and national planning policy
Planning Acts **National Planning Policy Framework** **Planning Practice Guidance**
Statutory Development Plan
Hertsmere Local Plan 2026–2041 **Policies Map** **Made neighbourhood plans, where relevant**
Other statutory or formal planning documents
Planning documents prepared by the minerals and waste authority **Any relevant strategic or joint planning documents, if applicable**
Supporting guidance and material considerations
Supplementary Planning Documents **Design codes** **Settlement visions and masterplans** **Infrastructure Delivery Plan** **Sustainability Appraisal, Habitats Regulations Assessment and technical evidence base**

How the Plan has been prepared

Key Stages

1.10 There are several stages and procedures required in the preparation of a local plan. The Hertsmere Local Plan has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, the National Planning Policy Framework and guidance, the Council's Statement of Community Involvement, and other relevant statutory requirements. The process includes consultation and engagement, which is required before a local plan can be submitted to the Secretary of State for independent examination.

1.11 The Hertsmere Local Plan has been prepared through an iterative process of evidence gathering, engagement, consultation, assessment and refinement. Earlier stages of plan preparation have informed the Regulation 19 Publication Local Plan, including previous consultation and engagement exercises, the assessment of potential development sites, consideration of reasonable alternatives, and the preparation of technical evidence to support the spatial strategy, policies and site allocations.

1.12 The Council undertook consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 during the first quarter of 20261. The Regulation 18 consultation invited comments on the emerging Local Plan, including the proposed spatial strategy, planning policy approaches, settlement and place-based policies, candidate site allocations, and reasonable alternatives. The Council has considered the representations received and taken them into account in preparing this Regulation 19 Publication Local Plan

1.13 The key stages of the plan-making process are set out below. This version of the Hertsmere Local Plan is published under Regulation 19 in anticipation of Submission under Regulation 22.

Figure 1.2: Key stages of the plan-making process

Evidence gathering and early
Baseline evidence, technical studies, call for sites, initial engagement.
Regulation 18 Consultation
Consultation on emerging strategy, policies and sites.
Consideration of representations
Review of comments, further evidence, refinement of strategy and policies.
Regulation 19 Publication
Publication of the proposed submission Local Plan for representations on legal compliance and soundness

[1] The Council consulted under the Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 18 during 2020/21 and 2024. These early versions being prepared under different national planning policy contexts.

Regulation 22 Submission
Submission of the Local Plan, representations and supporting documents to the Secretary of State.
Regulation 24 Independent Examination
Examination by a Planning Inspector, who has been appointed to represent the Secretary of State. This includes hearing sessions where required.
Inspector's report
The appointed Inspector advises whether the Plan is sound and legally compliant, including any required main modifications (that are necessary to secure soundness).
Adoption
The Council adopts the Local Plan.

Evidence Base

1.14 The Hertsmere Local Plan is supported by an evidence base made up of technical studies, research reports, assessments, site information, infrastructure evidence and other supporting documents. These have been prepared by the Council and, where appropriate, specialist consultants and partner organisations. The evidence base helps to ensure that the strategy, policies and site allocations in the Local Plan are justified, effective and based on proportionate and up-to-date information.

1.15 The evidence base covers a range of matters relevant to the future planning of Hertsmere, including housing need and supply, employment and economic development, town centres, Green Belt, settlement hierarchy, transport and connectivity, infrastructure, viability, design, heritage, climate change, flood risk, biodiversity, open space, health and wellbeing, and site assessment. The evidence base documents are available on the Council's website.

1.16 The preparation of the Local Plan has also been informed by place-based work for Hertsmere's four main settlements, including settlement visions, master planning and design guidance for Borehamwood, Potters Bar, Bushey and Radlett. These documents help to translate the Borough-wide spatial strategy into more detailed place-based expectations and have informed the relevant settlement policies, site allocations and delivery considerations.

Sustainability Appraisal and other assessments

1.17 A Sustainability Appraisal has been undertaken to inform the preparation of the Local Plan. This is an iterative process that assesses the likely social, economic and environmental effects of the Plan and reasonable alternatives. It helps to identify potential effects at an early stage so that the strategy, policies and allocations can be refined, and promote measures to avoid, reduce or mitigate adverse effects can be incorporated where appropriate.

1.18 The Sustainability Appraisal has considered the emerging spatial strategy, policy approaches, site options and reasonable alternatives. It has been published alongside the Local Plan at key stages of plan preparation, including this Regulation 19 Publication stage.

1.19 A Habitats Regulations Assessment has also been undertaken to consider whether the Local Plan is likely to have significant effects on protected habitats sites, either alone or in combination with other plans or projects. The Council has also prepared an Equalities Impact Assessment to inform the Plan and support the Council's statutory duties.

Tests of soundness

1.20 The Local Plan sets out a positive strategy for managing growth, meeting identified development needs, supporting infrastructure delivery and securing sustainable development across Hertsmere over the plan period. To be adopted, the Plan must be capable of being found sound at independent examination.

1.21 The National Planning Policy Framework2 sets out the tests of soundness that apply to local plans. The Plan must be positively prepared, justified, effective and consistent with national policy. The soundness of the Plan will be assessed by an independent Planning Inspector following submission to the Secretary of State.

1.22 The Council considers that this Regulation 19 Publication Local Plan has been prepared in accordance with the relevant legal and procedural requirements and is capable of being found sound, subject to consideration of representations submitted at Publication, to be considered through the subsequent Examination. The National Planning Policy Framework confirms that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. These tests of soundness are illustrated in **Figure 1.3.**

Figure 1.3: The Tests of Soundness

TESTS OF SOUNDNESS FOR LOCAL PLANS (NPPF, paragraph 36)	
Positively prepared	Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
Justified	An appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence.

[2] The Hertsmere Local Plan has been prepared, consulted upon, published and will be submitted under the transition arrangements for the previous plan-making process. Consequently, the Hertsmere Local Plan will be examined under the National Planning Policy Framework (December 2024).

Effective	Deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
Consistent with national policy	Enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.23 A key consideration for Hertsmere in preparing the Local Plan is ensuring that it meets its housing needs in full to demonstrate that the plan has been positively prepared. Hertsmere's housing requirement is calculated using the standard method set out in national planning guidance. The current housing requirement for Hertsmere is 975 dwellings per year. Further details on the housing requirement are provided in Chapter 7 – Housing.

Duty to Cooperate

1.24 On 2 March 2026 commencement regulations were laid before parliament bringing into effect the Levelling-up and Regeneration Act. This included in the provisions, which came into force on 25 March 2026, the revocation of the Duty to Cooperate. The Duty therefore ceased to apply from 25 March 2026 including where local plans are being prepared under transitional arrangements such as the Hertsmere Local Plan. Despite this, the Government has continued to emphasise the importance of local planning authorities collaborating across their boundaries, including on unmet development needs from neighbouring authorities. Therefore, whilst referring to the Duty to Cooperate, the Council is demonstrating how it has collaborated with partners on cross-boundary strategic matters and the steps it has taken to ensure effective cooperation in the preparation of the new Local Plan.

1.25 The Council has a sought to corporate with neighbouring local planning authorities, Hertfordshire County Council, prescribed bodies and other relevant organisations in relation to strategic matters that cross administrative boundaries. These matters include housing need, employment land, transport, infrastructure, education, healthcare, utilities, Green Belt, green infrastructure, biodiversity, flood risk and other strategic planning issues.

1.26 The Council has engaged constructively, actively and on an ongoing basis with relevant authorities, infrastructure providers and prescribed bodies during the preparation of the Local Plan. This engagement has informed the spatial strategy, infrastructure planning, evidence base and policy approach. The outcomes of this engagement are set out in the Council's Duty to Cooperate Statement and Statements of Common Ground.

1.27 The Council continues to work with neighbouring authorities, Hertfordshire County Council, infrastructure providers, statutory bodies, local communities and delivery partners through the examination, adoption and implementation of the Local Plan.

How to Use the Plan

1.28 The Local Plan sets out a vision, strategic objectives and planning policies that together provide the overarching framework for the delivery of sustainable development in the Borough. It covers the period from 2026/27 to 2042/43.

1.29 Those with an interest in the Hertsmere Local Plan should:

- Read the Local Plan as a whole.
- Begin with the spatial strategy and key diagram, then consider the relevant Borough-wide policies, settlement policies, site allocation policies and Policies Map designations.
- Note that the Local Plan is organised into five main parts:
  - **Part 1** context, vision, objectives and spatial strategy;
  - **Part 2** borough-wide planning policies for managing development;
  - **Part 3** place-based policies for Hertsmere's towns and places;
  - **Part 4** delivery, infrastructure, implementation and monitoring;
  - **Appendices and schedules** provide supporting information, definitions and policy lists.
- Note that site allocations do not remove the need to satisfy other relevant policies, including design, heritage, transport, flood risk, biodiversity, infrastructure, viability and delivery requirements.
- Consider the supporting documents such as the Settlement visions/masterplans/design guidance because:
  - They translate the spatial strategy into more detailed place-based expectations;
  - They help guide regeneration, intensification and site-specific development;
  - They support policies for Borehamwood, Potters Bar, Bushey and Radlett;
  - They should be used to inform development proposals, pre-application discussions, masterplans and design responses.
- Note that where there is tension between policies, proposals will be assessed having regard to the development plan, national policy, site circumstances and material considerations.

Strategic and Non-Strategic Policies

1.30 The Council is legally required to identify the strategic priorities for the development and use of land in the Borough, and to set out policies to address these in the Local Plan. The National Planning Policy Framework is clear that local plans should identify and clearly distinguish strategic policies from other non-strategic policies.

1.31 Those with an interest in the Hertsmere Local Plan should note that:

- The Local Plan contains both strategic and non-strategic policies. These are clearly identified.
- Strategic policies are those that set the overall strategy for the pattern, scale and quality of development across the Borough, including the homes, jobs, infrastructure, environment and places needed over the plan period.
- Non-strategic policies are more detailed policies used to manage particular forms of development, local design matters, site-specific requirements or detailed development management issues.
- Strategic policies provide the framework for neighbourhood plans, site allocations, infrastructure planning, master planning and development management.
- Non-strategic policies support the delivery of the strategic policies and provide detailed criteria for assessing planning applications.
- A full schedule of strategic and non-strategic policies is included in Appendix 3 for ease of use.
- The distinction does not imply that non-strategic policies are less important. All adopted policies form part of the development plan and must be applied where relevant.
- The National Planning Policy Framework states that the tests of soundness are applied to non-strategic policies in a proportionate way, taking account of their consistency with relevant strategic policies.

Next steps

1.32 Following the publication of the Hertsmere Local Plan under the Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 19 it is anticipated that the plan-making process will take the following path:

- Representations received at Regulation 19 will be submitted to the Secretary of State alongside the Local Plan and supporting documents. This is in accordance with Regulation 22.
- An independent Planning Inspector will be appointed to examine the Plan on behalf of the Secretary of State. They will assess whether the Plan has been

prepared in accordance with legal and procedural requirements and whether it is sound. Government guidance confirms that the local plan examination considers legal/procedural compliance and soundness.

- Following examination, the Inspector may recommend main modifications where necessary to ensure that the Plan is sound and legally compliant.
- Once adopted, the Hertsmere Local Plan will replace relevant existing adopted policies and become the principal planning framework for the Borough.

Hertsmere Today and into the Future

Section
Introduction
Location
Population
Deprivation and Inequality
Character, Heritage and Culture
Housing
Economy
Green and Blue Infrastructure
Environment
Transport and Connectivity
Health and Wellbeing

Introduction

2.1 This section provides an overview of Hertsmere in the context of the wider Hertfordshire area. It draws on the latest available information to provide a snapshot of the Borough and its people looking at the current situation and considering future trends. This information highlights some of the main challenges and opportunities for the Local Plan to address.

Location

2.2 Hertsmere is a south Hertfordshire borough, located to the east of Watford and south of St Albans. It shares a boundary with other Hertfordshire authorities, Three Rivers to the west and Welwyn Hatfield to the north. To the south the Borough is bordered by the London boroughs of Barnet and Harrow and to the east the London Borough of Enfield.

2.3 As shown on Figure 2.1, Hertsmere benefits from good strategic transport links[1] into London and the rest of Hertfordshire, and beyond into Bedfordshire and Cambridge.

[1] This specifically refers to the railway and strategic highway networks.

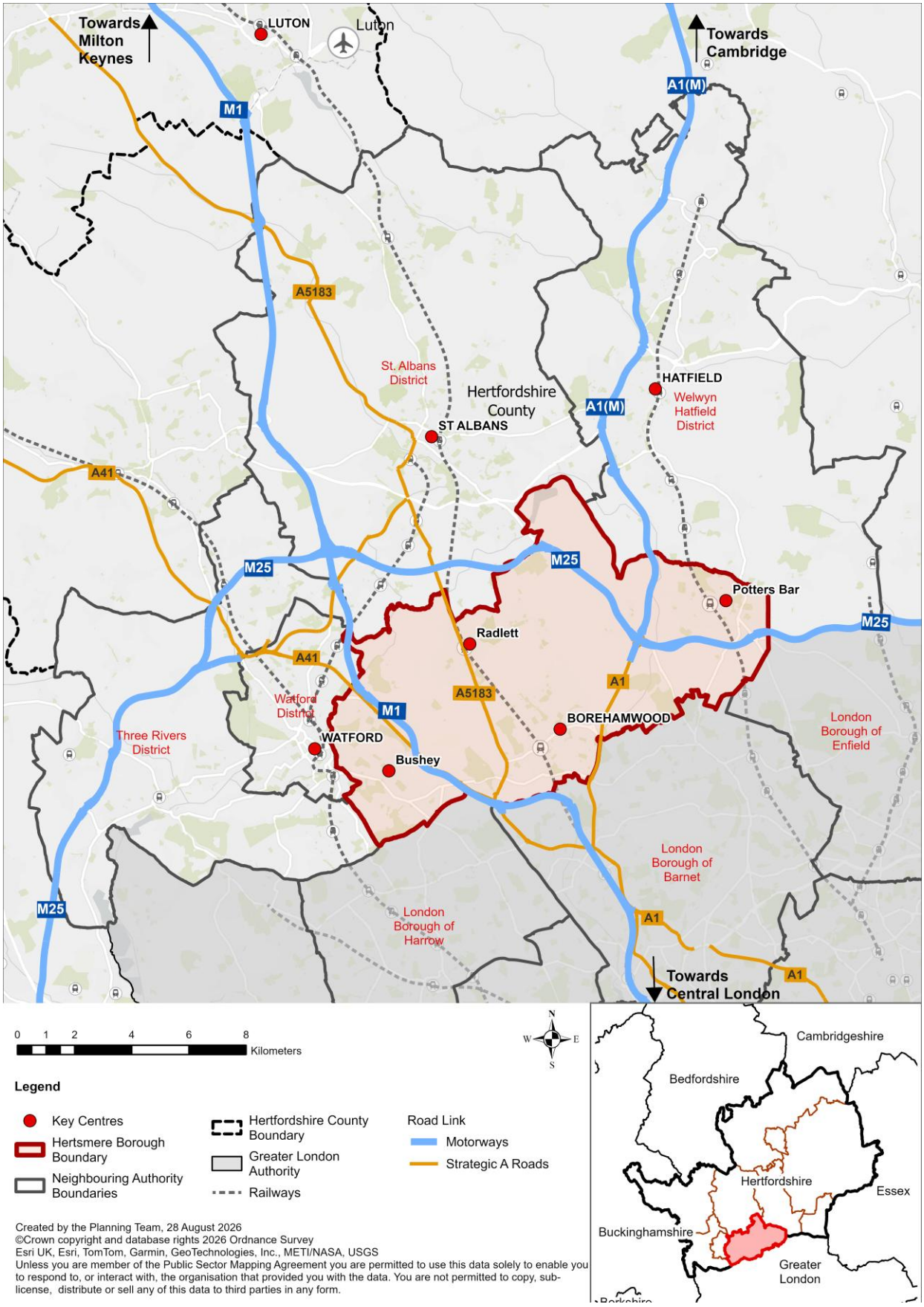

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Figure 2.1 Hertsmere in a South-West Hertfordshire Context

Population

2.4 Like other boroughs across Hertfordshire, Hertsmere is experiencing population growth. The Borough's population grew from 94,762[2] in 2001 to an estimated 110,212[3] people in 2024, an increase of roughly 16.3% over a period of 25 years.

2.5 Hertsmere has an ageing population, with 40.8% of residents being between 40 and 69 years of age. It is a predominantly middle-aged working population, with the median being 41 years of age.

2.6 According to the Office for National Statistics, the Borough's population is forecast to rise to 113,007 by 2032. The median age of residents is also set to rise to 42 years of age from 41. It is projected that by 2032, the percentage of people aged 18 years and under is set to rise from 22% to 24% but the percentage of the working age population is set to remain around 62%[4].

2.7 Since 2011 the population has witnessed an increase of 17.6% in people aged 65 years and over, an increase of 5.7% in people aged 15 to 64 years, and an increase of 7.5% in children aged under 15 years[5].

2.8 Hertsmere has a predominantly white population, with 75% of residents stating their ethnic group as white. The second most prevalent ethnicity identified themselves within the group 'Asian, Asian British or Asian Welsh' at 10.5%[6].

2.9 Across the Borough, Christianity is identified as the main faith grouping, with 41.8% of Hertsmere residents describing themselves as Christian. The Borough is home to several Jewish communities, and conversely 17% of residents described themselves as Jewish, which equates to a rise from 14.3% the decade before[7].

Deprivation and Inequality

2.10 Hertsmere is a place of stark contrasts in so much as it contains areas of wealth as well as deprivation. Out of the 62 neighbourhoods in Hertsmere, 17 of these sit within the top 20% least income deprived neighbourhoods in the country. However, evidence demonstrates that the Borough has pockets of income deprivation in Borehamwood and other settlements. For example, Cowley Hill in Borehamwood is in the 20% most income deprived neighbourhoods[8].

2.11 Within these areas, child poverty/poverty is an issue, and it is noted that approximately 10% of children resident in Hertsmere are in relative poverty, before housing costs are considered. This rises to about 20% of children when housing

[2] Office for National Statistics 2001
[3] Office for National Statistics 2024
[4] Subnational population projections for England - Office for National Statistics
[5] How life has changed in Hertsmere: Census 2021
[6] How life has changed in Hertsmere: Census 2021
[7] How life has changed in Hertsmere: Census 2021
[8] Department of Health and Social Care

costs are applied. Nevertheless, it is highlighted that this is lower than the wider scale of child deprivation for the East of England; in which 15% of children live in relative poverty before housing costs, rising to approximately 24% after housing costs are applied[9].

2.12 Physical activity can be a key determinant of health and wellbeing as obesity is linked to many serious risks. Approximately a quarter of Hertsmere's adult population is considered overweight or obese. Childhood obesity is an issue in Hertsmere. During the period 2024/2025 some 22% of school children in reception class were categorised as overweight or obese, rising to 32% in Year 6[10].

Character, Heritage and Culture

2.13 Hertsmere is characterised by four distinct settlements, the towns of Borehamwood, Potters Bar, Radlett and Bushey. These are well established and each have their own neighbourhoods, town centres and communities. There are further smaller settlements across the Borough, each with their own unique character but reliant on the services provided by the four main settlements.

2.14 Hertsmere has a long history, with some settlements tracing their origins to Roman and medieval periods. Hertsmere has been the scene of many important historical events, including the significant Battle of Barnet in 1471, which effectively concluded the War of the Roses. There are 15 conservation areas in Hertsmere and 325 statutory listed assets, including historic buildings, parks and gardens.

2.15 Hertsmere saw substantial growth during the inter-war and immediate post-war periods. Notably during the 1950s the Borough experienced growth that met and accommodated housing need emanating from London. Today, Hertsmere's places are characterised by a mix of historically important buildings and more modern developments that collectively contribute towards meeting the needs for services that serve the wider Hertfordshire and north London area.

2.16 The Borough has made a significant contribution towards the film and television industry, which continues to have a significance in Hertsmere. Notably, Borehamwood and Elstree have been home to Elstree Studios, since 1941. The studios have been responsible for many internationally successful, and culturally significant films such as Star Wars IV - A New Hope, The Shining and Raiders of the Lost Ark. In addition to global blockbusters, successful television productions such as The Crown, Strictly Come Dancing and The Voice UK continue to be filmed at Elstree Studios.

2.17 Other film and television studios, in Borehamwood, include Sky Studios and BBC Studios, which are notable for internationally successful films such as Wicked, and the location of the EastEnders Albert Square set.

[9] Department of Health and Social Care
[10] Department of Health and Social Care

Housing

2.18 Housing affordability is an issue across Hertsmere. Hertsmere is a desirable place to live due to good connections to London and home counties. As a result, housing prices are high in comparison to the national average of £285,000[11]. House prices across the Borough are above the national average, costing £555,000[12]. In some parts of the Borough, for example in Radlett and Aldenham, the average house price is significantly higher at £1,002,500[13].

2.19 The average income for residents in Hertsmere is £45,103. This results in a ratio of house price to average income in Hertsmere of 11.9. It is highlighted that for residents in Radlett this ratio increases significantly to 22.2[14]. The Council's assessment of technical evidence suggests that some parts of Borehamwood are more affordable than the rest of the Borough, whilst Radlett is shown as being more expensive.

2.20 In parallel to the matter of affordability, the Borough is experiencing a rise in the private renting sector in terms of demand and cost of rents. From May 2025 to May 2026 private rents rose by 2.6% higher than the average for the East of England. There has also been a 4.8% rise in privately rented homes between 2011 and 2021, from 12.5% to 17.3%.

2.21 Hertsmere's housing tenure is significantly varied across its four main settlements. It is noteworthy that 33.5% of Borehamwood households, and 31.1% of Bushey households reside in flatted accommodation. In contrast, 51% of households in Radlett reside in detached properties and 48.8% of households in Potters Bar reside in semi-detached properties[15].

Economy

2.22 Hertsmere has a strong and diverse economic profile. Employment trends over the past decade show both growth and decline across different sectors. Real estate activities have experienced the greatest expansion, with employment rising by 140%. Professional, scientific and technical activities have also grown strongly, up by 80%, further reinforcing the Borough's status as a hub for knowledge-intensive industries. Accommodation and food service activities are also on the increase, having expanded by nearly 29%. Public administration and defence, construction, arts, entertainment and recreation have all seen growth, contributing to the area's economic resilience and diversity[16].

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[11] Land Registry and ONS House Price Index – other sources, including Zoopla, suggest a lower average house price at about £271,900.
[12] Office for National Statistics
[13] How affordable are homes in your neighbourhood? - Office for National Statistics
[14] House price to residence-based earnings ratio ONS March 2026
[15] Hertsmere Local Housing Need Assessment 2025
[16] Hertsmere Economic Study

2.23 Professional, scientific, and technical activities represent the largest share of employment in Hertsmere, accounting for over 15% of all jobs. The jobs present in Hertsmere demand a highly skilled workforce - as shown by businesses engaged in research, consultancy and technical services. A further 13% of the economy is based on wholesale and retail trade as well as the repair of motor vehicles. Construction is another major employer, representing nearly 12% of local jobs[17].

2.24 It is noteworthy that many Hertsmere residents work beyond the Borough's administrative boundary – notably commuting outward towards jobs in Central and Greater London, and towards neighbouring employment centres in St Albans and Watford. Conversely, it is noted that there are good strategic public transport links that enable such onward commuting patterns and make Hertsmere a highly accessible employment location for those travelling into the Borough for work.

2.25 It is noted that the Borough also enjoys a high level of access to the Strategic Road Network, which has contributed to its success as a location for strategic industrial employment uses, including those associated with manufacturing, and storage and distribution. In the past five years, the Borough has also become a focus for data centres, whilst the latter are not high intensity employment uses, they are a critical component of national infrastructure.

2.26 Hertsmere's resident film and television industries have also benefited from this growth. This is evidenced by significant investments by the industry; with £15.6 million directed towards the development of the Platinum Stages in Borehamwood. The latter providing training and apprenticeship opportunities in film and TV production[18]. This demonstrates the importance of the film and television industry for the Borough, which represents between 0.9% and 2% of all available employment in the Hertsmere depending on the year.

2.27 It is noted that 39.6% of residents in Hertsmere aged 16 or over benefit from a qualification at NVQ4 level or above. This is higher than the East of England (31.6%) and the national average (33.9%). In contrast it is noted that only 16.0% of residents in Hertsmere hold no qualifications, which is lower than the national average (18.1%)[19].

2.28 The Annual Survey of Hours and Earnings shows that the median annual gross pay for full-time workers who reside in Hertsmere was £42,168[20] in 2024, higher than the average across the East of England and England as a whole[21].

[17] Hertsmere Economic Study
[18] Elstree Studios' £15.6 million expansion in Borehamwood | Borehamwood Times
[19] ONS Census 2021 & 2011: Highest Level of Qualification
[20] ONS (2024); Annual Survey of Hours and Earnings.
[21] Hertsmere Economy Study 2025

Green and Blue Infrastructure

2.29 Despite its settlements benefiting from being close to large areas of open countryside, access and connectivity to green and blue infrastructure networks is limited across Hertsmere. The Borough's settlements have their own parks and open spaces, but these lack coherent access and connectivity with each other or to surrounding uses. It is noteworthy that much of the Borough's open natural land is either in private ownership or has limited public access. This results in relatively poor access to recreational green space[22].

2.30 Hertsmere has a single Site of Special Scientific Interest (SSSI) at Redwell Woods[23]. This is primarily comprised of ancient woodland and is designated as an area of Particular Importance for Biodiversity within the Hertfordshire Local Nature Recovery Strategy (LNRS). The latter seeking to restore the Borough's populations of protected species; including Nightingales, Swifts and rare arable plants[24] that are characteristic of Hertsmere as a place.

2.31 There are other pockets of ancient woodland to the north and west of the Borough, including Combs Wood and Hounds Wood[25]. Furthermore, the Borough has an active designated habitat bank, with additional provision in preparation on the Aldenham Estate.

2.32 Blue infrastructure, whilst currently not celebrated, is present across the Borough, notably including protected chalk streams and Aldenham Reservoir.

Environment

2.33 There is substantial evidence that climate change, because of human activity, is linked to increasing frequency and intensity of extreme weather events. It is broadly accepted as one of the key challenges now facing the world with carbon emissions as a key contributory factor. In response, Hertsmere Borough Council declared a climate emergency in 2019. It has subsequently implemented its Climate Change Strategy and Action Plan in 2025. This seeks to reduce the Borough Council's own emissions to net zero by 2050. To date, emissions have reduced by 37% from 2005 and 9% since declaring the climate emergency in 2019[26].

2.34 Across Hertsmere, almost 50% of emissions are produced by transport, 24% by domestic energy consumption, this is followed by commercial energy use, disposal of waste and the industrial/public sector. It is highlighted that CO2 emissions in

[22] Green Infrastructure Map
[23] Sites of Special Scientific Interest (England)
[24] Hertfordshire Local Nature Recovery Strategy 2025
[25] Ancient Woodland (England)
[26] Climate Change and Sustainability Strategy 2025

Hertsmere are 5.8t per capita – higher than the East of England and the National average.

2.35 It is noted that private cars and vans are the most frequently used modes of transport in Hertsmere. Whilst travel by walking over short distances is a common practice for residents, reliance on cycling and public transport remains low. Currently cycling accounts for only 1-2% of journeys, travel by buses 3-5% and trains 2-3%[27].

2.36 In addition to the above, domestic energy consumption across Hertsmere is significantly higher than either the East of England or the National average. It is further noteworthy that this level of consumption has not reduced at the same rate as the rest of the country over the past 20 years.

Transport and Connectivity

2.37 There is significant reliance on private vehicles for travel across Hertsmere with private cars and vans the primary modes used by Hertsmere's residents. This in part reflects the Borough's hinterland location – relative to Greater London. In contrast to the global city to its immediate south, Hertsmere places and settlements are dispersed across open countryside, and do not enjoy the same level of access or frequency to public transport opportunities. Consequently, the Borough experiences relatively poor local transport connectivity between its four main settlements

2.38 The Borough does benefit from a very high level of accessibility to the Strategic Road Network, inclusive of the A1(M), M1 and M25, all of which pass and connect through the Borough. These strategic networks provide excellent access, for private vehicles, to Greater London, the East of England and beyond. These major roads are supported by a series of secondary and primary level roads which are used on a more local level.

2.39 The Borough benefits from three railway stations, these are located at Elstree and Borehamwood, Radlett and Potters Bar. These provide essential links to Central London (Kings Cross St Pancras and London Bridge), St Albans and Cambridge. Furthermore, Bushey and Watford railway stations are both located close to the Borough's western boundary. Access to London's Underground Network is also available from tube stations located at Bushey, Oxhey, Cockfosters, High Barnet and Stanmore. These being most accessible to residents in the south of the Borough.

2.40 There are several bus operators that operate in Hertsmere, including Transport for London, Arriva, Uno, Metroline and smaller operators, Red Eagle, Rad Rose and Sullivan's. Routes connecting into London tend to be better served and more frequent than others that are focused on servicing the places between Hertsmere's settlements or beyond to the rest of Hertfordshire[28].

[27] Herts traffic and transport Data Report 2024.
[28] Hertsmere Sustainable Transport Appraisal and Outline Settlement Transport Studies

2.41 The Borough is served by several national walking and cycling networks, however, these are somewhat fragmented or not suitable for everyday use. Alongside the new Local Plan, the Borough Council is working in partnership with Hertfordshire County Council to bring forward a Local Cycling Walking and Infrastructure Plan (LCWIP) for Hertsmere. Upon implementation this will deliver improvements to the Borough's walking and cycling networks to make them genuine alternatives for everyday travel, either between places or to improve access to public transport nodes, such as existing railway stations and bus interchanges.

Health and Wellbeing

2.42 Increasing accessibility and resilience of health and wellbeing infrastructure is a key part of the Hertsmere Local Plan and achieving successful and sustainable place-making. This is not just limited to investment in conventional healthcare provision such as hospitals, surgeries, dentists, and clinics, and consequently the new Local Plan considers this a common thread throughout all its content.

2.43 Nevertheless, it is acknowledged that Hertsmere's residents and communities have distinct healthcare needs, such as those related to obesity, diabetes, hypertension and stroke, which can be addressed and overcome through investment in healthcare facilities. Consequently, place-making will seek to secure an appropriate level of provision for the required social infrastructure to support planned-for growth.

2.44 It is noted that Hertsmere has a significantly higher percentage of residents that described themselves as generally healthy (40.9%), in comparison to the rest of South West Hertfordshire (22.8%). Nevertheless, there is a strong link between areas of deprivation within the borough and conditions such as obesity, insufficient physical activity and smoking. Hypertension is the most reported chronic health condition, with 15.3% of the population reporting this, followed by 8.2% of the population reporting a history of depression. It is noted however that both figures are lower than the rest of South West Hertfordshire[29].

2.45 During the plan period it is anticipated that an increasingly ageing population will present its own challenges in terms of successful and sustainable place-making. Ensuring that the Borough is an inclusive place for its elderly residents will secure health and wellbeing benefits for all residents and communities.

[29] Hertfordshire and West Essex Neighbourhood Pack – Hertsmere

Vision, Strategic Objectives, and Spatial Strategy

Section

Hertsmere Vision: Delivering Better Futures

Strategic Objectives

HBF 1 Delivering a Better Future for Hertsmere

Hertsmere Vision: Delivering Better Futures

3.1 The Hertsmere Local Plan is focussed upon delivering the Hertsmere Vision – Delivering Better Futures.

Hertsmere is a place where vibrant towns, green spaces and close-knit communities come together. We are investing in homes, businesses and community life to build a greener, fairer and more prosperous future — all while staying connected to the energy of the city and the heart of our community spirit. Working hand in hand with our residents, we are shaping a future where every generation can call Hertsmere home.

3.2 The Hertsmere Vision – Delivering Better Futures will be applied by the Council across four themes. These are:

Table 3.1 Hertsmere Vision: Delivering Better Futures themes

Growing Opportunity
Powered by Community, Driven by Ambition - We are shaping Hertsmere into a Borough of opportunity – where people can live securely, work successfully, and enjoy green, sustainable and vibrant communities, close to the heart of the city.

Strong Homes, Secure Futures
Creating secure, affordable homes for every generation - We are committed to increasing access to social and affordable housing, ensuring that everyone in Hertsmere has a place to call home – now and in the future.

Community Equals Place
Safe, Sustainable, Successful – Together in Hertsmere - Hertsmere's strength lies in its people and places. Together, we are building a Borough that balances green living, economic vitality, and a strong, supportive community for generations to come.

Delivering Excellence
Strong foundations for smarter services - We are strengthening the way we work to deliver better outcomes for residents. We will modernise processes, improve efficiency and create a council that is ready to meet the future with confidence.

Strategic Objectives

3.3 To ensure alignment with the Vision, and to deliver a better future for Hertsmere, the Local Plan translates the four themes into a series of Strategic Objectives (see Table 3.2). The Strategic Objectives form a link between the Hertsmere Vision and the Local Plan Spatial Strategy. They address the key challenges facing the Borough now and over the long-term and represent the main delivery outcomes sought through the implementation of the Local Plan.

3.4 The Local Plan's Strategic Objectives have been informed by and reflect the Council's key objectives, including the Corporate Vision and Plan 2026-2028, along with those published by our partners and other key stakeholders. The Objectives have been directly translated from the four themes set out under Table 3.1.

3.5 The Hertsmere Vision helps to frame the Local Plan's Strategic Objectives, which are presented across themed topic areas. The objectives have been set out this way for organisational purposes and are not listed in order of priority. Many of the individual objectives are crosscutting in that they address more than one of the topic areas.

3.6 The Strategic Objectives are used to provide a clear link between the Local Plan's Spatial Strategy; it's Planning Policies and Site Allocations. Consequently, each policy and allocation identifies which of the Strategic Objectives will be met through their implementation. These are signalled at the start of each policy and allocation.

Table 3.2 Hertsmere Local Plan – Strategic Objectives

Growing Opportunity **Powered by Community, Driven by Ambition**	
A	**Delivering a better future for Hertsmere -** Where vibrant towns, green spaces and close-knit communities come together. We are investing in homes, businesses and community life to meet needs[1], build a greener, fairer and more prosperous future — all while staying connected to the energy of the city and the heart of our community spirit. Working hand in hand with our residents, we are shaping a future where every generation can call Hertsmere home.
B	**A thriving local economy -** Strengthen Hertsmere's role in the wider economy by expanding the local business base; particularly in relation to the Borough's prominent role as a centre for the national and international film and television industry. Steer investment to town centres and other employment hubs and support the growth of sectors in which the Borough maintains or is poised to perform a key role, including the cultural, creative and digital industries. Enable the development of modern green industry and promote the greening of existing industries to reduce their environmental impacts and support the transition to a low carbon, circular economy.
C	**The regeneration of Borehamwood and Potters Bar –** Secure and deliver the regeneration of Borehamwood and Potters Bar Town Centres that transforms them as successful and sustainable places that sit at the heart of their respective communities. Ensure that the delivery of new homes, main town centres, employment opportunities, community infrastructure and public realm improvements are optimised so that they collectively contribute towards regeneration.
D	**Support a well-educated and skilled population –** Ensure that businesses have the necessary support they need to grow; specifically, through the delivery of a range of activities and events including networking, training and skills development.
Strong Homes, Secure Futures **Creating secure, affordable homes for every generation**	
E	**Meet the Borough's housing needs[2] by delivering homes for everyone -** Ensure Hertsmere's existing and future residents benefit from good access to a wide range and mix of high-quality housing, including genuinely affordable housing, which is tailored to meeting the varied needs of the community. This includes the needs of those from all age groups and at different stages of life, families and those with specialist housing requirements.
F	**Delivering affordable homes -** Optimising the delivery of affordable housing to meet identified need.
Community Equals Place **Safe, Sustainable, Successful – Together in Hertsmere**	

[1] The Local Plan seeks to provide a framework that ensures that new development meets the Borough's needs. These include the delivery of new homes; employment floorspace; main town centre uses; and social and community infrastructure.
[2] The baseline for calculating housing requirements is the national standard method, which identifies the need for all of England's plan-making authorities. The standard method calculation is responding to the national housing crisis.

G	**Securing a greener Borough –** Ensure all people across Hertsmere benefit from access to high-quality green spaces by protecting, enhancing and connecting the Borough's network of parks, open and water spaces. Promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets - including trees, green spaces and water spaces - and seek to enhance existing assets or make new provision through new development wherever opportunities arise. Address the decline in the number and distribution of species and deliver Biodiversity Net Gain across the Borough.
H	**Responding to the climate emergency -** Realise long-term reductions in energy use and carbon emissions in helping Hertsmere to reach its zero-carbon target by 2050. Increase the use of sustainable transport modes (including walking and cycling) and ensure that new development is designed to reduce car use, maximise energy efficiency, and integrate greening measures to limit the urban heat island effect.
I	**Celebrating our local identity -** Ensure that all new development responds positively to the special attributes of its local context – including the cultural, historic, built and natural environment. Secure and deliver new development that is designed, constructed and maintained to a high-quality standard. Make the optimal use of land and, where appropriate, facilitate the regeneration and renewal of localities within the Borough's four main towns. Set a positive framework for conserving and enhancing the Borough's historic environment that promotes its understanding and appreciation.
J	**Healthy and safe communities –** Create an environment that encourages and enables people to pursue active and healthy lifestyles irrespective of their age, ability or income, including by applying the Healthy Streets Approach, making provision for accessible leisure and recreation opportunities and protecting the amenity of residents and visitors, particularly from pollution. Promote cohesive and mixed communities along with walkable and liveable neighbourhoods by ensuring development is carefully integrated and designed to secure high-quality, legible and permeable spaces that are inclusive and easy to access by everyone. Create safer neighbourhoods and improve perceptions of safety by ensuring the built environment comprises of welcoming spaces and places and that new development both designs out crime and improves resilience to emergencies.
Delivering Excellence **Strong foundations for smarter services**	
K	**Securing the timely delivery of infrastructure -** Provide the essential physical, community and green infrastructure needed to support growth and sustainable places, by coordinating investment and securing the timely delivery of new infrastructure, including using Community Infrastructure Levy funding and planning contributions.

HBF 1 Delivering a Better Future for Hertsmere (spatial strategy)

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
C The regeneration of Borehamwood and Potters Bar
D Support a well-educated and skilled population
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

The Council will work positively and alongside local communities, community groups, and other public and private sector stakeholders to realise the Hertsmere Vision and to address the strategic objective for 'Delivering a Better Future for Hertsmere'. Successful and sustainable places will be delivered in the Borough, over the plan period, by:

a. Directing new development to the Regeneration Nodes, opportunities and well-connected sites within Borehamwood and Potters Bar and carefully managing growth in these locations in response to local character. Regenerative growth will support their vibrancy, vitality, viability and long-term resilience as places, and through this process will:

   i) Secure comprehensive regeneration across Borehamwood so that it serves Hertsmere as a centre for growth, in respect of employment, leisure, cultural and main town centre uses. The managed delivery of employment provision will ensure that Borehamwood maintains its position as a key centre for film and television production.

   ii) Facilitate the comprehensive regeneration of Potters Bar's town centres so that they can support the growth directed towards the town.

b. Directing new development to the Growth Nodes located around the Borough's four main towns and carefully managing growth in these locations in response to local character. Ensuring that the opportunities are fully optimised and delivered in a timely manner to provide at least a rolling five-year land supply for growth over the plan period.

c. Directing new residential, commercial, community, leisure and cultural development at an appropriate and proportionate scale to locations within Bushey and Radlett's existing town and local centres to maintain and enhance their vibrancy, vitality, viability and long-term resilience.

d. The opportunity for a new settlement on land known as Bowman's Cross will deliver a source of strategic housing supply. The new town will serve as an important delivery vehicle that sustains the step-change in housing supply and delivery into the next plan period. The delivery of the new settlement will secure necessary infrastructure network and capacity improvements.

e. In all other locations within the four main towns, small scale residential development in existing residential areas, will be positively considered. Such proposals will be considered in accordance with the approach towards small housing sites. Proposals involving larger windfall sites will be considered in accordance with relevant local plan policies, specifically in respect of their impact on the wider townscape character and their ability to access transport and infrastructure networks.

f. The Borough's smaller settlements are inappropriate and unsuitable locations for further growth during the plan period. Proposals for major housing development in these places will be resisted and will be directed towards the Borough's four main towns. Proposals for single infill dwellings that deliver self or custom build housing and/or deliver affordable housing that meets specific local needs will be considered on their merits.

g. Enabling new and improved infrastructure as a catalyst for investment and to unlock the development potential of sites across the Borough. Ensuring that new development delivered at the Borough's existing four main towns, and at the new Bowman's Cross settlement make an appropriate contribution towards the timely delivery of local infrastructure.

h. Making the best use of land and space by prioritising the redevelopment of brownfield/previously developed land and enabling the sensitive intensification of established residential neighbourhoods and commercial areas, including through the development of small urban sites located within the Borough's four main towns.

i. Ensuring all new development proposals follow the design-led approach to make the optimal use of land, respond positively to local distinctiveness (including the historic, cultural, natural and built environment), and helps to secure inclusive, safe, liveable, walkable and healthy neighbourhoods.

j. Protecting, enhancing and connecting Hertsmere's network of green and blue infrastructure (including trees, parks and open spaces, water spaces and biodiversity), as well as improving access to it by walking and cycling; and

k. Ensuring that a strategic and coordinated approach is taken by the Council and its partners to respond to the climate emergency and requiring new development to integrate measures for climate change adaptation and mitigation.

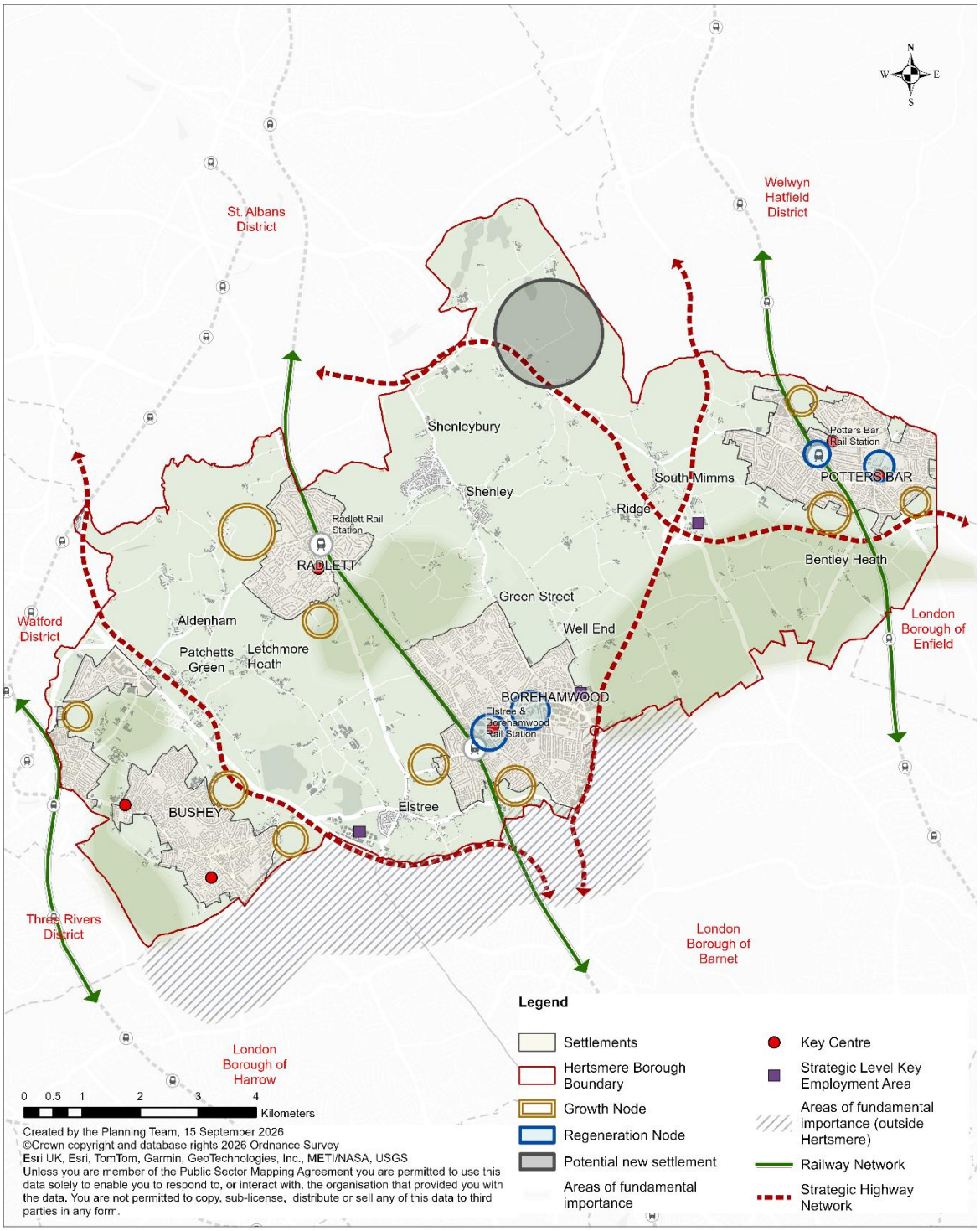

Figure 3.1 Hertsmere Spatial Strategy

Explanation

Regeneration Nodes and Opportunities:

3.7 This is the overarching policy for the Local Plan and is the starting point for achieving the Hertsmere Vision and responding to the plan's strategic objectives. It sets out the Spatial Strategy for the Borough. This is the land use and planning framework for the Council and its partners to manage growth and development, meet the Borough's needs, and to guide new investment in infrastructure up to 2043. It will help to ensure that successful and sustainable places are delivered in a way that responds to Hertsmere's distinctiveness as a place. The Spatial Strategy seeks to achieve this objective by identifying a hierarchy of places across the Borough where sustainable development will be directed. This includes those places identified in Figure 3.1 as being regeneration nodes, growth nodes, and a location for a new settlement.

3.8 The Local Plan's Spatial Strategy identifies Borehamwood Town Centre and Elstree Way and Potters Bar's town centres as Regeneration Nodes. These are identified on Figure 3.1. The urban areas, within both Borehamwood and Potters Bar, also contain well connected opportunities for accommodating optimised growth. They are already sustainable and successful places that have the capacity to be the focus of future growth during the plan period. They already have a sustainable mix of residential, main town centre and employment uses and good public transport connections that can be future improved through the delivery of sustainable growth. The Local Plan's Spatial Strategy, planning policies and site allocation seek to direct future growth and investment towards these places. Their highly sustainable nature provides them with the potential capacity to facilitate the delivery of growth at higher intensities.

3.9 Borehamwood and Potters Bar's identified Regeneration Nodes include several site allocations that seek comprehensive redevelopment of previously developed urban land. Evidence demonstrates that these site allocations, which are identified under the Local Plan's Part 3, are available, deliverable and developable during the plan period. Their delivery will contribute towards the realisation of the Spatial Strategy.

3.10 In addition to the Regeneration Node site allocations, the Local Plan-making process identified further opportunities for regeneration across Borehamwood and Potters Bar. These opportunities include several large well-located urban sites currently in a single low-intensity use; notably, the Tesco food store in Borehamwood Town Centre, and the Sainsburys food store in Potters Bar. Although these sites are not currently available, they remain as opportunities that could come forward during the plan period. The Council will seek to ensure that such opportunities contribute towards the implementation of the Spatial Strategy should they become available during the plan period.

Growth Nodes:

3.11 The Spatial Strategy's growth hierarchy continues by directing future development towards the Growth Nodes located across the Borough. These are located on sites immediately adjacent to the Borough's four main towns and are shown in Figure 3.1. The Plan seeks to direct a proportionate level of growth towards these locations that reflect their potential capacity as defined by their character and infrastructure.

3.12 The Borough's Growth Nodes will be delivered through a suite of site allocations that will provide extensions to the Borough's four main towns. The Growth Nodes will deliver an appropriate and proportionate mix of uses including residential, main town centre, employment, open spaces, community infrastructure and transport. Development across the Growth Nodes will be optimised to ensure that they deliver at least a rolling housing land supply over the course of the entire Local Plan period.

3.13 All the Growth Node site allocations are adjacent to the four main towns. They are characterised as countryside that is designated as Green Belt. The Borough's plan-making process has considered and assessed their potential to accommodate and delivery new development over the plan period. This has included a full consideration of their performance against the purposes of Green Belt. The Local Plan and its Spatial Strategy consider the Growth Nodes sites as being necessary to meet the Borough's needs and consequently seeks their release.

Hertsmere's Four Main Towns:

3.14 The Borough's four main towns of Borehamwood, Potters Bar, Bushey and Radlett are appropriate locations for the Local Plan to direct future growth to secure successful and sustainable place-making. Outside of the identified Regeneration and Growth Nodes, the four main town's existing urban areas provide highly sustainable opportunities for growth that makes optimal use of comprehensive and infill development sites as they arise. The delivery of these opportunities will be supported through the Local Plan's planning policies. These provide development industry partners, particularly in the SME sector, with the confidence to bring these key sources of supply forward during the plan period. The delivery of these opportunities will secure a progressive intensification, and better use, of the Borough's four main towns.

3.15 The Spatial Strategy directs new development to the Borough's most sustainable locations. These are the four main town's centres and their surrounds. It supports an approach where centres provide people with most of their needs within a short walk or cycle journey from their home. This pattern of development is advocated to facilitate and better balance growth as well as to redress the distribution of investment locally, ultimately, to make neighbourhoods more sustainable and ensure equality of opportunity across Hertsmere.

3.16 The Borough's centres tend to have better access to sustainable travel networks, which provide choice of travel options beyond the private motor car. This along with a concentration of services and community facilities, make them well-placed to

accommodate more people and activities. New development can support town centre vitality particularly where larger schemes deliver public realm and townscape improvements. There are also opportunities to secure the long-term viability of town centres through the introduction of a wider range of uses including housing, workspace, cultural uses and community facilities. The scale of development envisaged across the Growth Node site allocations provide an opportunity to deliver meaningful mixed-use developments that include new centres that serve their surrounding communities.

3.17 The Council considers it important that town centres complement and support but do not compete with one another. Therefore, the Local Plan seeks to build on their unique qualities, character and function. As these centres will be important focal points for sustainable growth and new development they are expected to evolve over time, responding to the challenges facing our high streets and becoming even more liveable, vibrant and vital.

3.18 The delivery of the Regeneration and Growth Nodes will secure the Visions for the Borough's four settlements. The Regeneration and Growth Nodes will be aided by the delivery of new and improved transport infrastructure, which will help to unlock the development potential of their constituent sites. This includes improvements to sustainable travel networks and services that will provide connections to the wider adjoining town and beyond.

3.19 The settlements and places that lay beyond the Borough's four main towns are inappropriate locations for directing the scale of growth envisaged by the Local Plan. Whilst some of these places, such as the large village of Shenley, have experienced recent growth, these have largely been unplanned and implemented in a piecemeal manner via planning appeals. These places remain distant, disconnected and poorly supported by facilities, services, infrastructure and amenities. =Consequently, the Spatial Strategy considers these places unsustainable locations for meeting the Borough's needs. The exception being proposals for single infill dwellings that deliver self or custom build housing and/or deliver affordable housing that meets specific local needs. These will be considered on their merits.

New Settlement:

3.20 The potential for a new settlement located on land known as Bowman's Cross has been explored by successive plan-making processes. The opportunity lies to the east of the existing town of London Colney, which itself is in the neighbouring administrative area of St Albans City. The Bowman's Cross site has been used for a variety of minerals extraction and waste processing uses, all of which are now time expired. Whilst the site is not an inherently sustainable location, the scale of development provided by a new settlement, provides a genuine opportunity to investment in necessary supporting infrastructure that can make it a successful and sustainable place over the lifespan of its implementation.

3.21 The new settlement will deliver a significant quantum of new homes; a new centre that comprises a full range of main town centre uses, inclusive of retail, community

infrastructure and complementary employment uses; open spaces; education provision; and transport infrastructure and services. It is anticipated that the new settlement will begin to deliver an up-lift in housing supply during the second half of the plan period, which will be sustained into the following. The Council considers this an important aspect of the Spatial Strategy that demonstrates a strategic commitment to meeting the Borough's, and the nation's, development needs.

Tackling deprivation and ensuring equality of opportunity:

3.22 The Hertsmere Visions considers it important that everyone can enjoy a good quality of life irrespective of their background, age or ability. Whilst there are many prosperous neighbourhoods in Hertsmere there are some localities where environmental, social and economic barriers adversely affect peoples' lives. The Local Plan seeks to tackle deprivation by coordinating new investment within these areas. It also highlights for our stakeholders, and delivery partners the need for targeted interventions to address the specific causes of deprivation and inequality. This includes investment in the built and natural environment as well as programmes for education, training, health and social care.

The timely delivery of infrastructure:

3.23 The Council will continue to work with its key stakeholders and development industry partners to deliver the infrastructure Hertsmere's neighbourhoods and communities need. This includes maintaining the valued partnerships with neighbouring boroughs. We have prepared an Infrastructure Delivery Plan (IDP) which will be used to inform planning and investment decisions. This will help us to secure infrastructure where and when it is needed. Further details are set out in Part 4 of the Local Plan.

3.24 The Council will continue to work with the local transport authority and other key transport infrastructure partners to deliver improvements to the Borough's sustainable and active travel networks. This aligns with successful and sustainable place-making objectives that seek to secure growth that is genuinely forward facing and positively considers car-lite use and ownerships into the future. Improvements promoted under the LCWIP, alongside investment in public transport will seek to secure improved connections between the Borough's settlements and places.

Making the best the use of land and space:

3.25 Hertsmere will play its part in positively responding to the national housing crisis. Whilst growth will bring many opportunities and new investment it will also lead to increasing and competing pressure on the use of land. In response to this the Local Plan sets a framework to help ensure that the best use is made of the Borough's limited supply of land. The Spatial Strategy directs higher density and mixed-use development to well-connected locations and other areas where new investment will support regeneration. It is complemented by the Part 2 policies which set requirements to ensure that new development is designed to a high-quality standard and makes the optimal use of land. For example, by making provision for the co-

location of uses or designing buildings and spaces which are adaptable to the needs of different activities and users.

3.26 The Spatial Strategy prioritises the redevelopment of brownfield land, or previously developed land of low or negligible ecological value. Development on those Growth Nodes that require land released from the Green Belt will be fully optimised. This will ensure that Hertsmere's countryside, green and open spaces are protected, and opportunities are taken to enhance the ecological value of brownfield sites. The Local Plan's Part 3 includes site allocation policies to ensure that the best use of land and optimal capacity of sites is realised. These are mainly located the Growth Nodes, Regeneration Nodes, and town centres. Elsewhere within the four main towns, the sensitive intensification of established residential neighbourhoods and commercial areas will be supported. This will be enabled by mainly by the redevelopment of small sites.

Celebrating Hertsmere and enhancing its distinctiveness:

3.27 The Local Plan requires all new development to be delivered through a design-led approach. This means that new development must be based on an understanding of the site context and respond positively to the Borough's local distinctiveness. The use of the design-led approach will help to ensure that the unique and valued features of our neighbourhoods remain at the heart of the spatial strategy and are fully considered in planning decisions.

3.28 Hertsmere will continue to evolve in the wider context of Hertfordshire and as a key part of London's hinterland. Respecting local character and accommodating growth should not be seen as mutually exclusive. New development must help to reinforce the special characteristics of the Borough. At the same time, it should assist in repairing and re-shaping those elements of the built environment that could make a more positive contribution to the visual quality and liveability of our neighbourhoods.

3.29 The open countryside that surrounds the Borough's four main towns makes a significant contribution towards their character and appearance, particularly in respect of how they are perceived and experienced as distinctive places. The established Metropolitan Green Belt that extends across Hertsmere plays an important role in ensuring that the Borough's four main towns, and other smaller settlements and places, remain separated from one another. The Spatial Strategy contributes towards this approach by ensuring that future growth is optimised and does not contribute to sprawl. This process is informed by an appropriate and proportionate technical evidence base[3] that assessed the performance of the Green Belt.

3.30 This is further reflected in the Spatial Strategy under Figure 3.1, which identifies the extent of the Borough's Green Belt. This includes those parts of the Green Belt

[3] The Hertsmere Green Belt Assessments Stage 1 and 2 (2026)

identified as being Areas of Fundamental Importance. The Spatial Strategy seeks to secure the strategic extent of the Green Belt.

A greener Borough that responds to the climate emergency:

3.31 The Council is committed to promoting and securing sustainable development. We have declared a climate emergency and prepared a Climate Change and Sustainability Strategy4, which will work in tandem with the Local Plan. Sustainable development means development that meets the needs of the present without compromising the ability of future generations to meet their own needs5. Environmental stewardship is an integral part of this. Hertsmere's natural assets are an irreplaceable resource and need to be conserved and protected. However, they are coming under increasing pressure from human activity, including that which is contributing to global climate change.

3.32 The Local Plan sets a framework for delivering successful and sustainable places with environmental considerations fully integrated into the planning and development process. It sets out our approach to protecting and enhancing the local network of green infrastructure, parks and open spaces and the water environment. As well, it provides the local land-use strategy for mitigating the Borough's impact on global climate change, whilst ensuring neighbourhoods are made more resilient and well placed to adapt to the consequences of it. The Local Plan's Part 2 and Part 3 set out further detailed requirements for new developments.

[4] Hertsmere Climate Change and Sustainability Strategy (2025-30)
[5] The Bruntland Report - Resolution 42/187 of the General Assembly of the United Nations

PART 2

Managing Development

PLANNING POLICIES

Chapter 4: Introduction

4.1 Part Two of the Local Plan forms a key component of our approach to managing new development across the Borough to meet local needs. It includes policies that will help to facilitate the delivery of successful and sustainable places whilst ensuring that those factors that make Hertsmere distinctive are reflected, celebrated and enhanced. To achieve this, the following chapters set out planning policies across a range of topic areas that all new development proposals will be required to consider and meet.

4.2 It is important that the planning policies set out under Part Two are not considered in isolation of other elements of the Local Plan, and the Plan must be read as whole.

4.3 All development proposals should consider and address how they will, through their timely delivery, contribute to the achievement of the Local Plan's strategic objectives and the Borough-wide Spatial Strategy, as set out in Part One. Furthermore, proposals must also consider and support the priorities for Hertsmere's Towns and Places as set out in Part Three of the Local Plan.

Chapter 5: High-Quality Design

Section

HQD1 Delivering High-Quality Design in Hertsmere

HQD2 Inclusive and Welcoming Design

HQD3 Public Realm and Connecting Places

HQD4 Optimising Site Capacity

HQD5 Building Heights

HQD6 High-Quality Housing Design

HQD7 Building Alterations and Extensions

HQD8 Infill and Backland Sites, Garden Land and Amenity Areas

HQD9 Shopfront Design

HQD10 Outdoor Advertisement

HQD1 Delivering High-Quality Design in Hertsmere

Strategic objectives

A Delivering a better future for Hertsmere
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
G Securing a greener Borough
I Celebrating our local identity
J Healthy and safe communities

Strategic policy

A Delivering high-quality design is a key component towards delivering the Spatial Strategy, the Local Plan's Strategic Objectives, meeting the Borough's growth needs, and successful and sustainable place-making. To achieve these objectives proposals for development must follow a design led approach that considers supporting guidance provided by the National Design Guide to contribute to delivering high-quality, inclusive, safe, healthy, liveable and sustainable neighbourhoods.

Delivering distinctive and valued places for people

B The design-led approach prioritises people and place. To achieve this, development proposals must demonstrate an understanding of the site context and respond positively to Hertsmere's local distinctiveness by providing for buildings, spaces and places that reinforce and enhance local character. This includes the special and distinctive visual, historical, environmental, social and functional qualities of places that contribute to local character, identity, sense of community and belonging.

C Proposals for development must demonstrate an understanding of the site context and respond positively to the local distinctiveness of Hertsmere's settlements and places by providing for buildings, spaces and places that reinforce and enhance local character. This includes the special and distinctive visual, historical, environmental, social and functional qualities of places that contribute to local character, identity, sense of community and belonging.

To successfully respond to local distinctiveness, development proposals must demonstrate that they have been designed to address:

i. Natural features including trees, landscape, ecology, biodiversity, topography, open spaces, waterways, drainage and flood risk;

ii. The prevailing or emerging form of development (including urban grain, building typology, morphology and the hierarchy of streets, routes and other spaces);

iii. The proportion of development (including height, scale, mass and bulk) within the site, its immediate vicinity and the surrounding area;

iv. Building lines along with the orientation of and spacing between buildings;

v. Strategic and local views, views in and out of a site and landmarks;

vi. Important townscape features;

vii. Heritage assets and their setting;

viii. Architectural styles, detailing and materials that contribute to local character;

ix. Microclimate and noise, air and water quality; and

x. Uses including community facilities, cultural assets and local facilities.

Places for people

D Proposals for development must put people at the centre of the design-led approach, ensuring buildings and spaces are welcoming, inclusive, safe and accessible to people of all backgrounds, ages and abilities. Development should be designed and built to a human scale by responding to the ways in which people move through, engage with and experience their surroundings.

E Proposals for development must be designed to facilitate good physical and mental health, support the wellbeing of the population and foster community cohesion by demonstrating how they have used the design-led approach to deliver:

i. Buildings and spaces that are inclusive, intuitive to use, comfortable, safe and secure;

ii. A high-quality public realm that maintains and wherever possible enhances access to green and open spaces;

iii. Positive and active frontages that generate visual interest and which have a positive relationship with the public realm, particularly at the street-level;

iv. Well-integrated, dedicated space and equipment for relaxation, social interaction and physical activity, including where appropriate space for play and informal recreation; and

v. A high standard of amenity.

Well-functioning and resilient places

F Development proposals must be well-integrated within the places and neighbourhoods that they are located. They must provide a positive and coherent relationship with all land uses and spaces within the site and its surroundings responding to:

i. The compatibility of land-uses and activities within and surrounding the development;

ii. Ensuring they are well-connected and accessible by encouraging and enabling movement by walking, cycling and the use of public transport; and

iii. Securing efficient servicing and effective management of buildings and the public realm, including for delivery and servicing vehicles.

G Proposals for development must connect to and be appropriately supported by infrastructure networks. Development proposals will be expected to consider, and be linked to, the provision and timing of future planned levels of infrastructure improvement. Where there is insufficient capacity of existing infrastructure to support a development proposal, applicants will be required to work with infrastructure providers to ensure sufficient capacity will exist at the appropriate time, including through the phasing of development.

H Development proposals must be designed to mitigate climate change and integrate adaptation measures to make neighbourhoods and properties more resilient to its impacts, including by maximising opportunities for urban greening, with reference to other Local Plan policies.

Delivering high-quality development

I Proposals for development that are required to be supported by a Design and Access Statement1, must demonstrate how the design-led approach has been applied meaningfully. Development proposals will be expected to have regard to and address:

i. Supplementary Planning Documents and Guidance published by the Council, along with other good practice guidance; and

ii. Any feedback received from the Council including through its Pre-application Advice Service and where appropriate, Hertsmere's independent Design Review Panel.

J Applicants should work closely with local communities and others likely to be affected by new development to understand the local and distinctive context of the site, as well as to consider design options that respond positively to this context. Public engagement with the local community and other key stakeholders should occur early on and at key stages in the design process for a scheme and be proactive and inclusive.

K Proposals for the development of strategic sites are required to:

i. Be reviewed at least once by an independent Design Review Panel (DRP). Evidence that feedback has positively informed the final proposals must be supplied. Schemes failing to engage with DRP or failing to respond positively to DRP recommendations will not be supported.

ii. Be accompanied by a comprehensive masterplan and Design Code that complies with the National Model Design Code (or successor document). This must be formulated in collaboration with the Council and submitted in advance, or alongside, a planning application.

iii. Be informed by robust community engagement. Evidence that feedback has positively informed the final proposals must be supplied.

iv. Demonstrate that 'green' status can be achieved in respect of all Building for a Healthy Life (or successor document) principles.

v. Provide a good standard of amenity that is consistent with other policies in the Plan and that will allow for acceptable levels of daylight, sunlight, privacy and outlook for adjoining, future and existing occupants.

vi. Provide to the Council a 30-year stewardship strategy to be agreed in advance of, or alongside, any application.

vii. Incorporate environmental management systems, considerate construction,

Explanation

5.1 High-Quality Design is a core tenet of sustainable development through its ability to produce valued and enduring places.

The design-led approach

5.2 To realise the Hertsmere Vision and address the Local Plan's strategic objectives it is important that all new development is designed, built and managed to a high-quality standard, using the design-led approach.

5.3 The design-led approach priorities people and place. It requires those proposing development to prepare and implement creative responses to the Borough's identified needs and challenges. Development proposals should consider how new buildings will interact with the people who will use them. This includes elements beyond the site boundary, such as interactions with wider street networks, public realm, transport opportunities, heritage assets, landscapes and valued architectural characteristics of existing places. It also considers the impacts the built environment has on the health and wellbeing of the population. This will allow Hertsmere to develop in a way that is economically prosperous, healthy, inclusive, walkable,

biodiverse and climate resilient. Finally, the design-led approach requires development to function effectively both on its own and in relation to the buildings and spaces around it.

5.4 The design-led approach must begin with an understanding of the development site's local context. This includes the distinctive character of the site and its wider setting. The Council commissioned Characterisation Studies for the four main towns (2026) as part of the Visions for the Borough's places and settlements (set out under Part 3). These Studies have informed the preparation of the Local Plan and will support its implementation. They provide a useful starting point for development proposals as it provides insight into the key features of the Borough's historical, built and natural environment. This is only one point of reference, however, and proposals will be expected to demonstrate a comprehensive understanding of the site context and clearly articulate how the development has been designed to respond positively to this. This includes consideration of the evolving character of an area and opportunities to carefully manage change in a way that supports successful and sustainable place-making. Development proposals should therefore address their relationship to the spatial strategy, site allocations and where relevant, development which has been consented but not yet unimplemented.

5.5 The successful delivery of the spatial strategy will require that new developments optimise the capacity of sites. There is a need to accommodate a significant amount of growth within the Borough over the plan period, which must be carefully managed. The design-led approach is integral to ensuring that the optimal capacity of development sites is realised. Further details are set out in Policy HQD6 Optimising Site Capacity.

5.6 The Visions for the Borough's four main towns are further supported by additional design guidance[1] that supports the implementation of the Local Plan. It is anticipated that this additional guidance will be published as supplementary planning guidance following the adoption of the Hertsmere Local Plan. This should be read in conjunction with the National Design Guide and other sources of good practice guidance, where appropriate, including that published by Historic England. Development proposals should provide the following ten characteristics of well-designed places, as described in the National Design Guide:

- Context – enhances the surroundings
- Identity – attractive and distinctive
- Built form – a coherent pattern of development
- Movement – accessible and easy to move around
- Nature – enhanced and optimised
- Public spaces – safe, social and inclusive
- Uses – mixed and integrated
- Homes and buildings – functional, healthy and sustainable

[1] The additional design guidance for the Borough's four main towns has initially been published as technical evidence that supports the Local Plan through its examination. Those proposing development within the Borough's four main towns should refer to this technical evidence as a material consideration.

- Resources – efficient and resilient
- Lifespan – made to last

5.7 Engagement between development industry partners and the Council through pre-application meetings provides a positive way to establish the land use principles for development sites, and to identify and discuss any key matters that need to be addressed within a particular scheme. This includes the consideration of routes to resolving planning issues or other potential conflicts prior to the formal submission of a planning application. Pre-application meetings are also useful information sharing exercises and provide the Council with opportunities to support development industry partners in linking up with other corporate services and service areas. For instance, we can identify resources available to help with sourcing local labour for construction projects, including apprenticeships, as well as funding opportunities to boost the delivery of genuinely affordable housing.

5.8 In Hertsmere the decision-taking process is positively supported by an independent Design Review Panel. Engagement with the Panel provides a positive approach to working with delivery partners on their proposals. The Panel is formed of professional design experts who meet regularly to review schemes and provide feedback to applicants the design of their proposals. While the panel does not have decision-making powers, it serves as an advisory body helping to achieve successful and sustainable place-making outcomes for Hertsmere's communities. Comments from the panel are fed into the assessment of pre-application schemes, planning applications and appeals. Proposals for major developments and other developments likely to have significant local impacts should be brought to the panel at the early stage in the planning process. Further information about the Panel is available on the Council's planning webpage.

5.9 Applicants should work closely with local communities and others likely to be affected by new development to understand the local and distinctive context of the site and its setting, as well as to consider design options that respond positively to this context. Community consensus and agreement on proposals is not in itself a reason for granting planning consent, as all proposals will need to demonstrate compliance with the Local Plan policies. However, applicants working with the community through the design-led approach are more likely to arrive at development proposals that respond to the distinctive qualities of neighbourhoods and places, based on a more thorough understanding of the local context, and therefore support the delivery of the spatial strategy. Development proposals that can demonstrate early, proactive, inclusive and effective engagement with the local community and other key stakeholders will be considered more favourably than those that cannot.

HQD2 Inclusive and Welcoming Design

Strategic objectives

A Delivering a better future for Hertsmere
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
G Securing a greener Borough
I Celebrating our local identity
J Healthy and safe communities

Non-strategic policy

A Proposals for development in Hertsmere should achieve the highest standards of inclusive, accessible and equitable design. They should ensure that places and buildings can be used safely, easily and with dignity by all people, regardless of age, disability, sex, gender, gender identity, or other protected characteristics. Proposals must recognise that different groups experience the built environment in different ways, and design must respond positively to these differences. It is imperative that people of all backgrounds, ages and abilities can move with ease throughout the Borough, and within buildings and spaces, as well as to feel safe in their surroundings wherever they are. An Inclusive Design Statement should demonstrate how the design of a scheme will contribute to delivering inclusive, accessible, safe and secure environments in Hertsmere. This should include a completed Design sense Check List (Appendix 6).

B Development proposals must respond positively to the diversity and varied needs of Hertsmere's population and promote social cohesion. This can be achieved through:

i. Access and use:

Inclusive access and use, which provides buildings, spaces and routes that are accessible, legible and step-free wherever possible, enabling independent use by all people. Design should respond to a diverse range of users, including:

a. Disabled people,
b. Older people,
c. Children and young people; and
d. Those who provide care for others.

ii. Public realm:

Delivering a high-quality public realm, in line with Policy HQD3 (Public realm and connecting places), which must be inclusive, legible and easy to navigate, providing safe, continuous and convenient routes for all users. Streets and spaces must support all day use by diverse groups, and include spaces that allow visitors to rest, gather and interact.

iii. Safe and welcoming:

Designing development that creates welcoming spaces that address natural surveillance, lighting, visibility and sightlines, while avoiding poorly overlooked spaces.

iv. Supporting information:

Securing inclusive high-quality design should be embedded from the earliest stage of the place-making process and be evidenced through an Inclusive Design Statement. This should demonstrate how the design of a scheme will contribute to delivering inclusive, accessible, safe and secure environments in Hertsmere.

C Where development proposals incorporate perimeter or external gates, the use of these must be justified for reasons of public health and safety. Where the Council considers gates to be acceptable in principle, these must be of a high-quality design and sensitively integrated into the development. Planning contributions and/or legal agreements may be used to secure the appropriate management of gates, and to help ensure they do not unnecessarily restrict public access to buildings and spaces, including the public realm.

Accessible and inclusive housing

D To ensure that new homes meet the varied and changing needs of Hertsmere's residents, development proposals incorporating new residential units must be accessible and adaptable as an integral part of the overall design of the scheme. Proposals must ensure that:

i. At least 10 per cent of dwellings meet Building Regulation requirement M4(3), 'wheelchair user dwellings'; and

ii. All remaining dwellings meet Building Regulation requirement M4(2), 'accessible and adaptable dwellings'.

E Development proposals for housing must maximise tenure integration and be designed to be tenure neutral, so that accessible and wheelchair user dwellings are well integrated within the development and distributed across tenures where appropriate, having regard to the National Design Guide or latest equivalent.

F Where housing development includes communal private amenity space or shared facilities, these must be designed and managed to provide equitable access and usability for all residents, regardless of tenure, age or disability.

Adapting historic buildings and other heritage assets

G Where adaptations to an historic building or other heritage asset is proposed to make the building or space more inclusive, accessible and welcoming, development proposals will be supported where they preserve or enhance

the significance of the asset and its setting, or where public benefits are achieved that outweigh the harm.

Explanation

5.10 The built environment influences the quality of life of everyone across Hertsmere. The layout and design of buildings and spaces can significantly impact on people's ability to move with ease around the Borough and to live independent and dignified lives. Development proposals must therefore apply inclusive and safe design principles using the design-led approach. This will need to be demonstrated through an Inclusive Design Statement, submitted as part of the Design and Access Statement.

5.11 Creating inclusive places is a fundamental component of high-quality design and sustainable development. Inclusive design goes beyond compliance with minimum accessibility standards and requires a proactive and holistic approach to ensuring that the built environment works for all people. New development should contribute to the creation of mixed and sustainable communities. These are well planned, promote healthy and active lifestyles, are inclusive and safe, environmentally sensitive, accessible, culturally rich, vibrant and vital, well served, and built to high-quality design standards reflecting local character. Inclusive design especially ensures that the built environment caters for disabilities, neurodivergence and the needs of women and girls while at the same time creating an environment that is pleasant for all users.

5.12 Published reports demonstrate that different groups experience the built environment in different ways, influenced by factors such as age, disability, sex, gender, gender identity, ethnicity, and socio-economic circumstances. Development proposals must therefore respond to a wide range of lived experiences, rather than assuming a single 'typical' user. Inclusive design is closely aligned with:

- Promoting social cohesion and equality,
- Improving health and wellbeing, and
- Supporting sustainable, active communities.

5.13 Well-designed places that are inclusive are more successful, resilient and adaptable over time. The Council recognises that the design of buildings and spaces can affect people differently depending on their gender and identity. Evidence indicates that:

- Perceptions of safety and comfort in public spaces vary significantly,
- Some groups are more likely to experience harassment or feel unsafe; and
- Everyday activities such as travel, caregiving and access to services are not experienced equally.

5.14 To ensure the delivery of successful and sustainable places proposals for development should adopt a gender responsive and intersectional approach, recognising that:

- Women, men and non-binary people may use and experience places differently,
- People may face multiple overlapping barriers (e.g. Gender and disability), and
- Inclusive environments must respond to these combined needs

5.15 Inclusive and welcoming design should be applied in relation to public realm interventions and the design of buildings to achieve active, welcoming, legible and permeable spaces for all members of the community.

5.16 Although gates and fences may be required to ensure public health and safety, they may also result in overbearing appearance, increasing the sense of segregation and resulting in unnecessary restriction of access to buildings and spaces. Where such measures are required, they will be expected to be designed to a high standard and ensure that they are sensitively integrated. Poor maintenance of such measures can also result in unattractive features on the street scene; therefore, proposals will also be expected to include provisions for maintenance in perpetuity.

Considering neurodivergence in design

5.17 High-quality design that caters for neurodiversity ensures that places respond to a wider range of needs and experiences, supporting comfort, ease of use and independence for neurodivergent people. It also contributes to more inclusive working environments, helping to foster greater diversity within the built environment professions and creating a positive cycle in which inclusive design practices lead to more inclusive outcomes.

5.18 There are seven “Principles of Universal Design”2 to accommodate people with varying abilities to move around built environments which include the following:

- Equitable use: The design is useful and marketable to people with diverse abilities.
- Flexibility in use: The design accommodates a wide range of individual preferences and abilities.
- Simple & intuitive use: Use of the design is easy to understand, regardless of the user’s experience, knowledge, language skills or current concentration level.

[2] Designing for neurodiversity - Making places for every mind (Neurodiversity in Planning)

- Perceptible information: The design communicates necessary information effectively to the user, regardless of ambient conditions or the user's sensory abilities.
- Tolerance for error: The design minimises hazards and the adverse consequences of accidental or unintended actions.
- Low physical effort: The design can be used efficiently and comfortably and with a minimum of fatigue.
- Size and space: Appropriate size and space is provided for approach, reach, manipulation, and use regardless of user's body size, posture or mobility

5.19 Where relevant, proposals for development should also:

- Provide clear wayfinding and inclusive signage, including intuitive navigation.
- Ensure reasonable distances between parking/drop-off points and entrances.
- Design communal spaces to be welcoming, visible, and well-lit.
- Incorporate:
  - Seating and rest points,
  - Accessible green infrastructure, and
  - Facilities that meet the needs of diverse users.
- Avoid design features that may exclude or disadvantage groups, including:
  - Poor lighting,
  - Hidden routes, or
  - Overly complex layouts.

Implementation and Design Process

5.20 Inclusive design should be embedded from the earliest stages of the design process and carried through to delivery. Applicants will be expected to:

- Demonstrate how inclusive and gender-responsive principles have informed the design,
- Consider the needs of a diverse range of users, and
- Explain how potential barriers have been identified and addressed.

5.21 For major development, an inclusive design statement should:

- Set out how different groups have been considered,
- Explain how safety and inclusivity have been addressed in layout and design, and
- Demonstrate how proposals achieve equitable access and usability.

5.22 Engagement with local communities and user groups is encouraged to ensure that proposals are informed by real-world experience and local context.

Accessible Housing

5.23 Accessible and inclusive housing is essential to ensuring that residents can live independently, safely and with dignity throughout different stages of life. Housing that can meet a range of mobility, sensory and support needs, contributes towards the creation of mixed and sustainable communities, reduces the need for costly later adaptations and supports people to remain in their homes as their circumstances change. All housing should be in accordance with the Building Regulations for M4(2) accessible and adaptable dwellings, and M4(3) wheelchair user dwellings. This will ensure that new housing better reflects the needs of Hertsmere's current and future population.

5.24 Accessible housing should be considered as part of the overall design quality of a scheme, rather than as a technical matter addressed at a late stage. Proposals should demonstrate that accessible and wheelchair-user dwellings are well integrated within the development, distributed across tenures where appropriate, and located to provide convenient access to entrances, lifts, parking, refuse storage, cycle storage, amenity space and other shared facilities.

5.25 Where communal private amenity space or shared facilities are provided, these should be designed and managed so that all residents can access and use them equitably, regardless of tenure, age or disability. This includes ensuring that routes are step-free wherever practicable, clearly legible, appropriately lit and capable of supporting independent use. Early consideration of inclusive housing requirements will help ensure that homes and residential environments are adaptable, resilient and responsive to changing community needs.

Adapting historic buildings and other heritage assets

5.26 Historic buildings, conservation areas and other heritage assets are an important part of Hertsmere's identity, character and sense of place. However, many historic buildings and spaces were not originally designed to meet modern expectations for inclusive access, comfort, safety or independent use. Sensitive adaptation can therefore play an important role in enabling more people to access, use and enjoy the historic environment, while helping heritage assets remain viable, active and relevant over time.

5.27 Non-standard approaches may be required when adapting historic buildings and other heritage assets, and current design standards should be considered flexibly alongside the heritage significance of a building or asset. We will work with applicants to help ensure that any alterations or changes proposed to make heritage assets safer and more inclusive do not harm their significance, in line with national planning policy and the Local Plan policies set out under Chapter 6 Heritage. Where historic buildings, spaces or other features are likely to be affected by development, careful consideration will need to be given to ensure that new design responds sensitively to its context and does not adversely impact on those elements that contribute to the significance of the asset. Applicants are advised to consult relevant guidance on this matter for support, including the latest standing guidance published by Historic England.

HQD3 Public Realm and Connecting Places

Strategic objectives

A **Delivering a better future for Hertsmere**
C **The regeneration of Borehamwood and Potters Bar**
G **Securing a greener Borough**
J **Healthy and safe communities**

Non-strategic policy

A Proposals for development must use the design-led approach to promote the protection, enhancement and delivery of high-quality public realm. They must provide safe, accessible and comfortable spaces which increases opportunities for incidental interaction and social connection.

B Development proposals must contribute positively to the public realm by creating streets, routes and spaces that are attractive, safe, inclusive, accessible, legible and easy to move through for all users. Proposals should seek to:

i. Design the public realm as an integral part of the overall layout, form and function of development;

ii. clearly define public, communal and private space;

iii. avoid unnecessary clutter, physical barriers, poorly located infrastructure and blank or inactive frontages.

C Development proposals must respond positively to the movement and connective function of the public realm. They should be designed to enable and encourage the use of public transport, cycling and walking; seeking to reduce vehicular dominance and speeds.

D Development proposals must address legibility and permeability of the public realm, both within a site as well as its immediate and wider surroundings taking account of the movement patterns and desire lines of people within an area. Proposals should encourage links between neighbourhoods, parks and community spaces to create a more cohesive structure.

E Proposals must ensure that the public realm provides for coherent relationships with surrounding buildings and land-uses, and good connections within and between neighbourhoods. Consideration should be given to the location of street crossings and other measures to promote safe access for all, such as way-finding markers and signage, external lighting, ramps, lifts, dedicated cycle lanes, bridges, and underpasses.

F Development proposals must investigate and maximise opportunities to enhance the public realm. Proposals should seek to:

i. Improve connections to existing or planned transport and community infrastructure, including open space;

ii. Reduce vehicle dominance through lower traffic speeds, improved crossings, traffic-calming measures and pedestrian priority environments

iii. Make provision for cycle parking, cycle hire schemes, car club spaces, e-bike infrastructure and weather-sheltered, accessible bus stops;

iv. Where possible deliver step free access to promote inclusivity and accessibility.

v. Create safe, direct and attractive walking and wheeling routes between homes, schools, shops, public transport and community facilities

vi. Enhance and where appropriate help to reinstate connections that make a positive contribution to the locality, including those that are of local importance and historic significance;

vii. Integrate wider pavements, or widen pavements where these already exist;

viii. Avoid or remove barriers that unnecessarily impede or restrict movement and accessibility, and adversely impact on public safety; and

ix. Integrate green and blue infrastructure provision, including street trees and other urban greening measures, as well as SuDS integration across development proposals (see Chapter 11 Sustainable Design and Infrastructure).

G Development proposals should be designed to establish or reinforce a clearly defined public realm that helps to support the function of different uses within an area and protects local amenity. Development will be expected to:

i. Create active and attractive street frontages that contribute to natural surveillance and public safety.

ii. Incorporate high-quality spill-out spaces, including outdoor seating, social spaces, café terraces and flexible areas for community, cultural and commercial activity where appropriate.

iii. Ensure spill-out activity does not impede pedestrian movement, accessibility, servicing requirements or highway safety.

iv. Demonstrate how the design of streets and public spaces contributes positively to placemaking, supports local businesses and encourages people to spend time within the area.

H Development proposals should deliver a vibrant public realm that promotes opportunities for relaxation, social interaction and physical activity for people of all ages and abilities, in line with Policy HQD2 (Inclusive and Welcoming Design).

They should seek to create welcoming environments that attract people into public spaces and encourage their enjoyment within them during different times of the day and night, throughout the year. This includes consideration of how the local microclimatic impacts on people's health and comfort.

I Development proposals must make provision for public realm that is appropriate and proportionate to the use(s) involved along with the location, nature and scale of development, including consideration for:

i. Public conveniences, including toilets and changing facilities, particularly for families with children and those with specialist needs;

ii. Free drinking water fountains

iii. Sensitively integrated lighting;

iv. Shading and shelter to protect and provide comfort from direct sunlight, rain and wind;

v. Public art

vi. Benches and other types of seating which encourages face to face interaction

vii. Formal and informal play space, learning and social interaction addressing the needs of people of different ages and abilities;

viii. Create smaller, distributed spaces for gathering, socialising, and recreation which cannot easily be dominated by one user group

ix. Adaptable space to support events and activities (such as markets, civic and cultural events) and infrastructure to support these, such as connections to power and water.

J Public realm should be sustainably designed and constructed, including by maximising opportunities for urban greening, biodiversity enhancement, sustainable drainage and climate adaptation with reference to other Local Plan policies and regard to national planning policy where appropriate. Proposals must ensure that:

i. Street trees and planting
ii. Green corridors and open space connections;
iii. Sustainable drainage, rain gardens and permeable surfaces;
iv. Shade and cooling;
v. Habitat connectivity;
vi. Reduced surface water run-off, overheating, air pollution and noise;
vii. Lighting that balances safety with impacts on amenity, heritage and biodiversity.

Public art

K Development proposals for major development should investigate opportunities to integrate public art, interpretation, cultural activity and meanwhile uses will be encouraged where appropriate to the scale, location and character of the proposal. Where provided, they should respond positively to local character, support legibility and sense of place as well as avoid harm to amenity. The use of local artists and a diverse range of art commissions is strongly encouraged.

L Public art, including installations, proposed to be integrated as part of a development, or within the public realm, should be appropriately located in a prominent position and be sensitively sited and/or fixed to a building in a manner that:

i. Responds positively to the site context and local character, including historic character and the significance of heritage assets;

ii. Enhances the legibility of the public realm; and

iii. Does not adversely impact on amenity.

M Where public art is proposed to be provided, the location, siting and general design of the art, along with long-term management and maintenance arrangements, must be agreed by the Council prior to its installation.

Effectively managing the public realm

N Development that results in poor quality, unsafe, inaccessible, disconnected, car-dominated or poorly managed public realm, or which would prejudice existing or future connections to surrounding areas, will not be supported. Management Plans will be required for major development and other proposals with significant elements of public realm. Planning contributions and/or legal agreements may be used to secure the appropriate management of the public realm.

Explanation

5.28 Public realm is essential to creating successful, healthy and sustainable places. It includes all publicly accessible space between and within buildings, whether publicly or privately owned, including streets, pavements, cycleways, squares, parks, station forecourts, play areas, open spaces, green corridors, civic spaces, markets, station concourses, shopping malls and cultural facilities.

5.29 These spaces shape how people experience and move through Hertsmere, and provide opportunities for social interaction, active travel, play, recreation, access to nature, local identity and community life. Development should be designed around people first. New streets, spaces and routes should be attractive, inclusive, safe, legible and easy to use by everyone, including children, older people, disabled people and those with mobility or sensory needs. The public realm should prioritise

walking, wheeling, cycling and public transport, and connect development to surrounding neighbourhoods, key destinations and existing transport networks.

5.30 Public realm performs a key role in shaping the character of Hertsmere's neighbourhoods and influencing the function of the buildings and spaces within them. It also factors significantly in the population's physical and mental health, wellbeing and quality of life. This is because the public realm affects how people experience the Borough through their movements and daily activities. It also impacts on the opportunities available to people of all ages, abilities and gender identity to lead healthy and active lifestyles. This policy therefore should be read in conjunction with Policy HQD2 Inclusive and Welcoming Design.

5.31 It is important that the different elements of the public realm are not considered in isolation of each other or the people and places they support. Rather the public realm should be seen in a holistic way, as a series of connected routes and spaces that together help to form the urban and social fabric of the Borough. Public realm should be planned as an integral part of the design process from the outset, rather than treated as residual space between buildings. It should be shaped by the site's character, movement patterns, landscape, heritage, biodiversity, topography and relationship with surrounding streets and spaces. Development should create clear distinctions between public, communal and private space, with buildings, frontages, entrances, landscape and boundary treatments arranged to provide activity, enclosure, natural surveillance and a positive relationship with the street.

5.32 The public realm links Hertsmere's places and neighbourhoods with one another, enabling people to access homes, jobs, community facilities, services and leisure and recreational opportunities, whether within the Borough or elsewhere. Connecting places is central to successful and sustainable place-making. Development should repair poor connections, remove barriers to movement and create direct, convenient and attractive routes that integrate with the wider area.

5.33 Large sites, regeneration areas and strategic allocations should provide a coherent network of streets, paths, open spaces and green and blue infrastructure, avoiding inward-looking layouts, cul-de-sacs that prevent onward movement, and development that prejudices future connections to adjoining land.

5.34 The design of development should be informed by an understanding of how people currently use, or will be expected to use, the public realm. Placing people at the heart of the design process will help to secure inclusive and well-functioning spaces and places. Development should be designed and built to the human scale, for example, by integrating generous public realm treatments, building setbacks and articulations, active ground floor frontages and greening measures.

Healthy Streets

5.35 The Healthy Streets Initiative[3] is a people-focused approach to street design and transport planning that aims to make streets healthier, safer and more enjoyable for everyone. The approach places health and wellbeing at the centre of decision-making, recognising that well-designed streets can increase physical activity, strengthen communities and support local economic vitality. Through the Healthy Streets Initiative, streets are viewed not only as corridors for movement but also as places where people can spend time, interact and contribute to vibrant, sustainable neighbourhoods.

5.36 The Local Plan requires that proposals for development should prioritise the movement of people by walking, wheeling, cycling and the use of public transport, in line with the Healthy Streets Approach. This policy should be read alongside relevant Local Plan policies on sustainable transport, inclusive design, health and wellbeing, green and blue infrastructure and climate resilience. Development proposals are encouraged to refer to the emerging Design Codes that are being prepared in relation to the Borough's four main towns, and the Government's Manual for Streets 2.

5.37 Development should help to create welcoming, attractive, vibrant and healthy places where people have ample opportunity to relax, socialise and enjoy leisure pursuits at different times of the day, evening and night-time throughout the year. This is especially important within and around Hertsmere's town centres, which are key focal points for civic and public life. All public realms should be designed to achieve high sustainability standards, with reference to other Local Plan policies. Public realms should contribute to climate resilience and environmental quality. Opportunities should be taken to incorporate street trees, planting, sustainable drainage, rain gardens, permeable surfaces, shade, seating, biodiversity features, lighting and durable materials that are attractive and easy to maintain. Green and blue infrastructure should be integrated into streets and spaces to support urban cooling, surface water management, habitat connectivity and access to nature.

Streets for Kids

5.38 The Streets for Kids Design Guide[4] approach is relevant to the design of inclusive and healthy streets. Development should create streets and spaces that are safe, healthy, comfortable, convenient, inspirational and educational for children, young people and caregivers. Streets should provide opportunities to pause, play, learn and interact, and should support safe and reliable mobility choices for children and young people.

Management of the Public Realm

[3] What is Healthy Streets? — Healthy Streets
[4] Streets for Kids - Global Designing Cities Initiative

5.39 Development proposals should demonstrate how public realm will be delivered, managed and maintained over the lifetime of the development. Where public spaces are privately owned but publicly accessible, arrangements should ensure that they remain inclusive, welcoming and available for public use, with clear expectations for access, management, maintenance, safety and community use. Any controls on access or use should be proportionate, transparent and clearly justified. It is imperative that the public realm supports inclusive neighbourhoods and communities.

5.40 Proposals that seek to place inappropriate controls on the use and access of the public realm will be resisted. It is recognised there may be a need for reasonable measures to address liability, public health and safety which will be considered on a case-by-case basis.

HQD4 Optimising Site Capacity

Strategic objectives

A Delivering a better future for Hertsmere
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone

Non-strategic policy

A Development proposals must make effective use of land by optimising the capacity of the site through the design-led approach; with reference to Policy HDQ1 (Delivering High-Quality Design in Hertsmere). The optimum capacity will be the amount and form of development that can be accommodated while delivering high-quality design, responding positively to local context, and minimising harmful impacts.

B Proposals must demonstrate that the proposed density, scale, form, layout and mix of uses are appropriate having regard to:

i. The type, nature and mix of uses proposed;

ii. The site's location, size, shape, constraints and opportunities;

iii. Local character, townscape, landscape, settlement pattern and the historic environment, including heritage assets and their settings;

iv. Accessibility by walking, cycling and public transport, including access to services, facilities, employment opportunities and open space;

v. Existing and planned infrastructure capacity, including transport, utilities, education, healthcare, community, green and blue infrastructure;

vi. The quality of accommodation, internal and external amenity, privacy, outlook, daylight, sunlight, safety and environmental conditions for occupiers and neighbours;

vii. Biodiversity, trees, water management, sustainable drainage, overheating and climate resilience; and

viii. The individual and cumulative impacts of development, including where adjoining or related sites may come forward separately.

C Higher density development will be supported where it is in sustainable and well-connected places and where the proposal demonstrates that the increased density is achieved through high-quality design, appropriate infrastructure provision, acceptable amenity standards, and a positive response to local character and distinctiveness.

D Where a proposal forms part of a larger site, a strategic allocation, a regeneration area or group of related sites, it must demonstrate that it will contribute to the comprehensive and coordinated development of the wider area and will not prejudice the future optimisation or delivery of adjoining land. Such proposals will be considered in association with Policy DM3 (Masterplans and Comprehensive Development).

E Where a proposal does not accord with an indicative capacity set out in a site allocation or other development plan policy, it will only be supported where it is clearly demonstrated that the optimum capacity of the site would still be achieved in accordance with this policy.

F Proportionate supporting information will be required to demonstrate how the optimum capacity has been established. For major, complex, sensitive or allocated sites, this will include masterplans, design codes, parameter plans, capacity studies, options appraisals or other appropriate material.

Explanation

5.41 Delivering successful and sustainable places for Hertsmere will necessitate that new developments use the Borough's constrained supply of land effectively and efficiently, whilst improving the quality of places and spaces that people inhabit and use, along with the natural environment.

5.42 Making effective use of land is central to delivering sustainable growth, meeting development needs and supporting vibrant, well-connected places. However, optimising site capacity is not simply a matter of maximising density. It requires a design-led approach which identifies the optimum capacity of each site by

considering the most appropriate form, scale, mix and intensity of development, having regard to the type and nature of uses proposed, local character and distinctiveness, accessibility, infrastructure capacity, environmental constraints and contribution to place.

5.43 The optimum capacity of a site is not necessarily the maximum capacity. It should be established through a clear understanding of the place, including the site's immediate and wider context, urban structure, landscape setting, heritage significance, movement networks, open space, biodiversity, flood risk, utilities and social infrastructure. Development should make the best use of previously developed land and locations with good access to public transport, services and facilities, while ensuring that higher densities are achieved through high-quality design rather than at the expense of liveability, amenity or local distinctiveness.

5.44 A design-led approach should be proportionate to the scale and complexity of the proposal. Applicants should provide evidence, where proportionate, of how options have been considered at an early stage and how the proposed capacity has been arrived at. For larger, more sensitive or strategically important sites, this may include masterplans, design codes, parameter plans, capacity studies or other appropriate material. These will demonstrate how building heights, massing, density, layout, movement, open space, landscape, green and blue infrastructure, parking, servicing, climate resilience and relationships with surrounding communities have informed the capacity proposed. Such proposals will be prepared in accordance with Policy DM3 (Masterplans and Comprehensive Development). For smaller schemes, a planning statement may be sufficient.

5.45 Optimising site capacity should support the creation of compact, walkable and inclusive places. It should help to deliver an appropriate mix of homes, jobs, services and community infrastructure where relevant, and should enable efficient use of land while maintaining acceptable standards of daylight, sunlight, privacy, outlook, internal space, outdoor amenity, accessibility, safety and environmental quality. Development proposals should address existing and planned infrastructure, including transport, community, green, blue and utilities infrastructure, and demonstrate that any individual and cumulative impacts can be appropriately mitigated or managed. Proposals that result in overdevelopment, poor quality accommodation, unacceptable impacts on neighbouring amenity or harm to heritage, townscape, landscape or biodiversity will not be supported.

HQD5 Building Heights

Strategic objectives

A Delivering a better future for Hertsmere
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone

Strategic policy

A Tall buildings are substantially taller than their surroundings and cause a significant change to the skyline. Within Hertsmere Tall Buildings are defined as buildings which are 10 storeys or 32.8 meters measured from the ground level to the top of the building (including any rooftop equipment), or greater.

B Tall buildings should only be developed in locations identified as appropriate for tall buildings on the Policies Map (i.e. Tall Building Suitability Zones). Development proposals for tall buildings outside of these zones will be resisted.

C All proposals for tall buildings must follow a design-led and context-led approach, aligning with the appropriate height ranges, and demonstrate that they:

i. Will contribute to delivery of, and is not at odds with, the Spatial Strategy for the Borough.

ii. Respond positively to the character, identity, scale, grain, topography and townscape of the surrounding area, including the relationship with neighbouring buildings and spaces.

iii. Protect the legibility and identity of the area by creating a positive landmark within the townscape and creating a strong sense of place.

iv. Are proportionate and compatible to their surroundings and the character of the area.

v. Are of exemplary architectural quality, with a coherent form, well-resolved elevations, high-quality materials and detailing, and an attractive roofscape and skyline profile.

vi. Provide an appropriate transition from the taller section of a building to the lower volume relating to the streetscape and surrounding context and ensuring a human scale street level experience.

vii. Provide a clear and justified townscape role, such as marking Borehamwood and Potters Bar town centres, key gateways, civic spaces, transport nodes or

other point of significance, without creating unjustified visual prominence or isolated height.

viii. Protect, and where possible enhance, important local views, including views to and from conservation areas, listed buildings, local landmarks, public open spaces, and the Green Belt edge.

ix. Provides a high-quality public realm in line with Policy HQD3 (Public realm and connecting places). Where appropriate, development will be required to make provision for free to enter, publicly accessible areas that are incorporated into the building.

x. Demonstrate that cumulative impacts with existing, consented and planned tall buildings have been fully assessed.

xi. Demonstrate that any aviation, aerodrome safeguarding, telecommunications, electronic communications or operational constraints have been identified and addressed, including where relevant in relation to Policy TR7 (Airspace Safeguarding Zones).

D Tall buildings must be designed to avoid unacceptable environmental impacts. Proposals must assess and, where necessary, mitigate effects relating to:

i. Wind conditions, downdraughts, turbulence and pedestrian comfort.

ii. Daylight, sunlight, overshadowing and reflected glare.

iii. Overheating, urban heat island effects and climate resilience.

iv. Noise, air quality and vibration.

v. Biodiversity, green infrastructure, trees, water management and sustainable drainage.

vi. Energy use, whole-life carbon, circular economy principles and opportunities for renewable or low carbon energy.

vii. Telecommunications, aviation, navigation and other technical constraints where relevant.

E Tall buildings must create a positive relationship with the street and public realm. Proposals will be required to:

i. Provide active, attractive and legible frontages at ground and lower levels.

ii. Maintain a human scale at street level through appropriate podium, shoulder or lower-level design, entrances, materials, landscape and public realm treatment.

iii. Provide clearly visible, safe and welcoming entrances, with routes that are accessible and inclusive for all users.

iv. Deliver high-quality public realm, landscaping, seating, tree planting and green infrastructure proportionate to the scale and intensity of the development.

v. Avoid blank frontages, inactive edges, hostile boundary treatments, excessive servicing areas and public realm that is dominated by vehicle movement, parking, plant or refuse storage.

F Proposals must demonstrate that the building can function well for occupiers, visitors, neighbours and the wider area. Development will be expected to:

i. Provide high standards of internal amenity, including daylight, sunlight, outlook, privacy, ventilation, noise mitigation, accessibility and usable private or communal amenity space.

ii. Avoid unacceptable overshadowing, overlooking, loss of privacy, loss of daylight or sunlight, or overbearing impacts on neighbouring properties, public spaces and open spaces.

iii. Provide appropriate arrangements for servicing, deliveries, waste storage and collection, cycle parking, car parking where justified, building management and maintenance.

iv. Demonstrate safe and efficient movement within and around the building, including vertical circulation, evacuation, emergency access and inclusive access for all users.

v. Meet all relevant building safety, fire safety and security requirements, with safety considered from the outset as an integral part of the design.

G Within those locations identified as appropriate for tall buildings, the maximum height of buildings shall not normally be more than:

Location	**Lower end**		**Upper End**	
	Storeys	**Metres**	**Storeys**	**Metres**
Borehamwood Town Centre	8 storeys	26.2 metres	20 storeys	65.6 metres
Elstree Way Corridor	6 storeys	19.6 metres	12 storeys	39.3 metres
Bowmans Cross	4 storeys	13.1 metres	6 storeys	19.6 metres
Potters Bar Town Centre	6 storeys	19.6 metres	15 storeys	49.2 metres

Although maximum heights are provided for each for the Tall Building Suitability Zones, proposals will still be expected to include robust design justifications for the heights proposed.

H Development proposals for tall buildings should incorporate sensitively designed measures to ensure public safety at height such as barriers, rails and anti-climb equipment in accordance with requirements set out within the building regulations. These must be considered as part of the overall design-led approach, considered from the outset, and contribute positively to the skyline.

I Tall buildings must be delivered through a masterplan process to ensure that they

Explanation

5.46 To deliver the spatial strategy and meet local needs, such as for new housing, workspace and community facilities, it is imperative that development proposals optimise the capacity of sites. Well-designed and sensitively integrated, higher density development that responds positively to its local context can support successful and sustainable place-making. Higher density development can be achieved through a wide range of site layouts and building forms and does not necessarily require tall or taller buildings.

5.47 Hertsmere's character varies across its settlements and is strongly influenced by its network of distinct settlements, edge-of-London location, Green Belt setting, historic villages, conservation areas, locally distinctive residential neighbourhoods, employment areas and valued open spaces.

5.48 Opportunities for taller buildings may arise where they can help optimise previously developed land, support regeneration, improve the public realm, strengthen local centres, make efficient use of accessible locations and reduce pressure for less sustainable forms of growth. Taller buildings may therefore have a role in carefully selected locations across the Borough, but only where height is justified by a clear place-making purpose and supported by high-quality design.

5.49 There may be locations where the prevailing heights of buildings are expected to evolve over time. For instance, there are areas within Borehamwood where the Spatial Strategy provides in-principal support for the sensitive intensification of neighbourhoods, including through the comprehensive redevelopment of sites. This is a feature of the Spatial Strategy's approach towards regeneration as a mechanism to deliver high-quality design, introduce a mix-use of uses, deliver infrastructure improvements, and make efficient use of land supply (among others). Furthermore, there may be consented developments that establish new land use and design principles and which will influence the existing character of a site or area once implemented.

5.50 Tall buildings can have impacts beyond their immediate site, including on long-distance views, settlement identity, the relationship between built-up areas and surrounding countryside, and the perception of the borough's skyline. Proposals

must therefore be assessed individually and cumulatively, taking account of existing, permitted and planned development, including any relevant site allocations, and the Settlement Visions.

5.51 Development proposals will be considered on a case-by-case basis considering their impacts on an individual site level and cumulatively in combination with other existing, consented and planned tall and taller buildings. Impacts include those in the building's immediate vicinity, surrounding area and elsewhere, particularly in relation to places in neighbouring Boroughs.

5.52 Proposals must include a sufficient level of information to demonstrate that potential impacts have been suitably identified and adequately addressed. Development proposals will be refused where they will result in an unacceptable visual, functional, environmental and/or cumulative impact. Development proposals for building heights that depart from the parameters set by the Local Plan will be considered having regard to relevant material considerations. In such circumstances a wider public benefit must be demonstrated to justify the design of the development.

5.53 The Council will expect applicants to engage early with the planning authority, local communities, infrastructure providers and relevant statutory consultees. Early engagement should establish whether the site is suitable for increased height, what evidence is required, which views, heritage assets, landscape sensitivities and neighbouring uses are relevant, whether there are aerodrome or technical safeguarding constraints, and how the proposal should contribute to public realm, active travel, local infrastructure, sustainability and high-quality place-making. Poorly located or poorly designed tall buildings, or those that would be outside the identified locations, harm heritage significance, amenity, environmental quality or safety, will be resisted.

HQD6 High-Quality Housing Design

Strategic objectives

A Delivering a better future for Hertsmere
E Meet the Borough's housing needs by delivering homes for everyone
I Celebrating our local identity
J Healthy and safe communities

Non-strategic policy

A High-quality design is integral to ensuring housing that meets the diverse and changing needs of Hertsmere residents over their lifetimes. All development proposals for housing must ensure provision for adequately sized rooms and living spaces, comfortable and functional layouts and well-integrated amenities. This includes development proposals for new-build housing, changes of use, alterations and extensions.

B Proposals for housing must deliver high-quality, inclusive and adaptable homes that provide a good standard of amenity for existing and future occupiers and respond positively to local character and context.

C All new homes must meet the nationally described space standard as a minimum, unless robustly demonstrated to be unfeasible or unviable. Proposals must provide functional room sizes and layouts, adequate built-in storage, appropriate floor-to-ceiling heights and convenient circulation.

D Proposals for new housing must provide high-quality private, shared or communal outdoor amenity space that is usable, accessible, safe and appropriate to the type, size and occupancy of the homes proposed. Provision must be designed to support recreation, children's play where required, biodiversity, climate resilience and opportunities for food growing where practicable.

E Housing must be designed to be tenure blind and tenure neutral. Affordable and market homes must be comparable in design quality, materials, external appearance, access, entrances, circulation, amenity space and relationship to the wider development.

F Housing development must be inclusive, accessible and safe. Proposals must provide step-free and legible access where required, convenient shared circulation, natural surveillance, appropriate lighting, secure entrances and layouts that reduce opportunities for crime without compromising the quality of the public realm or residential amenity.

G Development proposals must protect the amenity of existing and future occupiers, having regard to privacy, outlook, daylight, sunlight, overshadowing, overbearing impacts, noise, vibration, odour, air quality, light pollution and thermal comfort.

Where relevant, daylight and sunlight must be assessed having regard to the latest Building Research Establishment guidance or any successor guidance.

H Proposals should maximise dual aspect homes. Single aspect homes will only be supported where they are clearly justified and demonstrate acceptable daylight, sunlight, outlook, privacy, ventilation and thermal comfort, and where they avoid predominantly north-facing aspects and locations exposed to unacceptable noise, odour, light or air pollution.

I Proposals for new housing must integrate layout, orientation, form, landscape, servicing, cycle parking, refuse storage and maintenance arrangements into the design from the outset. These matters should not harm residential amenity, accessibility, safety, local character or the quality of streets and spaces.

Explanation

5.54 Everyone should have access to a decent and secure home that is adaptable to one's changing needs over their lifetime. All new housing development, irrespective of tenure, must be designed to a high-quality standard to meet the diverse needs of Hertsmere's residents, considering those who choose to live independently, families (including with children) and others sharing accommodation, and those requiring managed support or care. High-quality housing design is essential to creating homes and neighbourhoods that are healthy, inclusive, safe, adaptable and resilient over the lifetime of the development. This includes new build housing, the alteration or extension of existing housing units, and the conversion of other buildings into housing.

5.55 Housing should be designed to meet the needs of a wide range of residents, including families, older people, disabled people, people living independently and those requiring support or care. It should be accessible and adaptable, with practical layouts and shared spaces that are safe, convenient and welcoming.

5.56 Mixed and inclusive communities will be supported by requiring tenure blind and tenure neutral design. The policy requires affordable and market homes to be indistinguishable in design quality, external appearance, access, materials, amenity and integration within the site and surrounding neighbourhood.

5.57 Proposals for new homes should provide functional and comfortable internal layouts, adequate storage, good daylight and sunlight, natural ventilation, privacy and outlook. Proposals for development should provide usable private or communal outdoor space, including space that supports play, recreation, food growing and wider health and wellbeing.

5.58 Dual aspect homes are strongly encouraged because they improve daylight, outlook, cross-ventilation and thermal comfort. Single aspect homes will only be acceptable

where justified by site-specific constraints and where they provide a high standard of amenity, avoiding north-facing, noisy, polluted or overheating-prone locations. The design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate passive ventilation, privacy, daylight and outlook, and that the unit's microclimate will be appropriately managed. Policy HQD6 should be read in conjunction with Policy HQD4 Optimising Sites.

5.59 Proposals should demonstrate how layout, orientation, form, landscape, servicing, waste, cycle parking and ongoing management have been considered from the outset so that practical requirements do not undermine design quality or residential amenity.

HQD7 Building Alterations and Extensions

Strategic objectives

A Delivering a better future for Hertsmere
E Meet the Borough's housing needs by delivering homes for everyone
I Celebrating our local identity
J Healthy and safe communities

Non-strategic policy

A Proposals for building alterations, extensions and basements must be designed to a high-quality standard.

B Proposals for building alterations and extensions will only be supported where they:

i. Respect and complement the form, proportion, setting, period, architectural characteristics and detailing of the original building and the site;

ii. Use high quality, durable and matching or complementary materials;

iii. Maintain and wherever possible enhance, and do not adversely impact on, the architectural integrity of a group of buildings, or cause an incongruous element in terms of the important features of an area's character; and

iv. Do not adversely impact on, or result in the loss of, the amenity of neighbouring properties, including back gardens.

C Innovative and contemporary designs will be supported where they comply with (B) above.

D Roof extensions on the street frontage of a building, particularly within predominantly residential street, should be avoided in favour of extensions

to the rear of the building. Development proposals for roof extensions on the street frontage will only be supported where it is demonstrated that there is a clear design rationale, or a design options appraisal has been undertaken that demonstrates an extension to the rear of building is not feasible or appropriate, and other design and amenity policies are satisfied.

E Residential extensions should retain an accessible and functional private garden area which is appropriate in size in relation to building and the intended number of occupants of the dwelling and not result in overdevelopment of the site.

F New units created by a residential alteration or extension must meet and, where possible, exceed the housing quality standards outlined in Policy HQD6 (High-quality housing design).

Basement development

G Basement development will be permitted where it can be suitably demonstrated that the development:

i. Is sensitively integrated into the site, proportionate to host building (including the original building in the case of a basement extension) and avoids harm to local and historical character;

ii. Will not adversely impact on the structural stability of the host building, neighbouring properties, infrastructure and the public realm, considering local geology;

iii. Will not result an increase to flood risk whilst ensuring users of the development will be safe from all sources of flooding;

iv. Will not adversely impact on the natural environment; and

v. Will not adversely impact on the amenity of neighbouring properties on occupation and use and minimise impacts on amenity during construction.

H Development proposals for basements including habitable rooms for housing, or other sensitive uses, must ensure safe access and egress for all likely users of the development.

Light wells

I Development proposals for light wells must respect the architectural and historical character of the host building and its wider setting and not adversely impact on the amenity of neighbouring properties. Light wells should be sensitively integrated and designed to avoid the loss of amenity space, including garden land. Proposals that will result in an excessive or harmful loss of amenity space will be resisted.

Explanation

5.60 All new building extensions, alterations and basement developments must be designed to a high-quality standard. This is necessary to ensure that the delivery of high quality (design) place-making is consistent and encompasses improvements to the existing townscape. Where this type of development is poorly designed and built it can have an adverse impact on local character, particularly on buildings of historic interest or within established residential areas, including Conservation Areas. The policy specifically seeks to manage the quality of improvements being delivered beyond the permitted development regime.

5.61 Extensions to residential buildings should normally be subordinate in scale to the original building. This is to ensure that new development does not dominate existing and well-established features of the building or setting or result in disproportionate additions that detract from local character. Alterations and extensions must also respect the architectural qualities and coherence of the urban grain.

5.62 The policy allows for the positive consideration of innovative, high quality and creative contemporary designs subject to them considering the architectural language and integrity of the original building and its setting. Avoiding awkward jarring building forms that detract from local character.

Basement development

5.63 Basement developments are becoming an increasingly popular way for householders to adapt their homes to changing lifestyles and needs, for example, to create more amenity or living space. Not all new basements will require planning consent owing to permitted development rights. Where planning permission is required, proposals will be assessed against the Local Plan policies. Consideration must be given to impacts on structural stability of the host building and adjoining properties, as well as to any environmental impacts that are likely to arise from the development. Proposals will be refused where it cannot be demonstrated that harmful impacts will be avoided or appropriately mitigated. Impacts on amenity should be minimised as much as reasonably practical during construction. Depending on the nature and scale of development a Construction Management Plan may be required, and this will be secured by condition or legal agreement.

Light wells

5.64 Light wells can enhance the amenity of a building's users and occupiers. Careful consideration is required to ensure new light wells do not have an adverse impact on amenity, including nuisance caused by light pollution. Light wells should not result in an excessive or harmful impact on amenity space, including garden land. We will resist proposals that will result in a significant loss of amenity space, considering the amount and quality of amenity space on-site.

HQD8 Infill and Backland Sites, Garden Land and Amenity Areas

Strategic objectives

A Delivering a better future for Hertsmere
E Meet the Borough's housing needs by delivering homes for everyone
I Celebrating our local identity

Non-strategic policy

A Development proposals for infill and backland sites, garden land and amenity areas will be supported where they make efficient use of land and demonstrate, through a design-led approach, that the site is suitable for the proposed use, scale, layout and form of development.

B Proposals must:

i. Be of a high-quality design and respond positively to local character, townscape, landscape, historic context, urban grain, plot pattern, building lines, scale, height, massing, roof form, materials, boundary treatments and spaces between buildings;

ii. Protect the amenity of existing and future occupiers, including privacy, outlook, daylight, sunlight, noise, disturbance, overbearing impact, garden space and access to usable outdoor amenity space;

iii. Retain and integrate trees, landscape features, biodiversity value, green infrastructure and sustainable drainage unless it is clearly demonstrated that this is not feasible or appropriate;

iv. Provide safe, legible and convenient access for all users, prioritising walking, cycling and inclusive access;

v. Provide well-integrated parking, cycle parking, servicing, refuse storage and emergency access that do not dominate the street scene or harm amenity; and

vi. Create safe, inclusive and well-overlooked routes and spaces, with clear distinction between public, communal and private areas.

C Infill development within street frontages or on street corners will be supported where it demonstrably:

i. Preserves or enhances the character, rhythm and enclosure of the street frontage;

ii. Repairs harmful gaps, inactive frontages or poorly designed buildings where such opportunities exist;

iii. Respects the proportions, spacing, building lines and relationship of adjoining buildings; and

iv. Retains adequate garden or amenity space for existing and proposed homes.

D Backland development will be supported where it:

i. Is clearly subservient to the surrounding street frontage and respects the established pattern of development;

ii. Provides access that is safe, convenient and does not cause unacceptable disturbance to neighbouring occupiers;

iii. Does not create isolated, gated or poorly overlooked development, unless access restrictions are necessary for security or privacy and are justified; and

iv. Safeguards the privacy, outlook and garden amenity of neighbouring properties.

E Development resulting in the loss of garden land will be resisted where it would harm local character, residential amenity, biodiversity, trees, drainage, the pattern of development or the function of garden space. Proposals involving garden land will only be supported where they satisfy Parts A and B and demonstrate that the remaining garden and amenity space is adequate for existing and future occupiers.

F Development on communal amenity areas or landscaped open space associated with residential development will only be supported where it:

i. Would not result in an unacceptable loss of usable amenity, play, landscape, biodiversity or open space value;

ii. Would improve the quality, safety, accessibility or function of remaining communal space; and

iii. Would enhance active frontages, natural surveillance and the distinction between public, communal and private space.

G Proposals must not prejudice the comprehensive development of adjoining or functionally related land and, where relevant, must demonstrate how the proposal relates to the wider site or block.

Explanation

5.65 Small sites within existing settlements can make an important contribution to housing supply, support efficient use of land and help repair gaps in the urban fabric where they are well designed and sensitively integrated. However, development on infill, backland, garden land and amenity area can, raise concerns due to their proximity to existing homes, gardens, trees, access routes and established settlement patterns.

5.66 For the purposes of this policy, infill sites are sites within street frontages, including gaps in terraces, former yards, small workshops, garages and gardens to the side of dwellings. Backland sites are sites to the rear of street frontages that are not historically in garden use and are often close to existing housing. Garden land includes private gardens and back gardens serving dwellings. Amenity areas include communal landscaped areas associated with residential development.

5.67 Garden land is not treated as previously developed land where it falls within the definition in national policy. The loss of garden land or residential amenity areas will only be acceptable where it is clearly justified and where the proposal delivers high-quality design without causing unacceptable harm to character, amenity, biodiversity, trees, open space or the living conditions of existing and future occupiers.

5.68 These small site typologies cover most sites that will require consideration under this policy (extensions and alterations are dealt with separately in this Local Plan). However, there may be some instances where a site will not fall definitively within any one of these categories. In such cases, the principles that will be applied for planning decisions will be taken from the appropriate parts of this policy. The Council will decide of the relevant policies, informed by the planning statement submitted by the applicant.

5.69 The policy supports appropriate small site development while protecting local character, residential amenity, biodiversity, trees, usable garden space, open space and the distinction between public and private areas. Proposals must be design-led, based on a clear understanding of the site and its context, and must not prejudice the comprehensive development of neighbouring or functionally related land.

5.70 Not all infill sites will be considered appropriate for new development or for certain types of land uses. Backland, garden land and amenity area sites will only be acceptable for new development where proposals comply with the above policies. Development proposals must clearly demonstrate that the site is appropriate for the proposed use(s), there is a clear urban design rationale for bringing forward development at the location and there will be no adverse impact on amenity. This should be set out in the Design and Access Statement.

Infill and backland development

5.71 Development proposals for infill and backland development must follow the design-led approach. Careful consideration will need to be given to the distinctive character

and features of the site and its wider setting. This includes the streetscape and architectural detailing, along with the proportions and orientation of buildings, including the spaces between them. Development on mid-terrace sites will require particular attention to ensure they complement the character of the street and provide a positive frontage. Infill development provides opportunities to repair harmful breaks in the street frontage.

5.72 Access and servicing requirements of backland sites poses unique design challenges. Development proposals must ensure adequate arrangements for all vehicles likely to require access the site, including for emergency services, refuse and recycling collection and deliveries. Proposals must also ensure safe and convenient access to the site and buildings by walking and cycling.

5.73 Development proposals should seek to retain and enhance existing walking routes and cycleways. Where this is not feasible or preferential in design terms adequate replacement provision must be provided. The design must ensure permeability within the site and the rest of the neighbourhood. Gated developments will be resisted.

5.74 Where development proposals include new housing, this must be designed with reference to other Local Plan policies. Provision of accessible, secure, private and functional outdoor amenity space, including children's play space, will be required where appropriate. Outdoor amenity space, including garden land, must not be delivered in a piecemeal fashion. Rather this must be designed in an integrated way to ensure it is functional space suitable for the intended occupants.

Garden land (including back gardens)

5.75 Garden land, including back gardens, make an important contribution to local character and amenity and often have ecological value. Development on garden land should therefore be avoided in favour of development opportunities elsewhere in the Borough, particularly on brownfield sites and previously developed land, consistent with the spatial strategy for the Borough. The NPPF is clear that garden land is not considered Previously Developed Land.

5.76 There is a growing body of evidence indicating that people who live in greener neighbourhoods tend to have better cardiovascular health and lower levels of stress[5]. The greater the biodiversity in those green spaces, the larger the benefit to psychological well-being. Participating in activities such as gardening can have physical and mental health benefits. This policy works together with other Local Plan policies on green infrastructure.

5.77 Development proposals that will result in the loss of garden land, including private back gardens, will be strongly resisted. The loss of garden land will only be considered acceptable in exceptional circumstances, where sites can be assembled

[5] For example, the Create Streets Foundation has published research covering this topic.

to bring forward comprehensive redevelopment, and appropriate re-provision of garden land is provided to mitigate losses as much as possible.

HQD9 Shopfront Design

Strategic objectives

A Delivering a better future for Hertsmere
B A Thriving Local Economy
I Celebrating our local identity

Non-strategic policy

A Hertsmere's high streets and shopping areas, including their shopfronts, are an important and highly valued part of our local neighbourhoods and often reflect the unique character and historical development of the Borough. The policy seeks to maintain their visual character and appearance and strengthen their legibility as places that sit at the centre of the Borough's settlements, places and communities.

B Securing high-quality commercial environments within the Borough's centres is a key objective for place-making and maintaining and enhancing economic vitality and viability.

C Shopfronts, including their signs, canopies and security installations, must be designed to a high-quality standard. Development proposals for shopfronts will be supported where they do not adversely impact on local character, amenity and public safety.

D Development proposals for new shopfronts or alterations to existing shopfronts must promote consistency or higher quality design through the following measures:

i. Retain, refurbish or reinstate shopfronts, or associated elements of architectural interest where these contribute to the distinctive visual or historic character of a building, townscape or area;

ii. Seek to minimise undue attention or dominate their surroundings unnecessarily

iii. Be of a proportion, scale and quality that responds to the character of the host building and, where relevant, adjoining properties; including ensuring fascias are not overly large or extend above first floor windows.

iv. Use high-quality materials and colours that are sensitive to local character; and

v. Retain or provide glazed shop windows.

vi. Developments which relate to corner plots should take advantage of their location by having frontage on both sides.

E Development affecting shop fronts will be supported where it delivers a high-quality design that contributes positively to the character, appearance, safety and functionality of the public realm through provisions of active and attractive frontages that promote natural surveillance and maintain clear accessible pedestrian routes. Shop fronts should collectively create vibrant, attractive and inclusive streets that support economic vitality and a strong sense of place.

F Development proposals for shopfronts must apply inclusive and safe design principles. They should retain and wherever possible enhance street level access and entrances, including access to upper floor residential, commercial and community uses.

G Development proposals for open shopfronts without a stall riser and glazed screen will be resisted.

H For shopfronts in Conservation Areas or of Listed or Locally Listed Buildings, original historic shopfront windows and framework features should be retained or restored, where appropriate.

I Within Conservation Areas and residential areas, internally illuminated box fascia signs and projecting signs will not be permitted unless they successfully relate to the design and detailing of buildings and contribute positively to the distinctive character of a group of buildings or street.

J Development proposals for shopfront canopies that are fixed in the ‘down’ position will be resisted. Retractable canopies may be acceptable where they are designed to provide sufficient clearance.

K Shopfront security features, including roller grilles and shutters, must not be visually intrusive, create blank frontages or detract from the character of the host building and townscape. Where such installations are considered necessary development proposals should seek to use internally located, open mesh security shutters and boxes.

L Development which promotes unsightly external additions will be resisted. Proposals which include additions such as air conditioning units, satellite dishes, burglar alarms or surveillance systems should form an integral part of the design

and be in unobtrusive positions that avoid interference with any architectural detail or negative impact on the street scene.

M Where proposals require a new shopfront as part of a mixed-use scheme, including re-provision of an existing unit, development will be expected to make provision for shopfront fit out.

Explanation

5.78 Highstreets and Shopping areas including their shopfronts, are an important part of local neighbourhoods and often reflect the unique character and historical development of the Borough. They have an important role in the shaping of streetscapes and the public realm; this policy should be read in conjunction with Policy HQD2 Safe and Welcoming Design and Policy HQD3 Public Realm and Connection Places.

5.79 Development proposals should ensure that shopfronts of good architectural quality or those with historic value are retained, refurbished or reinstated wherever possible. Where retention is not possible, replacements should be designed to a high-quality standard using materials which are appropriate to the period and character of the building. Consideration should be given to shopfront framework features including pilasters, brackets, fascias and projecting signs. This is especially important where development of a shopfront would impact on the significance of a heritage asset or its setting, for example, within a Conservation Area or part of a Listed Building.

5.80 All shopfronts should be designed to a high-quality standard, using materials and treatments that are sensitive to the character of the host building and neighbourhood. The standardisation in much of current shop design can gradually devalue the character and individual qualities of buildings in shopping areas. It is important that the design and materials of new and replaced shopfronts relate well to the scale of the building and its surrounds, as well as the original features of the building where these contribute positively to local character.

5.81 The design and quality of shopfronts can be maintained by referring to the architecture of the host building and high-quality shopfronts in comparable neighbouring units, and by reflecting the general scale and pattern of shopfronts in the area. New shopfronts should contribute towards a cohesive streetscape, retain a consistent building line and contribute toward or enhance the character of the centre or parade it is located in. The detailing, quality of materials, execution and finishes are very important in shopfront design, particularly as they are viewed close-up.

5.82 Contemporary shopfront designs will be supported in appropriate locations. All new and altered shopfronts should apply inclusive and safe design principles. If a shopfront is replaced or altered, the design should respect the characteristics of the host building and, where appropriate, shopfront windows and framework features should be retained or restored.

5.83 Contemporary shopfront designs will be supported in appropriate locations. All new and altered shopfronts should apply inclusive and safe design principles. If a shopfront is replaced or altered, the design should respect the characteristics of the host building. For shopfronts in Conservation Areas or of Listed or Locally Listed Buildings, original historic shopfront windows and framework features should be retained or restored, where appropriate.

5.84 Shopfront security features should not have a detrimental impact on the townscape and local character. The use of solid external security shutters and grilles can create an unpleasant atmosphere when premises are closed, creating or perpetuating fears to personal safety. The use of open mesh security shutters and boxes is encouraged where such measures are considered necessary. Security features should be designed so that they can be hidden behind the fascia to reduce visual clutter from the frontage and townscape.

5.85 Development proposals for mixed-use schemes involving the creation of a new shopfront must provide a reasonable shopfront fit out, having regard to viability. This will encourage the occupation of business units and reduce the likelihood of vacancy, which can adversely impact on town centre vitality. Proposals should therefore provide appropriate level of shopfront design detail.

HQD10 Outdoor Advertisement

Strategic objectives

I Celebrating our local identity

Non-strategic policy

A Outdoor advertisements, digital displays and hoardings should contribute to attractive and safe environments. Development proposals for these types of installations will be supported where they are designed to a high-quality standard, appropriately sited, and adequately maintained throughout their operation to ensure:

i. There is no adverse impact on local character, appearance or visual amenity on the site or surrounding area;

ii. Heritage assets and their setting and preserved or enhanced;

iii. They do not result in the unsightly proliferation or dominance of signage and displays in the vicinity of the site;

iv. There is no harm to public amenity, including by way of excessive illumination and visual intrusion of light pollution into adjoining or neighbouring properties and public spaces;

v. There is no adverse impact on public or highway safety; and

vi. There is no harmful impact on trees, especially those with Tree Preservation Orders (TPOs).

Explanation

5.86 Outdoor advertisements, digital displays and hoardings are a means of providing information to the public and can play a complementary role in supporting the local economy. Poorly sited, designed and maintained installations can have an adverse impact on public health and safety, amenity and local character. We will seek to ensure that all such development is designed to a high-quality standard and secures safe, accessible and attractive environments.

5.87 Advertisements, digital displays and hoardings are regularly located on or adjacent to the public realm. To ensure that everyone can move safely and easily within it, development must apply inclusive and safe design principles. Where installations are proposed to be located on or adjacent to the highway, the lead transport authority should be consulted for an opinion on the safe operation of the highway network.

5.88 Applications for advertisements and hoardings are required to follow the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Chapter 6: Heritage

Section

HE1 Hertsmere's Historic Environment

HE2 Designated Heritage Assets

HE3 Non-Designated Heritage Assets

HE1 Hertsmere's Historic Environment

Strategic objectives

A **Delivering a better future for Hertsmere**
C **The regeneration of Borehamwood and Potters Bar**
E **Meet the Borough's housing needs by delivering homes for everyone**
G **Securing a greener Borough**
I **Celebrating our local identity**
J **Healthy and safe communities**

Strategic policy

A The Council will conserve and enhance Hertsmere's historic environment in a manner appropriate to the significance of heritage assets and their settings.

B Proposals for development involving heritage assets will be supported where they:

i. Conserve or enhance the significance of heritage assets and their settings;

ii. Make a positive contribution to local character, townscape, landscape and distinctiveness;

iii. Are informed by an understanding of the historic development of the site and its surroundings;

iv. Avoid or minimise harm through siting, layout, scale, height, massing, design, materials, landscaping and lighting;

v. Secure the viable and appropriate reuse of heritage assets, including assets at risk, where this is consistent with their conservation;

vi. Better reveal, interpret or improve public understanding of the historic environment where appropriate; and

vii. Incorporate energy efficiency, climate adaptation and low carbon measures in a sensitive way that avoids unacceptable harm to significance.

C Proposals for development affecting a heritage asset or its setting must be supported by a proportionate Heritage Statement. This must describe the asset's significance, including any contribution made by its setting; explain how significance has informed the proposal; assess likely impacts; and identify measures to avoid, minimise or mitigate harm and secure enhancement where appropriate.

D Where harm to the significance of a heritage asset is identified, clear and convincing justification will be required. Proposals will be assessed in accordance with legislation, national policy and the development plan, having regard to the significance of the asset and the scale of any harm or loss.

Explanation

6.1 Hertsmere's historic environment is an irreplaceable resource. It includes designated and non-designated heritage assets, archaeological remains, historic landscapes, townscapes, parks and gardens, buildings, structures, spaces, routes and features which together contribute to the Borough's character, identity and sense of place.

6.2 The historic environment is integral to successful and sustainable place-making. Its conservation and enhancement can support high-quality placemaking, climate resilience, town centre vitality, tourism, cultural activity and community identity. Sensitive reuse of existing buildings can also reduce environmental impacts. The successful integration of the Borough's heritage assets as part of the delivery of future growth is a component towards meeting local needs. The Council will take a positive and proactive approach to managing change affecting heritage assets and their settings.

6.3 Hertsmere contains a varied historic environment, including conservation areas, listed buildings, registered parks and gardens, scheduled monuments, locally important buildings and structures, archaeological remains, historic settlements, landscapes and features associated with the Borough's rural, urban, cultural and social history.

6.4 Proposals for development should be informed by a proportionate understanding of the significance of affected heritage assets, including the contribution made by setting. Proposals should avoid harm where possible and seek opportunities to sustain, enhance or better reveal significance through high-quality contextual design, heritage-led regeneration, appropriate reuse and improved interpretation.

6.5 The policies in this chapter are informed by the Council's heritage evidence base, including conservation area appraisals and management plans, the Hertfordshire Historic Environment Record, the National Heritage List for England, local lists and other relevant studies. The Council will maintain and use up-to-date evidence to inform plan-making and decision-making. Evidence gathered through planning applications and policy work should, where appropriate, be made publicly accessible.

6.6 The Local Plan's Policy HE1 (Hertsmere's historic environment) provides a positive strategy for the conservation and enjoyment of Hertsmere's historic environment. It recognises that heritage assets are finite and that their significance can be affected by direct physical change, changes within setting, cumulative alteration, neglect or inappropriate development.

6.7 Those proposing development should address heritage considerations at an early stage. Information requirements will be proportionate to the asset's significance and the likely impact of the proposal. For major, complex or sensitive proposals, early engagement with the Council and relevant heritage bodies is encouraged.

6.8 Heritage Statements should identify the heritage asset(s) significance; explain how the proposal responds to that significance; and assess the likely impact on it. Where harm is identified, the Statement should set out how harm has been avoided, minimised or mitigated, including through design changes, conditions, planning obligations, recording, interpretation or management arrangements where appropriate.

6.9 Not all heritage assets are currently known, documented or fully understood. Buildings, structures or sites may be identified as non-designated heritage assets through the development process. For example, new information may be revealed by local groups through the consultation process or during preliminary site investigations undertaken by an applicant. This may also apply to those heritage assets of an archaeological nature, which may only become revealed and understood through the development process. In these circumstances we may seek amendments to proposals to ensure that the significance of an asset is appropriately preserved or enhanced.

6.10 Proposals affecting heritage assets should be of the highest architectural and urban design quality, having regard to and respecting local character and complying with other policies in this plan. Heritage should be considered as an integral component of sustainable neighbourhoods and communities and must meaningfully inform the design of development. Development proposals that appropriately preserve or help to better reveal and enhance heritage assets and their setting will be supported, subject to meeting other policy requirements.

6.11 Proposals that may cause harm to the significance of heritage assets should be clearly and convincingly justified through the information provided in the Heritage Statement. Where the loss or harm to a heritage asset is suitably justified and planning consent is granted, a programme of building recording of a level appropriate to the significance of the building and the extent of loss may be required. Archaeology revealed through the delivery of development will also need to be recorded. Such measures will help to mitigate impacts of development and will normally be sought by way of a planning condition.

6.12 Where there is evidence of deliberate neglect or damage to a heritage asset, the current condition of the asset will not be considered in planning decisions.

6.13 The Council advises those proposing development to seek the advice of specialist historic environment consultants at an early stage of the design process. This will help to ensure that the significance of heritage assets likely to be affected is appropriately identified. Those proposing development will then be better placed to consider options for bespoke and sensitive, heritage-led design solutions that

respond to this significance. Specialist consultants can also advise on and provide the necessary information to support an application.

6.14 The Council will use available powers to support conservation objectives through the development management process. This includes the use of Article 4 Directions to remove permitted development rights, along with the use of Section 215 notices, Urgent Works or repair notices where this would help achieve conservation objectives. The use of such powers may be appropriate where there is a risk to historic fabric or the appearance of an area. There are Article 4 Directions in place for many of the Borough's Conservation Areas, and we will investigate the scope for introducing these elsewhere.

6.15 Historic England maintains a Heritage at Risk register to assist in the monitoring and management of Listed Buildings and conservation areas that are at risk of losing their special interest. The Council has statutory authority to intervene when there is evidence of serious neglect, including Urgent Works Notices to secure works to vacant listed buildings or unlisted buildings in conservation areas and has powers of inspection.

6.16 National planning policy sets out policies for 'enabling development'. This is a term specifically used for cases where the cost of repair - and conversion to optimum viable use, if appropriate - of a heritage asset exceeds its market value on completion of repair or conversion, allowing for appropriate development costs (termed a 'conservation deficit'). In these cases, development proposals which depart from the Development Plan and would normally be considered unacceptable may be permitted to secure the conservation of the asset.

6.17 Enabling development should not harm the heritage asset it is intended to conserve. The Council will expect that measures have been fully explored and undertaken prior to considering enabling development. This may include maintenance, repair and decay prevention measures, grant-funding for repairs and reuse, transfer of ownership to a building preservation trust or similar charity, and other sympathetic measures. Development proposals for enabling development must submit full financial viability details and will be assessed having regard to the criteria set out in Historic England's advice note GPA4 Enabling Development and Heritage Assets (2020).

HE2 Designated Heritage Assets

Strategic objectives

A Delivering a better future for Hertsmere
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
G Securing a greener Borough
I Celebrating our local identity
J Healthy and safe communities

Non-strategic policy

A Designated heritage assets, including conservation areas, listed buildings, registered parks and gardens, scheduled monuments and their settings, will be conserved in a manner appropriate to their significance. Opportunities for enhancement will be supported where appropriate.

B Development proposals affecting designated heritage assets or their settings will be supported where they:

a. Preserve or enhance those elements which contribute to the asset's significance;

b. Respond positively to the asset's character, appearance, setting, historic fabric, materials, layout, form, scale, massing, roofscape, boundaries, spaces and important views;

c. Retain buildings, structures, trees, landscape features, open spaces, boundaries and other elements which make a positive contribution to the significance of a conservation area or other designated heritage asset;

d. Avoid cumulative harm arising from incremental change, loss of historic features, inappropriate materials, visual clutter, excessive lighting or erosion of setting;

e. Secure appropriate repair, maintenance, reuse and long-term management where this would sustain the asset's significance; and

f. Provide appropriate archaeological assessment, evaluation, preservation, recording, analysis, publication and archive deposition where archaeological interest may be affected.

C Substantial harm to, or total loss of significance of, a designated heritage asset will not be supported unless the harm or loss is necessary to achieve substantial public benefits that outweigh it, or the relevant tests in national policy are met.

D Where a proposal would lead to less than substantial harm to the significance of a designated heritage asset. Harm to the heritage asset will be weighed against the public benefits of the proposal, including where appropriate securing the asset's optimum viable use.

E Demolition within a conservation area will only be supported where the building, structure or feature does not make a positive contribution to the area's character, appearance or significance, or where any harm is clearly justified and outweighed in accordance with national policy.

Explanation

6.18 Designated heritage assets are recognised for their national importance. In Hertsmere they include listed buildings, conservation areas, registered parks and gardens and scheduled monuments. Their significance may derive from architectural, historic, archaeological, artistic, townscape, landscape or communal interest.

Conservation areas

6.19 Conservation areas are designated for their special architectural or historic interest. Development within or affecting their setting should preserve or enhance their character or appearance. Regard should be had to established settlement patterns, plot form, building lines, roofscape, materials, boundary treatments, trees, open spaces, views and buildings that make a positive contribution.

6.20 The character of a Conservation Area can depend heavily on the cohesiveness of form, consistency of materials and detailing of buildings. The alteration or loss of one individual feature to a building may appear minor in the wider context, but incrementally such small changes can erode the special interest of an area. We have made Article 4 Directions to several Conservation Areas to help prevent the loss of important and distinctive features and will continue to do this where it is considered necessary.

6.21 We strongly encourage the reinstatement of original or other features that make a positive contribution to a Conservation Area. Such works can help to enhance or better reveal the area's significance. This includes the reinstatement or repair of features such as front boundary walls and fences, front garden soft landscaping and missing architectural detailing.

6.22 Not all elements of a Conservation Area contribute to its significance. Some buildings or features can have a negative or neutral impact. The adaptive re-use of redundant buildings and new infill development on disused land or under-utilised sites can represent an opportunity for enhancement. We will therefore support in principle such redevelopment where this will positively impact on and improve local character.

Listed buildings

6.23 Listed buildings are protected for their special architectural or historic interest. Proposals affecting a listed building should preserve its special interest, setting and significant fabric, including internal features, plan form, curtilage structures and spaces where these contribute to significance.

6.24 The Council has a duty to preserve the character of Listed Buildings under Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990. We will seek to ensure that the significance of a Listed Building is not harmed through inappropriate development to it, to structures or features in its curtilage, or by new development in its setting. Proposals will need to be informed by an understanding of the significance of a Listed Building and its wider setting, irrespective of whether works are proposed to the Listed Building itself. Planning permission and/or listed building consent will only be granted where the relevant requirements are satisfied.

6.25 The best way of securing the upkeep of historic buildings and areas is to keep them in active use. It is recognised that buildings and structures will often necessitate some degree of adaptation. The range and acceptability of proposed uses must therefore be a major consideration, particularly where Listed Buildings are concerned. The conversion of Listed Buildings to new or different uses can result in harmful impacts to the building's significance. This is due to works to the historic fabric (for instance related to the insertion of new service routes, vents and ducts) or plan form (for instance subdividing floor spaces to create additional units).

6.26 We will seek to ensure that extensions and other works or alterations to Listed Buildings are restricted to the less significant parts of the building. Proposals will be required to provide full details of the development or associated works. This is in order that the impacts can be appropriately assessed. This must include details of any ancillary works of servicing, extraction, fire separation, access, and sound and thermal insulation. In many cases non-standard approaches and materials will be necessary to respond sensitively to the historic building fabric and form. The cumulative impact of works that, in isolation, may cause only minor harm will also be considered.

6.27 Where development in the curtilage of a Listed Building is justified by the applicant as necessary to ensure its future viability or repair, and/or is classed as enabling development, full financial viability details will be required to be submitted.

Registered parks and gardens, and scheduled ancient monuments

6.28 Registered parks and gardens and scheduled monuments require particular care because of their landscape, archaeological, historic and cultural significance. Proposals should avoid harm to their layout, design, character, setting and important views, and should not prejudice conservation, interpretation or restoration.

6.29 The effect of a proposal on the archaeological value or special interest of a scheduled ancient monument is a material consideration in determining a planning application.

6.30 The best way to avoid loss of significance of buried archaeological remains is to preserve them in situ. Where this cannot be done, provision for excavation and recording will be required to be undertaken prior to development or required by condition during development.

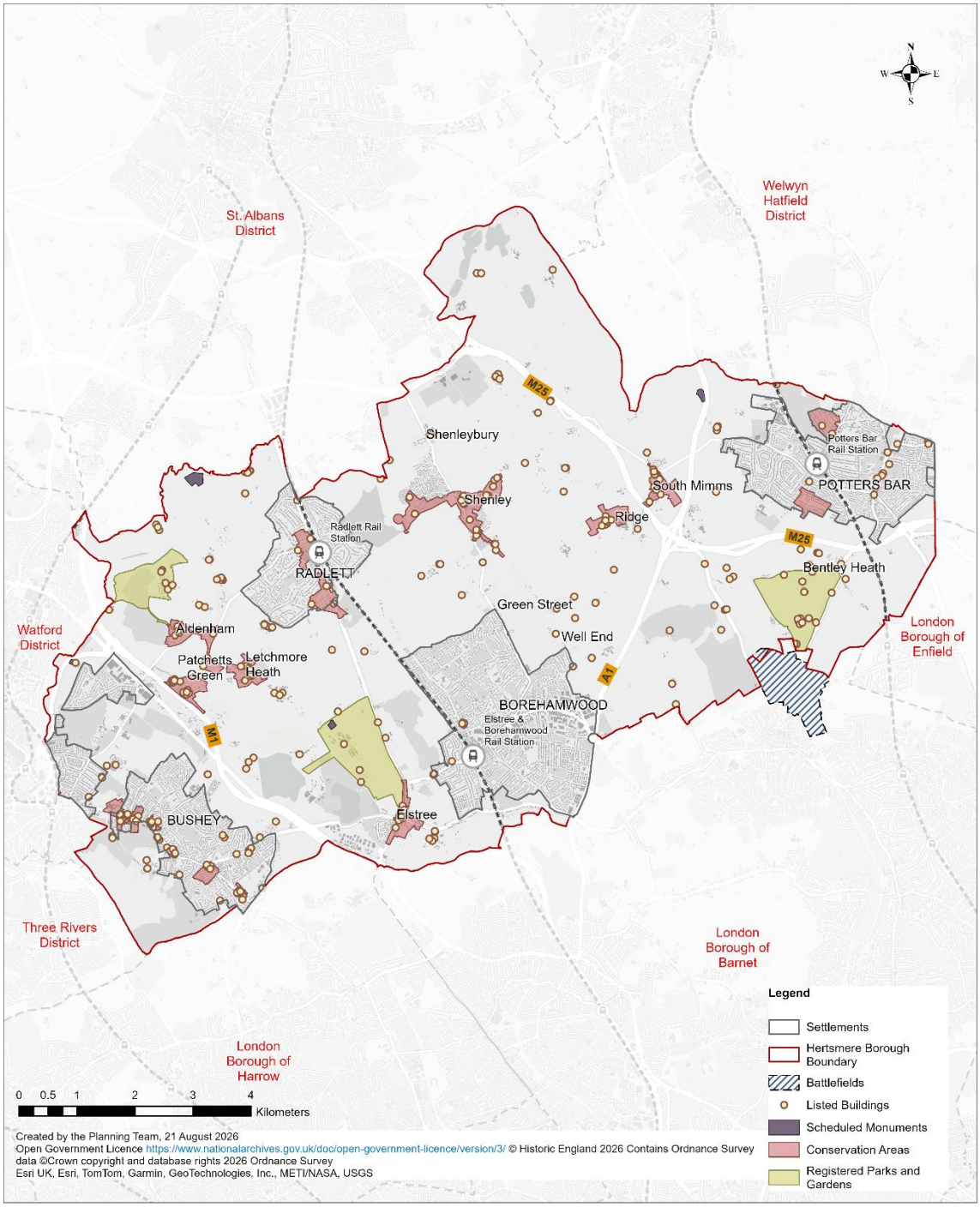

Figure 6.1: Designated Heritage Assets

HE3 Non-Designated Heritage Assets

Strategic objectives

A Delivering a better future for Hertsmere
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
G Securing a greener Borough
I Celebrating our local identity
J Healthy and safe communities

Non-strategic policy

A The Council will conserve non-designated heritage assets in a manner appropriate to their significance, including any contribution made by setting.

B Development proposals affecting a non-designated heritage asset or its setting will be supported where they:

i. Identify the asset and assess its significance proportionately;

ii. Conserve or enhance the elements which contribute to that significance;

iii. Respond positively to the asset's siting, form, scale, materials, detailing, setting and contribution to local character;

iv. Retain, repair and reuse the asset where feasible and consistent with its significance;

v. Avoid or minimise harm through sensitive design, layout, landscaping and mitigation; and

vi. Where loss or harm is justified, secure appropriate recording, interpretation and archive deposition.

C Where a proposal would directly or indirectly harm or result in the loss of significance of a non-designated heritage asset, a balanced judgement will be made having regard to the scale of harm or loss, the significance of the asset and the public benefits of the proposal.

D The Council will support the identification of additional non-designated heritage assets through local listing, neighbourhood planning, conservation area appraisal, development management and other evidence-based processes.

E The absence of an asset from a local list will not preclude it from being treated as a non-designated heritage asset where evidence demonstrates local heritage interest.

Explanation

6.31 Non-designated heritage assets are not included on statutory lists or national registers but are valued for their contribution to Hertsmere's local character, identity and history. They may be identified through local lists, neighbourhood plans, evidence studies or during the determination of planning applications. They may include locally listed buildings and structures, locally important parks and gardens, historic landscapes, archaeological sites, historic shopfronts, boundary features, public realm features, industrial heritage, places of worship, cultural venues and other buildings, spaces or features of local architectural, historic, archaeological, artistic, townscape, landscape or communal interest.

6.32 The absence of an asset from a local list does not mean that it has no heritage significance. Where evidence demonstrates that a building, structure, landscape, archaeological site or feature has local heritage interest, it will be treated as a non-designated heritage asset for the purposes of decision-making.

6.33 Proposals affecting non-designated heritage assets should be informed by a proportionate assessment of significance. The Council will encourage early identification, retention, repair and reuse, particularly where assets contribute positively to townscape, landscape, community identity or the setting of designated heritage assets.

6.34 Where harm or loss is unavoidable and justified, the Council may require appropriate recording, analysis, publication, interpretation or archive deposition to ensure that knowledge of the asset is not lost.

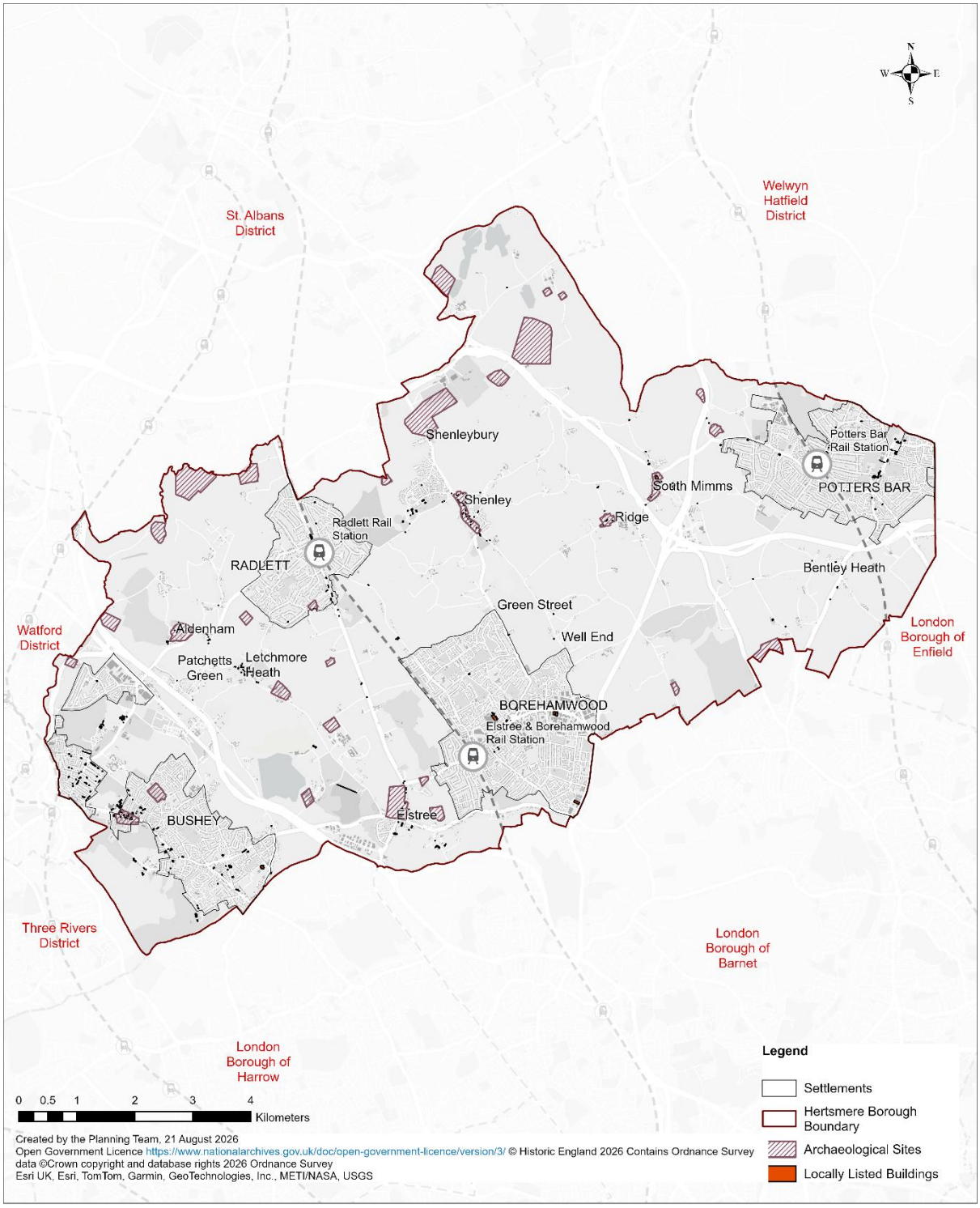

Figure 6.2: Non-designated Heritage Assets

Chapter 7: Housing

Section

H1 Meeting Hertsmere's Housing Need

H2 Optimising Delivery from Small Urban Sites

H3 Genuinely affordable housing

H4 Accommodation for older people

H5 Supported and specialised accommodation

H6 Housing with Shared Facilities/Homes in Multiple Occupation

H7 Self and custom-build housing

H8 Gypsy and traveller accommodation

H9 New Homes in the Countryside / Green Belt

H1 Meeting Hertsmere's Housing Need

Strategic Objectives

A Delivering a better future for Hertsmere
E Meet the Borough's housing needs by delivering homes for everyone

Strategic Policy

Hertsmere's housing target

A The Council will work positively and proactively with stakeholders, including development industry partners, to facilitate a significant increase in the delivery of new homes to help meet Hertsmere's housing needs and secure successful and sustainable place-making.

Development proposals must make the best use of land and optimise the capacity of housing sites to ensure that the Borough's local housing need is exceeded through the delivery of at least 16,575 net housing completions from the anticipated start date of the Local Plan, 2026/27 to 2042/43 (equivalent to 975 net housing completions per annum).

B The Council will keep under review the Local Plan's strategic housing target and performance against delivery. Outputs form the monitoring process will be reported through the Authority Monitoring Report, which will include an annual five-year housing land supply statement. The Council will consider taking appropriate and proportionate measures should consented housing schemes fail to be delivered in a timely manner.

Increasing housing supply

C A carefully managed uplift in the delivery of new housing development across the Borough, with priority given to genuinely affordable housing, will be achieved by:

i. Directing new housing development to the Borough's four main settlements and their town centres, consistent with the spatial strategy for the Borough set out in Policy HSS1 (Delivering a better future for Hertsmere);

ii. Allocating strategic sites for new housing, including mixed-use development, and supporting development proposals where they comply with the site allocation requirements and resisting proposals that are at odds with these;

iii. Facilitating the sensitive intensification of established residential areas and supporting the development of small sites for housing, in line with Policy H2 (Optimising the use of small sites);

iv. Securing the delivery of a new town at Bowman's Cross that will commence during the plan-period and continue to supply new homes into the next. The delivery of the new homes at Bowman's Cross will be supported by proportionate and appropriate infrastructure necessary to make it a successful and sustainable place;

v. Ensuring that all development proposals make the best use of land and optimise the capacity of housing sites, in line with Policy HQD6 (Optimising site capacity).

vi. Making the best use of the existing housing stock, including by using available tools to bring vacant units back into use and to regulate the use of homes for short-stay visitor accommodation;

vii. Refusing development proposals that will result in the net loss of housing unless:

   a. It is suitably replaced at existing or higher densities with at least the equivalent amount of new residential floorspace; or

   b. The proposal is for strategic infrastructure that demonstrably meets an identified need and is necessary to support delivery of the spatial strategy for the Borough; and

   c. Ensuring the phasing of development corresponds with the delivery of infrastructure required to support growth and to speed up the rate of delivery of new homes where planning consent has been granted.

Inclusive and mixed neighbourhoods and communities

D Development proposals for housing must demonstrate how they will contribute to and support inclusive and mixed neighbourhoods and communities across Hertsmere. Details should be set out in the Inclusive Design Statement which must be submitted in accordance with Policy HQD2 (Inclusive and Safe Design).

E Development proposals must deliver an appropriate mix of housing within the site and local area. The appropriate mix should be established on a case-by-case basis having regard to the site's location and character, the nature and scale of development proposed, along with;

i. The requirement for at least 40% of all new homes delivered in the Borough to be for genuinely affordable housing. The exception being flatted developments being delivered on previously developed land in Borehamwood and Potters Bar, which will deliver at least 20% of all new homes as genuinely affordable housing;

ii. The required mix of tenure types for affordable housing, with reference to Policy H3 (Genuinely affordable housing);

iii. The need to secure provision of a mix of unit sizes to meet local need, with reference to the target unit size mix for affordable housing set out Table 7.1;

iv. The need for provision of family housing units (3+ bedrooms), with a reasonable proportion of family units to be delivered on major developments of 10 or more dwellings; and

v. The delivery of liveable and sustainable neighbourhoods that are appropriately supported by community facilities and other infrastructure.

Housing choice

F To help ensure that residents and other people have access to a wide range of suitable housing provision, the Council will:

i. Seek that development delivers a wide range of genuinely affordable and other housing products, including market housing, to meet the needs of households of different sizes and income levels;

ii. Support development proposals that meet the needs of specific groups including families with children, older people, people with disabilities, students and vulnerable people;

iii. Promote and support innovative housing designs, such as modular housing, particularly where these address acute or specialist local housing needs;

iv. Support appropriate proposals for self-build or custom build housing, and seek to identify land to help facilitate such development where a need is clearly established; and

v. Encourage developers and agents to market new housing units for sale or rent to existing residents and people with a local connection before advertising them more widely to others.

Table 7.1: Target unit size mix for affordable housing

Tenure Type	1 Bed	2 Bed	3 Bed	4 or more beds
Social Rent	23%	33%	34%	10%
Intermediate	18%	39%	30%	13%

LHNA housing mix distribution for Market housing

1 Bed	2 Bed	3 Bed	4 or more beds
4%	24%	43%	29%

Explanation

Hertsmere's Housing Target

7.1 The delivery of new homes that meet the Borough's needs is a key component of successful and sustainable place-making. Hertsmere's previous local plan set out the requirement for housing provision for the Borough between 2012 and 2027, which equated to the delivery of about 266 homes per annum over that plan period. However, much has changed since that plan's adoption. Notably, national planning policy has sought to provide a positive response to the housing crisis by identifying a level of housing need that seeks to boost supply and delivery. Consequently, the latest national standard method calculation[1] identifies a housing need for Hertsmere that delivers at least 975 additional homes per annum. Whilst national planning guidance recognises there are some specific exceptional circumstances in which an alternative approach to the national standard method could be justified However, the Council concludes that there is no evidence that Hertsmere experiences any exceptional circumstances that justify an alternative approach.

7.2 National Planning Policy requires that the supply of deliverable homes must also include a suitable buffer that considers the delivery of new homes[2]. The latest Housing Delivery Test measurement demonstrates that Hertsmere has fallen below 85% delivery over the three-year reporting period. Consequently, the Borough is subject to the application of the 20% buffer on the first five-years of the plan period. Annualised this equates to a total requirement of 1,170 additional homes per annum, which will apply for as long as delivery performance remains below 85% over a three-year period. Once delivery exceeds 85% the buffer will fall away and Hertsmere's annual housing requirement will return to at least 975 additional homes per annum.

7.3 To be found sound the Hertsmere Local Plan must seek to at least meet all the Borough's identified housing need in full during the plan period. Consequently, it identifies sufficient and diverse sources of supply, which accord with the spatial strategy, to achieve that objective. The plan-making process, through the Duty-to-Co-operate[3] has explored the possible of opportunities for accommodating any potential unmet need, which may arise over the plan-period, on sites located within neighbouring boroughs. That process confirms that Hertsmere's neighbours do not have the capacity to meet any unmet needs should they arise.

7.4 To help inform the preparation of the Local Plan the Council has undertaken an assessment to identify sources of land that may be suitable and available for housing development, including:

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[1] At the point of the Local Plan's publication under Regulation 19 during Autumn 2026.
[2] National Planning Policy Framework (December 2024) Paragraph 78.
[3] Following the removal of the Duty, as part of the newly introduced plan-making process (August 2026), the Council continued engagement with partners under the auspices of discharging its strategic planning responsibilities.

- A comprehensive review of land and sites available for development in the Borough, including the preparation of Borough-wide HELAAs;
- Undertaking of several 'call for sites' exercises inviting the public, including landowners, developers and agents, to help identify sites that might be suitable for different types of development;
- A strategic Green Belt Assessment to understand how the Borough's designated Green Belt is performing and whether there is scope to release any parts of this land to other uses, including for housing;
- Scrutiny of potential development sites to establish whether they are deliverable and developable[4], including through engagement with landowners during the plan's preparation;
- Detailed assessments of the development capacity of potential development sites, considering relevant market signals and making reasonable assumptions as to what the industry can deliver.

7.5 The Local Plan identifies specific site allocations which have the potential capacity to deliver at least 14,390 net new homes over the lifetime of the Plan. When combined with other consented housing schemes, housing sites delivering less than 50 dwellings identified in the Housing and Economic Land Availability Assessment, and the trend-based small windfall delivery rates in the Borough, there will be sufficient capacity to provide at least a supply of 17.3 deliverable years and meet the housing need over a 17-year period. However, the phasing of development will be an important consideration. A Housing Trajectory is included at Appendix 5 to the Local Plan which sets out details on the expected phasing of housing delivery over the plan period[5].

7.6 For monitoring housing completions, net changes on conventional and non-conventional forms of housing will be calculated in line with national planning policy guidance. For the avoidance of doubt, non-self-contained student accommodation bedrooms will be counted on a 2.4:1 ratio, with every 2.4 bedrooms being counted as a single home. All other net non-self-contained communal accommodation, including residential institutions, care homes and other non-student communal bedrooms, every 1.9 bedrooms will count as a single home.

7.7 The Local Plan seeks to facilitate a carefully managed uplift in the delivery of new housing development across the Borough to meet local needs, with priority given to genuinely affordable housing. There are several different routes to increasing housing supply which reflect the varying scale of opportunities available. These range from enforcement action to bring vacant housing units back into use, the sensitive intensification of small sites, and more strategically, the comprehensive

[4] Deliverable and developable as defined by the NPPF Glossary Page 72 (December 2024).
[5] In accordance with NPPF Paragraph 78 (December 2024) a 20% buffer has been applied as there has been under delivery of housing over the previous three years.

redevelopment of larger brownfield sites including those for which site allocations have been prepared. All such routes to housing delivery relate to the spatial strategy for the Borough, which aims to direct development in support of successful and sustainable place-making. We will work with development industry partners and other stakeholders to identify opportunities to optimise the capacity of sites that are suitable for new housing, ensuring that development will be appropriately supported by infrastructure.

Inclusive and mixed places and communities

7.8 Hertsmere is a relatively diverse Borough comprised of many distinctive places and communities. Whilst it is vibrant and wealthy there are pockets of social and economic deprivation scattered across the Borough. The Council is committed to achieving inclusive and mixed communities by addressing the environmental, social and economic barriers that adversely affect peoples' lives. The Local Plan seeks to facilitate a significant uplift in housing, and our expectation is that new development must respond to existing imbalances in provision, so to better meet local needs and contribute to sustainable places and communities. This policy sets the strategic approach for securing an appropriate mix of housing when new development comes forward.

7.9 There is a significant and acute need for more genuinely affordable housing in the Borough, as demonstrated by the Hertsmere Local Housing Needs Assessment (2026). To respond to these acute needs, development proposals must contribute towards the Borough's target of at least 40% of all new homes delivered to be genuinely affordable. The exception is towards schemes that deliver optimised flatted and apartment developments within Borehamwood's and Potters Bar's existing urban areas. These will be required to deliver at least 20% of all new homes as genuinely affordable provision. Residential development proposals must maximise the amount of affordable housing on-site, subject to viability, having regard to the requirements in Policy H3 (Genuinely affordable housing). We will work proactively with partners and industry stakeholders, including private developers, to secure the delivery of more high-quality and genuinely affordable housing.

7.10 Development proposals must respond to local need by securing a mix of dwelling sizes (in terms of occupancy measured by bed spaces), particularly family sized units (i.e. 3+ bedrooms). Development proposals for major residential development must make provision for a reasonable proportion of family housing units, the amount of which will be considered on a case-by-case basis considering financial viability. Minor development proposals of less than 10 units incorporating family sized units will be considered favourably. Development proposals should not normally result in the loss of family sized units (including through demolition and redevelopment); further details on the conversion of family housing are set out in Policy H2 (Optimising the use of small housing sites). Where development proposals include an element of affordable housing, the unit size mix should be established with reference Table 7.1. All development proposals will be expected to demonstrate how

the dwelling size mix is appropriate to the site in contributing to inclusive and mixed neighbourhoods and communities.

Housing Choice

7.11 The availability of a wide range of housing choices, with provision for a mix and balance of housing types, sizes and tenures is essential to the achievement of inclusive neighbourhoods and communities. We will generally support proposals that enhance housing choice and access to genuinely affordable housing across Hertsmere. The Local Plan sets out additional policies that address the needs of different groups including those who require specialised forms of housing. Further details are set out later in this section.

7.12 Hertsmere welcomes and encourages innovative and high-quality housing design with both public and private sector led. We are broadly supportive of development proposals applying innovative and contemporary designs where they comply with other Local Plan policies. Development proposals for housing as a meanwhile use will be considered with reference to Policy DM5 (Meanwhile uses).

7.13 Those with a connection to Hertsmere, including people currently living or working locally or with family connections in the Borough should have a good opportunity to access new housing as it is made available on the private market. This is particularly relevant for those residents with adult children who are struggling to find new homes in the Borough. We will therefore encourage developers and agents to advertise new units locally, ideally for a period of 3 months, before marketing them more widely. Whilst the Council exercises no planning control in this respect, it will broadly support developers and agents in making a reasonable proportion of new residential units available to residents, UK citizens and others with a strong connection to the Borough, particularly for owner occupation.

H2 Optimising Delivery from Small Urban Sites

Strategic Objectives

A **Delivering a better future for Hertsmere**
E **Meet the Borough's housing needs by delivering homes for everyone**
J **Healthy and safe communities**

Strategic Policy

A The development of small urban sites will play an important role in increasing housing supply across Hertsmere, meeting needs, and supporting provision for a wide range of high-quality and affordable homes. Historic windfall rates from small sites suggest that without any interventions about 1,000 new homes could be delivered from windfall sources across a plan-period. This policy supports a step change in delivery. This assumption is supported by evidence collected during the plan-making process.

B Hertsmere's Spatial Strategy (Policy HSS1 Delivering a better future for Hertsmere) directs future housing development towards the Borough's four main towns. The intensification of these existing settlements through the delivery of small urban site opportunities is a key component of that approach. However, sites that fall outside of the four main towns may also be suitable for small site intensification. Conversely small sites located within the four main towns do not necessarily have an automatic right to be developed as such.

i. Opportunities should be taken to optimise the capacity of small sites for new housing development across the Borough's four main towns, including through:

ii. Redevelopment of vacant and underused brownfield sites, and ancillary buildings such as garages;

iii. Housing conversions;

iv. Housing alterations and extensions; and

v. Infill and backland development

C Development proposals for housing on small sites will only be supported where they help to facilitate the delivery of the spatial strategy for the Borough, and:

i. Are appropriately located for residential use;

ii. Are of a high-quality design with accommodation that meets the relevant standards for living and amenity space, with reference to Policy QD8 (High-quality housing design);

iii. Respond positively to local character, including historical character and heritage assets;

iv. Protect and enhance biodiversity and green infrastructure, and further maximise opportunities for urban greening;

v. Make provision for affordable housing, in line with Policy H3 (Genuinely affordable housing);

vi. Protect and do not result in unreasonable adverse impacts on local amenity;

vii. Do not result in the loss of community infrastructure, with reference to Policy CI1 (Safeguarding and securing community infrastructure); and

viii. Do not prejudice the delivery of site allocations in the Local Plan.

D Neighbourhood forums are encouraged to identify locations and allocate sites appropriate for housing development, including small sites, within neighbourhood plans.

Housing conversions

E To maintain a supply of housing suitable for families, development proposals for the conversion of a single-family dwelling, or self-contained unit with 3+ bedrooms, into smaller self-contained residential units (including flats) will only be supported where:

i. A family sized unit (3+ bedrooms) is re provided, unless it is demonstrated that the property is not suitable for family accommodation due to environmental or other site constraints;

ii. All housing units benefit from a layout and configuration that is practical for residential occupation, with reference to other policies on high-quality design;

iii. In the situation garden land or other dedicated private outdoor amenity space is available, the extent of and access to this private amenity space is maintained for the existing family unit, and wherever possible, made accessible to residents in other units; and

iv. The development will not result in an adverse impact on local character.

F Development proposals for the conversion of properties into Houses in Multiple Occupation will be considered against Policy H6 (Housing with Shared Facilities - Houses in Multiple Occupation).

Explanation

7.14 Securing the delivery of small urban sites for high-quality new homes is an important element of the Local Plan's Spatial Strategy. The delivery of these small urban sites will contribute towards meeting the Borough's housing needs; provide a positive response to the national housing crisis; diversify the Borough's sources of housing land supply; provide greater certainty to windfall assumptions; and help the industry make the necessary step change in building-out their consents. Critically for Hertsmere, making the best use of the Borough's small urban sites for new home will take some of the pressure-off larger the larger urban extension sites allocated around the four main towns.

7.15 Previous local plans have considered the potential sources of supply provided by small urban sites through the inclusion of an assumed windfall allowance. This approach considered historic trends of small schemes that came forward speculatively through the development management process. The Council is seeking to move away from this approach by providing small and medium sized enterprise (SME) developers with greater certainty that proposals that optimise the potential of small sites will be positively considered.

7.16 The Council considers that this approach will over the life of the Local Plan boost the delivery of small housing development beyond historic delivery levels. Our aim is not only to meet historic windfall trends but to exceed them, recognising a variety of measures are needed to achieve the overall housing target and meet the range of housing needs of different groups in the Borough. This includes meeting the need for genuinely affordable housing. Through the development and sensitive intensification of small sites, there will be more opportunities to secure planning contributions that can be invested in the delivery of new affordable housing units.

7.17 Furthermore, small sites can play an important role in addressing local deprivation and contributing to the wider Spatial Strategy objective of urban regeneration. The delivery of high-quality development on small urban, whether solely residential, or as part of a compatible mix of uses, provides a mechanism for more incremental investment and area improvement. These can help to address the underlying causes of deprivation and contribute towards regeneration. In short, our positive approach to small site development is informed by the Local Plan's strategic objectives and is not simply a matter of housing numbers.

7.18 Across Hertsmere's four main towns there are a variety of opportunities and types of small sites that can support new housing development. Vacant and underused brownfield sites along with redundant ancillary facilities, such as garages or residential storage units, present relatively straightforward options for redevelopment. However, these types of sites can be limited in availability and are often constrained, such as by irregular plot forms, site access issues or land-use designations (including those that protect land for commercial uses). It is therefore expected that on most of the small sites, development will occur in established residential areas, where new homes can be sensitively integrated with other

compatible uses. Housing development on small sites can take several forms including: new build, infill and backland development, conversion (subdivision of houses into flats), demolition and redevelopment or extension of existing buildings (including upward, rear and side extension, and basement development).

7.19 Our approach to housing development on small sites is expected to facilitate the incremental intensification of established residential areas within the Borough's four main towns, particularly in accessible locations that are within 800 metres of a railway station or town centre.

7.20 It is imperative that future growth and development occur in a way that respects and enhances local character, with the distinctive features of Hertsmere's communities at the heart of the design-led approach. The Settlement Vision for the Borough's four main towns, prepared in support of the new Local Plan, identify areas that could facilitate the uplift in small housing development, recognising that the physical character of some areas may need to evolve gradually over time, for example, to accommodate new housing and investment in infrastructure. There is a recognition that the Borough's small urban site opportunities are located on a spectrum of sensitivity to change, based on local character, considering factors such as existing urban grain, historic evolution, building typologies, and spatial strategic growth and regeneration priorities. All proposals for small housing development will be expected to consider and account for these factors, as a starting point, to understand the scope for intensification in each area and to gain an appreciation of the key features of local character. This will be undertaken through the design-led approach to growth.

7.21 Where small site housing development is proposed it should not have an unacceptable adverse impact on biodiversity and green infrastructure. Applications will be expected to identify potential impacts in this respect and clearly set out measures to minimise and mitigate these. Measures may include the return of hard standing to green space, installation of green roofs and walls, and sustainable landscaping. In exceptional circumstances, where site constraints demonstrably preclude the implementation of on-site measures, then off-site provision (for example, tree planting) may be acceptable to ensure policy compliance. Off-site provision will be secured on a case-by-case basis using legal agreements and/or planning contributions.

7.22 This policy presents a new strategic approach to meeting housing need locally. An allowance for small site development has been made in the Local Plan housing trajectory. This sets out the expected rate of housing delivery over the Plan period, based on past trends. We will monitor progress towards the small site housing target through the Authority Monitoring Report and consider this policy's effectiveness through the Local Plan review process. Monitoring will also provide us with information to understand the spatial distribution of new small housing development and consider whether interventions are necessary, for example, to ensure those areas where this type of development is concentrated are appropriately supported by community facilities and other strategic infrastructure.

Housing Conversions

7.23 The Hertsmere Local Plan seeks to ensure provision for a wide range of housing types and tenures to meet local need, including need arising from families. The Local Plan seeks to ensure provision for a wide range of housing types and tenures to meet local need, including need arising from families. Whilst recognising that conversions support delivery towards the strategic housing target, it is important that provision for family accommodation is not compromised. The Local Plan therefore sets out requirements to ensure that family sized units (3+ bedrooms) are retained when residential conversions come forward.

7.24 Development proposals must therefore ensure that existing family sized units are not unnecessarily lost through conversion. This policy is not considered to inhibit the achievement of the small sites housing target, as proposals will continue to be supported where adequate family sized units are retained or re-provided.

7.25 Some flexibility may be applied on a case-by-case basis where it can be suitably demonstrated that environmental or other site-specific constraints make re-provision of a family sized unit inappropriate. This includes consideration of the site or building size (which might compromise achievement of the minimum space standards for a 3+ bedroom unit), lack of amenity space suitable for a family, or other environmental constraints that would adversely impact on occupants, particularly children and young people.

H3 Genuinely affordable housing

Strategic Objectives

A Delivering a better future for Hertsmere
F Delivering affordable homes

Strategic Policy

A The requirement is for at least 40% of all new homes delivered in Hertsmere on major developments to be genuinely affordable. The exception is towards schemes that deliver optimised flatted and apartment developments within Borehamwood's and Potters Bar's existing urban areas. These will be required to deliver at least 20% of all new homes as genuinely affordable provision. The Council will seek the maximum amount of genuinely affordable housing to be delivered on new housing developments. Development proposals involving new housing will only be supported where the site capacity has been optimised and delivery of affordable housing maximised.

B The affordable housing requirement will apply to all forms of conventional housing in the C3 Use Class, and where appropriate, specialist and supported accommodation.

C The affordable housing requirements for major developments (large sites) will apply in circumstances where development has already been permitted and 10 or more dwelling units will be delivered considering:

i. New residential units that are proposed which would result in an uplift in the overall number of units on the site of the extant permission; and

ii. Development that is proposed on an adjacent site which by virtue of its layout, design and use is functionally related to the extant permission and would result in an uplift in the overall number of units across the sites.

D Applicants will be expected to make all reasonable efforts to secure grant funding to deliver an increase in affordable housing beyond the level that would otherwise be achievable. The Council will work positively with development industry partners to help identify opportunities to secure grant funding to deliver more genuinely affordable housing in Hertsmere.

Large sites (major developments)

E Development proposals for new housing, including mixed-use developments, with site capacity to accommodate 10 or more dwelling units must deliver the maximum amount of genuinely affordable housing, considering:

i. Their contribution to the Borough's strategic affordable housing target, based on habitable rooms, subject to viability.

ii. The need for provision of a mix of secure housing tenures, with the affordable component sought to be provided based on a tenure split of 75% genuinely affordable (social rent) and 25% intermediate (shared ownership);

iii. The preferred housing size mix for affordable housing, as set out in Table 7.1;

iv. Availability of public subsidy; and

v. Other planning benefits that may be achieved, having regard to the delivery of the spatial strategy for the Borough.

F Where a Viability Assessment is submitted to support the level of affordable housing provision made by a development proposal, this must be based on a standard residual valuation approach, with the benchmark existing use value of the land taken as the Existing Use Value (EUV) Premium or the potential for Alternative Use Value.

G To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal the use of 'review mechanisms' will be required, where appropriate, and implemented.

H To promote inclusive and mixed communities all new affordable housing provision should be delivered on-site. Off-site provision for major development proposals will only be considered in exceptional circumstances, where it can be demonstrated to the satisfaction of the Council that:

i. It is not practical or feasible to provide affordable housing on-site due to site development constraints;

ii. A higher level of affordable housing can be secured through provision on an alternative site;

iii. Off-site provision is necessary to better meet priority housing need, such as for affordable family housing; and

iv. The provision will better support inclusive and mixed communities.

Inclusive and mixed neighbourhoods and communities

I To secure inclusive and mixed neighbourhoods and communities the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. In establishing the most appropriate level of provision for a site, development proposals will be considered having regard to the existing levels of housing tenure and mix in the area (including extant permissions).

J All new affordable housing developments must be of a high-quality design having regard to other Local Plan policies. They must be designed to be 'tenure neutral' in accordance with the National Design Guide, so that affordable units

are indistinguishable from market units in terms of quality of design and materials, space standards, access and amenity. Where mixed tenure schemes are proposed these must ensure all residents of the development have access to amenities and communal spaces including play spaces, with reference to Policy HQD2 (Inclusive and safe design).

Explanation

The need for genuinely affordable housing

7.26 Although Hertsmere's has enjoyed some success in securing new affordable homes from new development schemes, affordability remains the most significant component of the Borough's housing need. It is still the case that not everyone is able to access housing that is affordable and within their means.

7.27 The Hertsmere Local Housing Needs Assessment (2026) indicates that median house prices across the Borough have increased by more than 17% in the ten-year period between 2016 and 2025. Home ownership is becoming an increasingly unaffordable prospect for those seeking to purchase a place to live in Hertsmere. This is particularly the case for first time buyers, with median house prices close to 12 times the median workplace earnings. The cost of private rented sector housing has also increased pointedly over recent years median rents reaching £1,300 in September 2022, making this housing option unaffordable to many.

7.28 The above situation has contributed to acute issue of homelessness in the Borough, which is reflected by the number of households on the Council's Housing Register. As of November 2025, there were 698 live applicants on the housing waiting list. In short, the gap between incomes and housing costs is rapidly widening, and consequently there is a significant local need for affordable housing.

7.29 Consequently, to address the matter of housing affordability the Local Plan sets a target for at least 40% of all new homes delivered in the Borough on major sites to be genuinely affordable. Within Hertsmere, "genuinely affordable housing" means housing that is available at social rent levels. All other housing products below market levels, whether for sale or rent, are defined as intermediate housing and should not be conflated with genuinely affordable housing. Furthermore, genuinely affordable housing and intermediate housing should provide for secure tenancies. For affordable homes, we will seek that residents are provided with lifetime tenancies, ideally in perpetuity. The tenants of intermediate tenure products will be provided tenancy protection through the relevant law and policy.

7.30 Our expectation is that the maximum amount of genuinely affordable housing will be delivered on all new residential development sites, having regard to viability. Habitable rooms will be used as the basis for calculating affordable housing provision against the Borough's target, which is an established approach elsewhere. This measure provides flexibility to deliver affordable housing that is best tailored to

meeting the range of local needs, and to enable additional provision of affordable family sized units to come forward.

7.31 Affordable housing will be required from all large sites with capacity to accommodate 10 or more residential units, and this applies where development is proposed incrementally. This includes variations to a planning consent resulting in additional units on the site. This policy seeks to guard against actions to circumvent the affordable housing requirements, such as through the artificial sub-division or phased development of sites. In considering whether the affordable housing requirement should apply in these circumstances, we will have regard to extent of single ownership of land and sites; occupied status of land/sites at the grant of permission and at commencement of development; and the amount of time elapsed between permissions, completions and any new proposals.

7.32 The exception to the above approach will apply to development proposals that deliver residential flats or apartments in Borehamwood and Potters Bar existing urban area. To ensure that proposals for schemes remain viable, deliverable in a timely manner, secure the regeneration in Borehamwood and Potters Bar, and optimise the capacity the Council will seek to secure at least 20% all new homes delivered on such sites to be genuinely affordable. Proposals for flatted schemes within Borehamwood and Potters Bar existing urban will also be required to meet other relevant planning policy requirements, specifically those relating to delivering high-quality design and optimising site capacity.

7.33 All development proposals will be expected to demonstrate that they have maximised the amount of genuinely affordable housing on-site in contributing to the delivery of the Borough's affordable housing target. Applicants are encouraged to investigate realistic options to provide a further uplift of genuinely affordable housing (i.e. beyond that which can be viability delivered through development value alone) including using public subsidy. This will require engagement with industry stakeholders, including Registered Providers, early in the development process to identify and capitalise on opportunities available. Where subsidy is secured, applications will be expected to clearly state the level of affordable housing that is to be provided using this subsidy. This clarification is required to assess schemes against the policy requirements, and for effective and transparent implementation of the threshold approach.

7.34 The Council has determined to set the requirement all major developments deliver at least 40% or 20% of all new homes as genuinely affordable provision to pre-empt all subsequent discussions on the matter of viability. Consequently, development proposals that do not provide the minimum required amount of genuinely affordable housing will be strongly resisted. Where applicants consider there are exceptional circumstances affecting the viability of a scheme and delivery of policy objectives, this must be justified through the submission of a detailed Viability Assessment. This must be undertaken by a suitably qualified professional (such as one accredited by the Royal Institute of Chartered Surveyors) and will be made publicly available upon validation of the planning application. All such assessments will be considered

having regard to higher level policies and associated guidance. This includes the NPPF and companion National Planning Practice Guidance on 'Viability and decision taking', or future equivalent. A lower level of affordable housing will only be permissible where there are clear barriers to delivery and development that is fully justified through detailed viability information. We may require that an independent appraisal of the Viability Assessment is undertaken, which will need to be paid for by the applicant.

7.35 Consistent with national planning policy, our expectation is that affordable housing will be delivered on-site. This is to promote inclusive and mixed communities, as well as to help ensure that there is no undue delay to the delivery of affordable housing when it is included with proposals for market housing. However, there may be exceptional circumstances where it is appropriate to deliver affordable housing off-site including through payment in lieu. Applications will be required to provide robust justification for any off-site provision. Viability alone will not be considered sufficient justification for off-site provision.

7.36 Viability 'review mechanisms' are reappraisal tools that can be used to ensure maximum public benefit is secured from development, including benefits associated with affordable housing delivery. Review mechanisms can be particularly important on phased schemes or schemes with longer build out periods and are a useful way to respond to economic uncertainties that may arise over the lifetime of a development proposal. We will seek to apply viability review mechanisms as a standard practice. This will help to ensure that if there is an improvement in viability over the lifetime of the development proposal, this contributes to the maximum amount of affordable housing provided.

7.37 The most pressing area of affordable housing need in Hertsmere is for new social homes with social rents. However, there is also a need for affordable housing which is available to people who are unable to access social housing due to the rigorous eligibility criteria but are also unable to afford private market housing. Therefore, where affordable housing is required on new development this should be provided on a tenure split basis of 75% social rent and 25% affordable home ownership. Shared ownership products may also be an acceptable form of tenure, where the total monthly costs are demonstrably affordable.

7.38 In line with other Local Plan policies, all new affordable housing development must be of a high-quality design and incorporate durable materials, adhering to the same space and amenity standards as market housing. To promote inclusive and mixed neighbourhoods and communities it is imperative that affordable housing is designed to be 'tenure blind' and 'tenure neutral, in accordance with the Government's National Design Guide, so that it is indistinguishable from other types of housing. Affordable housing must also be sensitively integrated into the site and its surroundings to ensure that all residents, irrespective of tenure type, are provided with high-quality living environments and are able to benefit from shared access to all on-site amenities.

H4 Accommodation for older people

Strategic Objectives

A **Delivering a better future for Hertsmere**
E **Meet the Borough's housing needs by delivering homes for everyone**
J **Healthy and safe communities**

Non-strategic Policy

A The housing needs of older people will be met mainly through conventional residential accommodation in the C3 Use Class that is designed in a way that allows for easy adaptation to the different needs of users over their lifetime. This includes new build development and the appropriate retrofitting of housing units. Specialist older person's accommodation and care home accommodation should supplement conventional housing to meet the needs of Hertsmere's older resident population.

Specialist older persons accommodation

B Development proposals for specialist older persons accommodation will only be supported where they:

i. Respond positively to the objectives in Hertsmere's Housing Strategy;

ii. Make provision for a mix of tenure types including affordable housing with reference to Policy H3 (Genuinely affordable housing);

iii. Make provision of accessible housing, in line with Policy HQD2 (Inclusive and safe design);

iv. Are sited at well-connected locations that are well-served by public transport and provide for good access to community facilities and services (including health and social care) appropriate to the intended occupiers;

v. Are of a high-quality design with fit for purpose accommodation and facilities suited to occupiers, staff and visitors, considering:

a. The level of independence of occupiers and corresponding level of managed care provision or support;

b. Private, communal and public amenity space; and

c. Access, parking and servicing arrangements, including for all types of vehicles expected to access the development

Explanation

7.39 The Council recognises that as a nation our population is ageing. This is true for Hertsmere, as it is for many other places across Hertfordshire, the East of England, and the nation. In response, we are committed to ensuring that a wide range of high-quality and affordable housing options are available to meet the needs of older people. This includes accommodation for those seeking to remain in their homes, downsize from larger homes whilst remaining in the area, or people requiring more tailored, specialist accommodation with elements of support or care.

7.40 Local needs for older persons' accommodation should be met principally through conventional housing. This is a sustainable solution to this issue. Where this is a good level of this type of provision available in the Borough there will be less reliance on specialist forms of accommodation. All new residential development in the C3 Use Class must therefore be designed to be adaptable to the varying needs of users at all stages of life, in line with Policy HQD 2 (Inclusive and safe design). We will also encourage the retrofitting of existing residential buildings and units to better suit the day-to-day needs of older people, including by making them wheelchair adaptable or accessible. All proposals for retrofitting must ensure compliance with other Local Plan policies, particularly those on the historic environment. Internal or external alterations have the potential to harm the significance of heritage assets or otherwise impact on local character.

7.41 The Hertsmere Local Housing Needs Assessment (2026) indicates that there are a several housing options available for older people in the Borough, including some 1,268 units of specialist accommodation with integrated elements of support or care and 1,122 care/nursing home bedspaces. This provision is helping to meet the varying types of need, but it is recognised additional capacity will be required over the plan period. The total additional need for specialist older person dwellings across Hertsmere is projected to be 1,557 by 2043. This is broken down to 1,206 units of Class C3 units (such as sheltered or extra care housing) and 351 units of Class C2 units (such as residential care). This translates to an annual need for 71 C3 dwellings plus 23 units of C2 dwellings each year.

7.42 To meet future needs, we consider it important that development proposals for older persons' accommodation must clearly distinguish between specialist older persons' accommodation and care home accommodation. Applications must state the use for which planning permission is sought. The must clearly set out how the proposal meets established definitions and attributes of specialist and care home accommodation.

7.43 Hertfordshire County Council provide further information on the nature of provision ideally required from development across Hertsmere during the plan period. This includes the breakdown of housing with care (both affordable and market); nursing care provision; residential care; and adult disability supported living accommodation. The County Council's technical evidence sets out how the Borough's needs should ideally be distributed among its settlements and places. The latter including

provision anticipated for the new settlement at Bowman's Cross. Advice is also provided to guide new care uses to accessible, sustainable and appropriate locations. Developers are encouraged to engage with the County Council at an early stage to ensure that proposals that full account of meeting adult care needs.

7.44 Where a development proposal does not meet the established definitions attributes of specialist older persons accommodation or care home accommodation then the general housing policies in the Local Plan will apply.

7.45 Specialist older persons and care home accommodation must be sensitively integrated into neighbourhoods at locations that are well-connected by public transport, and within easy reach of community facilities and services. Residents, carers and visitors should benefit from safe and convenient access to and from the site as well as the surrounding area. Developments should include accessible pathways and gradients to enable residents to move with relative ease whether by walking or with the use of aids, such as wheelchairs or mobility scooters. Accessibility is vital to ensuring the development adequately responds to the mobility needs of occupiers. It is also important to promote independence and facilitate social interaction, which in turn can help to address isolation and loneliness, which is a key public health issue.

7.46 Development proposals should be designed with reference to inclusive and safe design principles, considering the latest industry good practice guidance. They should promote and adequately respond to the sharing or joint use of facilities, particularly to encourage a sense of community belonging. Development should also be designed to ensure a good fit between the facilities supplied and the specialist needs of the intended occupants. This includes consideration for the level of managed care provision and support required by occupants, along with the need for high-quality facilities such as amenity space storage, and space for charging of mobility scooters. Developments must also make adequate provision for access, parking and servicing for vehicles, with drop-off points for taxis, mini-buses and ambulances located near the building's principal entrance. To encourage considered and intelligent use of private cars/ vehicles and deliver a car-lite future for the Borough, maximum parking standards will be sought and applied.

H5 Supported and specialised accommodation

Strategic Objectives

A **Delivering a better future for Hertsmere**
F **Delivering affordable homes**
J **Healthy and safe communities**

Non-strategic Policy

A Proposals for supported and specialised accommodation will only be supported where they:

i. Contribute towards meeting the identified need within the Borough for approximately 1,557 units of supported accommodation for the period until 2043;

ii. Make provision for a mix of tenure types including affordable housing, where appropriate, with reference to Policy H3 (Genuinely affordable housing);

iii. Support mixed and inclusive neighbourhoods and communities without leading to a harmful overconcentration of supported or specialised accommodation. This will be assessed where the character of the area has changed or local amenity has been adversely impacted because of:

a. Visual amenity;

b. Increased noise;

c. Vehicular traffic generation, along with car and cycle parking pressure;

d. Inadequate provision of waste management and recycling facilities;

e. Additional pressure on community facilities; and

f. Anti-social behaviour and public safety.

iv. Are appropriately located in areas that are well-connected to services and facilities that are likely to be required by the occupiers;

v. Are of a high-quality design, considering the:

a. Intensity of use that is appropriate to the size of the development;

b. Integration of accommodation and facilities for the specific use or group it is intended for;

c. Suitable arrangements for managed care or supervision, security and community safety; and

d. Protection of the amenity of adjoining and neighbouring uses.

B Development proposals that will result in the net loss of floorspace for supported or specialised accommodation will be refused unless it can be suitably demonstrated that:

i. The specific type of accommodation is no longer required for the particular use and/ or group, or other relevant groups in need of supported housing; or

ii. Adequate replacement provision will be provided; or

iii. The existing accommodation is not suitable for the support or care of the intended occupants in its current condition and format and/or is incapable of being maintained at an acceptable standard.

C Where the loss of accommodation is acceptable in line with (B) above, development proposals must secure the re-provision of an equivalent amount of floorspace for residential use, including an element of affordable housing, where appropriate.

Explanation

7.47 The Council considers it an important element of successful and sustainable place-making that everyone has access to a decent and secure home. Supported and other forms of specialised accommodation offer respite and provision of care or support for individuals with distinct needs, particularly those from more vulnerable groups, whether for temporary stays or longer-term periods. Supported accommodation can take a variety of forms and fall into different Use Classes, depending on the nature of use and type of care or supervision required.

7.48 To achieve the above objective the Local Plan broadly supports development proposals involving the retention, refurbishment and delivery of supported and specialised accommodation. Applications should clearly set out how the development will assist in meeting an identified need for the use proposed. The Hertsmere Local Housing Needs Assessment (2026) confirms that the delivery of new supported and specialised accommodation remains a priority for housing stakeholders. It identifies a specific need for an additional 21 homes per annum delivered as care units, and an ongoing need for a smaller number of specialist housing units for people with additional needs. It is anticipated that this latter area of need will be met through the delivery of conventional housing stock that is appropriately adapted. It is vital that the accommodation is appropriate for the use and group(s) for which it is intended, so that the specific type of managed care or supervision required can be delivered effectively. Applicants are encouraged to engage with relevant health and social care providers or stakeholders through the

design-led approach. To secure mixed and inclusive neighbourhoods and communities, development proposals should not result in a harmful overconcentration of similar uses within an area.

7.49 For it to continue to meeting needs, existing supported housing should be retained and maintained to a decent standard. Development proposals involving the change of use or loss of accommodation based on Policy H6.B.a (above) must consider need at both the local and sub-regional level, recognising that delivery of provision for certain types of uses or groups may involve stakeholders across Hertsmere and its neighbouring authorities[6].

[6] It is recognised that the functional markets for this type of residential extend beyond local housing market areas into the wider sub-region, and in some cases across the region itself, or becoming national in their scope.

H6 Housing with Shared Facilities/Homes in Multiple Occupation

Strategic Objectives

A **Delivering a better future for Hertsmere**
F **Delivering affordable homes**
J **Healthy and safe communities**

Non-strategic Policy

A Proposals for housing with shared facilities (i.e. Houses in Multiple Occupation) (HMOs) in the Sui Generis Use Class will only be permitted where they:

i. Do not result in the loss of existing housing suitable for family occupation, which includes but is not limited to the following considerations:

   a. Location within a residential street or area;

   b. Size and layout, including number and size of individual rooms and bedrooms;

   c. Amenity space, such as access to a private garden;

ii. Contribute to inclusive and mixed neighbourhoods and do not result in a harmful overconcentration of HMOs. This will be assessed where the character of the area has changed or local amenity has been adversely impacted because of:

   a. Visual amenity, including impacts arising from poorly maintained properties;

   b. Increased noise;

   c. Vehicular traffic generation, along with car and cycle parking pressure;

   d. Inadequate provision of waste management and recycling facilities;

   e. Additional pressure on community facilities; and

   f. Anti-social behaviour and public safety.

iii. Are appropriately located in areas that are well-connected to local services by walking, cycling and public transport; and

iv. Are well-designed and provide high-quality accommodation that satisfies the relevant standards for HMOs, including units that provide adequate functional living spaces and layouts.

B Development proposals for small HMOs in the C4 Use Class (i.e. 3 to 6 unrelated people) within any area covered by an Article 4 Direction will only be permitted where:

i. The gross original internal floorspace of the original dwelling is 130 square metres or greater; and

ii. The requirements of (A)(b-d) above are satisfied.

C Development proposals that result in the loss of an HMO, or the self-containment of any part of an HMO, will be refused unless it can be suitably demonstrated that:

i. The existing building does not meet the appropriate standards for an HMO and has no realistic prospect of meeting the standards; and

ii. Adequate replacement provision can be secured within the Borough, having regard to the requirements of (A) above, with no net loss in HMO floorspace; or

iii. Any replacement use includes housing provision that meets an acute local need, particularly genuinely affordable housing, with at least the equivalent amount of residential floorspace re-provided.

Large-scale purpose-built shared living accommodation

D Development proposals for large-scale purpose-built shared living accommodation in the Sui Generis Use Class will be permitted where it is robustly demonstrated through evidence that:

i. There is an identified local market demand for the type of housing proposed and the development will not lead to a proliferation of this type of development in an area and the Borough which will compromise the delivery of conventional housing;

ii. Private units within the development are demonstrably not self-contained homes in the C3 Use Class or capable of being used as self-contained homes;

iii. There is well-integrated provision of communal facilities and services sufficient to meet the requirements of the intended number of occupiers;

iv. The development is appropriately located and of a high-quality design, having regard to the requirements of (A) above;

v. The development will be under single management, suitably managed and maintained over its lifetime, as evidenced by a management plan;

vi. All units are available to rent, with minimum tenancy lengths of no less than 3 months;

vii. A cash-in-lieu contribution is made towards affordable housing in the C3 Use Class; and

viii. The development contributes towards creating mixed and balanced communities.

Explanation

7.50 A house with shared facilities, or House in Multiple Occupation (HMO), refers to a shared house, flat or other non-self-contained dwelling that is the main residence for 3 or more occupiers forming 2 or more households. A household is generally a family (or people with relationships like a family), including single persons and co-habiting couples. There are two planning Use Classes for housing with shared facilities. A Use Class C4 HMO is a 'small' HMO used by 3 to 6 unrelated people. A 'large' HMO shared by more than 6 unrelated people is a Sui Generis use[7].

7.51 It is permitted to change a Use Class C4 HMO property to a Use Class C3 dwelling house without planning consent, and vice versa. Therefore, for planning policy implementation we will generally treat small HMOs in the same way as self-contained homes, with legislation controlling changes of use between these Use Classes. Exceptions apply in situations where an Article 4 Direction covers a specified area.

7.52 Planning permission is required for the use of land and buildings for large HMOs as defined as being a Sui Generis use. Some forms of housing with shared facilities are not considered HMOs in planning terms (for example, supported housing) and these are addressed elsewhere in the Local Plan.

7.53 The recognises that HMOs can play an important part in the Borough's housing supply, with provision that helps to meet distinct needs and reduces pressure on other elements of the housing stock. However, this type of provision must be carefully delivered and managed to ensure that it provides high-quality housing that supports and positively contributes towards mixed and inclusive neighbourhoods and communities.

7.54 To ensure that HMOs are built and maintained at an acceptable standard the Council operates a licencing scheme for larger scale accommodation, in accordance with housing legislation. All development proposals for HMOs must ensure these standards, or any future equivalent, are met as a minimum, irrespective of

[7] The above provides a summary of HMOs and the full legal definitions should be referred as appropriate, as set out in the Town and Country Planning (Use Classes) Order 1987 (as amended). There are separate definitions in respect of the legal licencing of HMOs as set out in the Housing Act 2004 and related secondary legislation.

associated licencing requirements. The standards should be considered alongside other planning policies to ensure that new housing is fit for purpose.

7.55 Good quality HMOs make an important contribution to local housing provision, particularly for vulnerable groups and those on lower incomes. For some people the availability of bedsits may be the only alternative to homelessness. For these reasons the loss of good quality shared living accommodation will be resisted, including where loss occurs through the self-containment of parts or all of buildings. We will seek to protect HMOs where there is good reason to believe they could be improved to a decent standard.

7.56 Consideration will be given to changes of use of existing HMOs where it is suitably demonstrated that the building does not meet local and other relevant standards, as set out in the Housing Act 2004 and the Management of HMOs (England) (Regulations) (2006), and has no realistic prospect of meeting these. The Council's Environmental Health team will be consulted on a case-by-case basis to assist in determining the condition of the accommodation and whether it can be maintained at an acceptable standard. Where change of use or re-development is acceptable in principle, development proposals must make appropriate re-provision of residential floorspace giving priority to HMO or other accommodation to meet priority needs in the Borough, including genuinely affordable housing.

7.57 New HMOs should contribute positively to their local area and must not result in a harmful overconcentration of HMOs. This is to ensure an appropriate distribution of different types of housing provision across the Borough, along with the protection of the character and amenity of immediate and neighbouring properties. Furthermore, as with other forms of higher density development, housing with shared facilities should be sustainably located in well-connected areas with good access to facilities and services.

7.58 The Council continues to monitor and review HMO accommodation across Hertsmere. Across the Borough HMOs have historically provided a flexible housing option that has sustainably met the accommodation needs of a variety of different communities. HMOs have also, to an extent, partially met needs that stem from the unaffordable nature of homes across the Borough. However, the recent rise in demand for HMOs, particularly in Potters Bar, has required the Council to introduce an Article 4 Direction to manage their delivery. Development proposals for new small HMOs will be considered against Part (B) of the policy. The Council will consider the introduction of further Article 4 Directions to manage HMOs where such measures are demonstrably necessary.

Large-scale purpose-built shared living accommodation

7.59 Large-scale purpose-built shared living accommodation, including co-living schemes, are similar in terms of their built form and layout to student housing but tend to include facilities, services and communal spaces tailored to a wider range of occupants, such as young professionals. Such developments can define this type of provision as a shared living accommodation generally comprising of 50 units or

more. In Hertsmere, proposals will be considered on a case-by-case basis, typically with the relevant Local Plan policies applying on developments of 20 or more units as a guideline. This is owing to the significant variances in the character, urban structure and mix of uses across the Borough, and the need to ensure development of this nature and scale is appropriate to its location.

7.60 Whilst the Council recognises that housing with shared facilities can contribute to meeting the Borough's housing need, it is demonstrably the case that the acute need in the Borough is for conventional housing, especially genuinely affordable self-contained housing. Development proposals for large-scale purpose-built shared living will therefore only be supported where there is an identified local market demand for such provision, and they will not lead to a proliferation of this type of housing locally. This is to ensure that development does not compromise opportunities to deliver conventional self-contained, family housing and affordable housing units, and to prevent against speculative development which does not adequately respond to local need. Applicants will be required to submit robust, relevant, and proportionate evidence of market demand in the Borough for the type of provision proposed, along with evidence to demonstrate that the development will not result in a proliferation of purpose-built shared living in the Borough.

7.61 The Council consider it imperative that large-scale shared accommodation is of a high-quality design and well-managed to address the requirements and number of residents it is intended for. This includes provision of high-quality, adequately sized and functional living spaces, communal indoor and outdoor amenity areas, and shared facilities. Development proposals must be accompanied by a management plan covering matters such as site management and maintenance, communal facilities, safety and security for occupants, and mitigation of potential noise or other forms of nuisance.

7.62 All large-scale shared living units must be available for rent with minimum tenancy lengths of at least 3 months. This is necessary to ensure that the development is retained as shared accommodation over its lifetime. We will seek to ensure that development is appropriately designed and managed in order to prevent against future material changes of use, where development effectively reverts to another form of specialist accommodation, such as a large-scale hostel, which is not considered appropriate in the Borough, or conventional housing for which this type of building is not originally designed and intended.

7.63 Development proposals for large-scale purpose-built living accommodation must make a cash-in-lieu contribution towards affordable housing in the C3 Use Class. The nature of the payment, whether up-front cash-in-lieu or annual payments in perpetuity to the Council, will be established on a case-by-case basis.

H7 Self and custom-build housing

Strategic Objectives

A Delivering a better future for Hertsmere
F Delivering affordable homes

Non-strategic Policy

A The Council will keep a register of those seeking to acquire serviced plots in the Borough for their own self-build and custom-build house building. It will also seek to identify plots to help meet identified need for self-build and custom-build housing particularly where this will improve access to affordable housing.

B Development proposals for self-build or custom-build housing will only be supported where they:

i. Make the optimal use of land and support the delivery of the spatial strategy;

ii. Where appropriate make provision for affordable housing in line with Policy H3 (Genuinely affordable housing); and

iii. Are appropriately located and of a high-quality design, with reference to other Local Plan policies.

C Development proposals for self-build and custom-build housing must demonstrate how the design-led approach has been used. They should clearly identify whether there are any elements of the design that may require adaptation to secure the delivery of new housing.

Explanation

7.64 Self and custom-build housing are built or commissioned by individuals, or associations of individuals, for their own occupation. This type of development can provide a more affordable route to home ownership than other options available, such as ‘built for sale’ market housing. Self-build generally refers to people who apply their own skills in the design and construction process, whereas custom-build involves the outsourcing of industry professionals, often for bespoke or innovate schemes. Self and custom-build housing units provide an additional source of supply of conventional housing and a further housing choice and will therefore be considered as housing in the C3 Use Class for policy implementation. The Council will consider proposals for new self and custom build housing in the Borough’s smaller settlements and places, outside of the four main towns, as an exception on their individual merits.

7.65 The Council has a duty under the Self-build and Custom Housebuilding Act 2015 and Custom Housebuilding (Register) Regulations 2016 to keep a register of those seeking to acquire plots for self-build and custom-build housing in the Borough and to have regard to this register in its planning and housing functions. The register forms part of the Local Plan evidence base. It provides an indication of the demand for serviced plots from individuals or groups who meet specific eligibility criteria.

7.66 Development proposals for self and custom-build housing must use the design-led approach to ensure high-quality development that responds positively to the locality, optimises the capacity of sites and supports the delivery of the spatial strategy for the Borough. Applicants should clearly identify whether any elements of the design may require adaptation or alterations. This will help the Council to work with applicants to respond to the unique challenges facing self-builders and to ensure schemes are policy compliant.

7.67 Proposals for self and custom build housing will not normally require contributions towards meeting the Borough's genuinely affordable housing needs – this is because of the small scale of such schemes. It remains the responsibility of the self-builder to apply for exemptions from the CIL charging regime. Exemptions from the CIL will only be provided if self-builders are able to demonstrate that they qualify (in accordance with the CIL Regulations).

H8 Gypsy and traveller accommodation

Strategic Objectives

A Delivering a better future for Hertsmere
F Delivering affordable homes

Non-strategic Policy

A There is an identified need in Hertsmere during the period between 2025-45 for 123 gypsy and traveller pitches for households that meet the Planning Policy for Traveller Sites (PPTS) definition. A further 9 pitches will need to be provided for Undetermined Gypsy and Traveller households. To meet these needs the Council will seek to secure additional provision through the delivery of the Local Plan's site allocations and the decision-taking process.

B Development proposals for gypsy and traveller accommodation, including sites and pitches, must be of a high-quality layout and design and make adequate provision for:

i. Basic amenities including running water, sewerage/drainage, energy and waste management;

ii. Safe and reasonably convenient access to and from the site;

iii. Access, parking and servicing arrangements for all vehicles likely to use the site, including emergency services;

iv. A site location that is well-integrated into the locality with reasonable access to local shops, services and community facilities including education, health and social care; and

v. Facilities to serve occupiers of the development, including where appropriate pitches, hardstanding, amenity blocks, and amenity space and play areas.

C Development proposals for gypsy and traveller accommodation must not pose a risk to public health and safety and not adversely impact on the amenity of site occupants and neighbouring properties.

Explanation

7.68 Hertsmere's gypsy and traveller communities make a valued contribution towards the Borough's overall diversity and inclusivity. The Borough's existing communities are focused on several public and private sites[8] that adjoin the main towns; enjoying

[8] Hertsmere Gypsy and Traveller Accommodation Assessment (ORS, January 2026) – see Figure 3.

good accessibility to social and community infrastructure, and the strategic highway network. There are additional smaller private sites located within Hertsmere's countryside that adjoin smaller settlements. It is anticipated that the Borough's existing communities will benefit from the growth being planned-for in the Local Plan, particularly in respect of investment in social and community infrastructure networks. This may enable the positive consideration for proposals to intensify or expand these existing communities.

7.69 The Council considers it an important component of successful and sustainable place-making that people within the gypsy and traveller community have access to safe, suitable and well-serviced accommodation. The Local Plan provides an approach to meet the identified need for permanent gypsy and traveller pitches in Hertsmere during the plan period. This is consistent with national planning policy, which requires local planning authorities to assess need and plan positively for traveller sites through the plan-making process.

7.70 The Hertsmere Gypsy and Traveller Accommodation Assessment (2026) forms part of the Local Plan evidence base. It provides the most up-to-date assessment of accommodation need for gypsies and travellers in the Borough, including the need for permanent pitches and whether there is a requirement for transit provision. The assessment has informed the approach taken by Policy H8 to meet this need during the plan period.

7.71 Meeting the identified need through the identification of sites provides greater certainty for the travelling community, landowners, infrastructure providers and settled communities. It also assists in reducing the likelihood of unauthorised encampments and development by ensuring that additional planned provision is available in a location assessed as suitable through the Local Plan process.

7.72 The Council will seek to meet the needs of the community across the plan period through its plan-making and decision-taking activities. The Council will seek to secure new provision through a variety of measures. This includes securing new pitches as part of the delivery of growth on the Local Plan's site allocations; the expansion and intensification of existing sites; the consideration of regularising unlawful sites; and through the decision-taking process. For clarification, proposals for new provision being considered by decision-takers will be determined within the context of the Borough's identified need.

7.73 The provision of new gypsy and traveller accommodation has design, layout and servicing requirements that differ from conventional housing. Nevertheless, it remains critical that new provision is delivered as high-quality design. Sites must be capable of accommodating caravans, mobile homes, touring vehicles and ancillary facilities in a manner that provides safe, practical and healthy living conditions. Development proposals will therefore be expected to demonstrate that pitch layouts, access arrangements, parking, servicing, waste management, utilities, drainage, amenity space and, where appropriate, play space are proportionate to the scale and nature of the development.

7.74 The location and design of sites are important to achieving inclusive and mixed communities. Proposals should be well-related to existing settlements and provide reasonable access to local shops, services, education, health and social care, public transport and community facilities. They should also respond positively to the character and environmental quality of the surrounding area, including landscape character, biodiversity, the historic environment, neighbouring amenity, flood risk, air quality and noise.

7.75 Development proposals for gypsy and traveller accommodation will be considered in accordance with the development plan. Where proposals are in the Green Belt, they must demonstrate compliance with national planning policy and the relevant Local Plan policies. All proposals must avoid unacceptable adverse impacts on public health and safety, highway safety, environmental quality, local character and residential amenity. Where mitigation is necessary to make development acceptable, this will be secured through planning conditions and/or planning obligations as appropriate.

7.76 The delivery of additional pitches will be monitored through the Authority Monitoring Report as part of the Local Plan's wider monitoring and review framework. Monitoring will include permissions granted, pitches delivered, losses of existing provision, unauthorised development and any material changes in assessed need. The Council will keep the evidence base under review and will continue to work with neighbouring authorities and relevant stakeholders to ensure that provision remains effective over the plan period.

H9 New Homes in the Countryside / Green Belt

Strategic Objectives

A Delivering a better future for Hertsmere
F Delivering affordable homes

Non-strategic Policy

A Speculative small-scale proposals for new homes on sites in Hertsmere's countryside/ Green Belt located beyond the Borough's four main towns will be positively considered subject to their robustly demonstrating that they:

i. Contribute towards meeting identified needs across the Borough, specifically in respect of their affordability, size and tenure;

ii. Are appropriately located and of a high-quality design, with reference to other Local Plan policies;

iii. Support inclusive and mixed communities;

iv. Do not have a negative impact on the relevant purposes of Green Belt[1];

v. Will be delivered in a timely manner following their consent, in order that they make a meaningful contribution towards housing delivery; and

vi. Meet the requirements of other relevant Local Plan policies.

B The delivery performance of consented small-scale housing schemes located in Hertsmere's countryside/ Green Belt will be monitored as part of the Local Plan's wider monitoring and review regime (Policy DM7). The Council may introduce appropriate measures as part of the consent process that encourage timely delivery during the lifespan of the consent. The Council will consider delivery performance as a material consideration when determining proposals to renew undelivered schemes.

C Speculative proposals for major-scale housing development upon sites located in Hertsmere's countryside/ Green Belt beyond the Borough's four main towns will not be positively considered; as such proposals are contrary to the Spatial Strategy.

Explanation

7.77 The Local Plan's Spatial Strategy directs housing growth primarily to Hertsmere's four main towns, where development can make effective use of existing and planned social and community infrastructure, public transport, services and facilities. The

Borough's four main towns remain the most appropriate locations for directing future growth during the plan period.

7.78 Nevertheless, the spatial strategy acknowledges that whilst the Borough's smaller settlements and places are inappropriate for major development proposals, these locations may be suitable for single infill dwellings that deliver self or custom build housing and/or deliver affordable housing. Within that context, Policy H9 provides a limited basis for considering small-scale housing proposals beyond the Borough's four main towns.

7.79 Much of Hertsmere's countryside is designated as Green Belt. It continues to perform specific important strategic planning policy functions. This includes preventing unrestricted sprawl and maintaining separation and openness between settlements. For clarification, Green Belt policy is fundamentally concerned with maintaining openness between settlements and places; it is not concerned with protection of landscapes, habitats and ecology[9]. Proposals for new housing in the countryside and Green Belt must therefore be assessed carefully to ensure that they do not prejudice those purposes that seek to maintain openness or undermine the planned approach to growth during the plan period.

7.80 The policy applies to genuinely small-scale proposals. It does not provide a general route for speculative housing growth outside the four main towns and does not replace the plan-led allocation of strategic housing sites. Any proposal relying on Policy H9 must demonstrate, with proportionate evidence, that it would make a justified contribution to meeting identified housing needs, including genuine affordability, size and tenure, without causing unacceptable harm when assessed against other relevant policies.

7.81 Applicants should clearly explain how the new homes respond to local housing needs and support inclusive and mixed communities. Relevant information may include the number of homes proposed, dwelling sizes, tenure, affordability, local connection where applicable, and how the proposal would relate to the nearby settlement or community. Proposals that would be isolated, poorly integrated or unsupported by necessary infrastructure will not be supported.

7.82 Development must be design-led, appropriately located and respond to its rural, village or edge-of-settlement context. Proposals should have regard to landscape character, settlement form, heritage significance, biodiversity, access, highway safety, neighbouring amenity and infrastructure capacity. Development that would result in an isolated or car-dependent pattern of housing, or otherwise conflict with the Local Plan's approach to sustainable place-making, will not be supported.

7.83 Where a site is in the Green Belt, proposals must be assessed in accordance with national policy and relevant Local Plan policies. Applicants should identify the basis on which development is considered appropriate in the Green Belt, including where

[9] It is noted that Hertsmere's designated Green Belt includes the strategic highway network (A1, M1 and M25) and several industrial employment complexes.

reliance is placed on previously developed land or another national policy exception. Proposals must also demonstrate that any impact on Green Belt openness and purposes has been avoided or minimised so far as practicable.

7.84 Timely delivery of consented proposals is relevant consideration. This is because the policy is intended to support housing supply through small-scale schemes capable of implementation within the lifetime of a planning permission. Conditions or planning obligations may be used where they meet the relevant legal and policy tests and are necessary to make the development acceptable. Delivery of consented schemes will be monitored through the Authority Monitoring Report as part of the Local Plan monitoring and review framework.

7.85 Major-scale speculative housing proposals in the countryside or Green Belt beyond the Borough's four main towns are inconsistent with the spatial strategy and will not be supported. Such proposals only be considered through the plan-making process, including any assessment of Green Belt release, infrastructure requirements and reasonable alternatives, rather than through speculative applications that would undermine the planned distribution of growth.

Chapter 8: Economy and Culture

Section

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EC17 Concentration of Harmful Uses

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EC1 Meeting Hertsmere's Economic Needs

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
D Support a well-educated and skilled population
I Celebrating our local identity
K Securing the timely delivery of infrastructure

Strategic Policy

The Council will work positively with stakeholders and its delivery partners to build a thriving and inclusive local economy that provides everyone with access to high-quality education, training and good job opportunities. This will be achieved by:

A Promoting and strengthening Hertsmere's economy, including by supporting business sectors of local importance, in particular:

i. Maintaining Hertsmere's key role in the international film and television industry;
ii. Meeting the need for future B8 logistic uses and ensuring that complement wider demands generated by businesses across Hertfordshire and wider region;
iii. Securing an improved understanding of the role and future need for datacentres as nationally important infrastructure;
iv. Meeting the needs of the Borough's four main towns, place-focused needs, which may be ancillary/ complementary to the film industry; and
v. Expanding the role of green industries to enable the transition to a low carbon, circular economy.

B Ensuring the timely delivery of infrastructure to support business growth and development and to better enable residents and businesses to access economic opportunities across the Borough and further afield.

C Safeguarding industrial land and making provision for vibrant and attractive employment locations, including town centres, that are well-connected and suited to the needs of modern business.

D Requiring that new employment development is of a high-quality design and contributes positively to the local area.

E Retaining and securing new affordable workspace and ensuring it is appropriately managed.

F Ensuring residents benefit from good access to high-quality jobs as well as education, skills and employment training opportunities.

Explanation

8.1 The delivery of a balanced mix of uses, including new employment provision, is a important element of successful and sustainable place-making. A key objective of the Local Plan's Spatial Strategy is to maximise economic development and employment opportunities for the Borough by promoting the local economy and local job opportunities and ensuring that development makes efficient and effective use of land. The Local Plan provides an appropriate planning framework to promote sustainable and competitive economic performance.

8.2 In Hertsmere, the key employment priorities are:

- Maintaining Hertsmere's key role in the international film and television industry;
- Meeting the need for future B8 logistic uses and ensuring that complement wider demands generated by businesses across Hertfordshire and wider region;
- Securing an improved understanding of the role and future need for data centres as nationally important infrastructure; and
- Meeting settlement-specific, place-focused needs, which may be ancillary/ complementary to the film industry.

8.3 The Council consider it imperative to tackle the inequalities and the economic barriers that affect people's lives, and to ensure that everyone has opportunities to access good quality jobs along with high-quality education, skills and training. It is recognised that many people take up work or training outside of the Borough, however, securing a wide range of local provision is vital to creating a more inclusive economy and giving residents greater choice in accessing opportunities closer to where they live. This policy sets out our overall approach to facilitate development and channel investment in a way that allows everyone to share in Hertsmere's economic prosperity.

Industrial Provision

8.4 Evidence prepared in support of the plan-making process[1] reveals that the industrial property market (across Use Classes E(g)(iii), B2, B8) in Hertsmere is substantial and diverse, with 160 properties providing 333,221 sqm of floorspace, 12% of the Functional Economic Market Area (FEMA) total. The largest share is in storage and distribution (B8), accounting for 68.4% of floorspace, followed by general industrial (B2, 22.2%) and light industrial (E(g)(iii), 9.3%).

[1] Hertsmere Economic Study, (AECOM, 2026)

8.5 Whilst Hertsmere provides a modest contribution to the industrial market it has characteristics sought after by major occupiers. Notably, its proximity to London and direct access to the strategy road network.

8.6 The largest concentrations of industrial properties are around Elstree Way in Borehamwood and Cranbourne Industrial Estate in Potters Bar, with the majority of floorspace in storage and distribution (B8) use (68.4% of floorspace across 68 industrial properties in the Borough), followed by general industrial (B2) (22.2% of floorspace across 64 properties); and light industrial E((g)(iii)) (9.4% of floorspace across 38 properties). This reflects the size profile of the use classes, with storage and distribution properties tending to be over 1,000 sqm in size, whereas most general industrial and light industrial properties are less than 500 sqm.

8.7 The evidence highlights several key challenges for industrial space policy. High vacancy rates suggest opportunities for redevelopment and intensification but also highlight the need for careful alignment of new supply with evolving occupier requirements. The market's future will rely on the Borough's ability to modernise older stock, intensify existing sites, and accommodate growth sectors such as logistics, the film/media, and its supply chain (including datacentres).

Office Provision

8.8 Evidence demonstrates the need for a nuanced and responsive approach to office space policy (Use Class E(g)(iii)). While there is no evidence of a significant quantitative shortfall in office supply over the plan period, the qualitative aspects of supply, such as the suitability, flexibility, and modernity of premises, are increasingly important. The market is adapting to structural changes, with future growth likely to depend on Hertsmere's ability to attract high-value, office-based sectors, particularly in creative, tech, and professional services. The Borough's location within London's hinterland, strong transport connectivity, and established creative industries cluster remain key assets to achieve this.

8.9 The Borough is home to about 256,799 sqm of office floorspace, representing 10.1% of the FEMA's total, with a notable concentration of medium and larger premises. Growth in office floorspace has been minimal, with just +0.3% between 2016 and 2025, substantially below the FEMA, regional, and national averages. This limited expansion is attributed to both subdued demand and a constrained land supply, as well as a market preference for higher-quality, modern premises in well-connected locations such as Borehamwood and Elstree.

8.10 To tackle inequalities and the economic barriers that affect people's lives it is imperative that everyone has opportunities to access good quality jobs along with high-quality education, skills and training. It is recognised that many people take up work or training outside of the Borough, taking advantage Hertsmere's good transport links to the rest of London and beyond. However, securing a wide range of local provision is vital to creating a more inclusive economy and giving residents greater choice in accessing opportunities closer to where they live. This policy sets out our overall approach to facilitate development and channel investment in a way that allows everyone to share in Hertsmere's economic prosperity.

EC2 Protecting employment land and delivering new workspace

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
D Support a well-educated and skilled population
I Celebrating our local identity
K Securing the timely delivery of infrastructure

Strategic Policy

A The Borough's employment land, as set out in Hertsmere's Employment Land Hierarchy, is safeguarded for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and related Sui Generis uses. Development proposals must ensure that land-uses are commensurate with the type and function of land within this hierarchy.

B There is a forecast need for 27,093 square metres of net additional employment floorspace in the Borough up to 2041. Proposals for development must contribute to meeting the Borough's employment need in totality by:

i. Within Key Employment Sites and Employment Areas, retaining and wherever possible delivering net gains in industrial capacity over the life of the Plan, including through intensification, to deliver a minimum of 14,428 sqm (net) industrial floorspace, comprising E(g)(iii), B2, B8 floorspace.

ii. Within other designated employment areas within the Hierarchy, delivering a minimum of 12,665 sqm (net) office (E(g)(i) / E (g)(ii)) floorspace, alongside a contribution to the need for E(g)(iii);

iii. Maximising opportunities to deliver new and enhanced workspace, including through appropriate mixed-use development in town and edge-of-centre locations and non-designated employment sites;

iv. Outside of identified employment areas, avoiding new development that consists solely or predominantly of Class B8 storage or warehousing uses unless:

a. The site is currently solely or predominantly in storage and warehousing use;

b. Redevelopment proposals comprise of intensification of storage and warehousing uses and/or employment generating uses appropriate to the site.

C Outside of designated employment areas the appropriateness of development proposals for new Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis Uses will be assessed having regard to the nature and scale of the development, and:

i. Its contribution to the delivery of the spatial strategy for the Borough;

ii. Compatibility of the proposed use(s) with the adjoining and neighbouring land uses, including consideration of impacts on local amenity;

iii. Whether the employment provision is for temporary use; and

iv. Compliance with other Local Plan policies.

D Over and above the evidenced general employment need for Hertsmere, a need has been identified for 10.2ha of additional land for film-industry uses, and up to 10.8ha land for datacentres.

E Planning conditions will be used to protect new commercial and industrial development from changes of use, and Article 4 Directions will be considered to protect key Employment Areas from being totally or partially lost where any loss would impact on the ability of the remainder of the site to perform its employment function.

F Where new business floorspace is conditioned for a specific use, changes to another commercial or industrial use appropriate for the site and employment area will only be permitted where there is no reasonable prospect of the unit(s) being retained for the conditioned use. This must be evidenced by a robust and recent marketing exercise covering a minimum continuous period of one year at a reasonable rental or sale value for the local area. Proposals seeking to change the use of existing business floorspace, to another commercial or industrial use will be considered against Local Plan Policies EC5 – EC8. Proposals that result in an increase in industrial capacity will be supported.

Table 8.1: Hertsmere's Employment Land Hierarchy

Classification	Location
Key Employment Areas	• Centennial Park, The Waterfront and Lismirrane Industrial Estates, Elstree • Elstree Way, Borehamwood • Sky Elstree • South Mimms Motorway Services
Main Employment Areas	• Stirling Way, Borehamwood • Tylers Way, Bushey • Cranbourne Road, Potters Bar • Station Close, Potters Bar • Otterspool Way, Bushey • Imperial Place, Borehamwood • BBC Elstree • Elstree Studios
Locally Significant Employment Areas	• Borehamwood Enterprise Centre, Borehamwood • Theobald Court, Borehamwood • Hollies Way Business Park, Potters Bar • Farm Close, Shenley • Beaumont Gate, Radlett
Rural Employment Areas	• Wrotham Business Park, between High Barnet and Potters Bar • Bio Products Laboratory, Elstree • The National Institute for Biological Standards and Control, Ridge • Clare Hall Laboratories, Ridge

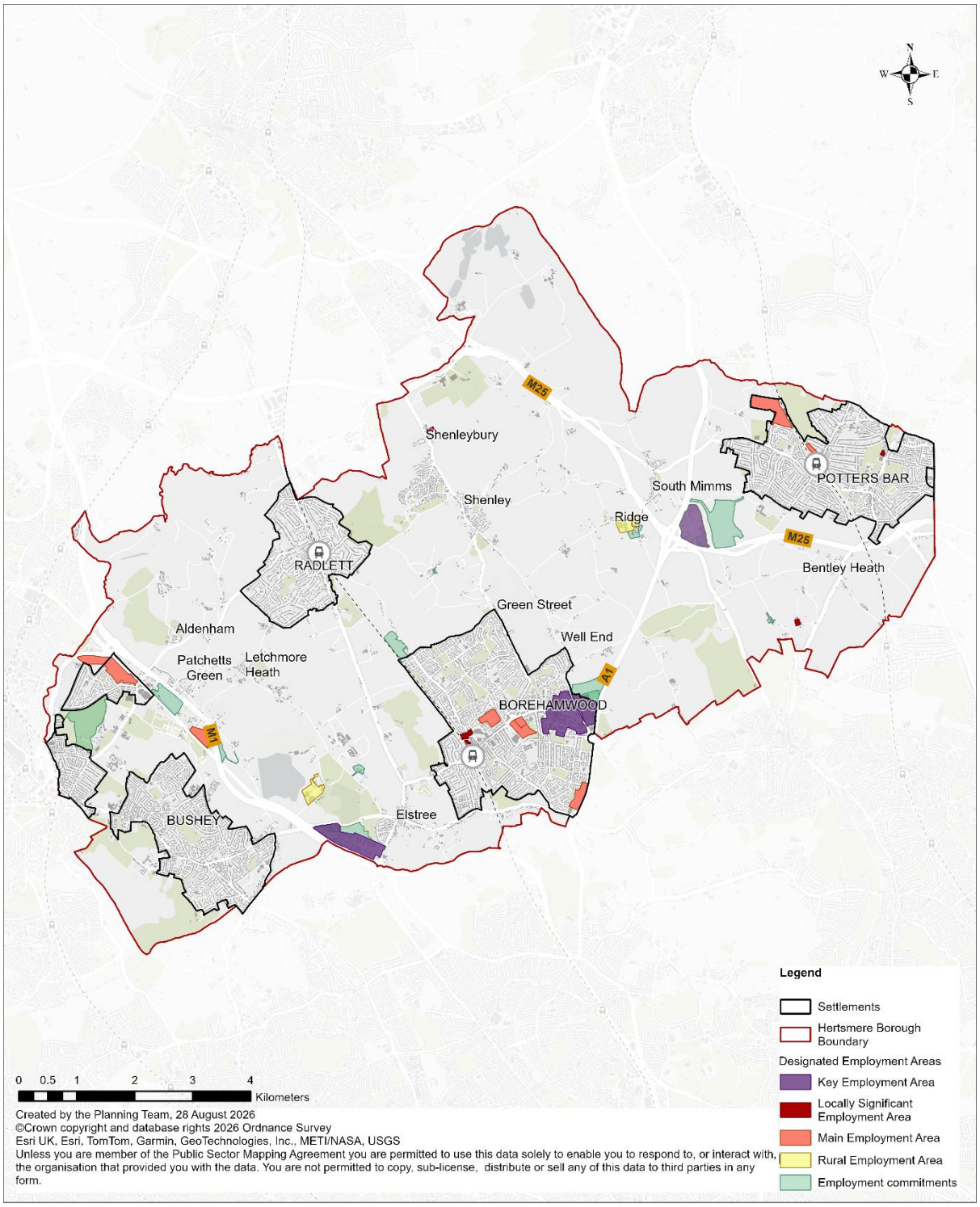

Figure 8.1: Employment land hierarchy map

Explanation

8.11 This policy establishes Hertsmere's employment land hierarchy. This comprises the different types of employment land and sites across the Borough. The safeguarding of land within this hierarchy is necessary to ensure a sufficient supply of land and industrial capacity to meet the Borough's current and future needs for employment.

8.12 The hierarchy is linked to the spatial strategy and:

- Identifies and maps the key sites within the hierarchy, including their relationship with the strategic highway network;
- Sets out the forecast need for employment land across the Borough, broken down by Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution, and related Sui Generis uses; and
- Forms a basis for decision-taking in terms of how the identified need will be met.

8.13 Designated employment locations include Key Employment Areas, Main Employment Areas, Locally Significant Employment Areas, and Rural Employment Areas.

8.14 The successful delivery of the spatial strategy for the Borough is dependent on new employment development being directed to these locations, along with town centres. Development proposals should maximise opportunities to intensify and make a more efficient use of land, whilst ensuring the type and nature of uses is commensurate with the site's place in the employment land and town centre hierarchies, where relevant.

8.15 Hertsmere has relatively modest employment land provision compared to other areas within the FEMA, and the supply of office space has been diminished as employment sites and premises are facing increased pressure for redevelopment from other higher value land uses, particularly housing. This pressure has been amplified by changes to planning legislation, for example, new Permitted Development rights enabling the conversion of offices and warehouses to residential uses through the Prior Approval process.

8.16 Our expectation is that there will be no net loss of industrial capacity in the Borough and that net gains are delivered wherever possible to meet the need identified in Policy EC2.

8.17 Proposals for development should retain industrial capacity and seek net gains through site intensification, including additional floorspace, wherever possible and appropriate. However, it is recognised that net gains may not always be possible. The onus will be on the applicant to demonstrate that the design-led approach has been used to make the optimal use of land and maximise employment provision.

This should include evidence of alternative design options, such as site layouts and building typologies (including multi-storey or basement development).

8.18 Table 7.2 below sets out the net requirements for industrial and office floorspace and land over the plan period. Additional bespoke analysis suggests that 10.2 ha for the film industry[2] and up to 10.8 ha for datacentres, could be considered in the Local Plan to respond to the specific needs of these industries[3]. There is an indication within the Economic Study that there is likely to be a surplus of supply which can accommodate these additional specialist future economic requirements.

Table 8.2: Industrial and Office Floorspace Requirements

	Floorspace	Land
Net additional office (E(g)(i) / E (g)(ii)) requirement 2024-2041	12,665 sqm	1.3 ha
Net additional industrial (E(g)(iii) / B2 / B8) requirement 2024-2041	14,428 sqm	3.2 ha
Film and Television	n/a	10.2 ha
Datacentres	n/a	Up to 10.8 ha

Changes of use within Employment Areas

8.19 The Council will consider the use of Article 4 Directions to protect key employment locations from being lost or partially lost[4] where there is significant pressure to convert employment land to residential use.

8.20 There is increasing fluidity in the workspace market, and some office uses do not fit neatly into the Use Class Order categories. In response, the Council will take a broader view to planning for its future employment floorspace needs. The full complement of Class E(g) uses will be promoted, including E(g)(iii) light industrial uses, to ensure that the Local Plan does not unnecessarily constrain employment development. Proposals for Class B2 industrial and B8 storage or distribution uses will be directed towards the Borough's Key Employment Areas. These locations may also be appropriate for compatible and complementary industrial employment uses defined under Class E(g)(ii), such as research and development of products and processes; Class E(g)iii industrial processes; and related sui generis industrial type uses.

8.21 The Borough's Main Employment Areas are appropriate for proposals seeking to deliver industrial employment uses defined under Class E(g) office and light

[2] Hertsmere Film and Television Study, 2024
[3] Hertsmere Economic Study (AECOM 2026)
[4] In circumstances where partial loss could impact on the ability of the remainder of the site to perform its role for employment activities.

industrial; Class B2 general industrial; Class B8 storage and distribution; and related sui generis uses. It is anticipated that the precise mix of use classes that define industrial employment uses will be assessed through the decision-taking process. The LSIS will not normally be considered as being appropriate locations for main town centre uses; such uses will be directed to existing and designated centres. Within the Borough's and Locally Significant Employment Areas, proposals for employment uses, defined under Class E(g) office and light industrial will be positively considered. It is anticipated that these use classes will form most employment uses being delivered within the and Locally Significant Employment Areas.

8.22 The Spatial Strategy directs growth towards the Borough's four main towns; as these are the most sustainable locations in Hertsmere. Nevertheless, we recognise that businesses and employers located beyond the four main towns continue to contribute towards the Borough's economy. Within this context, Rural Employment Areas are suitable largely for the E(g)(ii) research and development and associated office uses which already exist within those locations. Wrotham Business Park is suitable for more general Class E(g) office and employment uses There is no intention to permit large-scale expansion of the uses on these sites, as they are all subject to a variety of heritage considerations and are in isolated locations which are unsustainable and broadly inappropriate for meeting the Borough's needs. However, there is a desire to encourage the operators of these sites, such as Bioproducts Laboratory, which have a national significance, to remain within the Borough. Consequently, limited and sensitive expansions of the existing and ancillary uses within these sites will be considered.

8.23 The above approach broadly aligns with the national planning policy requirement that sites be identified for laboratories, and also with Hertfordshire Draft Local Industrial Strategy (2019), which includes an aim to unlock "science-based clusters in the Golden Triangle: This will be achieved through life sciences and advanced engineering recognising Hertfordshire's current strength in commercial research and development, particularly cell and gene sector clustering". The Rural Employment Areas (except Wrotham Business Park) support this through the high-quality bio-research establishments in the Borough.

8.24 Industrial capacity will be monitored over the Plan period to ensure strategic objectives are realised and that an overprovision of employment land does not negatively impact the delivery of housing, infrastructure and other services.

EC3 Delivering High-Quality Employment Sites and Workspaces

Strategic Objectives

B A thriving local economy

Non-strategic Policy

A Proposals for development involving Class E business, (as defined under Class E (g) (i – iii)) B2 industrial and B8 storage or distribution uses, and related Sui Generis industrial employment uses must be of a high-quality design with well-integrated and purpose-built business space. They must demonstrate how the design-led approach has been used to improve the site's suitability for business activity having regard to the type and use of space. Development proposals must:

i. Optimise the use of land and maximise opportunities to increase job densities;

ii. Where it is practicable, make provision for an appropriate level of internal fit out beyond shell and core, including:

a. Connection-ready high-speed broadband;

b. Installation of mechanical and electrical services;

c. Toilets and kitchenette;

d. Basic fire and carbon monoxide detection; and

e. Shopfronts and glazing, where appropriate.

iii. Make provision for flexible workspace that can be adapted to the needs of different employment uses, particularly where there is not a specified end user;

iv. Ensure the layout and design of development provides adequate operational space including for site access and servicing, alongside amenity provision and healthy work environments for staff;

v. Improve the attractiveness and environmental quality of the building, site and employment area, including providing high-quality working spaces, healthy work environments, and amenity provision for staff;

vi. Include high-quality public realm, where appropriate;

vii. Ensure that factors such as biodiversity net gain, urban greening, SuDS and public realm and green spaces that integrate high-quality habitats in

line with the Local Nature Recovery Strategy are considered at the earliest stage of the development process;

viii. Aim for the highest levels of water efficiency, including through grey water harvesting, Sustainable Drainage Systems, and a water consumption target of 80 l/p/d; and

ix. Ensure a coherent and positive relationship with adjoining and neighbouring land uses and protect local amenity, with reference to other Local Plan policies.

B Development proposals for new Class E(g), B2, B8 and similar Sui Generis uses over 2,500 square metres (gross external area) should include a reasonable proportion of flexible workspace or smaller units suitable for micro, small and medium sized enterprises.

Explanation

8.25 New commercial development that is well-designed can not only improve the quality and viability of employment areas and premises but also the liveability of neighbourhoods. Commercial development proposals must therefore respond positively to the wider neighbourhood context by addressing matters such as local character, amenity, public realm and green infrastructure.

8.26 Proposals for development must demonstrate how the design-led approach has been used to optimise and make more efficient use of land and commercial floorspace. This may include consideration of layout options to provide higher plot ratios and building designs to enable integration of smaller business units, co-working and incubator space, vertical stacking / multi-storey development, mezzanines and basement levels.

8.27 Flexibly specified buildings and workspaces should be provided wherever possible, particularly where there is not a specified end user for the development. These are essential to ensuring the long-term viability of employment land and premises. This is because they allow for the reconfiguration of internal space to suit a wide range of end users and support business retention by enabling existing occupiers to expand in situ. Flexible specifications could also include, for example, full height delivery doors, capacity to site additional delivery doors to enable subdivision of buildings, and reallocation of space.

8.28 Proposals for development must make appropriate provision for full internal fit out of buildings and workspace. This should normally include plumbing/heating, installation of sanitary and kitchen facilities, finishes for floors, walls and ceilings, and where appropriate, shopfronts and glazing. New development must also provide for modern communications facilities, including power points and connection-ready high-speed broadband. Proposals should provide sufficient details of interior fit out at the application stage.

8.29 Proposals limited to 'core' and 'shell' only specifications are not considered appropriate and will be strongly resisted. This requirement is necessary to ensure the attractiveness and marketability of units, particularly in promoting early take up of workspace and helping to prevent long-term vacancies. It is also vital to supporting micro, small and independent businesses which are unlikely to be able to absorb the initial overhead costs for fit out. The appropriate level of fit out will be considered on a site-by-site basis.

8.30 Site layout is especially important for commercial and industrial operators. The effective functioning of employment sites is dependent not only on fit for purpose buildings but also their associated operational land. Development proposals must therefore address matters such as vehicle access for loading and delivery, yard space, external storage, parking, site servicing and customer interface. A well-designed layout is also essential to ensuring the protection of local amenity and space for nature.

8.31 We consider it important that proposals for new high-quality employment sites and workspace be forward/ future facing and respond positive towards their environmental impact, energy use and carbon emissions. In addition to ensuring factors such as Biodiversity Net Gain, Urban Greening, SuDS and public realm are considered at the earliest stage of the development process.

8.32 Consequently, the Local Plan places a higher emphasis on proposals for employment development securing water efficiency measures. This is particularly necessary to address the issue of water scarcity within the area; and in respect of protecting water quantity sensitive sites. To achieve this objective new employment proposals are expected to aim for the highest level of water efficiency which can be achieved through grey water harvesting, SuDS, and more stringent water consumption of 80 l/p/d.

8.33 The Council considers it prudent to secure a diverse supply of employment provision available to the market in anticipation of market changes, and to meet the needs of SME businesses. Consequently, large scale commercial development proposals should consider incorporating an appropriate range and mix of business unit sizes. Provision for smaller units will help small business development particularly for Hertsmere's creative, cultural and digital industries. What constitutes a reasonable proportion of flexible workspace or small units will be considered on a case-by-case basis.

EC4 Affordable Workspace

Strategic Objectives

B A thriving local economy

Strategic Policy

A Proposals for development incorporating workspace should ensure that provision is made for suitable types and sizes of units, at an appropriate range of rents, particularly to meet the needs of specific social, cultural, or economic development uses.

B Where there is existing affordable workspace this should be retained or re-provided. The exception being when on-site retention demonstrably harms opportunities for investment and the delivery of industrial employment intensification. Proposals for development should use the design-led approach to explore options for retaining, re-purposing or creating new affordable workspace that is designed to a high specification and will remain suitable for local businesses, including small businesses and those in the cultural, creative and digital industries. Affordable workspace should be let at reasonable local market rates to encourage take-up of units and support business development, particularly by addressing financial barriers in access to workspace.

C Proposals for development that incorporate an element of affordable workspace at rents maintained below the market rate for social, cultural or economic uses will be considered favourably.

D New major commercial development proposals for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis uses should when demonstrably viable make provision for affordable workspace. Developments must provide at least 10% of the rentable floorspace (Net Internal Area) as affordable workspace at 50% of market rents. Affordable workspace should be provided on-site. An exception to this approach will be where proposals demonstrate, through robust technical evidence, that the provision of new on-site affordable workspace will harm the delivery of industrial employment intensification. Off-site provision will only be acceptable where it is demonstrated to the satisfaction of the Council that on-site provision is not feasible or off-site provision will achieve greater economic benefits. Off-site provision will be secured through planning obligations with payments in lieu calculated using the formula set out in Table 8.3 (Affordable workspace payments in lieu). Payment in lieu contributions will be used to support the provision of affordable workspace in Hertsmere.

E Where new affordable workspace is provided this must be secured for a specified period agreed by the Council to ensure that workspace is appropriately managed it must be provided in one of the following ways:

i. Leased and managed by an affordable workspace provider approved by the Council, with an agreed Workspace Management Plan;

ii. Managed directly by the owner, where it is demonstrated to the satisfaction of the Council that they have the necessary experience and expertise, with an agreed Workspace Management Plan; and

iii. Leased by the owner to an end user approved by the Council that requires non-managed workspace.

F Development proposals that do not provide the required amount of affordable workspace must submit a Viability Assessment. The assessment will be subject to an independent appraisal paid for by the applicant. Proposals must provide the maximum viable amount of affordable workspace, the level of which will be determined by the Viability Assessment and capped at the requirement set out in (D) above. The Council will apply viability review mechanisms where development proposals do not provide the amount of workspace required by the policy.

G Where there is existing affordable workspace this should be retained. Development proposals requiring planning permission that involve the loss of existing affordable workspace (including consented but undelivered workspace) will be refused unless the equivalent amount of affordable workspace is replaced on-site or re-provided elsewhere in Hertsmere. Affordable workspace that is replaced or re-provided must be of at least the same quality as the existing provision and secured on equivalent terms, or alternative terms agreed by the Council. Proposals for meanwhile uses that secure affordable workspace, on a temporary basis, will be assessed on their ability to contribute towards meeting demand.

H Affordable workspace will be secured using planning obligations and/or legal agreements.

Table 8.3: Affordable Workspace Formula for Calculating Payments in Lieu

Formula for Calculating Payments in Lieu
Step 1: C = A x B Step 2: E = D x C Step 3: G = E x F Step 4: H = G - E Step 5: J = 1 / I Step 6: K = H x J
A = Total lettable employment floorspace (square metres) B = Percentage of floorspace to be discounted C = Amount of floorspace subject to discount D = Market rent for per square metre before discount E = Marker rent for discounted floorspace before discount

F = Percentage discount G = Rent after discount H = Value of discount I = Investment yield J = Income multiplier K = Capital value of discount

Explanation

8.34 This strategic policy seeks to secure an appropriate portion of affordable workspace from larger employment schemes, in line with the Council's evidence base, as set out under Document E4 Economy Study which demonstrates a clear need for this type of provision. It includes a formula for calculating payments in-lieu for off-site provision where it demonstrably cannot be delivered on site.

8.35 The evidence base identifies rising commercial sales and rental rates and the lack of affordable workspace as an important issue in the Borough. The cost and availability of workspace can create a barrier to entry in the local economy and wider community, posing challenges for businesses and groups seeking to locate to, start-up or expand in Hertsmere. This is particularly for micro, small and independent businesses as well as social enterprises, charities and voluntary organisations. The Local Plan therefore seeks to ensure that existing affordable workspace is retained and that new provision is created as commercial development comes forward.

8.36 Affordable workspace is workspace that is provided at rents maintained below the market rate. Like low-cost workspace, this type of workspace is important to support business retention and development. For the successful delivery of the Local Plan there is an imperative to grow Hertsmere's economic base and provision of affordable workspace will be integral to achieving this objective. Therefore, all major commercial development, including mixed-use developments with a commercial component of 1,000 square metres or more gross, should ensure that 10% of new workspace is delivered as affordable workspace.

8.37 The policy applies to Use Class E(g) office and light industrial, B2 industrial and B8 storage and distribution uses. It will also apply to similar Sui Generis Uses however this will be considered on a case-by-case basis depending on the nature of the business activity. The Council will use discretion on a case-by-case basis in applying the policy to office space or other workspace that associated with community (social) infrastructure such as health, social care and education facilities.

8.38 To qualify as affordable workspace, provision should be let at a discount of 50% of the market rent over a period agreed by the Council. The market rent is the expected rent that would be achieved on the discounted space at market rates. Market rates (and therefore rents) should be established based on robust evidence of the commercial market in Hertsmere. Service charges should be set at a reasonable level that does not offset or adversely impact on the affordability of the workspace. The market rent and associated service charges will be assessed by the Council at

the time of the application, considering the nature and location of the proposed development.

8.39 Affordable workspace should normally be provided on-site. The policy sets out three options for delivering workspace to ensure it is appropriately secured and managed. Applicants should engage with workspace providers and representative groups early in the design led approach. This will help to ensure the design is suited to the requirements of the end user(s) and can also assist with the identification of providers. Applications should include evidence of an agreement to lease the affordable workspace along with a Workspace Management Plan, where appropriate. In most circumstances, proposals will be required to maintain or retain existing affordable floorspace that is already present on-site. Exceptions to this approach will be considered, subject to the proposal robustly demonstrating that it is necessary to replace existing provision to deliver higher intensity industrial employment uses on-site. Such proposals will be supported by technical evidence that demonstrate how industrial employment intensification will be delivered on the site, and the economic benefits that it will bring to the Borough. Proposals for new commercial development that deliver improved and higher intensity industrial employment uses will be positively considered, subject to meeting other Local Plan policy requirements. Flexibility may be applied for equivalent off-site contributions in exceptional circumstances, including payments in lieu, where it is demonstrated to the satisfaction of the Council that on-site provision is not feasible or off-site provision will provide greater economic benefits. Payment in lieu contributions will be secured using the formula set out in Table 7.3 (Affordable workspace payments in lieu).

8.40 Development proposals that do not provide the required amount of affordable workspace must submit evidence of a Viability Assessment with the planning application. This must be undertaken by a suitably qualified professional, such as a member of the Royal Institution of Chartered Surveyors (RICS). The applicant's Viability Assessment will be subject to an independent appraisal paid for by the applicant. The assessment will be used to confirm the maximum viable amount of affordable workspace that should be provided, with the level capped at the amount set out in the policy. Where the required level of affordable workspace is not provided the Council will apply early and late-stage viability review mechanisms. This is to respond to economic uncertainties that may arise over the period of the development, and to ensure maximum public benefit is gained from it. The Council will consider proposals for new B2 industrial, and B8 storage uses that seek to secure a lesser scale of new affordable workspace provision. This will be subject to them robustly demonstrating, through supporting technical evidence, that the provision of new on-site affordable workspace will harm the delivery of industrial employment intensification. Such proposals will be required to submit technical evidence that demonstrates how industrial intensification will be delivered across the site, and specifically how the on-site presence of affordable workspace would prejudice its timely implementation.

8.41 It is expected that affordable workspace will normally be provided as flexibly specified office or light industrial workspace81. Developments will also be encouraged to make provision for this type of space to contribute to meeting the Borough's identified needs for employment. However, there may be circumstances in which affordable workspace can be provided for Class B2 industrial or Class B8 storage and warehousing uses. In these cases, a lower level of affordable workspace and/or discount rent may be permissible. This is recognising these types of industrial uses may exhibit lower land values, which can in turn impact on viability. Where appropriate, the amount of affordable workspace and discount rent value will be determined considering the nature of the use(s) and development viability.

EC5 Strategic Level Employment Designations

Strategic Objectives

B A thriving local economy

Non-strategic Policy

A Proposals for development within Key Employment Sites and Employment Areas will be supported where the uses fall within the industrial-type activities specified within Policy EC2.

B Development proposals within or adjacent to Key Employment Sites / Employment Areas must not adversely impact on the function or effectiveness of those areas to accommodate commercial and industrial uses or their ability to function on a 24-hour basis.

C Proposals for development within the Borough's strategic level employment sites should protect and seek to make provision for business activities and uses that support the Hertsmere's key industrial employment activities. Proposals that support and enhance the international film and television industry; deliver sustainable 'last mile' distribution/ logistics; 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair, and maintenance); waste management and recycling, and nationally important infrastructure will be positively considered subject to them meeting other Local Plan policy requirements.

Explanation

8.42 This policy addresses strategic employment sites that serve a need wider than Hertsmere alone. Sites will be identified on a policies map and will include:

- Employment uses associated with the film and television industry (e.g. Sky Elstree) alongside existing large employment areas like Centennial Park, Elstree and Elstree Way, Borehamwood.
- Other large scale B8 storage and logistics, datacentres; and other strategic employment uses accessed or associated directly with the strategic highway network.

8.43 New employment uses and additional floorspace that meet identified need within the borough as well as wider regional and national need, evidenced through Document E4 Economy Study, will be directed towards these sites in line with Strategic Policy EC1. Proposals that support the Borough's role as an international centre for film and television production will be positively considered. Developers will be encouraged to engage with the Hertsmere Creative Strategy[5] to ensure that its objectives for culture and creativity are met through the delivery of new development (where relevant). Equally, those proposals that make efficient use of the Borough's high-level of accessibility to the strategic highway network in respect of sustainable 'last mile' distribution/ logistics and 'just-in-time' servicing will also be positively considered.

8.44 This policy ensures that Hertsmere's strategic level employment sites are safeguarded and their economic function is enhanced and not compromised by other uses. Proposals for development on the Borough's strategic employment sites must not compromise the overall function or effectiveness of the wider safeguarded areas. Proposals that seek the release of vacant land present within safeguarded areas, for uses other than employment, will only be supported in exceptional circumstances. Such proposals must be supported by robust evidence that demonstrates that any vacant land can be released without prejudicing the continued operation of the wider site for employment uses. The Council will apply to agent of change approach to such proposals.

8.45 The policy seeks to optimise industrial employment capacity of the sites. This approach will seek to secure industrial employment intensification of use on designated sites. Development proposals on the strategic employment must demonstrate through the design-led approach how they have sought to make optimal use of the site, and conversely how industrial employment intensification will be delivered.

[5] Hertsmere Creative Strategy (pdf 3.8 Mb) - The Hertsmere Creative Strategy sets out our strategic approach to the development of culture and creativity in the Borough. The strategy looks at culture and creativity in its widest sense, including art, dance and heritage across formal and informal settings including the community and voluntary sector. It looks at audiences and participants at all levels and makes specific reference to the creative industries, skills gaps and development.

EC6 Local Level Employment Designations

Strategic Objectives

B A thriving local economy

Non-strategic Policy

A These sites will be protected for Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and related Sui Generis uses, with priority being given to office and light industrial uses. Development proposals should maintain the Borough's industrial capacity within these locations and seek to deliver net gains wherever possible.

B Development proposals within or adjacent to Employment Areas must not adversely impact on the function or effectiveness of the Employment Areas to accommodate commercial and industrial uses. Hertsmere's Employment Areas are normally inappropriate locations for proposals seeking to deliver new main town centre uses, as defined under Class E (a) – (f).

C Within Employment Areas, development proposals for self-storage and large format storage and warehousing uses and facilities will only be permitted where:

i. The requirements of Policy EC2.B(d) (Protecting employment land and delivering new workspace) are satisfied; or

ii. There is a demonstrable local need or market demand for the use proposed;

iii. The use cannot be reasonably located in a higher-level employment site, as evidenced by a detailed site selection exercise; and

iv. The development will include provision of a reasonable proportion of flexible workspace or units for micro, small or medium-sized businesses.

D Within Employment Areas, development proposals for strategic infrastructure will be permitted where it is demonstrated that:

i. The infrastructure is necessary to support the delivery of the spatial strategy for the Borough, considering the Council's Infrastructure Delivery Plan;

ii. The use is appropriate to the industrial location and will not adversely impact on the function of the Employment Areas or prejudice the continued operation of commercial and industrial uses on the site or within the employment area; and

iii. The loss of industrial capacity has been minimised as much as reasonably practical, and efforts have been made to replace any such losses.

Explanation

8.46 Hertsmere's main and local level employment sites play a valuable role in the local economy as a source of industrial capacity and jobs. New development within these sites should be predominantly for Class E(g) office and light industrial uses with priority given to light industrial uses.

8.47 This non-strategic policy addresses the Main Employment Areas and Locally Significant Employment Sites identified in Policy EC2. These sites are identified on the proposals map. Development in these areas will:

- Meet local need for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution, and related Sui Generis uses, as identified through Strategic Policy EC1;
- Maintain the ability of the designated area to accommodate industrial and commercial land uses by resisting the introduction of main town centre and residential uses;
- Maintain the strategic position of the employment site within the Hierarchy by resisting very large warehousing and similar uses which would be better placed within Strategic Level Employment Sites; and
- Potentially encourage uses that are ancillary to strategic employment uses, where these are complimentary to and do not undermine the integrity and function of the employment area, including but not limited to businesses that support the film industry. This could include the construction of props; stage sets; and costumes.

8.48 Proposals for development that could result in the release of vacant land within these areas for uses other than employment will only be considered in exceptional circumstances and must be supported by robust evidence that demonstrates why that is necessary.

8.49 The Council seeks to secure progressive industrial intensification through new development and redevelopment of these sites. This approach is accordance with the Spatial Strategy, which seeks to direct and intensify future growth within and adjacent to the Borough's four main towns. We consider this approach justified as a mechanism for securing successful and sustainable place-making. It is further justified on the grounds that it will minimise the wider impact of industrial employment growth on the strategic extent/ permanence of the Green Belt; maintaining the openness between the four main towns.

8.50 Whilst main and local level employment sites are protected for office, and industrial employment uses it is recognised that other employment generating uses that are operationally ancillary to primarily industrial employment activities can help to support the attractiveness and viability of an employment site. Such uses may include small-scale workplace crèches, cafes, business services, community facilities and public amenity spaces. The acceptability of development proposals for

such uses will be considered on a case-by-case basis. In all cases, proposals for such uses within these employment areas must be ancillary and subservient to a clearly related primary industrial employment activity. For example, it may be permissible to allow a coffee roasting factory to have a limited public facing sales counter for product made on-site. Proposals for commercial operations that are entirely defined under Class E (a) – (f) as main town uses will not normally be considered appropriate for these employment sites. Fundamentally, they should remain attractive and viable places for business.

8.51 Development must not adversely impact on the function and effectiveness of LSIS or otherwise prejudice the continued operation of industrial and commercial uses. Development proposals should avoid harm to function of these employment sites by ensuring that they will not result in an overconcentration of non-commercial or inappropriate main town centre uses. Proposals will therefore be considered having regard to the cumulative impact of uses which are not Class E(g) office and other industrial uses.

EC7 Rural Employment Areas

Strategic Objectives

B A thriving local economy

Non-strategic Policy

A Hertsmere's designated Rural Employment Areas are identified on the proposals map. Proposals within designated Rural Employment Areas will be

i. in accordance with Green Belt policy;

ii. ancillary to an existing or approved use already on the site; and

iii. compatible with the local highway network.

B Development proposals that seek the release of vacant land for uses other than employment will only be considered in exceptional circumstances. Proposals of such nature must be supported by robust evidence including assessment of the suitability of a site for continuing employment use and as required, an employment land needs assessment.

C Proposals that seek the development of vacant land within identified Rural Employment Areas for residential uses will be resisted in accordance with the objectives of the Spatial Strategy. These are inappropriate and unsustainable locations for new residential uses.

Explanation

8.52 Hertsmere has several designated Rural Employment Areas. These are established employment uses that successfully operate from rural locations that are in the open countryside beyond the four main towns. Whilst these Rural Employment Areas make a valuable contribution towards the local economy, they are unsuitable and unsustainable locations for future growth.

8.53 This non-strategic policy seeks to ensure that proposals within designated Rural Employment Areas identified in Policy EC2 and identified on a policies map will be:

- In accordance with Green Belt policy
- Ancillary to an existing or approved employment use; and
- Compatible with the local highway network.

8.54 The policy seeks to secure progressive industrial intensification of these designated sites that is appropriate and proportionate to their rural locations. This approach is accordance with the Spatial Strategy, which seeks to optimise locations that are already in active employment use. We consider this approach justified as a mechanism for securing successful and sustainable place-making. It is further justified on the grounds that it will minimise the wider impact of industrial employment growth on the strategic extent/ permanence of the Green Belt; maintaining the openness between the four main towns. Proposals that seek to intensify the employment uses already present on site must demonstrate that such intensification can be achieved within existing constrains relevant to the location. Proposals must demonstrate why intensification is necessary and cannot be delivered at more sustainable locations. This is particularly the case in relation to the capacity of existing infrastructure networks. Where it is appropriate and necessary, the Council will work with its infrastructure delivery partners to identify appropriate and proportionate improvements to infrastructure necessary to support such proposals. These will be delivered through contributions from the development.

8.55 Any release of vacant land for uses other than employment use will only be considered in exceptional circumstances and must be supported by robust evidence demonstrates why such proposals should be positively considered. The Rural Employment Areas are wholly unsuitable and unsustainable locations for new residential uses. Proposals for new residential use will be resisted.

EC8 Hertsmere's Non-Designated Employment Sites

Strategic Objectives

B A thriving local economy

Non-strategic Policy

A Non-designated employment sites are those that contain or consist principally of Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and similar Sui Generis uses, and which are located outside of designated employment sites. These sites make an important contribution to Hertsmere's local economy by providing workspace for businesses and job opportunities. Development proposals should protect and not result in the net loss of viable industrial capacity on these non-designated employment sites.

B To ensure the continued viability of non-designated employment sites, development proposals for employment-led, mixed-used development will be supported where they are located within a well-connected area with high accessibility to services, or the site forms part of a cluster of commercial, industrial and/ or other employment generating uses, and the development:

i. Maximises the amount of industrial capacity;

ii. Provides demonstrable improvements in the site's suitably for continued employment use, having regard to Policy EC3 (High-quality employment areas and workspace);

iii. Does not compromise the employment generating function of the site and any adjoining or nearby sites, particularly where they form part of a complementary cluster of uses;

iv. Ensures appropriate protection of amenity both for the users of the development and neighbouring properties, with reference to the Agent of Change principle; and

v. Secures the provision of affordable housing for any residential element introduced, including through building conversions, in line with Policy H3 (Genuinely affordable housing).

C On all other non-designated employment sites (i.e. those which fall outside the location requirements in (B) above) development proposals must not result in the net loss of viable industrial capacity, unless it can be demonstrated that the building or site is not suitable for continued business use having regard to:

i. Feasible alternative commercial, industrial and/or employment generating uses;

ii. The condition of the existing building(s) and reasonable options for the refurbishment and/or reconfiguration of floorspace to enable continued occupation by employment generating uses;

iii. Site constraints including layout, access and compatibility with neighbouring uses;

iv. Long-term vacancy; and

v. Evidence of recent and continuous marketing, covering a minimum period of two years and at an appropriate rental or sale value.

D On sites where the introduction of a residential element is acceptable in line with (C) above, development proposals must make provision for affordable housing, in line with Policy H3 (Genuinely affordable housing).

E Development proposals involving the net loss of industrial capacity must make a financial contribution towards training or other employment related initiatives, in line with Policies EC9 (Workplace training and job opportunities) and DM2 (Infrastructure funding and planning obligations).

Explanation

8.56 This non-strategic policy relates to all of Hertsmere's non-designated employment sites. These small sites make a valued contribution towards the Borough's economy. They meet employment floorspace needs that will not normally be met by provision available on larger designated sites. As such they can also provide more affordable accommodation, particularly for SME employers. Consequently, the policy seeks to protect against the loss of any non-designated employment sites that remain demonstrably viable propositions.

8.57 There are several employment sites located outside of the Borough's designated employment areas. These sites may either contain or consist principally of commercial and industrial uses. They play an important role in the local economy through their offer of complementary business services and activities as well as providing a source of local job opportunities. Nevertheless, evidence suggests that the future of these sites and their employment contribution is at risk. The Council is concerned that their employment function could be compromised or lost without an appropriate level of protection. The Local Plan therefore seeks to safeguard these sites for employment use.

8.58 However, it is recognised that flexibility is needed to respond to market signals, ensuring that land is not unnecessarily protected when there is no reasonable prospect of it remaining in employment use. In determining whether land is a non-designated employment site the Council will refer to planning and Business Rate

records to identify whether the land and buildings are in business use or were last authorised for business use.

8.59 The policy seeks to secure progressive industrial intensification of these designated sites that is appropriate and proportionate to their rural locations. This approach is accordance with the Spatial Strategy, which seeks to optimise locations that are already in active employment use. We consider this approach justified as a mechanism for securing successful and sustainable place-making. It is further justified on the grounds that it will minimise the wider impact of industrial employment growth on the strategic extent/ permanence of the Green Belt; maintaining the openness between the four main towns.

8.60 Development proposals must provide the maximum reasonable amount of floorspace taking account of the minimum amount of non-commercial floorspace needed to make development viable. Proposals should clearly set out the net change in industrial capacity resulting from the development, distinguishing between floorspace and yard space in the planning statement, along with an indication of the number of jobs to be accommodated by the new employment element. Proposals should seek to increase employment densities to realise net gains in jobs even where the amount of industrial capacity is diminished.

8.61 Where development proposals involve the net loss of industrial capacity a financial contribution towards training or other employment related initiatives will be required, in line with Policies EC9 (Workplace training and job opportunities) and DM2 (Infrastructure funding and planning obligations).

EC9 Workplace Training and Job Opportunities

Strategic Objectives

B A thriving local economy

Non-strategic Policy

A The Council will work with stakeholders to support the Local Plan objectives for delivering a thriving and inclusive local economy.

B Proposals for development should make reasonable efforts to actively source local businesses, recruit local workers and provide workplace training, skills development, apprenticeships and other education and training opportunities for Hertsmere residents. Consideration should be given to opportunities during the construction and end-user phases of development. Development proposals that demonstrate there are suitable arrangements in place to secure local labour and workplace training will be considered favourably.

C Major development proposals must make provision for workplace training in Hertsmere. A financial contribution will be required using the formula set out in Table 8.4. This will be secured by conditions or planning contributions and used to support the Council's local labour scheme and associated projects.

D In line with other Local Plan policies, development proposals involving a net loss of industrial capacity in designated employment locations and non-designated employment sites will be resisted, unless such loss is part of a plan-led process of employment land consolidation. Where a development proposal will result in a net loss of industrial capacity, a financial contribution will be required for workplace training, using the formula set out in Table 8.4. This will be secured by conditions or planning contributions and used to support the Council's local labour scheme and associated projects.

Table 8.4: Financial Contributions for Workplace Training

Formula for Calculating Financial Contributions from Major Residential Development
X = A x B
X = Total financial contribution (£) A = Financial contribution of £715 per dwelling B = Number of dwellings
Formula for Calculating Financial Contributions from Major Commercial Development
X = A x B
C = Total financial contribution (£) A = Financial contribution of £715 per job generated by the development.

B = Estimated number of jobs provided by the development The estimated number of jobs will be calculated based on gross new employment floorspace provided by the development, considering the relevant land use(s) and applying the (former) HCA Employment Densities Guide (2nd Edition).
Formula for Calculating Financial Contributions for the Loss of Industrial Capacity
X = A x (B – C)
X = Total financial contribution (£) A = Financial of £715 per job lost because of the development. B = Estimated number of existing jobs C = Estimated number of jobs provided by the development. The estimated number of jobs lost will be calculated based on the net loss of existing employment floorspace resulting from the development, considering the relevant existing land use(s) and applying the (former) HCA Employment Densities Guide (2nd Edition).

Explanation

8.62 It is important that residents can share in Hertsmere's economic growth and prosperity. To achieve a more inclusive local economy, residents must be well equipped to access jobs, advance career prospects and fulfil their aspirations. Everyone, regardless of their background or experience, should be able to develop their skills through lifelong learning and have good access to these opportunities.

8.63 Employment and training schemes to maximise employment opportunities for local people and help address skills deficits in the local population will be supported in accordance with the Council's Economic Development Strategy. Major development proposals will be required to demonstrate how they are supporting employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Developers are encouraged to engage with and consider the Hertsmere Creative Strategy, to ensure that its objectives for addressing skills gaps are met.

8.64 All large development schemes, providing over 1,000 m2 employment floorspace or 10 homes, will be required to contribute towards the provision of local employment skills and opportunities. Employment and Skills plans (ESP) will be required, and the developer will be expected to agree to deliver the commitments secured in the ESP. The ESP should as a minimum address, in detail, how the developer intends to deliver on the following objectives:

- Enable those people undertaking training to complete their training and apprenticeships;
- Ensure the greatest possible level of take-up by Hertsmere residents of the training, apprenticeship and employment opportunities created, with a

minimum of 25 per cent of future recruitment created by the development (in both the construction phase and for the first two years of end-use occupation of the development) being specifically targeted at residents;

- Increase the proportion of under-represented groups within the construction industry workforce;

  Engage with local schools, colleges and/or community organisations to promote amongst young people the range of careers available, skills and qualifications needed for employment in the construction and commercial sectors of the end-use occupiers in place during the first two years of the development;

- Support those sections of Hertsmere's workforce that are furthest from employment, having been out of work for a long period of time and/or having low levels of skills; and

- Provide monitoring reports on the implementation of their ESP at agreed regular intervals and set out detailed arrangements for the timing of payments (including the provision of a monitoring fee linked to the overall package of obligations).

8.65 Applicants, developers and business owners are encouraged to recruit local labour, source local businesses and provide residents with opportunities for workplace training and skills development, such as apprenticeships. Consideration should be given to sourcing at all stages in the development process, and particularly in the construction and operational phases. This will not only benefit residents, but the use of local labour and business can also support the Circular Economy and limit the environmental impact of new development, for example, by helping to reduce the need for long distance commuting and the transport of materials.

EC10 The Rural Economy

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
D Support a well-educated and skilled population
I Celebrating our local identity
K Securing the timely delivery of infrastructure

Strategic Policy

A Development must not result in the loss of the best and most versatile agricultural land, disturb or damage soils of high environmental value, or impede the continuation of a lawfully existing agricultural development and/or land use. Where this loss cannot be avoided, standing advice from Natural England shall be applied.

B Proposals for the diversification of agricultural businesses in the open countryside will be supported where they accord with other policies in the development plan and:

i. the development proposals are and will remain ancillary and related to the primary agricultural business;

ii. the development is necessary to support the continued viability of the existing agricultural business;

iii. the proposals make best use of existing infrastructure such as existing buildings, utilities, parking and vehicular access;

iv. additional buildings, structures and ancillary development are restricted to the minimum level reasonably required for the planned operation of the diversified business; are well-related to each other and existing buildings and do not form isolated or scattered development;

v. do not unacceptably affect the amenity and character of the surrounding area or landscape (including visual impacts, noise, odour, design and appearance), either on its own or cumulatively with other developments; and

vi. provide appropriate landscaping and screening.

In addition to the above, proposals for retail sales must be limited in scale and not impact on the vitality and viability of town centres in accordance with Policy EC11. Main town centre uses[1]. Where appropriate, the Council may impose conditions to control the future expansion or nature of the business when granting planning permission.

C Applications for re-use of buildings must relate to lawful permanent buildings of substantial construction. The lack of demand for the existing lawful use will need to be demonstrated. In circumstances where character and scale are important to the local setting, excessive external alterations and additions will not be permitted. Account will be taken of:

i. the change of use of the curtilage to the building;

ii. extension required to facilitate the change of use; and

iii. the impacts of such changes in use on the purposes of the Green Belt.

D Proposals for the use of land for equine uses or for the erection of stables and associated facilities and/or operational development will be considered on their merits. Assessment will include:

i. the location/layout of any buildings/structures;

ii. the need for the size of buildings and structures proposed to serve the use of the land; and

iii. the quality of the structures, buildings, and landscaping proposed.

Structures, engineering works, and buildings serving equine uses should be removed from the site when they are no longer in use and are no longer required to serve the equine use of the land.

E Proposals which promote sustainable agriculture and public participation in food growing, especially those which contribute to education, training and the development of local supply chains, will be supported.

Explanation

8.66 Hertsmere's open countryside plays an important role in defining the Borough's character and appearance. It positively contributes towards the openness and separation between the Borough's four main towns, and its smaller settlements. Green Belt policy seeks to protect the strategic integrity of that openness and separation. The Council acknowledges that the Borough's agriculture, livestock and equine uses continue to play a role in maintaining and enhancing the openness provided by the countryside that separates its settlements and places. Nevertheless, those uses must be carefully managed to ensure that they remain vibrant and vital contributors to the local economy and that they continue as appropriate uses compatible with the purposes of the Green Belt.

Protection of agricultural land

8.67 Agricultural land is an important natural resource which supports the local economy and has a key part to play in the delivery of sustainable development. National

planning policy requires that planning policies recognise the wider benefits from natural capital and ecosystem benefits from natural capital and ecosystem services, including the economic and other benefits of the best and most versatile agricultural land. Agricultural land is classified into five grades according to a system determined by Natural England[6] with Grade 1 being the highest quality. Most of the land within Hertsmere is classified as Grade 3 with some small areas of Grade 2. Applications should demonstrate how the requirements of EC10 are being addressed, including where strategic allocations in the plan would result in proposals for the development of agricultural land.

Re-use of agricultural buildings

8.68 The extension of buildings, provided they are not disproportionate, may not be inappropriate in the Green Belt. In some cases, they may be necessary to maintain the viability of existing uses. In certain circumstances, there may be buildings within the curtilage of those proposed for extension. Their existing presence and proposed removal will only justify a larger extension where it is clearly demonstrated that they are lawful and cause harm to the openness of the Green Belt and where their removal would reduce the harm to the openness of the Green Belt when compared to the proposed development. Replacement buildings need not be inappropriate provided that the replacement is not materially larger than the building it replaces, remains in the same use, and the open character of the Green Belt is maintained. Such development must be sensitively located and designed.

8.69 The re-use of buildings which are of permanent and substantial construction is included as an exception to inappropriate development in accordance with national planning policy where the development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. However, such re-use of buildings often also results in a change of use of the land around it which can have an impact on the Green Belt, such as introducing various paraphernalia associated with the proposed use, structures, fencing, hardstanding and lighting required to facilitate the new use, as well as pressure for further development that requires planning permission. Any extensions proposed which are required to facilitate the use will also be considered about the overall impact on the openness of the Green Belt. The re-use of buildings will be considered together with the impacts of the change of use of the associated curtilage.

Equine Uses

8.70 Equine uses and structures in the Green Belt require suitable land and an acceptable location. Sufficient land should be available for grazing plus a separately fenced exercise area, proportionate to the quantity of horses. Lighting arrangements should be designed to avoid adverse environmental impacts, and the stable building, food/bedding stores, and manure bay should not be in the proximity of neighbours where it would have a significant adverse impact on their residential amenity. Keeping or stabling of riding horses should be in reasonable proximity to bridleways

[6] Agricultural Land Classification map Eastern Region - ALC008

or suitable riding facilities, for example a large paddock. The size of the stabling and facilities proposed should be appropriate to the size of the site and the need for the facilities. To avoid stables being constructed and then converted to dwellings, the conversion of existing stables to other uses is likely to be resisted to ensure the availability of such facilities in the area. If equine uses cease, there will be a need to remove associated structures to ensure that the openness of the Green Belt is maintained.

8.71 Equine development should be environmentally acceptable. Appropriate hedges with protective or other fencing must be provided and maintained. Proposals for the erection of stables should include details of an area appropriately designed and sited for the reception of soiled bedding material. Additionally, in areas particularly sensitive to pollution of groundwater, it is essential for stables to be connected to a main drainage system or a cesspool. Safe and sufficient provision for access and parking should be made for equine vehicles.

EC11 Town Centres at the Heart of Hertsmere's Communities

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
D Support a well-educated and skilled population
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities

Strategic Policy

A Town centres are and should remain at the heart of Hertsmere's settlements, neighbourhoods and communities as focal points for retail, commercial, cultural, leisure, community and civic activities. Town centres will be managed positively to ensure they are inclusive, diverse, attractive and vibrant places that are made more resilient and adaptable to future challenges and opportunities, including those presented by new technology and changes in consumer behaviour, such as online shopping, and the impacts of climate change.

B Proposals for development should support and help to secure the long-term vitality and viability of Hertsmere's town centres by:

i. Optimising the use of land within and around them;

ii. Maintaining and enhancing their distinctive features and characteristics where these make a positive contribution to the neighbourhood, including their built form, environmental, historic and cultural character.

iii. Ensuring they are inclusive, safe and healthy places by creating environments that are barrier-free and accessible to all, with high-quality buildings, spaces and public realm that are designed to:

a. Reduce vehicular dominance and promote and enable movement by walking, cycling and the use of public transport;

b. Encourage street level activity along with opportunities for social interaction and relaxation, including through provision of publicly accessible open space, in accordance with Policy SCI 3(Delivering Sports, Recreation and Play Spaces) and Policy GI3 (Open Space); and

c. Maximise opportunities to deliver new or enhanced green and blue infrastructure, including by urban greening, river restoration and

sustainable drainage systems (SuDS), in accordance with Policy SDI 7 Managing and Minimising Flood Risk.

iv. Delivering an appropriate mix and balance of residential and main town centre uses to attract visitors and ensure people have good access to a competitive range of services and facilities, as well as to support businesses and grow the local economy through provision of a wide range of workspaces and premises;

v. Ensuring town centres function as vibrant places of daytime, evening and night-time activities. Temporary activities and meanwhile uses (such as festivals, markets, exhibitions, performances and other cultural events) will be supported within town centres, with reference to Policy DM5 (Meanwhile Uses).; and

Where it is appropriate, feasible and viable taking a retrofit-first approach to development in accordance with other Local Plan policies securing to sustainable place-making and responding to the climate emergency

Explanation

8.72 Hertsmere's town centres are healthy and competitive, with below-average vacancy rates and a mix of uses and functions proportionate to their overall scale, but limited prospects for growth. Each centre performs an important role in the hierarchy, serving the shopping and service needs of their respective catchments, although retail market share analysis reveals that Borehamwood Town Centre, Potters Bar (Darkes Lane) Local Town Centre and 'non-central' stores in the Borough are the principal destinations for convenience and comparison goods shopping in Hertsmere. Value-led consumer behaviour means that retail parks, like Borehamwood Shopping Park, are performing well across the UK supported by discount-oriented mix of stores and robust trading[7]. However, retail market trends are fast-moving and so the Local Plan must equip the Borough's Town Centres with the flexibility to keep pace.

8.73 The delivery of the spatial strategy for the Borough is dependent on a well-functioning network of town centres. Proposals for development must therefore demonstrate how they will support the long-term vitality and viability of town centres in the face of a changing retail market environment.

8.74 The Local Plan makes clear the integral role the Borough's town and district centres have in supporting sustainable growth in Hertsmere. It is important that town centres are lively, attractive and inclusive places that people can access safely and easily by walking, cycling and public transport. They should be places where people are able

[7] AECOM Retail and Town Centre Uses Study, 2026

to live and are encouraged to visit, with plenty of opportunities for leisure and relaxation throughout the daytime, evening and night-time.

8.75 Proposals for development must therefore respond positively to the character and environmental quality of town centres and secure the delivery of high-quality buildings and public realm. Proposals that impact upon heritage assets found within or adjoining the Borough's town centres will be considered against the Local Plan's Heritage policies.

8.76 There is a need to ensure that town centres remain resilient and adaptable to the challenges and opportunities facing the High Street, including changes in consumer behaviour and business practices.

8.77 Optimising the use of land within and around the Borough's town centres is key to delivery of the spatial strategy. Regeneration and intensification will be directed towards the most sustainable and accessible locations within the main towns of Borehamwood, Potters Bar, Bushey and Radlett. The regeneration of Borehamwood and Potters Bar's town centres will secure opportunities for high-quality intensified mixed-use developments that secure a diverse and improve mix of main town centre uses at ground and lower floors, and compatible residential accommodation above.

8.78 Proposals are expected to maintain and enhance the key positive distinctive features of the Borough's town centres. This might include consideration of the historic nature of some of the centres for example in Bushey and Radlett, and the cultural aspects of the centre, such as Borehamwood's film heritage, as well as design and amenity considerations. Opportunities for securing higher-intensity development in Borehamwood and Potter Bar's town centres through new tall buildings will be positively considered where they demonstrably deliver high-quality design and enhancement to the wider townscape.

8.79 The natural history of an area can be a way of celebrating the local character of a town bringing nature and culture together and help achieve a 'sense of place' unique to that settlement. In urban areas this can be achieved by, for example, creating a pocket park that provides high-quality greenspace, accessible to all, and which might celebrate an aspect of the area's history or a unique feature of the local urban or natural environment.

8.80 The creation of small pockets of green space can also help with mediating localised impacts of climate change. These can include the heat island effect, which particularly impacts areas like town centres where there are more reflective surfaces and less vegetation cover[8]). The delivery of new development will seek to mitigate these effects within Hertsmere's town centres, whilst celebrating the unique built and

[8] The Urban Heat Island Effect & Climate Change |UKGBC and Urban Heat Islands | MIT Climate Portal

natural history of the area, allowing greater space for nature, and providing small, accessible areas for people to pause and relax.

8.81 The introduction of street trees, native planting schemes, pocket parks, naturalised river corridors and sustainable drainage systems (SuDS) can all form a part of development that should be designed in from the earliest stages, and which should not have a negative impact on scheme viability and deliverability

8.82 The Borough's town centres must have an opportunity to evolve and adapt over time so that they continue to support our neighbourhoods and communities. The Local Plan acknowledges that diversification is vital to the revitalisation, adaptability and long-term resilience of retail centres. This must include an appropriate mix of uses, including commercial, leisure, community, services and residential, and controls are required to retain that mix, and not result in dominance of any particular use.

8.83 The Local Plan supports the retrofit of buildings where there is a benefit to the environment through the retention of embodied carbon. Where demolition is preferred, this will be subject to the considerations of Policy SDI11 (Securing a circular economy), and developers will be required to undertake a Whole Life Carbon Assessment.

EC12 Hertsmere's Town Centre Network and Hierarchy

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities

Strategic Policy

A Proposals for development must support and reinforce Hertsmere's town centre network and hierarchy as shown in Table 7.5 and the Policies Map. They must demonstrate how the development will maintain and enhance town centre vitality and viability commensurate with the role and function of the centre, in accordance with Table XX.

B A 'town centres first' approach will be used to assess development proposals for main town centre uses, in line with national planning policy. The Sequential Test will be applied to ensure that main town centre uses are directed to locations within town centres or, if no suitable town centre sites are available or expected to become available within a reasonable period, to appropriate edge-of-centre locations.

C Development proposals for Class F1 learning and non-residential institutions and Class F2 local community uses are encouraged to locate in town centres and other well-connected areas.

D Development proposals for new main town centre uses in out-of-centre locations will be refused unless provision has been made for these uses within the Local Plan, including site allocations, or it passes the sequential test. This includes proposals for rural diversification that incorporate main town centre uses, where these have regard to Policy EC10 (The Rural Economy). Proposals for new farm shops or extensions to existing farm shops will only be permitted where the range of goods sold is restricted to those in connection with the land-based business and most goods sold should be produced on site.

E Retail Impact Assessments (RIAs) will be required to be submitted with proposals for development comprising main town centre uses of 350 square metres gross floorspace or more at edge-of-centre and out-of-centre locations, unless provision for main town centre uses has been made in a site allocation. RIAs should be proportionate to the nature and scale of development. Development proposals will be refused unless an RIA demonstrates that:

i. There is an identified need and market demand for the amount and type of floorspace proposed; and

ii. The proposal, either by itself or in combination with other existing, committed or planned development, will not adversely impact on the vitality and viability of Hertsmere's town centre network and hierarchy and its wider catchment.

F Development proposals within town centres should contribute to the delivery of and support the appropriate distribution of retail uses to help ensure the Borough's future need arising from strategic site allocations and increased residential densities within town centres is met. Proposals for new major Use Class E (a) retail development1 should prioritise Borehamwood and Potters Bar Darkes Lane in the site selection process before considering other appropriate locations, including District Centres.

Table 8.5: Town Centre Network and Hierarchy

Designation	Location	Role & Function
Main Town Centre	Borehamwood Town Centre	Primary retail centre, with a range of retail, retail services, food and drink and leisure uses.
Local Town Centre	Darkes Lane, Potters Bar	Second tier retail centre with a range of retail, retail services, food and drink and leisure uses.
District Centre	High Street, Potters Bar Bushey Village Bushey Heath Radlett	More specialised, smaller centres, focussed around retail services and food and drink uses, alongside retail.
Local Centre	Leeming Road, Borehamwood	Localised provision of retail uses, alongside food and drink and retail services. Significant for its proximity to the residential area within Cowley Hill Ward.
Key Neighbourhood Parades	Manor Way, Borehamwood Harcourt Road, Bushey Bushey Hall Road, Bushey Cranbourne Parade, Potters Bar	Locally accessible retail parades that provide more than purely convenience retail.
Neighbourhood Centre	Elstree Village Centre Andrew Close, Shenley	Significant local shopping parades within the two largest villages in Hertsmere, primarily important for access to local convenience retail and retail services.

Neighbourhood Parade	Croxdale Road, Borehamwood Hartforde Road, Borehamwood Howard Drive, Borehamwood Rossington Avenue, Borehamwood Aldenham Road, Bushey Bournehall Avenue, Bushey Bushey Mill Lane, North Bushey Park Avenue, North Bushey High Street North (1), Potters Bar High Street North (2), Potters Bar Battlers Green Drive, Radlett	Smaller parades that allow access to a range of shops and services within walking distance of a larger number of homes away from the main shopping centres.
Individual Shops	Organ Hall Road, Borehamwood Shenley Road (North), Borehamwood Studio Way, Borehamwood Thrisk Road, Borehamwood Sparrows Herne (1), Bushey Sparrows Herne (2), Bushey High Road (1), Bushey Heath High Road (2), Bushey Heath Church Road, Potters Bar Wayside, Potters Bar Aldenham Road, Radlett London Road, Shenley St Albans Road, South Mimms	Individual shops that perform an important function in day to day life for residents without easy access to larger parades and centres.

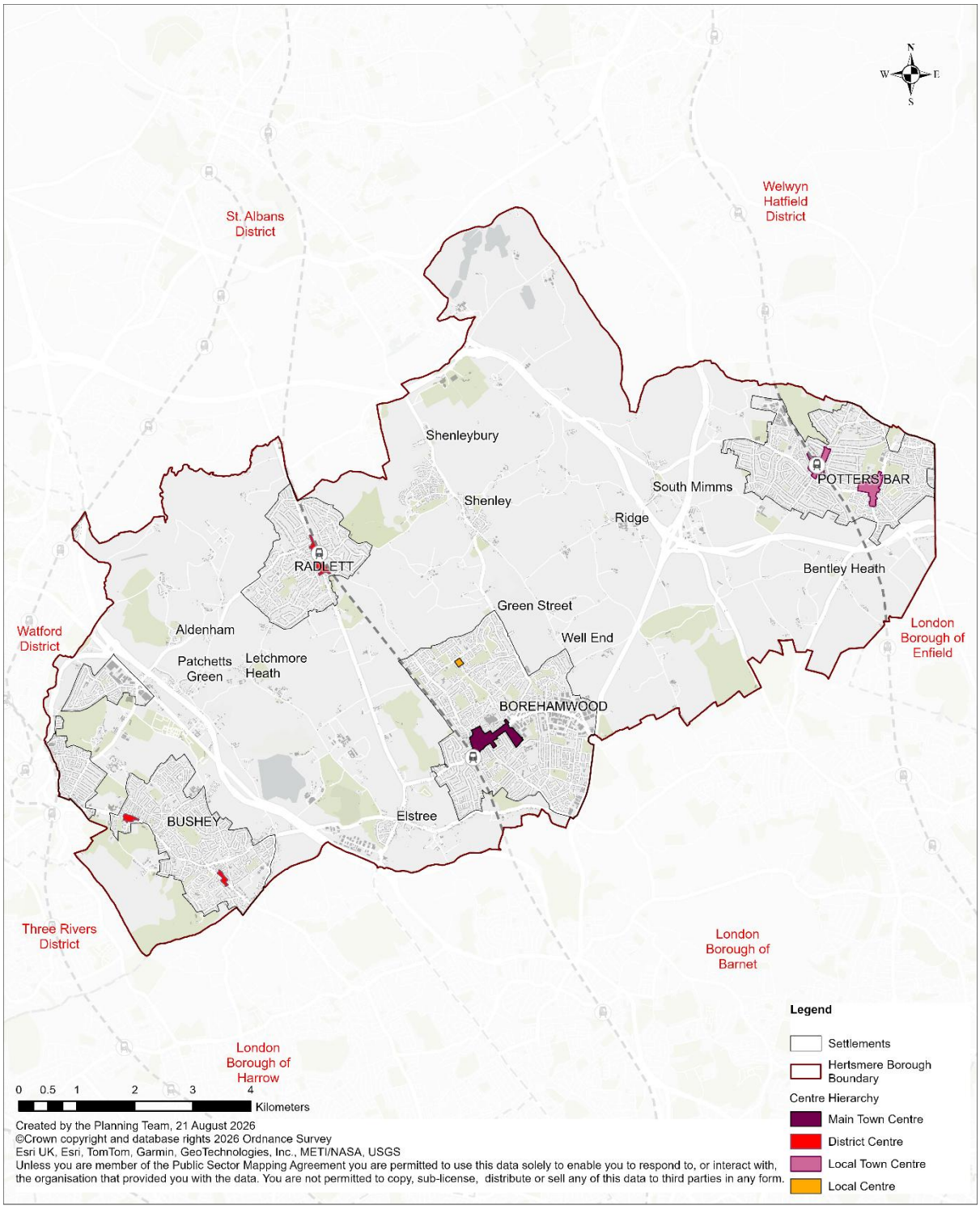

Figure 8.2: Town Centre Network and Hierarchy

Explanation

8.84 This policy establishes the Borough's town centre hierarchy and describes the main role and function of the centres within it. The Local Plan classifies Main Town Centres, Local Town Centres, District Centres and Local Centres. The boundaries of the designated town centres within this hierarchy are shown on the Policies Map, along with the corresponding Primary Shopping Areas for Major and District Centres

8.85 Proposals for development must help to facilitate the delivery of the Borough's spatial strategy by supporting and reinforcing Hertsmere's town centre network and hierarchy. The nature and mix of uses along with the design of development should be commensurate with the scale, role, function and character of a town centre within the hierarchy. Development proposals must demonstrate how they will support town centre vitality and viability by responding positively to the distinctive character and unique role of a centre in supporting the neighbourhoods and communities within its catchment, which may cover areas both within and outside of the Borough.

8.86 Borehamwood Main Town Centre is the Borough's principal town centre and a key shopping and leisure destination within the local catchment, with a variety of food and drink establishments alongside retail and service units. It includes several film and television studios, which draw in a contracted-in workforce from around London and the south-east, in relationship with other studios within the north-west London arc of film and television production and relates to central London via the mainline railway station. Public realm improvements identified through the Settlement and Place Polices in this Plan will help ensure that the vitality and viability of the Main Town Centre continue to improve.

8.87 Darkes Land Potters Bar Local Town Centre includes one of the borough's key cultural venues in the Wyllyotts Centre, as well as a good range of food and drink and a convenience retail offer anchored by a Sainsbury's store. It is highly accessible by train, but bus links which would be of more relevance to people using the centre who live within the catchment, are infrequent and do not serve a wide range of locations. Improvements to the town centre environment form a part of the Settlement and Place Polices in this Plan.

8.88 Part 3 of this Plan includes additional policies for the Borough's main settlements. It sets out how new development within these centres will be managed to facilitate the delivery of sustainable growth and liveable neighbourhoods, consistent with the spatial strategy for the Borough.

8.89 Site allocation policies have been included for strategic development sites within and at the edge of town centres.

8.90 This policy sets out the 'town centre first' approach for the location of main town centre uses as defined by the National Planning Policy Framework. Such uses should be directed to the Borough's designated town centres or if necessary, appropriate edge-of-centre locations (unless provision for such uses have been made elsewhere by the Local Plan). Development proposals will be assessed in

accordance with the Sequential Test to site selection set out in national planning policy.

8.91 Outside of designated centres, Retail Impact Assessments will be required for proposals of 350 square meters gross floorspace or more, unless provision for retail uses has been made through a Local Plan site allocation. This local threshold is more rigorous than that set by national policy and is informed by local evidence[9]. It provides wider scope for the consideration of proposals that could adversely impact on Hertsmere's town centre hierarchy and compromise delivery of the spatial strategy.

8.92 For the Sequential Test, flexibility will be applied to proposals for Class E(g) office uses, recognising that these uses will also be acceptable in designated employment areas, consistent with Policy EC2 (Protecting employment land and delivering new workspace).

Main town centre uses in rural locations

8.93 Proposals for rural diversification will be subject to the Sequential Test to ensure that they will not undermine the vitality and viability of the Borough's retail centres, and that of any identified retail centres that lie outside of the Borough. The need for farm diversification is recognised, and proposals that pass the Sequential Test will be permitted where they are not in conflict with other policies in this plan.

8.94 To protect the role of established retail centres in Radlett as well as Potters Bar and London Colney (in neighbouring St Albans District), further retail development at Battlers Green Farm or Willows Farm will be resisted.

Retail impact assessments

8.95 Retail Impact Assessments (RIAs) apply to any main town centre uses must demonstrate that there is a clear need and demand for the type and amount of the use being proposed in that location, and that it will not adversely affect any of the Borough's retail centres, or any identified retail centres located outside of the Borough in neighbouring administrative areas.

8.96 The Council may call upon specialist consultants to review RIAs where necessary, the cost of which is to be charged to the applicant. The need for external review will be determined on a case-by-case basis, depending on factors including the size and complexity of the proposal, and the level of likely impact on retail centres.

Meeting future needs

8.97 With the levels of growth planned in the Borough up to 2043, it is important that neighbourhoods and local communities are appropriately supported with good

[9] The Hertsmere Retail and Town Centres Study (AECOM, 2026) concludes that the 2,500 square metre gross threshold set in national policy is inappropriate for Hertsmere and that a lower threshold should be used.

provision of shops, services and community facilities. The Hertsmere Retail and Town Centre Study (AECOM 2026) include an assessment of retail floorspace needs in the Borough. The study has considered current market trends, whilst recognising that the retail market is fast-moving. The indications are that there is no real scope for new retail development within Hertsmere over the plan period, and there is no need to allocate sites for new retail development[10]. Nevertheless, the Local Plan does consider the comprehensive redevelopment and replacement of existing provision that has reached the end of its lifespan or provides an out-dated platform. These places are the subject of site allocations (in Part 3) and specify the mix of uses that will be delivered through comprehensive redevelopment.

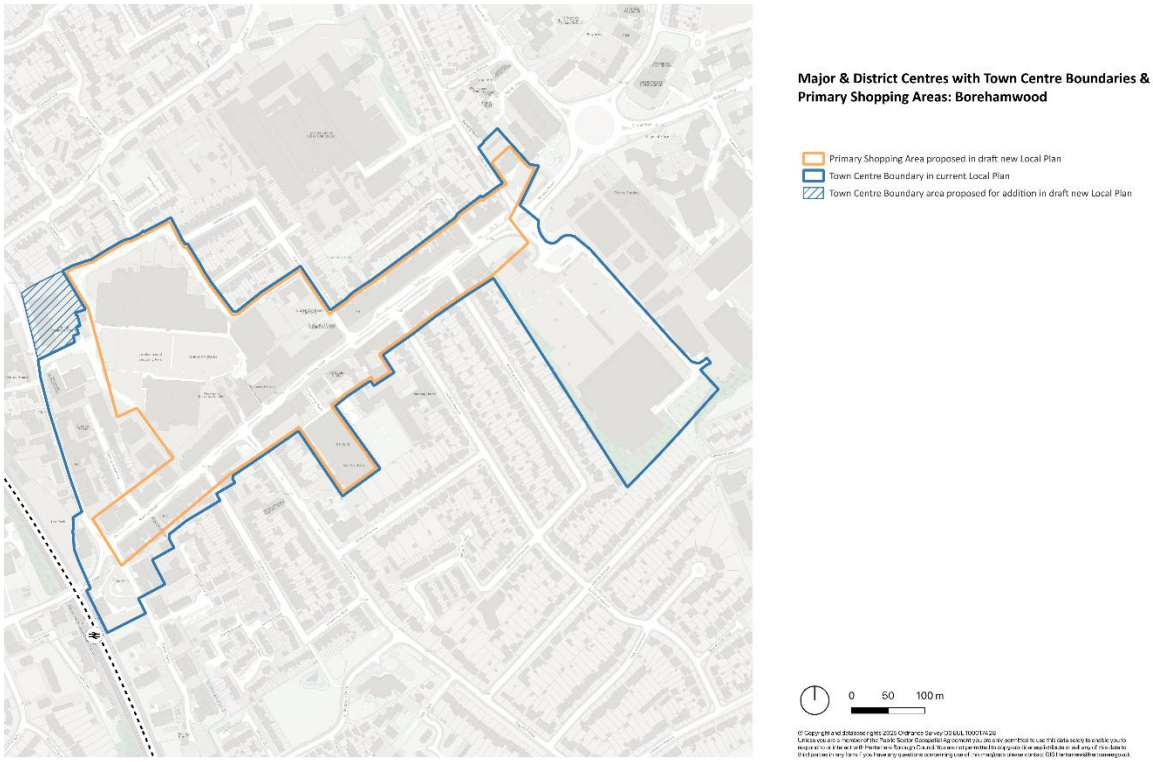

Figure 8.3: Borehamwood Town Centre

[10] The evidence recommends that the capacity forecasts, particularly beyond the next five years, should be treated with a degree of caution as they are based on various assumptions and forecasts that can and will change. Therefore, greater weight should be placed on the capacity forecasts over the next 5–10-year period. The figure is included in Policy EC11 as a benchmark to support the plan-led approach to meeting objectively assessed needs for retail, consistent with the NPPF.

Figure 8.4: Potters Bar Local Town Centre (Darkes Lane)

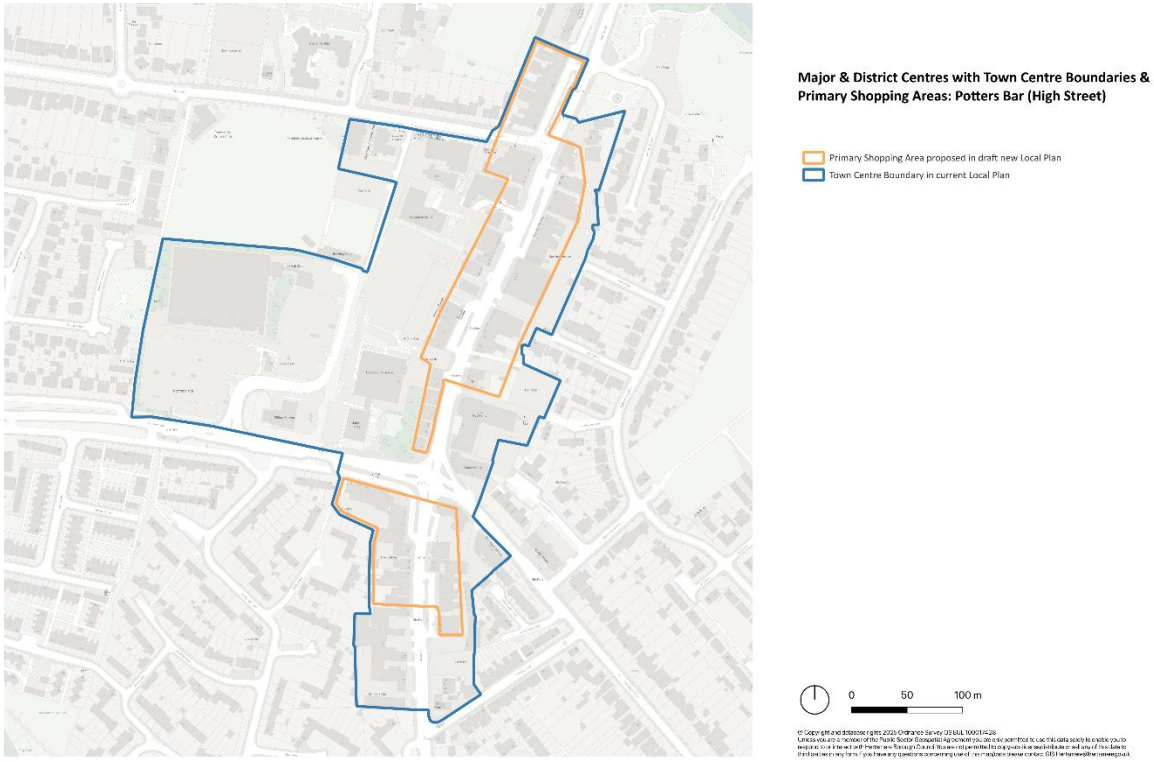

Figure 8.5: High Street, Potters Bar District Centre

Figure 8.6: Bushey Village District Centre

Figure 8.7: Bushey Heath District Centre

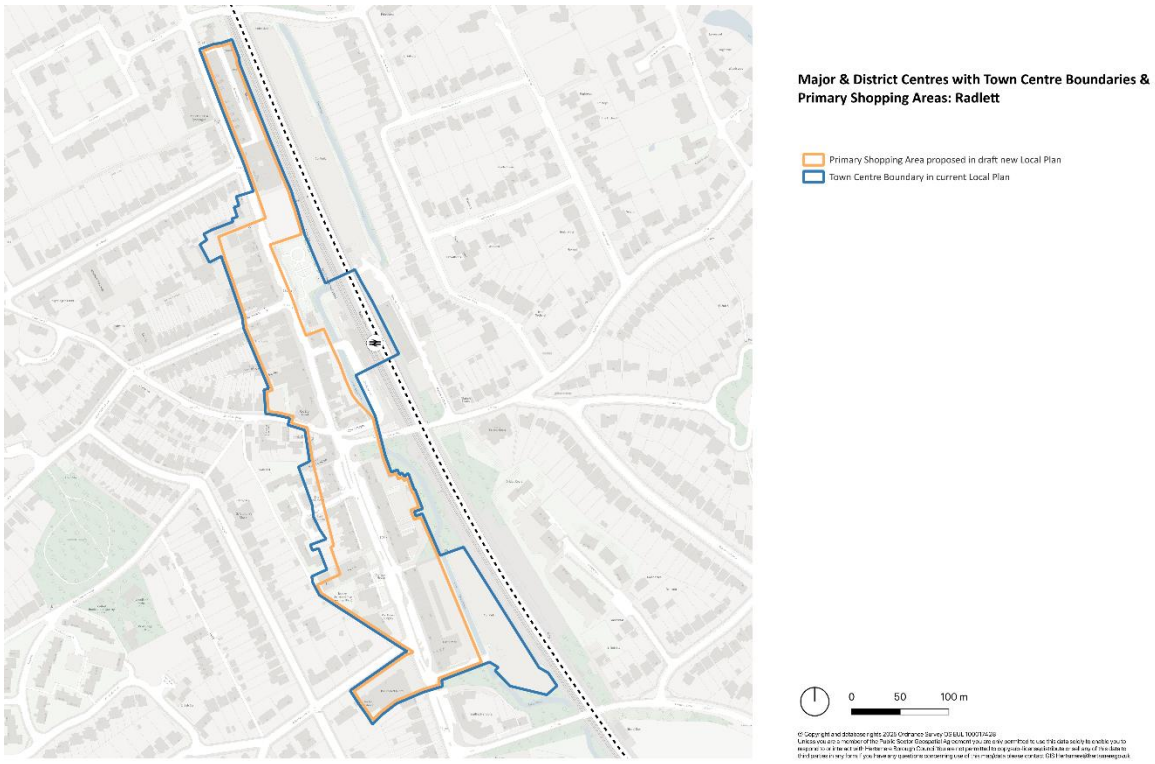

Figure 8.8: Radlett District Centre

EC13 Optimising the Use of Town Centre Land and Floorspace

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
I Celebrating our local identity
J Healthy and safe communities

Strategic Policy

A Proposals for development should optimise the use of land and floorspace within town centres and at edge-of-centre locations by:

i. Delivering new mixed-use schemes on individual sites and through comprehensive redevelopment of multiple sites, where appropriate;

ii. Investigating opportunities for the reuse and reconfiguration of existing space and buildings, or the provision of new additional space above or below commercial units; and

iii. Making the most of opportunities to incorporate multi-storey buildings and avoid single-storey development.

B Within town centres and edge-of-centre locations, mixed-use development proposals (including the expansion, reuse or reconfiguration of existing floorspace) will be considered having regard to:

i. The role and function of the centre;

ii. Impact on town centre vitality and viability;

iii. The scope to create an active and positive frontage;

iv. Compatibility of the proposed use with adjoining and neighbouring uses, both in terms of land use and character; and

v. Compliance with other policies.

C Subject to (A) and (B) above, where a development proposal includes a residential use the development must:

i. Not adversely impact on the function, appearance and character of the town centre, including its shopping and other frontages; and

ii. Provide adequate access arrangements for all the building occupiers including separate secured access for the residential element.

D Development proposals affecting an existing commercial unit must ensure any ancillary floorspace that is integral to business operations and viability of the unit is not compromised or lost.

E Where permission is required, changes of use within mixed-use site allocations will be supported provided there is no detrimental impact on the wider allocation.

Explanation

8.98 Town centres are key locations for supporting the Spatial Strategy in Hertsmere. They provide opportunities for growth and regeneration, alongside unique opportunities for new development which optimises the use of land in the most sustainable locations. This includes backland and infill sites, underused or vacant upper storeys of existing town centre buildings and airspace above relatively low-density or single-storey commercial uses. These spaces can help to accommodate a range of uses to meet local needs including for workspace, community facilities and housing, supporting the brownfield-first approach to housing delivery and helping to protect the Borough's Green Belt throughout the plan period.

8.99 Proposals for development for new single-storey development within and at the edge of town centres will be strongly resisted as this form of development is not considered to make the optimal use of the Borough's limited supply of brownfield land in sustainable locations. Town centres are better suited to a wider mix of uses and are normally suitable for higher density development. However, it is recognised that for some uses a multi-storey format may not be deliverable owing to issues of compatibility of use(s), fit with local character, site constraints or development viability. Where single-storey buildings are proposed, applicants must provide a statement and supporting evidence to clearly justify why multi-storey development is not appropriate or deliverable. Where Viability Assessments are submitted they must be independently appraised and verified by a Royal Institution of Chartered Surveyors (RICS) professional at the applicant's cost.

8.100 Mixed-use development can help to maximise land potential and promote healthy and safe communities. It provides an efficient way of supporting more intensive uses and providing wider environmental and social benefits to the area, including reducing the need to travel, increasing the possibility of living and working in the same neighbourhood, and creating more vibrant, active ground floor frontages within town centres that include activity throughout the course of the day. It may involve the intensification or reconfiguration of existing buildings and sites. Development and design parameters for strategic town centre sites are included in Part 3 of the Local Plan. Elsewhere, proposals for higher density mixed-use development will need to demonstrate that they are compatible with the role and function of the centre within which they are located and comply with other policies.

8.101 All development proposals, including changes of use, should ensure that the amount and quality of ancillary floorspace within a commercial unit is retained or enhanced.

This includes space for storage, back-office functions and amenities, such as toilets and cleaning facilities. It is important that development does not compromise the continued business operation or long-term viability of existing commercial premises, whether through the reconfiguration of space or site redevelopment.

EC14 Hertsmere's Main Town Centre and Local Town Centre

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
C The regeneration of Borehamwood and Potters Bar
I Celebrating our local identity
J Healthy and safe communities

Strategic Policy

A Proposals for development within and at the edge of Hertsmere's Main and Local Town Centres must demonstrate how they will support the vitality and viability of the relevant town centre and make a positive contribution to its local character, with reference to Policy EC11 (Town centres at the heart of Hertsmere' communities).

Primary Shopping Areas

B Primary Shopping Areas (PSAs) are the locations within Hertsmere's Main and Local Town Centres where there is an active mix of retail, leisure and service uses at ground floor, high levels of daytime pedestrian activity, and a lively evening economy. Proposals for retail, leisure, retail services and other Class E uses will be permitted within the Primary Shopping Area where an active window display can be maintained.

C Development proposals for Class E and other main town centre uses which do not contribute to an active ground floor frontage must submit a Shopping Area Impact Statement. The statement must demonstrate that the development will support the retail, leisure or service function of the Primary Shopping Area and will not result in an unacceptable adverse impact on it, whether individually or cumulatively with others. Proposals will be supported where they:

i. Contribute to the vitality, viability, vibrancy and character of the Primary Shopping Area, including by ensuring that a range of consumer goods and services remain available within it, considering the role and function of the centre in the hierarchy;

ii. Provide an appropriate main town centre use at the ground floor level that will attract visitors and generate footfall within the Primary Shopping Area;

iii. Provide a positive frontage along with an active ground floor use, or if it can be suitably demonstrated that this is not possible a window display or other appropriate positive frontage at the ground floor; and

iv. Ensure local amenity is not unreasonably harmed by increased noise, odour, fumes and other nuisances, with reference to Policy EC17 Concentration of Harmful Uses.

D Planning conditions may be used to secure Class E (a) uses that contribute to the retail function of the Primary Shopping Area. Where retail units are conditioned for Class E (a) use, development proposals seeking a change to another appropriate main town centre use, including full flexibility for Class E commercial, business and service uses, must demonstrate that there is no reasonable prospect of the unit being used for continued retail use. This must be evidenced by a robust and recent marketing exercise covering a minimum continuous period of 6 months at a reasonable market value for rent or sale to the local area. Shopping Area Impact Statements must be submitted with applications for changes to a non-retail use where appropriate, with reference to (C) above.

E Elsewhere within the Main and Local Town Centres, and at long-term vacant units in the Primary Shopping Frontages, non-retail main town centre uses, businesses and services will be permitted. This includes food and drink, cultural uses, local community uses, leisure uses and other main town centre uses within Use Class E where:

i. Sufficient effective marketing of vacant units for active Class E use has occurred. Marketing should be proactive and for a continuous period of 12 months or more, using a professional agent and an appropriate range of online, on-site and other advertising media. The asking price should be demonstrated to be reasonable for Class E use and reflecting the property and location; applying throughout the marketing period.

ii. Regard has been had to Policy EC17 Concentration of Harmful Uses.

Borehamwood Main Town Centre

F Proposals for development within Borehamwood Main Town Centre Primary Shopping Area (PSA) should support the role and function of the centre by contributing to the target for the PSA to maintain a minimum of 35% of retail units as defined under Class E (a) as a proportion of all units. Proposals for development result in the overall proportion of Class E (a) retail units within the PSA falling below 35% will only be supported where the retail function of the PSA will not be adversely impacted, with reference to (C) above.

Residential Development

G Proposals for residential development within the Main Town Centre and Local Town Centre will make effective use of land in accordance with the Spatial Strategy and other policies in this plan, in particular the Settlement and Place policies in Part 3, and will occur principally through:

i. Allocations identified in the Local Plan;

ii. High-quality conversion of upper floors or under-used buildings; and

iii. High-quality upward extensions to town centre buildings where the lower parts of the building remain in active main town centre use.

H Proposals for residential development at ground floor level or below within the Main and Local Town Centre will be strongly resisted.

Explanation

Primary shopping areas

8.102 This policy designates the Primary Shopping Areas (PSAs) within Hertsmere's Main and Local Town Centres, which are shown on the Policies Map. PSAs are characterised by their predominantly retail role and character and remain a focal point for town centre activity, particularly as they tend to be in the most accessible parts of the centre. The Local Plan seeks to ensure that the retail function of these areas is maintained and enhanced to support the long-term vitality and viability of the town centres.

8.103 The Local Plan provides flexibility for a wide range of commercial, leisure, community and cultural uses to locate within town centres. It is nonetheless important that a critical mass of retail uses is maintained within PSAs to reinforce their retail role and character as well as to ensure people have access to a range of consumer goods. Development proposals for Class E(a) retail uses are strongly encouraged to locate within these areas and only when suitable sites are not available within PSAs should other town centre locations be considered in the site selection process.

Borehamwood Main Town Centre

8.104 Borehamwood Main Town Centre is the Borough's principal town centre and a key shopping destination within the local area. The Primary Shopping Area covers most of the Town Centre, excluding the Tesco Extra on Shenley Road, the Station and commercial units on Theobald Street and Glenhaven Avenue, which includes a mix of residential and commercial uses. Local evidence[11] indicates that Borehamwood

[11] Retail and Town Centre Uses Study, April 2026

Main Town Centre makes a significant contribution to the Borough's retail floorspace capacity and will play a role in future needs over the Plan period. Borehamwood Shopping Park comprises a large part of the Primary Shopping Area and contains a significant concentration of retail uses.

8.105 Outside of the Shopping Park there are a prevalence of food and beverage uses on Shenley Road, which are a draw for visitors and complement the retail offer. It is envisaged that, alongside redevelopment of The Point and the Shopping Park, there will be an enhanced leisure offer in Borehamwood Main Town Centre, including an improved cinema, as befits a town with its film and TV history. This would take place alongside improvements to the public realm in the Main Town Centre, as referenced in the Settlement and Place Policies in Part 3 of this plan.

8.106 The Local Plan has identified the Borehamwood Town Centre Shopping Park for comprehensive redevelopment. This is the subject of a site allocation under Part 3, which envisages securing intensified and sustainable place-making across the site. It seeks the delivery of higher density mixed-use development comprised of main town centres at ground and lower level, arranged along traditional street-patterns and high-intensity residential uses above. The site allocation seeks the re-provision of an appropriate mix of high-quality main town centres that contribute towards the town centre's regeneration and continued vitality and viability.

Potters Bar Darkes Lane Local Town Centre

8.107 In Potters Bar, the Primary Shopping Area encompasses the majority of the Darkes Lane Local Town Centre. There is strong representation from independent retailers, as well as strong restaurant and café provision. Multiple outlets represent most national convenience retail offers including food stores, and fast-food operators. Strengthening the convenience retail offer, alongside retaining and enhancing the leisure and evening economy uses, would be beneficial to supporting existing residential and employment communities located near to the Local Town Centre.

8.108 This approach will also benefit future residential and employment intensification on brownfield sites in the Local Town Centre, and Potters Bar's urban extensions. New retail provision within strategic site allocations should not aim to compete with or draw business away from the existing town centre, but should seek to provide a complimentary, largely convenience retail offer.

Main town centre uses

8.109 The creation of use Class E brings together a range of commercial, business and service uses, including retail[12]. This provides flexibility for the commercial market by expanding the scope of Permitted Development rights, as changes between Class E uses do not require planning permission. The Council recognises the benefits of Class E which can help landowners and leaseholders to quickly respond to market

[12] This includes changes to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and amendments to the Town and Country Planning (General Permitted Development) (England) Order 2015.

signals and keep business units in viable use. At the same time, it is important to ensure the retail function of a PSA is not compromised to the extent that it adversely impacts on town centre vitality and viability, or the Council's ability to plan positively for identified needs for retail floorspace over the Plan period.

Shopping Area Impact Statements

8.110 Shopping Area Impact Statements are an important tool to assess the impact of development proposals on the retail function of a PSA. They must be submitted with all applications for uses within a PSA that do not contribute to its retail function (i.e. uses which are not Class E(a) uses), or that do not maintain an active street level frontage.

8.111 The level of detail included within a statement should be commensurate with the nature and scale of the development proposed. When assessing impacts on the PSA consideration will be given to the existing mix of uses within the PSA to establish whether the development will significantly diminish the availability of retail uses and people's access to consumer goods. The Council's latest Authority Monitoring Report should be referred for information on the mix of uses in the PSA, however applicants may need to undertake surveys to ensure decisions are informed by up-to-date information. Where non-retail uses are introduced in the PSA they must be for appropriate main town centre uses, be designed with positive frontages and maintain a contiguous active ground floor frontage with adjoining units. This will help to attract visitors and generate footfall which in turn can support the viability of existing retail uses and the PSA more generally.

Planning Conditions to Secure Class E Uses

8.112 Where applications for Class E main town centre active uses are permitted within the PSA, the Council will consider whether on a case-by-case basis whether it is prudent to make use of planning conditions to restrict the use to certain sub-categories within Class E, for example Class E (a). The Council may on occasion consider an Article 4 Direction to protect retail or other active uses within a key area of the PSA, if it is considered that the vitality and viability of the Main or Local Town Centre is being compromised by non-active uses, passive frontages and a reduction in on-street activity, or if retail uses are being pushed outside of the PSA. Of course, changing market forces and the health of the Town Centre will be a guide to whether an Article 4 Direction is the right approach.

Retail Uses Target Threshold

8.113 To support the continued retail function of the Primary Shopping Area in Borehamwood, a target threshold approach will be used to help manage the mix and balance of uses within it, so that retail uses form the majority of uses within the PSA. The 35% target threshold has been informed by our latest town centre surveys. It is considered a realistic and reasonable indicator for the point at which the PSA can retain its principal retail function and provide a balance of complimentary main town centre uses that retain and active and lively town centre for Borehamwood. Development proposals that will result in the overall percentage of retail uses falling

below this threshold target will be resisted. Flexibility will be applied where it can be suitably demonstrated that the viability and vitality of the PSA will not be adversely affected, and where positive and/or active frontages can be retained.

Continuity of Shopping Frontages

8.114 Breaks in the continuity of shopping frontages threaten to diminish the function, character or appearance of town centres. Development proposals must therefore be designed with positive frontages and maintain a contiguous active ground floor frontage with adjoining units, avoiding harmful breaks of the frontage, also considering the prevailing character of the streetscape and townscape. Active frontages should be associated with the use itself or where this is not possible or suitable, through a window display or other feature creating visual interest. This is necessary to ensure development supports town centre vitality and viability, such as by introducing a use that encourages linked trips or improves townscape and amenity by providing active uses at the street level.

Residential Uses Within Town Centres

8.115 Within town centres development proposals for residential uses on ground floor or basement levels are not considered appropriate and will be resisted. This is owing to the detrimental impact the introduction of housing at the street level can have on the vitality and viability of the town centre, along with the character of the townscape. Impacts include the introduction of harmful breaks in the continuity of frontages and, where conversion is considered, the loss or compromising of existing space for commercial and related town centre uses.

EC15 Hertsmere's District Centres

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
I Celebrating our local identity
J Healthy and safe communities

Non-strategic Policy

A Proposals for development within and at the edge of a District Centres must demonstrate how they will support the vitality and viability of the centre and make a positive contribution to its local character, with reference to Policy EC11 (Town centres at the heart of our communities).

Primary Shopping Areas

B Primary Shopping Areas (PSA) have been identified within all the District Centres. Proposals for development within the Primary Shopping Areas in the District Centres of Potters Bar High Street, Bushey, Bushey Heath and Radlett should focus on more specialist, independent provision of convenience and comparison retail, retail services, financial and professional services, and food and drink outlets.

C Proposals that incorporate small and moderately sized units for main town centre uses are encouraged to locate in the Local Town Centre and the District Centres. Where such provision already exists, it should be protected wherever possible to ensure a balanced mix of main town centre uses.

D Proposals for major development within a District Centre must make provision for a reasonable amount of small or moderately sized units suitable for micro, small and independent businesses. Where an end-user has been secured for immediate occupation on the development's completion and requires a larger unit or floor plate, this should be flexibly designed to enable sub-division into smaller units in the future.

E Proposals for development involving the change of use from Class E to other main town centre uses within Local Town and District Centres will only be supported where it is demonstrated that:

i. The replacement use is an appropriate main town centre, community, cultural or employment generating use; and

ii. An active frontage is provided at the ground floor level or, if it can be suitably demonstrated that this is not possible, a window display or other positive frontage.

F Development proposals for the change of a main town centre use to a residential use at ground floor level or below will only be permitted where:

i. it is demonstrated that the unit has been vacant for a minimum continuous period of two years, and that there is no reasonable prospect of retaining it in an appropriate main town centre, community or employment generating use. This will be demonstrated through a robust and recent marketing exercise (of a minimum continuous period of two years) at a reasonable local market value for rent or sale; and

ii. there will be no adverse impact on the character of the local area and the continuity of the shopping frontage in the District Centre.

G Planning conditions may be used to secure Class E(a) uses that contribute to the retail function of the Local Town and District Centres. Where retail development is conditioned for that use, development proposals seeking a change to another appropriate main town centre use, including full flexibility for Class E commercial, business and service uses, must demonstrate that there is no reasonable prospect of the unit being used for continued retail use. This must be evidenced by a robust and recent marketing exercise covering a minimum continuous period of 6 months at a reasonable market value for rent or sale to the local area.

Explanation

8.116 District Centres complement Hertsmere's Main and Local Town Centres and other retail centres outside of the Borough. They play an important role in providing a range of shops and services that meet the day-to-day needs of people who live and work within the Borough. In Hertsmere some of these centres also provide a specialised retail service or café and restaurant offer that make them leisure and service destinations. These centres have the potential to support sustainable neighbourhoods by enabling people to walk or cycle to access goods, services and facilities, although the evidence shows that they are generally frequented by car, and that walking and cycling connections could be improved as part of the Settlement and Place policies[13].

High Street, Potters Bar; Bushey; Bushey Heath; and Radlett District Centres

8.117 The evidence shows that the Borough's District Centres are performing well, with low vacancy levels and steady rental rates. They tend to be specialised within a particular type of main town centre uses, and do not all include a varied mix of services and uses in the same way as the higher-level centres. This is due to their function as local centres for top-up shopping, place to enjoy food and drink, or

[13] Retail and Town Centre Study (AECOM) 2026 and Settlement Visions (ARU) 2026

destinations for health and beauty services, which in are particularly strongly represented in both Bushey District centres.

8.118 The District Centres are well-placed to support intensification of residential, and employment uses in or close to the centres. Although a greater diversity of uses may be desirable to attract more pedestrian footfall across all centres, it is recognised that the District Centres perform an auxiliary function to nearby major centres, in particular Watford, St Albans, Barnet and, to a lesser degree, Borehamwood.

8.119 Any loss of retail, service or leisure provision within a District Centre has the potential to damage the integrity of the centre or retail provision in the area overall. Proposals for development that results in such damage will be resisted through:

- Supporting active main town centre uses within the Primary Shopping Area of each centre; and
- Resisting the loss of retail units to residential or non-main town centre Class E uses.

8.120 Development proposals for retail uses consisting of smaller and moderately sized units and floorplates are encouraged to locate in District Centres. Where such provision already exists, this should be protected wherever possible to ensure a balanced mix of main town centre uses and to support the role and function of the centre. However, it is recognised that the new Class E category provides greater flexibility for changes from retail to other commercial, business and service uses. Where planning permission is required, development proposals for the change of use from Class E must be for appropriate main town centre or employment generating uses.

8.121 District Centres are smaller in scale than Main and Local Town Centres, and therefore provide unique opportunities for accommodating micro, small and independent businesses which can enhance the existing niche retail, leisure and service offers in some of the Borough's centres. Major development proposals must, and all other developments should seek to, integrate a reasonable number of small units or space suitable for these types of businesses. This can include dedicated units or flexibly specified space that can be easily sub-divided. What constitutes a reasonable amount will be considered on a case-by-case basis.

8.122 Development proposals for the conversion of a main town centre use at the ground floor level or below to a residential use will be strongly resisted. This is to protect the function of Local Centres and the character of their townscape. Only where it can be suitably demonstrated through a robust and recent marketing exercise that there is no continued demand for the existing or an appropriate main town centre use will such proposals be considered. Viability will then be considered in combination with impact on the continuity of frontages and local character. Development that results in a harmful break in the frontage will not be supported. This will be considered on a case-by-case basis but generally refers to the introduction of a use that detracts

from the continuity of a publicly accessible and active frontage and is incoherent with the prevailing streetscape and townscape.

8.123 To support the role and function of District Centres the Council may use planning conditions to secure retail uses where new development comes forward. District Centres vary in terms of their size and catchment, provision of shops and services, and local character. The need for or loss of retail uses will therefore affect centres differently, for example, losses may be felt more acutely in smaller centres. The Council will therefore consider the need for conditions on a case-by-case basis. Where retail uses have been conditioned and a change of use is sought, applicants must demonstrate that reasonable efforts have been made to retain the unit in retail use in the first instance.

8.124 Positive street frontages and active ground floor frontages are vital to the vibrancy and character of District Centres. Development proposals must make a positive contribution to the townscape and create a coherent relationship with the street. Development proposals, including changes of use, must maintain the continuity of frontages in the centre and not result in a harmful fragmentation of the frontage, whether individually or cumulatively with other developments. Development proposals must provide an active ground floor frontage, preferably associated with the use itself and where this is not possible through a window display or other feature creating visual interest.

EC16 Hertsmere's Smaller Centres and Individual Shops

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
G Securing a greener Borough
I Celebrating our local identity
J Healthy and safe communities

Non-strategic Policy

A Retail uses located at shopping parades, corner shops and other service points (i.e. outside of larger shopping centres within the hierarchy) provide important day-to-day provision of consumer goods within Hertsmere's neighbourhoods and should be protected wherever possible. In Hertsmere, these smaller centres are comprised of places identified as a Local Centre, Key Neighbourhood Parades, Neighbourhood Centres and Parades, and Individual Shops.

B Development proposals involving the change of use from Class E to other main town centre or appropriate employment generating uses at shopping parades, corner shops and other service points will only be supported where it is demonstrated that:

i. Similar alternative provision is available within the local area which can be reached safely, easily and conveniently by walking, normally within 400-800 metres; and

ii. An active frontage is provided at the ground floor level, or if it can be suitably demonstrated this is not possible a window display or other positive frontage.

C At shopping parades, corner shops and other service points, development proposals for the change of a main town centre use to a residential use at the ground floor level or below will only be permitted where:

i. It is demonstrated through a robust and recent marketing exercise of a minimum continuous period of one year at a reasonable local market value for rent or sale, that the unit has been vacant during this time and there is no reasonable prospect of retaining the unit in an appropriate main town centre, community or employment generating use; and

ii. There will be no adverse impact on local area character and the continuity of the frontages within the shopping parade or other frontages.

D Where a development proposal involving a main town centre use is located outside of a Major, District or Local Centre and satisfies the Sequential Test, the Council may use planning conditions to secure an element of Class E(g) retail uses. This to ensure provision of essential daily consumer goods in the area where there is an identified need.

Explanation

8.125 There are several shops and services located outside of the designated town and local centres, which are dispersed across the Borough in shopping parades, at corner shops and other locations. These help cater to the essential day-to day needs of residents, workers and visitors that collectively ensures that the Borough's towns and settlements become more walkable places. These types of uses are distinguished from those located in out-of-centre retail parks and large format retail warehouses, which are dealt with elsewhere in the Local Plan.

8.126 It is important that people in the Borough have easy access to essential day-to-day consumer goods. Development proposals should therefore seek to retain shops outside of centres wherever possible. However, it is recognised that the new Class E category provides greater flexibility for changes from retail to other commercial, business and service uses. Where planning permission is required, development proposals for the change of use from Class E to other appropriate main town centre or employment generating uses will only be permitted where it is demonstrated that there is similar alternative provision available locally, normally within 5 to 10 minutes walking distance (roughly 400-800 metres). In terms of alternative provision, some flexibility may be applied where the use in question provides a bespoke offer which is not necessarily an essential good or service, such as a wine merchant or chocolatier. Development proposals for alternative employment generating or community uses that are compatible with the local area will be supported to secure the viability of existing units and buildings.

8.127 Out-of-centre shops and facilities are facing significant pressure for change of use, particularly to housing. However, the introduction of residential uses within shopping parades and other local service destinations can compromise their functional integrity, viability and townscape value. We will therefore seek to ensure that all reasonable efforts have been made to actively market units for other employment generating or community uses, before considering residential uses. In this instance, marketing should cover a minimum continuous period of one year at a reasonable local market rate for rent or sale.

8.128 All changes of use must maintain the continuity of frontages in the shopping parade or other frontages. Development proposals must not result in a harmful fragmentation of shopping frontages, either individually or by their cumulative impact. Additionally, development proposals must make a positive contribution to local character, consistent with other Local Plan policies. Ground floor residential development has the potential to interrupt the established rhythm of the streetscape and townscape in shopping parades.

8.129 To ensure that residents have easy access to essential day-to-day consumer goods, the Council may use planning conditions to secure new retail uses for development located in in areas where there is an identified need for this provision. Local need will be assessed on a case-by-case basis having regard to the availability of retail uses within 400 to 800 metres radius of the proposed development site, which is roughly equivalent to 5 to 10 minutes walking distance. Development proposals are

strongly encouraged to consider the need for provision of essential goods, particularly in areas which do not benefit from good access to public transport.

EC17 Concentration of Harmful Uses

Strategic Objectives

A Delivering a better future for Hertsmere
G Securing a greener Borough
H Responding to the climate emergency
J Healthy and safe communities

Non-strategic Policy

A Proposals for development must not result in a harmful overconcentration of the following Sui Generis uses:

i. Hot food takeaways;

ii. Betting offices, casinos and bingo halls;

iii. Payday loan shops;

iv. Vape shops;

v. Pawnbrokers;

vi. Nightclubs and dance halls;

vii. Drinking establishments; and

viii. Uses that contribute to localised air quality issues (e.g. BBQ, wood fired pizza).

B The harmful overconcentration of uses will be assessed based on the number of similar uses within a 400-metre radius of the development and where:

i. The vitality and viability of the town centre will be adversely impacted, considering the function of the centre in the hierarchy; and

ii. The character of the area has changed, or local amenity has been adversely impacted because of:

a. Increased noise, odour, fumes and other nuisances;

b. Traffic generation including from taxis, private hire and servicing vehicles;

c. Inadequate provision of waste management and recycling facilities;

d. Anti-social behaviour and public safety.

C Development proposals for uses listed in (A) must submit sufficient information to allow for an assessment of the concentration of uses, in line with the criteria in (B) above.

Hot food takeaways

D In addition to complying with (A) and (B) above, proposals for new hot food takeaways will only be permitted where:

i. If they are visible from an access point to a primary or secondary school, they must demonstrate that the proposed use would not undermine any existing or proposed healthy eating policy at that school; and

ii. The proportion of hot food takeaway premises in the shopping frontage complies with the thresholds set out in Table 7.6 Food and drink services

E Development proposals for uses involving the service of food and drink must make adequate arrangements to protect and manage local amenity, in line with the agent of change approach.

F Where development proposals for uses involving the service of food and drink are acceptable in principle, a condition will be sought requiring the operator to work closely with the Council's Environmental Health service to achieve and operate in compliance with high health and safety catering standards. These may be in alignment Healthier Catering Commitment Standard, which seeks to reduce the levels of saturated fat, salt and sugar in the food sold on their premises, and to make smaller portions available on request.

Table 8.6: Shopping frontage thresholds for takeaways and other harmful uses

Location	Threshold applied
Primary or secondary School	Visible from school boundary
Main / Local Town Centre	Proportion of hot food takeaways does not exceed 10% of units. No more than 5% or two consecutive betting shops, pay day loan shops, vape shops or amusement arcades within a centre.
District Centre	Proportion of hot food takeaways does not exceed 10% of units. Proportion of betting shops, pay day loan shops, vape shops or amusement arcades does not exceed does not exceed 5% of units within a centre.
Shopping Parade (20 units or more)	Maximum of 2 units in hot food takeaways use Maximum of 1 betting shops, pay day loan shops, vape shops or amusement arcades
Shopping Parade (19 units or less)	Maximum of 1 unit in hot food takeaways use

	Maximum of 1 betting shops, pay day loan shops, vape shops or amusement arcades

Explanation

8.130 Town centres play an important role in making Hertsmere's neighbourhoods and communities successful and sustainable places. Their vitality and viability rely heavily on the presence of a mix of uses and activities. It is important that development proposals do not result in a harmful concentration of uses. This is especially for certain Sui Generis Uses, whose proliferation can also adversely impact on local character, amenity, public health and safety.

8.131 In assessing whether development proposals will lead to a harmful over-concentration of uses, we will use the policy criteria above. A 400-metre radius, established as a straight-line distance from the proposed development site, is considered an appropriate range from which to assess impacts. This measure is generally accepted as 5-minutes walking distance and provides a useful benchmark against which other similar provision could be easily accessed in the locality. Development proposals must have regard to areas experiencing significant deprivation[14], where the impacts of some uses may be more pronounced. Development proposals for hot-food takeaways and betting shops must submit a desktop Health Impact Assessment in line with Policy DM6 (Health Impact Assessments).

8.132 Hot food takeaways are now recognised as an ongoing concern with respect to the wider systems approach to health and well-being. In response, many local plans seek to positively manage the concentration of such Sui Generis uses, both around schools and within town centres.

8.133 Food and drink establishments regularly attract a high number of visitors and by virtue of their operation may give rise to environmental and amenity issues. Development proposals must make adequate arrangements for operational requirements whilst ensuring protection of amenity. This includes consideration of litter, commercial waste disposal, fumes, noise, traffic and parking. Planning conditions may be used to ensure there are no adverse impacts on local area amenity.

8.134 The Herts Responsible Food Award is a scheme that helps food businesses in Hertfordshire to provide healthier food to their customers and adopt sustainable choices[15]. Hot food takeaways are often associated with unhealthy food. However, it is accepted that other uses supporting the food and beverage industry also make provision for items that are high in calories, fat, salt and sugar and which could adversely impact on health outcomes. This includes Class E business uses such as

[14] For policy implementation this should be taken as an indicative benchmark of the 20% most deprived areas, in accordance with the Government's latest Indices of Multiple Deprivation (IMD).
[15] Herts Responsible Food Award | Hertfordshire County Council

cafes, restaurants and coffee shops. To make it easier to access healthy food options in Hertsmere, we will seek that operators achieve compliance with the Herts Responsible Food Award.

EC18 Public Houses

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
I Celebrating our local identity
J Healthy and safe communities

Strategic Policy

A Public houses are an important and valued use within Hertsmere's places and neighbourhoods. There will be a presumption in favour of the retention of public houses. Development proposals involving the loss of a public house that has heritage, economic, social or cultural value to the community, including through change of use or redevelopment, will be refused unless there is robust and authoritative evidence, in accordance with the advice set out under Appendix 8, to demonstrate that:

i. Legitimate efforts have been made to preserve the facility as a public house, including through evidence of regular maintenance and upkeep, good management and through business diversification;

ii. The public house is not financially viable and there is no reasonable prospect of the premises remaining in this use, or an alternative community use, in the foreseeable future as evidenced through attempts at different business models and management, and an active marketing exercise of a minimum continuous period of two years; and

iii. Where the loss of a public house forms a part of a proposal for redevelopment of the site, all feasible options for the re-provision of the public house within the new development have been fully investigated, and, where these are not considered deliverable, sufficient justification is provided.

B Development proposals affecting a public house, including its operational and ancillary amenity space, will be refused unless there is robust and authoritative evidence to demonstrate that the viability of the pub, and its current and future operation, will not be compromised, and development will not detract from the character and appearance of the building, including any features of historic or cultural significance.

C Development proposals involving the replacement or re-provision of a public house must:

i. Ensure the replacement facility is of a high-quality design and responds positively to local character, considering the need to preserve or enhance the significance of heritage assets and their setting;

ii. Provide an appropriate amount and configuration of floorspace to enable the continued viability of the public house; and

iii. Not result in a net reduction of floorspace unless this can be sufficiently justified. This includes dedicated performance space or amenity space that has been or can reasonably be used for cultural or community uses.

D Where the change of use of a public house is considered acceptable by the Council, development proposals must retain the building and other associated features where these makes a positive contribution to local character, including by their historic, streetscape and townscape value.

E Development proposals for new public houses will be supported where they contribute to liveable and walkable neighbourhoods by improving people's access to these community facilities; and comply with other Local Plan policies.

Explanation

8.135 Public houses, or pubs, are a unique and integral feature of the British cultural identity of Hertsmere. They are fundamentally community facilities that promote social cohesion, offering a welcoming environment for people of all backgrounds to socialise and interact. Many local pubs are heritage assets or have played a part in the Borough's cultural and historical development. This may be reflected in their built form or through a pub's association with people or events that have shaped the Borough's history. Pubs often have longstanding ties to their neighbourhoods and strong affiliations with local communities and community groups and therefore contribute to people's sense of place and belonging.

8.136 There are many different community functions that pubs can perform. For example, pubs often include amenity space which is used as venues for functions, performance space, and informal meeting space for residents and community groups. Pubs also support the local economy and are particularly vital to the visitor, evening and night-time economy. Hertsmere, like many other places around the UK, has experienced a decline in public houses over time. Recognising the important social and economic role they play, we will seek to guard against the loss of these community and cultural facilities. Consideration will be given to the need to protect purpose-built, historic pubs (built in the 20th Century or earlier), especially where these are landmark features in the townscape or sited at prominent positions, within town and local centres or elsewhere in the Borough.

8.137 Development proposals involving the demolition or loss of an existing public house, including through change of use, must submit evidence to demonstrate that the pub is not financially viable and there is no reasonable prospect of the premises remaining in this use, or an alternative community use. Applications must provide full details of patronage levels and trading accounts over the past three years, including accounts from previous management where appropriate. In addition, applications must provide a statement documenting the steps taken by the owner or operator to respond to viability concerns, including falling patronage levels and profit margins. This might cover considerations given to business diversification (for example, expanding the food and beverage offer), promotions or building refurbishment. Finally, proposals will need to provide proof of a marketing exercise covering a minimum continuous period of three years, including details of commercial agents, advertisements and lease terms offered. During this time the pub must be actively marketing at a reasonable local market rent. We will consider whether any ties or restrictive covenants have affected interest. Development proposals will be refused where there is good reason to believe that the viability of the pub has been compromised by deliberate neglect or mismanagement.

8.138 Public houses require dedicated operational spaces. They also often feature function rooms or ancillary amenity space, including outdoor gardens, which are critical to supporting their role as community facilities and places of gathering. Where development proposals involve a reduction or reconfiguration of such operational and ancillary spaces, it must be demonstrated that this will not have a detrimental impact on the financial viability of the public house. Furthermore, proposals must show that the remaining residual space will be of a sufficient amount and quality to continue to meet the needs of pub users. Operational and ancillary spaces include, but are not limited to, beer gardens, function rooms, kitchens, cellars and accommodation integrated into the building.

8.139 Where sites are proposed to be redeveloped, including through comprehensive redevelopment, our priority is to protect pubs particularly where they are of historic, cultural or community interest. However, in certain circumstances it may be acceptable that a facility is replaced or re-provided. Development proposals will be required to demonstrate that they have considered all reasonable options for retaining the pub in situ. Where this is not possible, the replacement provision must be designed to a sufficient quality and standard to ensure the continued viability of the pub. This aim of this policy is to ensure there is a genuine intention to retain the facility in viable use, so to prevent against future changes to alternative uses.

8.140 National planning policy recognises the value of public houses as community facilities. We will therefore seek to protect against their loss, having regard also to Policy SCI 1 (Safeguarding and securing community infrastructure). Where the loss of a pub is proposed, development proposals must suitably demonstrate that there is similar alternative provision elsewhere in the local area. If there is sufficient evidence to support that the loss is acceptable in principle, proposals must retain the building and any ancillary land or other features, where these makes a positive contribution to local character.

8.141 Development proposals involving the loss of public houses listed as Assets of Community Value will be assessed against this and other relevant Local Plan policies.

8.142 To support the implementation of this policy the Local Plan sets out marketing requirements for development proposals affecting public houses (Appendix 8) which all proposals will be assessed against, as appropriate.

EC19 Markets

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
I Celebrating our local identity

Non-strategic Policy

A Proposals for development must protect and seek to enhance existing markets and market spaces. New markets or market spaces will be encouraged and supported where they complement Hertsmere's town centre network and hierarchy and will make a positive contribution to the culture and vibrancy of the Borough.

B Development proposals for new markets or market space should be directed to appropriate town centre locations. Where new market space is proposed outside of centres, and where the Local Plan has not made provision for main town centre uses there (for example, through site allocation policies), proposals will only be supported where it is demonstrated through the sequential approach that they:

i. Will not adversely impact on the vitality and viability of the town centre network and hierarchy;

ii. Make beneficial use of vacant or underused sites;

iii. Are in well-connected areas that are well-served by public transport;

iv. Can be appropriately accommodated on streets or other areas of the public realm, where appropriate; and

v. Are temporary in nature.

C Development proposals that are likely to affect existing markets within town centres will be considered having regard to:

i. The priority given to retaining markets as part of the town centre offer and ensuring appropriate re-provision of market space, where there is a demonstrable demand; and

ii. The impact on town centre vitality and viability with particular consideration given to:

iii. Provision of a range of premises and floorspace to support small and start-up businesses;

iv. Local character, including distinctive character of the market; and

v. Public realm and townscape.

D Development proposals for markets and market space must demonstrate that there will not be an unreasonable adverse impact on local amenity, and that they will not have a detrimental impact on public health and safety and the public realm.

Explanation

8.143 For the purposes of this policy markets are defined as land and/or space that is authorised or licenced for market use, considering market space secured on temporary basis (i.e. as a meanwhile use). Markets may also include public realm that has been designed to accommodate market space, but which is not currently authorised or licenced for this use, for example outdoor public realm in town centres designed with connection-ready infrastructure, such as power outlets and water supply. The presence of a market or market space will be established on a case-by-case basis with reference to planning, licencing and Business Rate records.

8.144 Borehamwood and Potters Bar both have monthly farmers and craft markets, and Borehamwood also has a twice-weekly street market on Shenley Road. There is currently no market in Bushey or Radlett, although attempts have been made to set up monthly markets over recent years with mixed results. A farmers' market in Radlett may have strong competition from the permanent high-end and farm shop-style shopping offer at nearby Battlers Green Farm. The Settlement Visions identified that local people were keen to see improvements to the public realm to facilitate a market within Radlett town centre.

8.145 Proposals for the development of new markets and market space will be expected to apply the 'town centre first' principle of site selection. Markets should complement and support the vitality and viability of the Borough's town centre network and not compete with existing centres for trade. However, it is recognised that site availability and other constraints may prohibit additional provision from coming forward in town centres. Further, there may be vacant or underutilised sites (such as those with planning consent but where development has not yet commenced) which offer interim opportunities for optimising the use of land in the Borough. We will therefore consider out-of-centre proposals where it can be demonstrated the town centre hierarchy will not be compromised.

8.146 The existing farmers and craft markets in Borehamwood and Potters Bar take place just outside of the town centres, and the Council seeks to encourage these markets

to continue, and, ideally, move inside of the town centres following improvements to the public realm that form a part of the Settlement and Place Policies.

8.147 Applications should detail how the goods and services provided will not undermine the offer in existing centres. Markets should not normally be in poorly connected areas. Given the high levels of footfall markets attract it is important that visitors can easily and safely access them during their operating hours. Temporary consents or planning conditions may be used to ensure flexibility for assessment of impacts over time.

8.148 Where new development relates to or may impact on existing markets, proposals must demonstrate how they will safeguard market space including appropriate re-provision. Where market space is to be reconfigured or reduced proposals will be expected to show that sufficient provision will remain to meet local needs for employment floorspace, particularly for small and start-up businesses. Development offers the opportunity to improve the functional and aesthetic quality of town centres and the market spaces within them. All proposals should seek to maintain and enhance the unique features of the market and its associated public realm where these make a positive contribution to local character.

8.149 Proposals for development must make adequate arrangements to avoid or mitigate unreasonable impacts on local amenity. This includes consideration of congestion on footpaths and the road network, refuse storage and collection, noise and odour. Proposals for street markets must demonstrate that there will be no detrimental effect on the functioning of the road network.

EC20 Visitor accommodation

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy

Non-strategic Policy

A Proposals for serviced visitor accommodation must be appropriately located at sites within or at the edge of town centres, or other sites that are well-connected by public transport.

B Proposals for serviced visitor accommodation should ensure a range of high-quality provision in the Borough catered to the varying needs of visitors. Proposals will be supported where they:

i. Are proportionate to their location in terms of size, scale and function;

ii. Do not result in a harmful overconcentration of serviced visitor accommodation in the area;

iii. Comply with the relevant parking standards;

iv. Ensure adequate access, drop-off/pick-up and servicing arrangements;

v. Are of a high-quality design, ensure adequate space and amenity for occupants and provide sufficient choice for people who require an accessible bedroom;

vi. Make appropriate arrangements for long-term adaptability and sustainability;

vii. Demonstrate that an agreement is in place to secure an operator prior to the commencement of the development; and

viii. Do not negatively impact the vitality and viability of a town centre through the provision of extensive ancillary uses (for example cafés and restaurants, conference facilities, salons, fitness studios and other uses) in edge of centre locations.

C Proposals for serviced visitor accommodation must be designed with positive frontages, including active ground floor frontages. Where the development incorporates ancillary uses and facilities these should be made available for public use, where appropriate, and access not unreasonably restricted.

D Proposals for visitor accommodation must not result in the net loss of housing, including through the conversion or change of use of dwelling units.

E The use of a residential property for ‘temporary sleeping accommodation’ (short-term let or holiday let) must not exceed 90 nights within a calendar year.

F Proposals for the conversion or change of use of serviced visitor accommodation to housing must demonstrate that the relevant Local Plan policies for housing will be satisfied including on design quality, space standards and provision of affordable housing.

Explanation

8.150 The visitor economy is an integral part of the local and wider regional economy. It provides residents with job opportunities, supports local businesses and helps to ensure the viability of cultural and leisure facilities. Visitor accommodation in Hertsmere supports the itinerant workforce associated with the film and television industry, and is also within easy travelling distance of London, especially Borehamwood which is on the Thameslink railway line between Luton Airport and St Pancras, making it a convenient base for visitors to explore the Capital.

8.151 For this policy, serviced visitor accommodation pertains to uses within the C1 Use Class including hotels, bed and breakfasts, traveller / youth hostels, short-term holiday lets and serviced self-catering apartments.

8.152 Serviced visitor accommodation is defined by national planning policy as a main town centre use. It should therefore be located within or at the edge of town centres[16]. These locations are well-suited to supporting visitors with a range of facilities and services and generally benefit from good public transport links. Development proposals outside of town centres will need to be sufficiently justified, having regard to the sequential approach for main town centre uses.

8.153 Proposals for visitor accommodation must contribute positively to the local area, including its character. The nature and scale of the development should be proportionate to its surroundings.

8.154 Proposals for visitor accommodation must ensure adequately sized amenity spaces and bedrooms. New development should be capable of achieving accreditation by the National Quality Assurance Scheme.

8.155 Proposals for visitor accommodation must be designed with positive frontages. They should also maximise opportunities to integrate active ground floor frontages and appropriate ancillary uses, particularly to support town centre vitality and viability. Ancillary uses may include cafés and restaurants, conference facilities, salons, fitness studios and other uses. Access to facilities should not be unreasonably restricted and made available for use by the wider public. Equally, the provision of such facilities within an edge-of-centre location should not undermine the integrity of a town centre.

[16] This is in line with the Sequential Approach to the location of main town centres uses established by the NPPF and London Plan (2021) Policy SD7 Town centres: development principles and Development Plan Documents.

8.156 Development proposals must demonstrate that the visitor accommodation is both sustainable and feasible and should comply with other policies in this plan with reference to policies within the Sustainable Design chapter. Applications must demonstrate that an operator will be identified and secured prior to the commencement of the development. This is necessary to guard against speculative hotel development for which there is no clearly established business demand, and which might preclude the use of land for more beneficial uses that support the delivery of the spatial strategy.

8.157 Hertsmere has significant housing needs and development proposals involving the net loss of housing will therefore be refused. In recent years the visitor economy has been bolstered by the growth in short-term serviced accommodation, often offering a more unique and affordable alternative to serviced accommodation. It is important that the Borough's housing supply is not compromised by unlawful use of residential premises for visitor accommodation.

Chapter 9: Social and Community Infrastructure

Section

SCI1 Safeguarding and Securing Social and Community Infrastructure

SCI2 Delivering High Quality Social and Community Infrastructure

SCI3 Delivering Sports, Recreation and Play Spaces

SCI4 Nurseries and Childcare Facilities

SCI5 Burial Spaces

SCI1 Safeguarding and Securing Social and Community Infrastructure

Strategic Objectives

A Delivering a better future for Hertsmere
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A The Council will work positively and collaboratively with Hertfordshire County Council, the Hertfordshire and West Essex Integrated Care Board and successor health bodies, education providers, emergency services, town and parish councils, community and voluntary organisations, faith groups, sports organisations and other infrastructure providers to:

i. Identify current and future needs for social and community infrastructure;

ii. Protect existing facilities, services and sites that are needed to serve existing and future communities;

iii. Identify opportunities to improve, expand, relocate or co-locate facilities; and

iv. Secure the timely delivery of the infrastructure necessary to support planned growth.

The identification of network improvements will consider the latest Infrastructure Delivery Plan and project schedule, site-allocation policies, relevant evidence-base documents and the plans, strategies and requirements of infrastructure providers.

B Development proposals must, where necessary and proportionate, address the additional demand for social and community infrastructure generated by the development.

Where a site-allocation policy or the latest Infrastructure Delivery Plan identifies a requirement for social or community infrastructure, development proposals must demonstrate how the necessary land, buildings, floorspace, works, funding and delivery arrangements will be secured.

Infrastructure requirements may be met through one or more of the following:

i. Direct provision within the development;

ii. The expansion, improvement or reconfiguration of an existing accessible facility;

iii. Provision at an appropriate off-site location; or

iv. A financial contribution towards an identified infrastructure project.

The appropriate means of provision will be determined having regard to the nature and catchment of the infrastructure, the scale and location of the development, the capacity, quality and accessibility of existing facilities, opportunities for co-location and the latest Infrastructure Delivery Plan.

Site allocations and other large or complex developments must identify infrastructure requirements at an early stage through the master planning process. Infrastructure must be appropriately phased and delivered in step with the development and population it is intended to serve.

Planning obligations will be secured in accordance with Policy DM2 Infrastructure Funding and Planning Obligations and must meet the relevant statutory and national policy tests.

C Existing social and community infrastructure will be safeguarded. Development proposals affecting an existing facility must retain and, wherever practicable, enhance that provision.

For the purposes of this policy, the loss of social and community infrastructure includes:

i. Demolition or change of use of a facility;

ii. A material reduction in its floorspace, capacity, functionality or accessibility;

iii. The loss or material restriction of formally secured community access; and

iv. Development that would prejudice the continued operation, improvement or expansion of a facility.

Land or floorspace identified for future social or community infrastructure in the Local Plan, a site-allocation policy, the latest Infrastructure Delivery Plan project schedule or an infrastructure requirement endorsed by the relevant provider will also be safeguarded.

Development that would prevent or prejudice the delivery of identified infrastructure will not be permitted unless the Council and relevant infrastructure provider are satisfied that:

v. the infrastructure is no longer required; or

vi. the requirement can be met through equivalent or better provision in another suitable and accessible location without prejudicing the delivery of the Local Plan.

D Development involving the loss, relocation or substantial reconfiguration of social or community infrastructure will be supported where equivalent or better replacement provision is secured.

Replacement provision will be assessed having regard to:

i. Its capacity and usable floorspace;

ii. Its quality, condition and fitness for purpose;

iii. Its functionality and the range of activities or services it can accommodate;

iv. Its location, accessibility and relationship to the community or catchment served;

v. Its hours and periods of availability;

vi. The affordability of access, where relevant;

vii. Supporting and ancillary facilities; and

viii. Its funding, management and long-term maintenance.

Replacement provision should normally be available for use before the existing facility is lost. Where this is not practicable, an agreed phasing and continuity plan must demonstrate how the needs of the affected community will be met during the intervening period.

E Development resulting in the loss of social or community infrastructure without equivalent or better replacement provision will only be permitted where robust and proportionate evidence demonstrates that:

i. there is no current or reasonably foreseeable future need for the existing use;

ii. there is no identified need for another social or community use that could reasonably be accommodated at the site or premises;

iii. the facility is no longer required by the relevant infrastructure provider; and

iv. the loss would not result in an unacceptable reduction in the accessibility, capacity, quality or resilience of provision available to the community served.

The assessment must take account of planned development, demographic change, relevant provider strategies, the potential for investment or reconfiguration, and the availability and accessibility of alternative provision.

Where appropriate to the type, ownership and operation of the facility, proportionate evidence of active marketing for continued social or community use will be required. The method, terms and duration of marketing must be agreed with the Council before the marketing exercise begins.

F Development involving the loss, relocation or consolidation of infrastructure as part of a public-service or public-estate transformation programme will be supported where:

i. The programme is endorsed by the relevant infrastructure provider;

ii. It will secure an equivalent or improved service for the community concerned;

iii. Reasonable access to the service will be maintained;

iv. The proposal will not result in an unacceptable net loss of service capacity or quality; and

v. Suitable arrangements are made to maintain continuity of service during the transition.

The disposal of a facility solely to generate a capital receipt will not, by itself, demonstrate compliance with this policy.

G Proposals involving sports, recreation and play facilities, nurseries and childcare facilities or burial space must also meet the requirements set out under the Local Plan's Policies SCI3, SCI4 or SCI5, as applicable.

Residential care, supported housing, extra-care housing and other forms of specialist accommodation will be assessed primarily under the relevant housing policies. This policy will apply where a proposal also involves the loss of a distinct community-facing service or facility.

Explanation

9.1 Social and community infrastructure[1] comprises the land, buildings and physical facilities that support the health, wellbeing, education, safety and social and cultural life of Hertsmere's communities. It includes:

[1] The term is used in this chapter to describe social and community facilities. It is not synonymous with the wider definition of infrastructure used for the Community Infrastructure Levy or the Infrastructure Delivery Plan.

- Schools, further education, training and special educational needs provision;
- Early-years, childcare, youth and family facilities;
- Primary, community and mental-health facilities;
- Community centres, village halls and other community meeting spaces;
- Libraries, cultural facilities, museums and local-history services;
- Places of worship and faith-based community facilities;
- Indoor sport and recreation facilities;
- Emergency and public-service facilities;
- Adult social-care and community support facilities; and
- Burial facilities.

9.2 Social and community infrastructure is essential to the creation of healthy, inclusive and sustainable places. It enables people to access essential services, participate in community life, build social connections and remain active and independent. It is critically important that the Borough's existing social and community infrastructure networks remain integrated into Hertsmere's settlements and places, as they are a key component to ensure that needs are met as part of successful and sustainable place-making. The Council will therefore plan positively for new and improved infrastructure while guarding against the unnecessary loss of facilities that continue to meet, or can meet, community needs.

9.3 Hertsmere's Infrastructure Delivery Plan (IDP) is the principal document for identifying the infrastructure required to support the Local Plan. It covers early-years and education provision, community centres, libraries, places of worship, health and social care, emergency services and indoor and outdoor sports. The IDP's project schedule will identify individual infrastructure projects, the development they serve, their location, delivery parties, priority, phasing, cost, funding and any funding gap.

9.4 The IDP is a live document and will be updated as the development strategy, provider requirements and infrastructure projects evolve. The absence of a quantified requirement or project from an earlier version of the IDP will not, by itself, demonstrate that an existing facility is no longer needed. It will consider and take account of the latest evidence, provider information, demographic change and committed and planned development.

9.5 Hertsmere contains a varied network of facilities delivered through different ownership and management arrangements. These include facilities operated by the borough and county councils, NHS bodies, schools, community and voluntary organisations, faith groups and private providers. Some services also operate across local-authority boundaries. The capacity or accessibility of the wider infrastructure network cannot therefore be assessed solely by counting facilities within the borough.

9.6 The Borough's social and community infrastructure facilities are not evenly distributed. The IDP identifies a concentration of community centres in Borehamwood and Elstree, with more limited provision in some other settlements. The Settlement Hierarchy Review also shows significant differences in access to schools, GPs, pharmacies and leisure facilities between Hertsmere's principal settlements and its smaller villages.

9.7 The settlement studies for the four main towns identify locally specific priorities. These include additional health and community hubs and more affordable access to facilities in Borehamwood; maintaining the role of Radlett's library and community spaces; strengthening the Wyllyotts Theatre cultural hub in Potters Bar; and improving the visibility, accessibility and inclusivity of community hubs in Bushey. These priorities reinforce the need for the infrastructure response to reflect local circumstances rather than rely solely on borough-wide standards.

9.8 Hertsmere's changing population will affect future infrastructure needs. The Local Housing Needs Assessment identifies a significant need for specialist housing and support for older people, while the Equality Impact Assessment identifies the importance of delivering infrastructure in step with growth and improving accessibility to services for older and disabled people.

9.9 Social and community infrastructure assets and facilities may remain valuable even where they are not operating at full capacity or is not financially profitable. Inclusion on the statutory list of Assets of Community Value will be a relevant consideration but will not, by itself, determine a planning application. Within this context, relevant considerations include:

- The nature of the service or activities provided;
- The population, geographic area and groups served;
- The affordability and accessibility of the facility;
- The availability of reasonable alternatives;
- Its contribution to health, wellbeing, culture or community cohesion;
- Evidence of community use and support; and
- Its potential for modernisation, co-location or another community use.

9.10 Hertsmere's indoor sports evidence illustrates the importance of considering quality and availability as well as numerical capacity. Although the existing network broadly meets current borough-wide demand, parts of the stock are ageing and community access to some school facilities is not secure or consistently available. The loss or restriction of an individual facility may therefore reduce the resilience of the wider network even where a borough-wide quantitative shortfall has not been identified.

9.11 A needs assessment submitted under Part E of the policy should be proportionate to the nature and scale of the proposal. It should normally address:

- Existing use, capacity and patterns of demand;
- The condition and suitability of the facility;
- Existing and forecast population and service needs;
- Committed and planned development within the catchment;
- Evidence from the relevant infrastructure provider;
- The availability, capacity, accessibility and affordability of alternatives;
- Opportunities for investment, shared use or reconfiguration; and
- The potential for another social or community use.

9.12 Where marketing evidence is required, it must demonstrate that the premises have been actively and appropriately marketed for social and community uses at a

realistic value and on terms that do not discourage such uses. Evidence should include the marketing method, asking price or rent, enquiries and offers received, and the reasons these were not pursued. Marketing will not normally be required where a proposal forms part of an endorsed public-service transformation programme and the requirements of Part F are met.

9.13 It is acknowledged that public bodies may need to modernise their estates, consolidate services or deliver services through different models. Co-location and estate transformation can improve accessibility and service quality but should not be used simply to justify the loss of a valued facility. Evidence should demonstrate the benefits of the proposed service model and how the needs of the affected community will continue to be met.

9.14 Development-generated requirements must be based on a clear relationship between the development and the infrastructure sought. The scale and form of provision will vary between infrastructure types because schools, health facilities, libraries, emergency services, community halls and sports facilities have different catchments, capacity measures and delivery arrangements. Contributions will therefore be informed by the relevant provider methodology, the latest IDP and the statutory tests for planning obligations.

SCI2 Delivering High Quality Social and Community Infrastructure

Strategic Objectives

A Delivering a better future for Hertsmere
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-strategic Policy

A Proposals for new, expanded, altered or reconfigured social and community infrastructure will be supported. Significant weight will be given to the benefits of providing new, expanded or upgraded public-service infrastructure. Proposals must demonstrate that the facility:

i. responds to an identified need or provides an evidenced improvement to existing provision;

ii. is appropriately located for its intended function and catchment;

iii. is safely and conveniently accessible by walking, wheeling, cycling and public transport, having regard to the needs of the people it is intended to serve;

iv. is welcoming, inclusive and accessible to people of different ages, backgrounds and abilities;

v. is of a high-quality, safe, flexible and adaptable design;

vi. includes the internal accommodation, storage, servicing and supporting facilities necessary for its effective operation;

vii. is compatible with surrounding uses and would not result in unacceptable impacts on residential amenity, highway safety or the local environment;

viii. incorporates appropriate climate-resilience, energy-efficiency and environmental measures; and

ix. complies with the relevant design, transport, environmental and health policies of the Local Plan.

B Proposals must make effective use of land and buildings, including the public-sector estate. Proposals that deliver the following will be supported:

i. the co-location of compatible services;

ii. multi-purpose community hubs;

iii. shared use of facilities;

iv. the incorporation of social and community infrastructure within mixed-use development;

v. the extension or reconfiguration of existing facilities; and

vi. the use of appropriate education, health, cultural, public-sector and sports facilities by the wider community.

Co-location or shared use must not compromise the capacity, functionality, privacy, safeguarding, security or operational requirements of the services involved.

C Where a facility is intended to meet wider community needs, access must be appropriate to the function of the facility and must not be unreasonably restricted.

Where community access is relied upon to meet an identified infrastructure requirement, it must be secured through a community use agreement, management agreement, planning obligation or equivalent mechanism.

The agreement must address, where relevant:

i. the groups and activities able to use the facility;

ii. opening hours and periods of availability;

iii. arrangements during school holidays, examinations or other interruptions;

iv. affordability and charging arrangements;

v. booking and access procedures;

vi. safeguarding, security and servicing;

vii. management responsibilities;

viii. maintenance and lifecycle costs; and

ix. procedures for reviewing or varying the agreement.

Access to facilities provided as part of residential development must not be unreasonably restricted by housing tenure or the part of the development in which a person lives.

D New and improved social and community infrastructure must be supported by appropriate arrangements for its funding, management, operation and maintenance over its intended lifetime.

Applications must be accompanied by information proportionate to the nature and scale of the facility. This may include:

i. an operational or management plan;

ii. a business or funding plan;

iii. a community use agreement;

iv. a maintenance and lifecycle plan; and

v. details of the intended owner, operator or infrastructure provider.

Where the operation of the facility depends on a third-party provider, the proposal must demonstrate that the provider has been appropriately involved and that the proposed facility is capable of being operated on a sustainable basis.

E Proposals to alter, extend, refurbish or reconfigure existing social and community infrastructure will be supported where they:

i. improve its quality, accessibility, capacity, flexibility or environmental performance;

ii. support a wider range of services or community activities;

iii. secure or improve community access; and

iv. accord with other relevant policies of the Local Plan.

Explanation

9.15 The Council will take a positive approach to proposals for new and improved social and community infrastructure. Well-designed facilities can improve access to services, promote social interaction, reduce health inequalities and strengthen community identity. National policy gives significant weight to the importance of new, expanded and upgraded public-service infrastructure.

9.16 The appropriate location of a facility will depend on its function, catchment and operational requirements. Town centres, local centres, neighbourhood hubs and locations accessible by sustainable transport will often be appropriate for frequently used community services. Some specialist, emergency or strategic facilities may require different locations because of their land, access, security or operational requirements.

9.17 Geographic proximity alone does not demonstrate that a facility can meet the needs generated by development. Proposals must consider:

- Its capacity and quality;
- The services and activities provided;
- Opening hours and periods of availability;
- Affordability;
- Accessibility for disabled and older people; and
- Whether the facility is suitable for the population or activity concerned.

9.18 This is particularly important in Hertsmere's smaller settlements and rural areas, where residents may rely on facilities in another settlement and public transport access may be more limited. The Settlement Hierarchy Review assesses access by walking, wheeling, cycling and public transport and identifies significant differences between settlements.

9.19 Inclusive design must be considered from the outset. Facilities should be easy to identify, enter and navigate and should provide appropriate lighting, signage, toilets, changing facilities, seating and other supporting infrastructure. The design must respond to the needs of disabled people, older people, children and young people, carers and groups that may otherwise experience barriers to access. Hertsmere's Equality Impact Assessment identifies improved accessibility to services and facilities as an important potential benefit of new development.

9.20 Flexible and adaptable facilities can respond to changing community needs and support a wider range of activities. Appropriate provision may include flexible rooms, storage, kitchens, digital connectivity, accessible toilets, changing facilities and spaces capable of being used independently at different times. However, flexibility should not come at the expense of specialist facilities or spaces required by groups.

9.21 Co-location can enable people to access several services in one visit, make more efficient use of land and buildings, and support the viability of facilities. Hertfordshire County Council's library strategy and the IDP identify co-location with other services as an important opportunity for improving library buildings and extending the range of services available.

9.22 Community hubs and shared facilities may be particularly appropriate within strategic developments and settlement centres. They should be designed around compatible uses and include sufficient floorspace, storage, servicing, privacy and operational independence for each service. A shared building should not be treated as providing adequate infrastructure where the space available is insufficient, access is unreliable or the services cannot operate effectively alongside one another.

9.23 Where a community facility is incorporated into a mixed-use building, it should normally have a clear public presence, convenient and inclusive access, appropriate servicing and, where necessary, an independent entrance. The design must minimise the potential for conflict with residential or other sensitive uses and must allow the community facility to operate at the times it is needed.

9.24 Education facilities form an important part of Hertsmere's wider community and sports network. The Local Plan's technical evidence base identifies school sports halls as important to meeting demand but also records disruption to community use during examinations, school holidays and other school activities. Where education facilities are relied upon to meet wider needs, reliable and affordable access must therefore be secured for the long term.

9.25 Community use agreements should be tailored to the facility concerned. For school facilities, agreements must ensure that community access is compatible with the primary educational function while providing sufficient certainty for clubs and other

users. Where investment or developer contributions are used to improve a facility, the scale and duration of community access secured must reflect the public investment made.

9.26 The design and construction of a facility is only one part of effective infrastructure delivery. Applicants must engage with the intended operator at an early stage and demonstrate that appropriate arrangements exist for occupation, management, maintenance and lifecycle replacement. A building without a realistic means of being operated will not normally constitute effective infrastructure provision.

9.27 The planning system can secure land, buildings, physical works and contributions necessary to mitigate the impacts of development. It cannot normally be used to fund general staffing or revenue costs that are not directly related to the development. This distinction is particularly relevant to emergency, health and social-care services, where growth may create operational and staffing requirements as well as a need for physical infrastructure. The IDP, for example, indicates that some ambulance and fire-service requirements may relate principally to staffing, vehicles and operational capacity rather than new premises.

9.28 Infrastructure required to serve larger developments must be identified and planned at the earliest possible stage. Detailed requirements for strategic sites must also be set out in the relevant site-allocation policy and masterplan. Planning applications must explain:

- The need being addressed;
- The proposed form and location of provision;
- The intended owner or operator;
- How the infrastructure will be funded;
- When it will be delivered in relation to occupation; and
- How it will be managed and maintained.

9.29 Infrastructure evidence and provider requirements will change over the plan period. The Council will therefore monitor the delivery, capacity and condition of social and community infrastructure and review the IDP and project schedule as necessary. Development proposals must have regard to the most recent available evidence at the time an application is determined.

SCI3 Delivering Sports, Recreation and Play Spaces

Strategic Objectives

A **Delivering a better future for Hertsmere**

G **Securing a greener Borough**

J **Healthy and safe communities**

K **Securing the timely delivery of infrastructure**

Non-Strategic Policy

A Proposals for development should help to ensure that people of all ages and abilities have access to a wide range of opportunities for sports, recreation and play. They should maximise opportunities to provide new or improved social and community infrastructure, along with public realm enhancements, so that sports and recreation facilities and play spaces can be reached safely and easily throughout the Borough. Proposals for new provisions, and enhancements to existing facilities will be designed to ensure that it is publicly accessible and inclusive so that it positively contributes to providing a wide range of multifunctional environmental, social, public health and economic benefits. Where it is appropriate and reasonable, proposals will contribute towards improvements and enhancements that increase the accessibility and capacity of existing local (to the proposal) facilities.

Sports and recreation facilities

B Existing sports and recreational facilities should be retained. Opportunities to increase or enhance the accessibility and capacity of existing facilities, to meet future needs arising from growth, will be explored, assessed and where appropriate implemented. Development proposals involving the loss of such facilities will be supported where they robustly demonstrate that the facilities are either genuinely surplus to needs or will deliver improved replacement provision. Applications will be assessed considering the Infrastructure Delivery Plan along with the Council's Playing Pitch Strategy, and other strategies as appropriate.

Play and informal recreation

C Development proposals that are likely to be occupied or used by children and young people must increase opportunities for play and informal recreation, inclusive of the provision of new informal recreation spaces. Where located in areas with identified deficiencies in play space, new housing development must provide demonstrable improvements in the quantity and quality of play space.

D Development proposals for new housing must incorporate well-designed and high-quality formal play provision that responds to the minimum standards set out under Table 9.1.

Table 9.1 Minimum open space standards

Typology	Quantity standard	
	Hectares per 1,000 population	**Square metres per person**
Parks & gardens	0.80	8 m^2
Natural & semi-natural greenspace	1.80	18 m^2
Amenity greenspace	0.60	6 m^2
Provision for children & young people	0.55	5.5 m^2
Allotments	0.25	2.5 m^2

Provision should be delivered on-site and made accessible to all children in the development without being segregated by housing tenure. Off-site provision will only be acceptable in exceptional circumstances, where it can be suitably demonstrated that on-site provision is not feasible and there is existing play space, or new provision that will be secured, in proximity to the development that can be accessed safely and easily by residents of the age group it is intended. Proposals for off-site provision, including new, or improvements to existing facilities, must demonstrate that they will meet the needs of the development, whilst continuing to meet those of existing residents. Where it can be demonstrated to the satisfaction of the Council that off-site provision is acceptable this will be secured through planning obligations, legal agreement or other appropriate mechanism, with payments in lieu calculated using the formula in Table 9.2.

Table 9.2 Play space payments in lieu

Formula for calculating payments in lieu
X = ((A x B) – C)) x D
X = Financial contribution (£) A = Number of children generated by the development (child yield calculated considering bedroom size(s) and tenure mix) B = 10 square metres per child (play space requirement) C = Square metres of play space proposed by the development D = Average cost per square metre of play space

E All play space and provision for informal recreation must be sensitively integrated into the site and neighbourhood, and be designed to:

i. Ensure that public access is encouraged and not unreasonably restricted, and made free-to-use wherever secured as part of new housing development;

ii. Provide a stimulating and pleasant environment that promotes social cohesion, including by enabling users of different ages and abilities to interact as well as to move around and play independently;

iii. Provide opportunities for respite, such as benches or seating areas;

iv. Enable informal supervision through passive surveillance; e. Integrate natural features such as trees, landscaped play areas and other greening measures; Maximise the use of permeable surfaces and Sustainable Drainage Systems; and g. Where possible, site play spaces at the street or ground floor of development.

F Where large-scale public realm is provided as part of a development proposal, this should incorporate incidental play space to make the public realm more playable. Incidental play space should supplement formal play provision elsewhere in the Borough and provide additional opportunities for physical activity.

G Development proposals including new or enhanced play space must ensure the provision will be appropriately managed and maintained over its lifetime.

H Development proposals that will result in the loss of play space, whether existing or consented but not built, will be refused unless:

i. Replacement provision of at least an equivalent amount and improved quality will be provided, either on-site or in proximity to it, within a reasonable walking distance for the intended age group; or

ii. It can be suitably demonstrated that there is no ongoing or future demand for the play space.

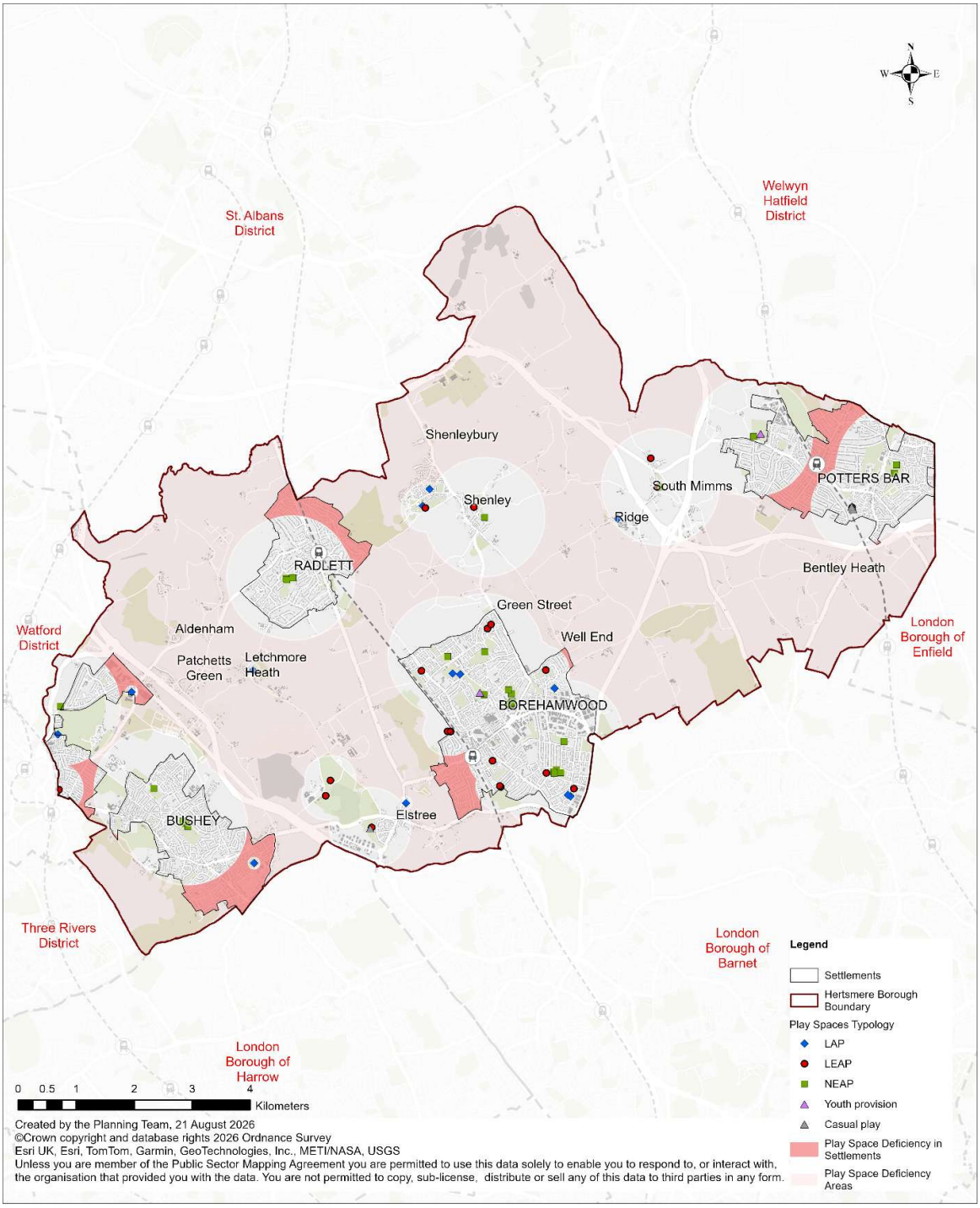

Figure 9.1: Play Space mapping and deficiency areas

Explanation

9.30 Healthy and liveable neighbourhoods provide ample opportunities for people of all ages and abilities to participate in sport, recreation and play. Safe and stimulating play is essential to childhood development. It can impact positively on physical health, helping to address and prevent obesity. The delivery of healthy and liveable neighbourhoods will contribute towards successful and sustainable place-making across the Borough.

9.31 All new play space should be delivered through the design-led approach with careful consideration given to the requirements of the intended users. Play space should be integrated at the street or ground floor level, where possible as the siting of play provision on rooftops and podiums may impede safe access and result in microclimate conditions that are not comfortable. Rooftop and podium play spaces will only be acceptable where they have a clear design rationale and the provision is of a high quality. Developments should maximise opportunities to integrate natural or semi-natural features into play space, including tree planting and landscaped play areas. Naturalised spaces provide for stimulating and pleasant environments, enhance access to nature, and help to reduce the need for hardstanding which is important for climate change adaptation and mitigation.

9.32 New housing developments must incorporate well-designed and high-quality formal play provision that responds to the minimum standards set out under Table 9.1. Provision must be proportionally based on the number of children expected to occupy the development and an assessment of future needs. Play space should be delivered on-site.

9.33 To address local deficiencies and improve access to provision throughout the Borough, new development, particularly for housing and social and community infrastructure, should investigate and seek to increase opportunities for play for all age groups, considering the types of provision needed for them. Diverse equipment to cater for a range of ages and abilities is important and enhances value. Inclusive provision as well as facilities catering for older ages (for example, skate parks and MUGAs) are often highly valued play forms.

9.34 Off-site provision will only be considered in exceptional circumstances. Applicants will be required to provide evidence to demonstrate that delivery on-site is not feasible, including a design options appraisal, and that the needs generated by the development will be adequately met. Off-site provision will be more appropriate for older children and young people as they are able to travel slightly longer distances by walking, wheeling and cycling. In addition, suitable play provision for this group might not be compatible within the development and could be better provided elsewhere, for example, as with skateboard parks. In all cases, proposals for off-site provision, whether that is for entirely new provision, or provided through financial contributions that improve existing facilities, must demonstrate that they will meet the needs of the development proposal, whilst continuing to meet those of existing residents. This approach is in alignment with the London Plan. Off-site provision will be secured by planning obligations or legal agreements, using the formula set out in Table 9.2 (Play space payments in lieu). The Council will look to review costs

regularly to ensure they are reflective of real-term costs and will link costs to inflation or consumer indexes.

9.35 To support inclusive neighbourhoods and communities we will seek to ensure that all play space is free to use and made accessible to the wider public. Development proposals that unreasonably restrict access to play space, for example, by fencing or other measures will be refused. Play space to which access is segregated by housing tenure is wholly unacceptable. It is recognised that some controls may be required in the interests of public health and safety as well as local amenity, for example, to ensure the use of facilities is limited to regular daytime or early evening hours. Site Management and/or Maintenance Plans must be submitted to address any such matters, along with arrangements for upkeep of space and equipment over the lifetime of the development.

9.36 Activity and play need not be restricted to parks and other types of formal play spaces. Incidental play space can be provided where features of the urban environment are made more playable. This is particularly in areas with large-scale public realm (for example around town centres, stations and community facilities) where people of all ages are likely to visit. The design of the public realm must encourage everyone to move around freely and independently in active ways, having regard to the Healthy Streets Approach and relevant good practice guidance, such as Sport England's Active Design Guidance. Development proposals must assess how the design and configuration of spaces and buildings might function to impede or enhance safe access to play opportunities.

SCI4 Nurseries and Childcare Facilities

Strategic Objectives

A Delivering a better future for Hertsmere

J Healthy and safe communities

Non-Strategic Policy

A Proposals for day nurseries and childcare facilities (including child minding, playgroups and related activities) must:

i. Be located where they can be safely and easily accessed by walking, wheeling, cycling and public transport;

ii. Not have an unacceptable adverse impact on the road network and ensure adequate arrangements for car parking including access, egress, cross-site movement and drop-off areas, with consideration given to needs of disabled users;

iii. Protect, manage and not adversely impact on local amenity;

iv. Respond positively to local character; and

v. Secure provision of fit-for-purpose facilities to accommodate the intended use and all likely users, including suitable outside play space where appropriate.

B The use of residential floorspace for day nurseries and childcare facilities will be supported where it is robustly demonstrated through evidence that:

i. The development will not result in the loss of a dwelling and the residual residential floorspace meets the requirements and standards for self-contained housing, as set out elsewhere in the Local Plan;

ii. The community use is ancillary to the residential use;

iii. There is a demonstrable local need or market demand for the use proposed; and

iv. There are no suitable and available non-residential premises to accommodate the use.

Explanation

9.37 The Council is committed to ensuring that there is sufficient provision of good quality, affordable and flexible nurseries and childcare facilities to accommodate the diverse needs of households within the Borough. All development proposals for

nursery and childcare provision should therefore refer to the latest assessment to identify opportunities for meeting demand and area-specific requirements. v

9.38 New nurseries and childcare facilities should be appropriately located at safe, well-connected and easily accessible locations. Applicants should investigate opportunities to locate such uses in Class E units before considering residential premises. Where it is proposed to incorporate a nursery or childcare facility within an existing self-contained (Class C3) property, this must not result in the loss of a dwelling unit. In most circumstances a detached C3 use will be more appropriate than a semi-detached unit, which in turn is preferable to a terraced dwelling. End of terrace locations will be treated the same as semi-detached properties. We may apply conditions to ensure residential uses are reinstated in any future change of use from a Class E community use.

9.39 It is important that nurseries and childcare facilities are designed to a high standard and will meet the needs of specific uses and all intended users. Development proposals must demonstrate how the policy requirements will be satisfied. A statement should be submitted setting out details of operations including nature of activity; numbers of staff and visitors expected; days and hours of operation; access, parking and servicing arrangements; and measures to protect local amenity.

SCI5 Burial Spaces

Strategic Objectives

G Securing a greener Borough

K Securing the timely delivery of infrastructure

Non-Strategic Policy

A The Council will ensure that sufficient burial provision is available to meet the current and future needs of Hertsmere's communities. This will be achieved by:

i. Safeguarding existing cemeteries, burial grounds and associated facilities from development that would result in their loss or negatively impact their continued operation;

ii. Supporting the appropriate expansion, enhancement and efficient use of existing cemeteries where this can be achieved without unacceptable environmental or amenity impacts;

iii. Planning positively for future burial needs, having regard to population growth, population ageing, mortality projections, changing community demographics and the requirements of faith groups and communities for whom burial is the preferred or sole option;

iv. Supporting the delivery of additional burial capacity where evidence demonstrates an identified current or future need.

B Development proposals for new cemeteries, cemetery extensions, burial grounds or associated facilities will be supported where they demonstrate that:

i. The proposal meets an identified need for burial provision within Hertsmere;

ii. The scale and capacity of the development are sufficient to meet long-term requirements and have regard to projected future demand;

iii. The site is appropriately located relative to the community it is intended to serve and is accessible by sustainable modes of transport;

iv. Appropriate provision is made for supporting infrastructure, including access roads, parking, drainage, landscaping, buildings and maintenance facilities;

v. The proposal would not result in unacceptable impacts on residential amenity, highway safety, landscape character or neighbouring land uses;

vi. The proposal protects and enhances biodiversity, ecological networks and green infrastructure;

vii. The proposal is informed by appropriate archaeological, heritage, ecological and arboriculture assessments; and

viii. The proposal demonstrates that the site is suitable in hydrogeological terms and will not result in unacceptable impacts on groundwater, watercourses or the wider environment.

Explanation

9.40 Hertsmere Borough Council is home to many communities and faith groups which require different burial requirements. There is no statutory duty for the Council to provide burial spaces. However, recognising the importance of providing opportunities for all individuals and communities to practise their faith, we have an interest in supporting provision to meet local needs wherever possible. The Council is exploring possible opportunities for the expansion of existing public burial sites.

9.41 Existing cemeteries, churchyards and burial grounds represent valuable community assets and often make important contributions to local character, green infrastructure networks and the historic environment. The continued operation of these facilities should be protected from incompatible development, and opportunities should be taken, where appropriate, to improve their accessibility, environmental quality and operational efficiency.

9.42 Information on the burial space provision is drawn from the Hertsmere Burial Space Strategy 2020[2] and the Open Space Needs Assessment 2026[3]. There are 11 sites classified as churchyards/graveyards in Hertsmere, all of which are facing increasing pressure on burial capacity as part of population growth and demographic change. With the predicted increase in Hertsmere's population over the plan period and faith communities' religious preferences, this pressure on burial capacity is set to increase. It is noted that some religious burial sites perform a more strategic role beyond the borough's boundaries. It is therefore important to ensure that adequate burial provision is maintained for both current and future generations.

9.43 New burial provision can require significant areas of land and long-term management arrangements. As such, proposals must be supported by robust evidence of need and should be planned on a strategic basis to ensure they can meet future demands over an extended period. Sites should be accessible to the communities they serve and accommodate associated facilities and infrastructure required for their effective operation.

9.44 The location and design of cemeteries and burial grounds must also carefully consider their environmental impacts. Regard should be given to landscape character, biodiversity, heritage assets, trees, water resources and residential amenity. Burial activities have the potential to affect groundwater and water quality in certain circumstances, and therefore proposals should be informed by appropriate

[2] Hertsmere Burial Space Strategy 2020
[3] Hertsmere Borough Council Open Space Needs Assessment 2026

hydrogeological assessments and demonstrate that they will not result in unacceptable environmental harm.

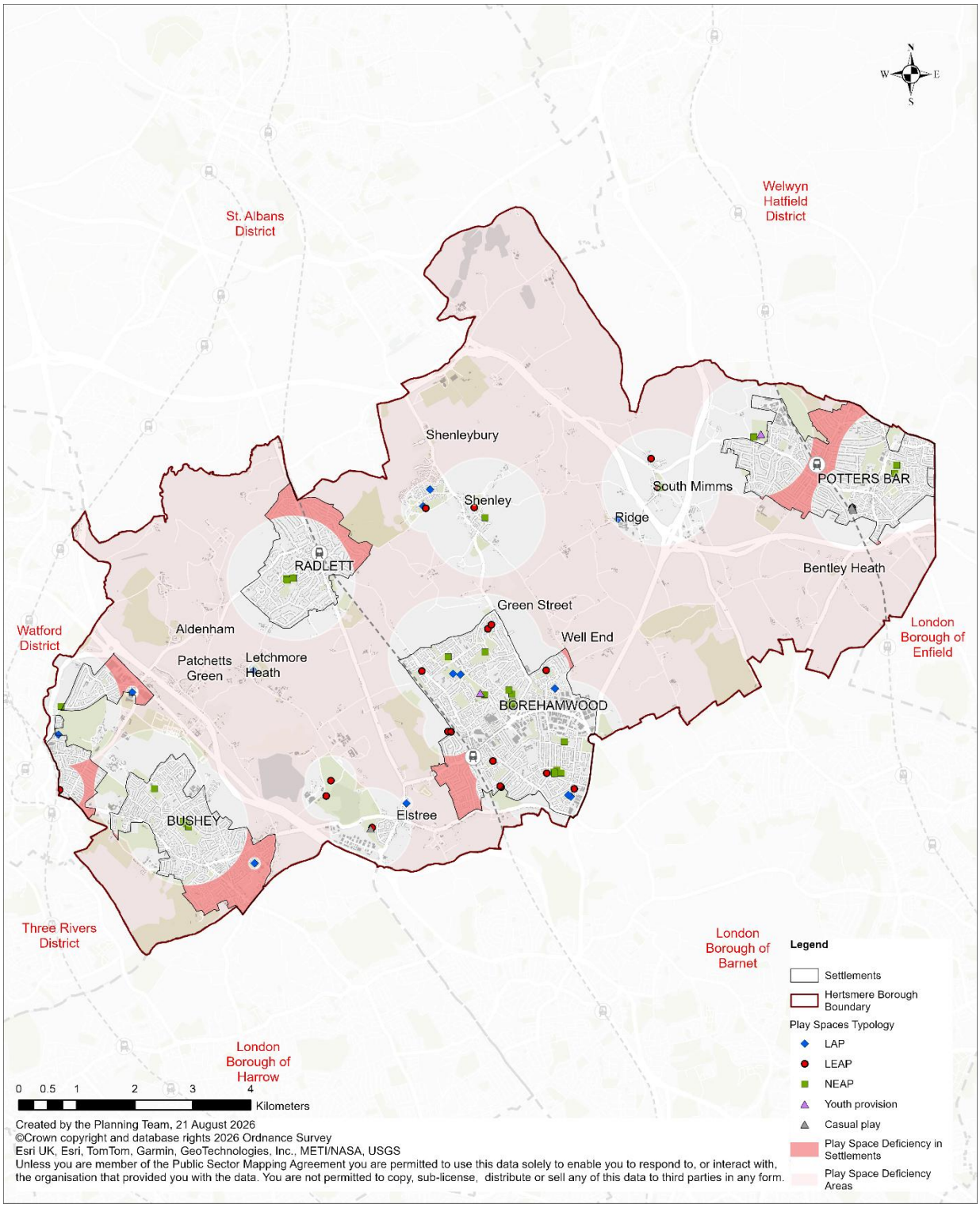

Figure 9.1: Play Space mapping and deficiency areas

Explanation

9.30 Healthy and liveable neighbourhoods provide ample opportunities for people of all ages and abilities to participate in sport, recreation and play. Safe and stimulating play is essential to childhood development. It can impact positively on physical health, helping to address and prevent obesity. The delivery of healthy and liveable neighbourhoods will contribute towards successful and sustainable place-making across the Borough.

9.31 All new play space should be delivered through the design-led approach with careful consideration given to the requirements of the intended users. Play space should be integrated at the street or ground floor level, where possible as the siting of play provision on rooftops and podiums may impede safe access and result in microclimate conditions that are not comfortable. Rooftop and podium play spaces will only be acceptable where they have a clear design rationale and the provision is of a high quality. Developments should maximise opportunities to integrate natural or semi-natural features into play space, including tree planting and landscaped play areas. Naturalised spaces provide for stimulating and pleasant environments, enhance access to nature, and help to reduce the need for hardstanding which is important for climate change adaptation and mitigation.

9.32 New housing developments must incorporate well-designed and high-quality formal play provision that responds to the minimum standards set out under Table 9.1. Provision must be proportionally based on the number of children expected to occupy the development and an assessment of future needs. Play space should be delivered on-site.

9.33 To address local deficiencies and improve access to provision throughout the Borough, new development, particularly for housing and social and community infrastructure, should investigate and seek to increase opportunities for play for all age groups, considering the types of provision needed for them. Diverse equipment to cater for a range of ages and abilities is important and enhances value. Inclusive provision as well as facilities catering for older ages (for example, skate parks and MUGAs) are often highly valued play forms.

9.34 Off-site provision will only be considered in exceptional circumstances. Applicants will be required to provide evidence to demonstrate that delivery on-site is not feasible, including a design options appraisal, and that the needs generated by the development will be adequately met. Off-site provision will be more appropriate for older children and young people as they are able to travel slightly longer distances by walking, wheeling and cycling. In addition, suitable play provision for this group might not be compatible within the development and could be better provided elsewhere, for example, as with skateboard parks. In all cases, proposals for off-site provision, whether that is for entirely new provision, or provided through financial contributions that improve existing facilities, must demonstrate that they will meet the needs of the development proposal, whilst continuing to meet those of existing residents. This approach is in alignment with the London Plan. Off-site provision will be secured by planning obligations or legal agreements, using the formula set out in Table 9.2 (Play space payments in lieu). The Council will look to review costs

regularly to ensure they are reflective of real-term costs and will link costs to inflation or consumer indexes.

9.35 To support inclusive neighbourhoods and communities we will seek to ensure that all play space is free to use and made accessible to the wider public. Development proposals that unreasonably restrict access to play space, for example, by fencing or other measures will be refused. Play space to which access is segregated by housing tenure is wholly unacceptable. It is recognised that some controls may be required in the interests of public health and safety as well as local amenity, for example, to ensure the use of facilities is limited to regular daytime or early evening hours. Site Management and/or Maintenance Plans must be submitted to address any such matters, along with arrangements for upkeep of space and equipment over the lifetime of the development.

9.36 Activity and play need not be restricted to parks and other types of formal play spaces. Incidental play space can be provided where features of the urban environment are made more playable. This is particularly in areas with large-scale public realm (for example around town centres, stations and community facilities) where people of all ages are likely to visit. The design of the public realm must encourage everyone to move around freely and independently in active ways, having regard to the Healthy Streets Approach and relevant good practice guidance, such as Sport England's Active Design Guidance. Development proposals must assess how the design and configuration of spaces and buildings might function to impede or enhance safe access to play opportunities.

Chapter 10: Green and Blue Infrastructure

Section

GI1 Hertsmere's Green and Blue Infrastructure Network

GI2 Hertsmere's Watercourses and Blue Infrastructure

GI3 Local Nature Recovery Strategy

GI4 Protecting and Enhancing Biodiversity, Habitats and Ecological Networks

GI5 Protection from Environmental Pollution

GI6 Urban Greening, Trees and Landscaping

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GI1 Hertsmere's Green and Blue Infrastructure Network

Strategic objectives

A Delivering a better future for Hertsmere
G Securing a greener Borough
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Proposals for new development should protect, maintain, create and enhance existing habitats, and contribute towards a blue and green network that improves habitat connectivity and resilience, taking account of the Hertfordshire Local Nature Recovery Strategy (LNRS) and other local and national biodiversity evidence.

B Proposals for development must take account of the natural environment from the earliest stages of the design-led process, and:

i. Improve existing connections and create new links between existing green infrastructure assets, including nationally and locally designated or identified sites, and avoid fragmentation of the Borough's green and blue infrastructure network to support a multifunctional and connected network across the Borough.

ii. Safeguard and create priority habitats within green and blue infrastructure, as well as the safeguard priority areas for habitat enhancement regarding the Hertfordshire Local Nature Recovery Strategy, in accordance with Policy GI3 Local Nature Recovery Strategy.

iii. Investigate and maximise opportunities to retain, enhance and create green infrastructure as an integral part of site design, having regard to the Hertsmere Green and Blue Infrastructure Study[1], Natural England's Green Infrastructure Framework, and other relevant evidence.

iv. Conserve and, where appropriate, enhance the character, quality and condition of the Borough's landscapes, having regard to the Hertsmere Landscape Sensitivity and Visual Impact Assessment, Landscape Character Assessments and other relevant evidence.

v. Respond positively to landforms including by retaining or enhancing landscape features of historic, ecological and visual amenity value.

vi. Protect and enhance ecological connectivity, including links between habitats, open spaces, waterways, the wider countryside and neighbouring authorities where appropriate, having regard to the Hertfordshire Local Nature Recovery Strategy.

vii. Incorporate multifunctional green and blue infrastructure that contributes towards biodiversity recovery, climate change mitigation and adaptation, sustainable drainage, improved air quality, recreation, active travel and healthier communities.

viii. Make suitable arrangements for the long-term management, maintenance and stewardship of green and blue infrastructure, including existing and newly created planting, woodland, trees, sustainable drainage, and other landscape features.

ix. Where appropriate, improve public access to green and blue infrastructure and strengthen connections between settlements, neighbourhoods, open spaces, rights of way, water bodies and the wider countryside, where this is compatible with the protection of biodiversity and other environmental assets.

C Development proposals that would result in the fragmentation, deterioration or unjustified loss of strategically important green infrastructure, or prejudice opportunities to strengthen the Borough's green infrastructure network, will not be supported unless it can be demonstrated that the harm is clearly outweighed by other material planning considerations, and appropriate mitigation or compensation has been secured in line with the mitigation hierarchy.

Explanation

10.1 Hertsmere's network of green and blue infrastructure is a fundamental component of Hertsmere's natural environment. It contributes to the Borough's distinctive landscape, biodiversity, heritage, climate resilience, health and wellbeing, and supports sustainable, attractive and inclusive places. The integration of the Borough’s green and blue infrastructure networks will contribute towards meeting growth needs, and successful and sustainable place-making.

10.2 The natural environment is a critical determinant of health. Access to nature and green spaces is important for physical activity and mental wellbeing. It is also important that environmental risks such as air pollution, flooding and extreme heat are mitigated to prevent harm to public health, especially in respect of the Borough’s vulnerable groups and areas of high deprivation.

10.3 Green and blue infrastructure refers to the Borough’s network of green and open spaces, waterways, street trees, green roofs, public and private residential gardens, allotments and other assets, such as semi-natural and natural drainage features. It includes parks and public spaces as well as private gardens and other spaces with vegetation. Together these elements of the environment help to support strategic objectives across several policy areas such as promoting public health and wellbeing, mitigating against and adapting to the impacts of climate change (including by reducing flood risk), improving air and water quality, and conserving natural habitats and species. A strategic approach to green infrastructure is necessary to ensure that green assets are protected, planned for, designed and

managed in an integrated way. Green infrastructure must not be considered in isolation of other aspects of the built environment.

10.4 Green and blue infrastructure covers a broad range of land use types that are not always necessarily wildlife rich. For that reason, the Borough's local wildlife-rich habitats, and wider ecological networks are important for successful and sustainable place-making.

10.5 The Borough's green and blue infrastructure provides multifunctional resources that contribute to biodiversity recovery, landscape character, climate resilience, sustainable water management, carbon storage, improved air and water quality, recreation, active travel, and the health and wellbeing of communities. Planning for green infrastructure as an integrated network helps to ensure these multiple benefits are delivered efficiently and supports the creation of sustainable, resilient and attractive places.

Local Nature Recovery Strategy

10.6 The Levelling Up and Regeneration Act (LURA) 2023 states that local plans must take account of Local Nature Recovery Strategies (LNRSs). National planning policy states that Local Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale.

10.7 The Council strongly supports the integration of the following standards within new development, in line with Natural England's Green Infrastructure Framework1:

- Green Infrastructure Strategy
- Accessible Greenspace Standard
- Urban Nature Recovery Standard
- Urban Greening Factor (UGF)
- Urban Tree Canopy Standard

10.8 The Council considers the Green Infrastructure Strategy Standard as a useful tool to assist local authorities in strategically planning their green infrastructure provision as part of a Green Infrastructure strategy and study, as well as supporting the delivery of high-quality green space within major developments.

[1] Natural England's Green Infrastructure Framework

GI2 Hertsmere's Watercourses and Blue Infrastructure

Strategic objectives

A Delivering a better future for Hertsmere
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Hertsmere's watercourses and blue infrastructure provide multifunctional social, economic and environmental benefits that support sustainable neighbourhoods and communities. Development proposals should identify and respond positively to the unique attributes of waterways, considering:

i. Environmental function and ecological qualities of blue infrastructure;

ii. Safeguarding and creating priority habitats within blue infrastructure, in particular protecting and enhancing the ecological quality of the borough's chalk streams;

iii. Safeguarding priority areas for habitat enhancement in the Local Nature Recovery Strategy, in accordance with Policy GI3 Local Nature Recovery Strategy;

iv. Contribution to the Borough's network of open spaces;

v. Recreational and amenity value;

vi. Distinctive features that help to shape and reinforce the Borough's physical, cultural and historical character; and

vii. Support for the visitor economy.

B Development proposals on-sites containing or adjacent to a main river, ordinary watercourse or other water space must:

i. Maintain an undeveloped buffer zone of at least 10m that is designed and managed for the benefit of ecology and biodiversity, and includes a long-term landscape and ecological management plan which includes the management of invasive non-native species (INNS);

ii. Investigate and maximise opportunities to enhance or restore river channels and their riparian zones, flood flow pathways, floodplains and other natural flood management features with the objective of returning them to their natural state wherever possible;

iii. Incorporate measures to enhance the ecological value of water spaces, including integrating riparian planting, wet woodland and soil protection where these are ecologically appropriate, and removing artificial structures

that act as barriers to the movement of animal species, including de-culverting where feasible.

iv. Not include buildings that introduce permanent overshading to a watercourse, propose the culverting of a watercourse, or prejudice future opportunities for de-culverting;

v. Incorporate measures to enhance the amenity, recreational and historic value of water spaces, including enhancing public access to these spaces. Where access to a watercourse is proposed the development must include appropriate zoning to establish areas for people and areas for wildlife as agreed by the Environment Agency'; and

vi. Contribute to a safe riverside environment by making appropriate provision for riparian life-saving equipment such as grab chains, access ladders, life buoys, along with information signage and CCTV.

vii. Protect hydrology, soil conditions and natural drainage patterns, especially in situations when nearby woodland, wet habitats or veteran trees may be affected. Applicants should assess and avoid impacts on adjacent habitats arising from changes in runoff, drainage, water levels or ground conditions.

viii. Give preference to flood mitigation measures which restore and work with natural processes and favour Natural Flood Management techniques (NFM). Sustainable drainage solutions should minimise the requirement for hard engineering to rivers. SUDs features should be designed so that they have biodiversity value in addition to their flood management function.

Explanation

10.9 The Council considers that the Borough's watercourses and blue infrastructure provide multifunctional social, economic and environmental benefits that support sustainable neighbourhoods and communities. They can make a valuable contribution towards successful and sustainable place-making. In this policy, a watercourse includes Main Rivers (as defined by the Environment Agency) and ordinary watercourses. Ordinary watercourses are passages of water that do not form part of a Main River; they can include streams; ditches, drains, mills, dams, culverts and weirs.

10.10 It is acknowledged that Hertfordshire has a variety of different habitats that are worthy of protection. Within the context of the Borough's watercourses there is an established international and national responsibility for protecting its special chalk rivers and their unique ecology. It is highlighted that there are only 260 chalk streams globally, and Hertfordshire is the custodian of about 10% of that resource.

10.11 It is further noted that not all chalk streams are fully recognised/protected by statutory or non-statutory designations. Rivers, chalk streams and floodplains are an important element of the Hertfordshire Nature Recovery Strategy. Consequently,

the Council agrees that it is important that local plans explicitly recognise them as a priority habitat reflected by policy.

Development Proposals Involving Watercourses

10.12 The policy seeks at least a 10m undeveloped buffer zone between new development and watercourses and blue infrastructure. This is in accordance with the definition of a riparian zone set out in the Statutory Biodiversity Net Gain metric. This width ensures development does not encroach on waterways, potentially damaging banks, and provides the minimum width of habitat needed to provide for the functioning of wildlife habitats and reduce the levels of diffuse pollution reaching the watercourse. There may be instances where a smaller buffer is agreed with those proposing development, where circumstances demonstrably merit. Nevertheless, at least a 10m undeveloped buffer should be considered the standard.

10.13 Riparian zones support the ecological functioning of watercourses, providing habitat, buffering watercourses from disturbance and pollution, improving water quality, and supporting natural flood management.

10.14 Opportunities for de-culverting of watercourses should be actively pursued as an integral part of associated development proposals. Planning permission will be granted for proposals that do not involve the culverting of watercourses, and which do not prejudice future opportunities for de-culverting. Where this is clearly demonstrated not to be possible, planning obligations will be used to secure funding to help enable enhancement works to sections of watercourse in the vicinity.

10.15 De-culverting watercourses can provide a range of benefits. These include:

- Improved biodiversity, habitat connectivity and climate resilience;
- Reduced flood risk from blockages or collapse and slowing the flow; and
- Improved social health and mental wellbeing through amenity and access to nature, urban cooling, improved air and water quality by filtration of air and water by aquatic and riparian vegetation.

10.16 As part of the plan-making process, the Council notes the Environment Agency's opposition in principle to the culverting of watercourses, due to the potential adverse ecological, flood risk, geomorphological, human safety and aesthetic impacts. It is understood that changes to national planning policy will include measures that seek to prevent the enclosure of watercourses and encourage their de-culverting and the re-naturalising of river channels. These measures are intended to deliver multiple social and environmental benefits of re-naturalising rivers, including improvements to water management.

10.17 Proposals for development must ensure that new buildings do not overshadow a watercourse. This is necessary because excessive shade inhibits aquatic plant growth which can lead to a loss of biodiversity and a decrease in water quality due to loss of filtration and oxygenation provided by aquatic plants. It can also lead to the loss of riparian vegetation which prevents bank erosion and maintains water quality by filtering run-off.

GI3 Local Nature Recovery Strategy

Strategic objectives

A Delivering a better future for Hertsmere
G Securing a greener Borough
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A A Proposals for development that deliver the objectives of the Hertfordshire Local Nature Recovery Strategy (LNRS) and improve the connectivity and resilience of biodiversity, including Local Wildlife Sites and Local Nature Reserves, will be supported.

B The Council will consider the Hertfordshire LNRS as part of its on-going plan-making and decision-taking responsibilities. Development proposals should support the delivery of the Hertfordshire LNRS's priorities by:

i. Avoiding harm to areas identified as important for biodiversity;

ii. Contributing to habitat creation, restoration and enhancement in areas identified as opportunities for nature recovery;

iii. Supporting the establishment of a coherent Nature Recovery Network.

Explanation

10.18 The Hertfordshire Local Nature Recovery Strategy (LNRS) makes a commitment to restoring and enhancing nature across Hertfordshire and playing our part in the restoration of nature across England. It sets out a shared vision and identifies priority areas for investment and action, including protecting our ancient chalk streams. The partnership brings together organisations from the public, private and voluntary sectors, working closely with land managers, citizen scientists and local communities.

10.19 Earlier in 2026, the Government updated Natural Environment and Plan-making Planning Practice Guidance on LNRSs. These updates include references to how LNRSs will provide valuable evidence in support of the local plan-making process and how they can inform local planning authority decision-taking.

10.20 In response to these changes in national planning practice guidance, the Council has sought to embed the Hertfordshire Local Nature Recovery Strategy within the Hertsmere Local Plan. This approach is specifically reflected within the Local Plan's site allocations.

10.21 In addition, the policy seeks to ensure that the Hertfordshire Local Nature Recovery Strategy is a consideration and informs decision-taking in respect of development

proposals that are not identified as site allocations. The policy seeks to ensure that development proposals consider green space/ environment improvement projects set out within the Strategy. These can include, but are not limited to:

- Restoration and protection of swift populations within urban areas with an aim to promote connectivity between sites
- Restoration of wood pasture and veteran trees, taking account of opportunities to bolster protected sites such as Wormley Hoddesdon Park Wood SSSI/ SAC
- Creation and restoration of fens and reedbeds
- Creation and restoration of open and still waters

GI4 Protecting and Enhancing Biodiversity, Habitats and Ecological Networks

Strategic objectives

A Delivering a better future for Hertsmere
G Securing a greener Borough
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Proposals for development are expected to protect, maintain and where possible enhance sites that are important for nature conservation, habitats, and ecological networks.

B Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development will be supported where:

i. An up to date, proportionate, ecological survey and assessment demonstrate that the proposals would not result in a negative impact upon those species and habitats; and

ii. A minimum buffer of 10m of complementary habitat is provided to all retained priority habitats, except for woodland where a 15m buffer will be required.

C Proposals for development likely to result in loss or harm to designated and other important sites for biodiversity and geodiversity will only be supported where:

iii. The mitigation hierarchy has been followed, to firstly avoid, reduce and remediate direct and indirect adverse impacts before considering compensation as a last resort; and

iv. Exceptional circumstances demonstrate that public need for and benefit from the development outweigh the harm and are proportionate to the ecological importance of the site.

D Development proposals that deliver the Hertfordshire Nature Recovery Strategy, or other local nature recovery objectives and improve the connectivity and resilience of biodiversity, including Local Wildlife Sites and Local Nature Reserves, will be supported.

E Development resulting in the loss of irreplaceable habitats (such as Ancient Woodland or veteran trees) will be refused unless there are demonstrable exceptional reasons, and a suitable compensation strategy exist.

F All proposals for development must consider potential impacts upon notable species (including protected, priority (of principle importance under the Natural Environment and Rural Communities Act) or those which are suffering significant declines) and consider the need and potential for species recovery.

G Development proposals that have the potential to impact on designated international or national nature conservation-sites located outside of the Borough must ensure that impacts are assessed in accordance with the relevant legislative requirements. Proposals will be considered having regard to national planning policies and legislation.

H Planning conditions and/or legal agreements will be used to secure Management Plans where these are considered necessary to support nature conservation objectives.

Biodiversity Net Gain

I Relevant development proposals, as defined in national legislation (Environment Act 2021), must secure Biodiversity Net Gain of 20%. The Hertfordshire LNRS should inform the location and type of biodiversity net gain, with support given to measures that align with identified priorities and mapped opportunities.

Biodiversity Net Gain (BNG) will be calculated using the statutory Biodiversity Metric, and should:

v. Be fully integrated into the design-led approach from the earliest stages, with consideration to the site context and its wider landscape setting, including the linkages with the Local Nature Recovery Strategy.

vi. Be delivered onsite wherever possible, including enhancing existing on-site habitats and creating new on-site habitats. where Biodiversity Gain Sites are used, they should be located close to the development.

vii. Deliver gains that are significant at a local or landscape scale. Habitat enhancements should be designed to provide significant contributions to nature's recovery in line with the latest Local Nature Recovery Strategy.

J Where proposals involve the creation of significant natural areas and habitats integral to the development, they should be accompanied by a long-term

management and monitoring plan which must be approved by the Local Planning Authority.

K All development proposals where the habitats fall below the de minimis threshold for biodiversity net gain, should seek to incorporate biodiversity enhancements into designs.

Access to Nature

L Proposals for development that help to reduce deficiencies in the population's access to nature, using the Natural England Accessible Greenspace Standard, will be considered favourably.

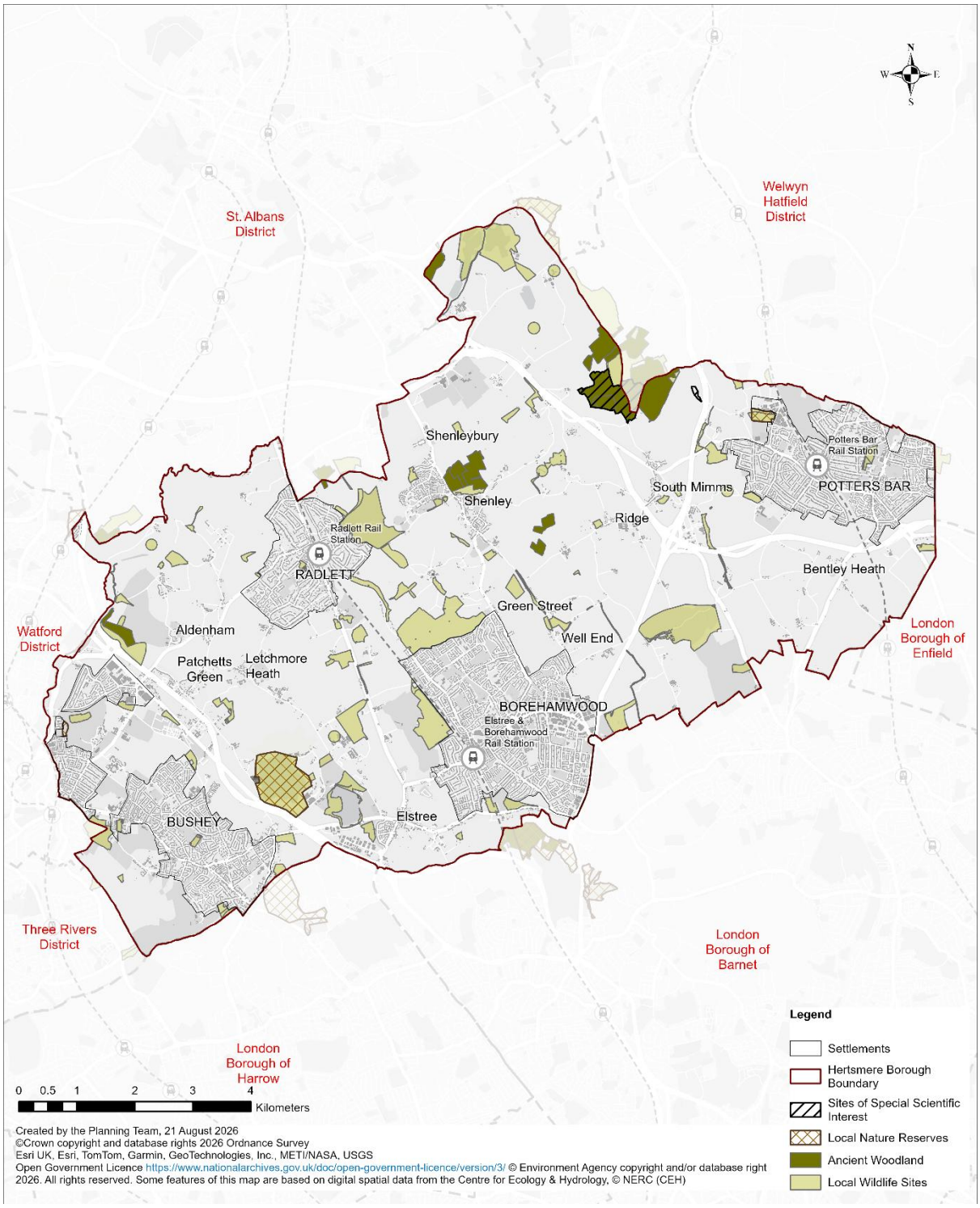

Figure 10.1: Designated Nature Conservation Sites

Explanation

10.22 The Borough has numerous natural assets, which make a significant contribution to the quality of life and identity of the local area. A number of these assets, such as Aldenham Country Park and Willows Farm, are also destinations for visitors from further afield.

10.23 Many habitats and species exist locally including woodland, neutral and other high value grassland, together with river corridors and small amounts of wetland and heathland - comprising a significant proportion of all heathlands in Hertfordshire.

10.24 The diverse range of natural and historic assets in the Borough includes both statutory national designations and sites and areas of local importance, including:

- Sites of Special Scientific Interest (SSSI)
- Local Nature Reserves
- Local Wildlife Sites
- Tree Preservation Orders
- Hedgerows
- Town and village greens
- Ecological links and green infrastructure
- Riparian habitats
- Grades 1, 2 and 3a Agricultural Land
- Minerals reserves (sand and gravel)
- Historic Parks, Gardens and Battlefields
- Watling Chase Community Forest ‘Gateway Sites’

10.25 It is highlighted that national planning policy draws attention to the difference between international, national and locally defined sites. Sites that are protected by statutory and non-statutory designations are regularly reviewed by other organisations such as the Wildlife Trust, Natural England, and Hertfordshire Ecology. Sites identified in the Hertsmere Local Plan are based upon the latest available information. The status of a site is based on its designation, taking account of its context in the local environment, the setting of the Borough and the wider ecological network.

10.26 The Council supports habitat conservation, improvement and extension, species recovery and where necessary mitigation measures. It is important to retain the ecological, geological and biodiversity benefits of sites. Policies also seek protection of species. Where it has been identified that a habitat or species protected in European or Statutory legislation could be affected by a proposed development, the Council will require sufficient survey information and mitigation or compensation proposals at the time the application is submitted. This is to ensure that an assessment is undertaken of the possible impacts, any appropriate mitigation or compensatory measures, including planning obligations, and future management of the site and any protected species.

Biodiversity Net Gain

10.27 The Council requires a 20% increase in habitat value for wildlife compared with the pre-development baseline, to make a meaningful contribution to coherent ecological networks. The need to deliver Biodiversity Net Gain (BNG) applies to types of development defined in the Environment Act 2021 and any subsequent updates to this legislation.

10.28 The Council notes that many commentators have expressed concerns that, due to the risks involved, the statutory minimum 10% requirement does little more than achieve a position of 'no net harm' to biodiversity. Natural England has admitted publicly and in Defra's impact assessment that the 10% BNG target is likely to only balance out nature loss, not secure nature gain, meaning that higher ambition is needed to secure any notable increase in nature recovery.

10.29 It is highlighted that local authorities are legally allowed to set requirements for gain above 10%. However, national guidance says that local authorities should not set requirements above the legally required 10% for BNG unless justified2.

10.30 Technical evidence prepared in support of the Hertsmere Local Plan3 assessed development viability based on providing 20% BNG. The cost of providing 20% BNG is taken to be 150% of the cost of 10% BNG. The assessment concluded that the requirement for 20% BNG would not adversely impact on most of the proposed allocations' capacity and has been considered when estimating site capacity. It is noted that most of the sites under consideration are in arable production or are improved grassland and so have a relatively low BNG baseline.

Access to nature

10.31 Green infrastructure has a critical role to play in improving health and wellbeing. The Local Plan seeks to ensure that new development contributes to the delivery of the government's target that every household is within 15 minutes of good quality green infrastructure. The delivery of connected green infrastructure networks will ensure a joined-up approach between policy areas, such as health and active travel planning, by providing green corridors and cycleways.

10.32 Access to nature for people can be assured using the established Natural England Accessible Greenspace Standard4, part of Natural England's Green Infrastructure Framework. This includes measures to ensure that greenspaces include a degree of naturalness, providing contact with nature and contributing to nature recovery networks.

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[2] NPPG Paragraph: 006 Reference ID: 74-006-20240214
[3] Hertsmere Whole Plan Viability Assessment (AECOM/ HDH Planning and Development, September 2026)
[4] Green Infrastructure Strategy Standard

GI5 Protection from Environmental Pollution

Strategic objectives

A Delivering a better future for Hertsmere
H Responding to the climate emergency
J Healthy and safe communities

Strategic Policy

A Development proposals that would cause harm to the environment or neighbouring land or properties from a significant increase in pollution (into the air, soil or any water body) by virtue of the emissions of fumes, particles, effluent, radiation, smell, heat, light, noise or noxious substances, will not be permitted.

B Development proposals must ensure that neighbouring land, properties and uses are not adversely affected by environmental pollution, including cumulative effects, in accordance with the 'agent of change' principle. Appropriate mitigation must be demonstrated for any remaining adverse impacts.

C The design of development must locate environmentally vulnerable or sensitive groups, and associated key facilities and services, in areas that minimise exposure to emissions.

Air pollution

D Development will be expected to minimise potential adverse impacts on air quality and where possible identify measures where it can be improved by:

i. Incorporating Public Health England's 'net health gain' principles and Hertfordshire's Health and Wellbeing Planning Guidance into designs;

ii. Supporting improvements identified for Air Quality Management Areas (AQMAs) set out within Air Quality Action Plans and Strategies;

iii. For developments likely to result in breaches of a relevant limit value or national objective for pollutants or located within or near an Air Quality Management Area and could harm air quality standards (including cumulative impact), provide an air quality report assessing the impacts of the proposed development on the surrounding environment. Proposals for mitigation or avoidance must be provided where it is predicted that a limit value or objective will be exceeded, to be agreed with Environmental Health and appropriately secured; and

iv. Being in accordance with any further Council guidance on air quality.

Soil pollution and land contamination

E Development will be expected to reduce the health and environmental impact of contaminated land and soil pollution by:

i. Maintaining soil quality standards and remediating contaminated land in line with Environment Agency, Defra and Natural England guidance;

ii. Where there is a risk of harm to receptors and the land, soil, ground or surface water is known or suspected to be contaminated, a preliminary land contamination risk assessment must be submitted. Advice will be taken from Environmental Health on the need for any further intrusive site investigation, remedial measures and validation report that may need to be secured by planning condition to ensure that the site is made suitable and safe for the proposed use before development can proceed; and

iii. Taking advice on the storage and handling of hazardous substances from the Health and Safety Executive and the Environment Agency as the statutory Competent Authority.

Water pollution

F Development proposals should adhere to the objectives of the Thames River Basin Management Plan. As such, development proposals must ensure that works do not result in any deterioration within water bodies, and that the development does not prevent the attainment of good status/potential. Consideration must be given to all quality elements including biological, physico-chemical, hydromorphological, and chemical.

G A Water Framework Directive Assessment must be carried out for any development which may impact a waterbody, whether surface water or groundwater.

H For developments involving new or altered foul drainage, a Foul Drainage Assessment must be submitted. Discharge to non-mains drainage will only be permitted where satisfactory justification has been provided to show that connection to mains drainage is not feasible, the non-mains system will not cause pollution of groundwater or surface water, Building Regulations Approved Document H will be met as necessary, confirmation from the Environment Agency that an Environment Permit could be issued where necessary, and adequate details of maintenance of the system have been provided.

I Development which could adversely affect the quality of groundwater, including and specifically within Source Protection Zones, will not be permitted.

Noise pollution

J J Development will be expected to minimise the impact of noise on the surrounding environment and noise sensitive receptors. This will be achieved by:

Developments that are noise sensitive and in locations where surrounding existing lawful land uses are likely to have an adverse effect on the occupants of new development, must submit an appropriate noise impact assessment including mitigation measures to address the identified impacts;

Where it is achievable to offset the adverse impact of noise and to protect existing / future sensitive receptors, applications for new development shall be supported by an assessment of the typical worst case noise impact and consideration of achievable mitigation measures to ensure adequate protection of those sensitive receptors. Where the impact cannot be offset then development should be avoided;

Good design must be used to improve and enhance the acoustic environment and reduce the impact of noise on and generated by the development, in accordance with the High-Quality Design policies in this Plan; and

The development of land for noisy countryside sports will only be permitted where:

i. The activity would not adversely affect noise sensitive receptors nearby;

ii. There would be no adverse impacts on wildlife and areas of ecological value;

iii. The scale and nature of the activity respects the countryside setting and surrounding area;

iv. The safety of adjoining users is not prejudiced; and

v. The enjoyment of users of public rights of way/the countryside would not be significantly adversely affected.

Light pollution

K Development proposals for new exterior lighting schemes will be expected to demonstrate that there would be no significant (or material) adverse impact upon important features of the urban and rural environment including a dark skies landscape, the amenity of residential areas, wildlife habitats and biodiversity, and the character of the natural and historic environment.

Where exterior lighting is a health and safety requirement of the development, lighting must be kept to the minimum level required.

Exterior lighting must be avoided in any identified areas that are important to be kept dark for wildlife.

All lighting schemes must:

i. Avoid dazzle and disturbance to highway users;

ii. Minimise sky glow, glare, light spillage and light intrusion;

iii. Minimise light pollution to watercourses, achieving less than 2 lux within 10m of the top of the bank of the river wherever possible;

iv. Minimise light pollution along existing and newly planted hedgerows; and

v. Minimise impacts on nocturnal wildlife.

All proposals including an exterior lighting scheme must submit a lighting statement by a qualified lighting professional. This should clearly show light impacts on all affected sensitive environmental and ecological receptors including sensitive landscapes/streetscapes, rivers, river corridors, hedgerows and ancient woodlands.

Explanation

10.33 The Environment Act 2021 enables the Government to set new long-term targets in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction, as well as a target for fine particulate matter, and establishes a new framework of environmental protection.

10.34 Planning plays a key role in preventing polluting emissions and limiting their impact on communities. National planning policy directs plan-making and decision-taking to consider contamination5, noise and light pollution6, and pollutants7 when assessing the suitability of a site or development. New development is also expected to be compatible with the existing uses of the area and not lead to neighbouring activities being restricted8.

10.35 In Hertsmere special consideration needs to be given to the following matters as part of the consideration of development proposals:

- the quality of the groundwater supplying the chalk aquifer;
- the maintenance of higher quality agricultural areas and the sand and gravel belt;
- limiting the effects of noise and air pollution along major routes (i.e. M25, M1 and A1(M) corridors and national rail routes);
- limiting light pollution, especially in the rural parts of the Borough; and
- ensuring that development land affected by ground contamination is safe and suitable for its proposed use to protect human health and the wider environment.

Water pollution

10.36 The Water Framework Directive is implemented through River Basin Management Plans (RBMPs), specifically under the Water Framework Directive Regulation 33.

[5] NPPF Paragraphs 189 and 190 (December 2024)
[6] NPPF Paragraphs 190 and 191 (December 2024)
[7] NPPF Paragraph 192 (December 2024)
[8] NPPF Paragraph 193 (December 2024)

Consequently, the Council has a legal responsibility to have regard to the Thames River Basin Management Plan, which seeks to prevent the deterioration of the status of water bodies and aims to achieve good status for all water bodies, including groundwater.

10.37 All improvements to water bodies should aim to achieve good status/potential. Development should reduce physical modification to any water body, prevent culverting, and introduce and protect buffer zones.

10.38 A Water Framework Directive Assessment (WFDA) is essential to fully understand and adequately address any impacts the development and its activities may have on the surrounding water bodies. The WFDA objectives are set out in Regulation 13 of The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.

10.39 The WFDA covers all waters, including surface waters (such as rivers, lakes and canals) and groundwaters, including undesignated WFD water bodies. This includes main rivers and ordinary watercourses. For surface waters, the water body includes all the land within the defined area, not just the wet environment. For instance, a water body might include all the land which drains into a watercourse, tributaries, a lake, a stretch of coastal water, and/or a groundwater unit.

Mitigating light impacts

10.40 Lighting statements must be produced by a qualified lighting professional and include full details (supported by plans and drawings) of all aspects of the installation, including siting, luminaire and lamp type, brightness, lux contours/distribution diagrams, column height and design, and proposed finished colour(s), dimming control and hours of luminance. This should clearly show light contours and lux levels on all affected sensitive environmental and ecological receptors including sensitive landscapes/streetscapes, rivers, river corridors, hedgerows and ancient woodlands.

GI6 Urban Greening, Trees and Landscaping

Strategic objectives

A Delivering a better future for Hertsmere
G Securing a greener Borough
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-strategic Policy

A Proposals for development must demonstrate how the design-led approach has been used to maximise opportunities for urban greening. This includes the integration of high-quality and species diverse landscaping, hedges, street trees, wildlife habitat, green roofs and walls and Sustainable Drainage Systems including rain gardens and tree pits. These features must:

i. benefit priority or threatened urban species, such as swifts, bats and hedgehogs;

ii. be designed with consideration given to the site context and the wider landscape setting as well as the layout, design, construction and long-term management of buildings and spaces;

iii. be designed regarding the latest industry good practice guidance to help ensure that green roofs and walls are designed to maximise environmental benefits and will function effectively over the lifetime of the development.

B Development proposals must respond positively to landforms including by retaining or enhancing landscape features of historic, ecological and visual amenity value.

C Major development proposals must increase green cover on-site to achieve the recommended target Urban Greening Factor (UGF) in the Natural England Green Infrastructure Framework, unless it can be suitably demonstrated that this is not feasible. Major development should meet National Urban Greening Factors of at least 0.3 for commercial development, 0.4 for residential development, (and, where appropriate, 0.5 for residential greenfield development). Existing green cover retained on-site will count towards the target score. Planning contributions may be sought where the target UGF is not achieved.

D Where it is not possible to incorporate these measures, major development proposals must demonstrate that the feasibility of integrating these measures has been fully investigated. Minor development proposals are strongly encouraged to incorporate them.

E Integral Swift and bat bricks should be incorporated within all new buildings at a ratio of one brick per dwelling.

Trees

F Development proposals must seek to retain existing trees as well as the associated habitat. They should also maximise opportunities for additional tree planting particularly in urbanised locations such as streets and town centres and seek to meet the Urban Tree Canopy Standard. Development proposals must demonstrate that they will:

i. Provide for the sensitive integration of all trees whilst ensuring any new or replacement on-site provision is of a high ecological quality (including appropriate species, stem girth and life expectancy) and contributes positively to the microclimate;

ii. Protect veteran trees and ancient woodland;

iii. Retain trees of quality and associated habitat, wherever possible, with appropriate arrangements to secure their protection throughout demolition, construction, and external works, to the occupation stage of development;

iv. Avoid the loss of, and mitigate against adverse impacts on, trees of significant ecological, amenity and historical value;

v. Ensure building foundations are sufficient to be climate change resilient in proximity to trees; and

vi. Ensure adequate replacement tree planting where the retention of trees is not reasonably practical, with replacement provision that meets the requirements of (a) above.

G Development proposals must look to retain protected trees (i.e. those covered by a Tree Preservation Order and trees within Conservation Areas). Developments should avoid imposing detrimental impacts on the health of protected trees and visual amenity they provide. The Council may identify and seek to protect trees that are of a significant amenity, heritage, ecological, or other value through the development management process.

Landscaping

H Major development proposals, and where appropriate other development proposals, will be required to submit a Landscape Design Strategy and Arboriculture Survey to demonstrate that landscaping and other urban greening measures are appropriate to the site, can be implemented effectively and will be suitably managed over the lifetime of the development.

Explanation

10.41 Urban greening is a term used to describe a wide range of measures that can be incorporated into buildings and spaces to increase green cover in the Borough. These measures include but are not limited to tree planting, naturalised biodiverse landscaping, green roofs and walls, hedges, climbers, plants for pollinators, de-paving, rain gardens and sustainable drainage systems using natural or semi-natural features. Urban greening can provide multifunctional benefits such as for climate change resilience, amenity including air quality, nature conservation and local character.

10.42 The Council is seeking to meet the Urban Greening Factor (UGF) requirement for major developments as set by the Urban Greening Factor Standard. The UGF is a model used to provide a baseline for green cover that development will be expected to achieve, considering various site development factors. We will apply the recommended UGF factors for major residential and commercial development as set out in the national UGF Standard. Existing green cover retained on-site as part of a development proposal will count towards the target UGF score. Relevant major development proposals should meet and seek to exceed the target score. Some flexibility may be applied on a case-by-case basis where it is suitably demonstrated that the target cannot be achieved for reasons of technical feasibility or financial viability, in which case proposals should show that they have been designed to achieve the highest score possible.

10.43 Green roofs and walls will normally be required as part of the package of urban greening measures delivered on-site. They will be supported where they appropriately respond to local character and comply with other Local Plan policies. This includes consideration for the historic environment, where development must preserve the significance of heritage assets. Green roof assembly should as a minimum consist of a root repellent system, a drainage system, a filtering layer, a growing medium and plants, and be installed on a waterproof membrane on an applicable roof. Buildings should be designed to have sufficient structural capacity and integrity to resist all loads from soil, moisture, plants, rain and wind uplift, safely, effectively and permanently. It is important that living roofs are included in the early planning and design stage and supported by a qualified and accredited installer. Green roofs should be designed with photovoltaic panels. Development proposals must demonstrate how the installation and maintenance will comply with the latest industry standards, currently the Green Roof Code of Best Practice for the UK 2014, or any national equivalent.

10.44 Swifts are summer migrants to the UK and a familiar species in urban areas, but their numbers declined by 62% between 1995 and 2021 and they are now on the Red List of Birds of Conservation Concern. The loss of suitable nesting sites when buildings are renovated or demolished is likely to be a key factor in their decline, so providing integral swift bricks (which are more durable and less obtrusive than external boxes) in new buildings is an easy and cheap solution. Even when they are not used by Swifts, they benefit other red listed urban species such as House Sparrows, Starlings and House Martins. Until they are mandated through building

regulations, local plans have an important role to play by requiring them in all new buildings. For housing developments this should be at a ratio of one brick per dwelling, as recommended by National Planning Practice Guidance.

10.45 All species of bats are legally protected and, like Swifts, have suffered population decline which may be due in part to the loss of roosting sites in modern buildings. Integral bat bricks are part of the solution for new developments.

Trees

10.46 Trees and woodland are an integral part of the Borough's network of green infrastructure and have many beneficial functions. In addition to enhancing local character and amenity, including air quality, they provide extensive areas of habitat for wildlife. Trees also have an important role in climate change adaptation and mitigation. For example, they reduce strain on drainage systems by absorbing rainfall and enable positive microclimatic effects through cover and shade.

10.47 Trees should be considered at the early stages of the design-led approach to maximise their many beneficial effects. Where development proposals include elements of public realm, tree provision must be commensurate with the nature and scale of development. Development proposals will be expected to retain and protect existing trees, ensuring they can be sustained over the long-term. This includes trees of quality which are Category A and B trees as defined by British Standard BS5837:2012 and Category C & U trees within biodiverse habitat areas. New development should not result in an unacceptable harm to or loss of trees, particularly where these are protected by a Tree Preservation Order, are in a Conservation Area or make a significant contribution to local ecology, public amenity and local character, including historic character. Whilst acknowledging the Council has limited control in terms of the protection of trees in private residential gardens, it will seek to promote the multifunctional benefits of trees and prevent the loss of trees wherever possible.

10.48 Where it can be suitably demonstrated that the loss of a tree is acceptable, such as when the tree is considered dangerous to the public or where its removal is necessary to secure site redevelopment consistent with the spatial strategy, then replacement planting will be required. Priority will be given to on-site replacement unless it can be demonstrated there are exceptional circumstances which necessitate off-site provision, in which case planning contributions may be sought. When a financial obligation is required for replacement trees the value may be calculated using the Capital Asset Value for Amenity Trees (CAVAT) or a similar methodology. Financial contributions will be expected to include on-going maintenance costs where trees are planted in the public realm.

10.49 New or replacement species should be selected to avoid the risk of decline or death arising from increases in non-native pests and diseases. When purchasing trees, they should be responsibly sourced ideally from a domestic nursery with UK grown or imported trees appropriately quarantined for a minimum of one year within the UK before sale. This ensures plant health and non-infection by foreign pests or disease.

10.50 The Council makes Tree Preservation Orders (TPOs) to protect specific trees or areas, groups or woodland with amenity value from deliberate damage and destruction. If a tree is subject to a TPO, consent will be required before any work that might affect the tree can be carried out. It is a criminal offence to prune, fell or damage protected trees without appropriate consent, and the Council will enforce breaches in accordance with relevant policy and legislation.

Landscape design strategy

10.51 A site's landscape and its relationship to existing and future development, and immediate surrounds, should be considered comprehensively from the start of the design-led approach. Proposals should have regard to the existing character of the site including landform and features of the natural landscape (such as trees on or in proximity to the site). Where existing landscapes contribute to local distinctiveness, development should respond positively to those features.

10.52 A Landscape Design Strategy must be included with all major development proposals and proposals for sites where a Tree Preservation Order is in place. Other applications may also be required to provide this information having regard to individual site circumstances and the biodiversity interests involved. The Landscape Design Strategy must include an assessment of the relevant site features and nature conservation interests, details of work required to ensure the successful implementation of the strategy, and a Management Plan.

10.53 The Management Plan should address maintenance of hard and soft landscaping features over the lifetime of the development, with specific details covering a minimum 5-year period from occupation. Considerations may include: planting plans with species, frequency of maintenance operations such as weeding, irrigation and the use of hydration bags for trees, checking stakes and ties, plant condition, mowing times for long grass sward areas, materials and minimising hard surfacing, details of building subsidence and other liabilities such as climate change resilient foundations within zone of influence of trees, permeable surfacing and Sustainable Drainage Systems, wildlife connectivity such as hedges for boundary treatment and hedgehog gaps when fencing is used, underground services and infrastructure in relation to root protection areas of existing trees and new tree planting areas, security and access arrangements to landscaped areas.

10.54 Arboriculture Surveys should be undertaken separately and help to inform the Landscape Design Strategy, where one is required. Surveys should provide details of existing species (with information on spread, roots and position of trees), details of trees affected by the development (including measures to be taken to protect retained trees during the construction process), and other plans for the positive management of trees. Plans and documents will be expected to be submitted in accordance with the British Standards 5837 (2012).

GI7 Open Space

Strategic objectives

A Delivering a better future for Hertsmere
G Securing a greener Borough
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A A Open spaces form an integral part of Hertsmere's green infrastructure network and contribute to the Borough's landscape character, biodiversity, health and wellbeing, climate resilience and the creation of sustainable communities. The Council will protect, enhance and expand the Borough's network of publicly accessible open spaces to meet the needs of existing and future communities.

Protecting Open Space

B Development proposals resulting in the loss of, or harm to, existing open space, including publicly accessible parks, recreation grounds, natural and semi-natural greenspace, amenity greenspace, allotments, playing fields and other designated open spaces, will only be permitted in the following exceptional circumstances:

i. The open space is surplus to current and future requirements, having regard to the Council's Open Space Assessment and other relevant evidence;

ii. Replacement provision of at least equivalent quantity, quality and accessibility is provided in a suitable location that serves the same community; or

iii. The development would deliver substantial public benefits that clearly outweigh the loss of the open space;

iv. There will be no adverse impact on biodiversity;

v. Suitable replacement provision will be made for outdoor sports facilities or playing fields, as well as allotments and community gardens where appropriate; and

vi. Where the development involves part of an area of open space the quality of any remaining open space will not be eroded by the development.

C Where replacement provision is required, it should be available for use before the loss of the existing open space unless otherwise agreed by the Council.

New Open Space Provision

D Development proposals shall deliver new or enhanced open space where their provision is required to meet the needs arising from the development, having regard to the Council's Open Space Assessment, Natural England's Accessible Greenspace Standard and the scale and nature of the proposal.

E Major development proposals should incorporate publicly accessible open space within the site wherever practicable and demonstrate that open space has been planned, as part of the master planning and/ or design-led process, as an integral component of the development from the outset.

F Where on-site provision is demonstrated to be impracticable or inappropriate, appropriate off-site provision or financial contributions towards improving existing open spaces may be secured where they would address identified deficiencies.

Quality and Function

G New and enhanced open spaces should:

i. be safe, inclusive and accessible to all users;

ii. be multifunctional and contribute towards recreation, biodiversity, climate resilience and sustainable drainage where appropriate;

iii. respond positively to local landscape character and townscape;

iv. integrate with the Borough's wider green infrastructure network;

v. incorporate appropriate arrangements for their long-term management and maintenance; and

vi. use the Natural England Accessible Greenspace Standard to ensure that everyone has access to good quality green and blue spaces close to home for health and wellbeing and contact with nature.

Improving the Open Space Network

H Development proposals should:

i. Contribute, where appropriate, to improving the quality, accessibility and connectivity of Hertsmere's open space network, particularly within areas identified by the Council as experiencing deficiencies in open space provision.

ii. Provide or improve accessible natural greenspace, including woodland and semi-natural habitats

iii. Where adjacent to open space, protect and, where possible, enhance its character, biodiversity, recreational function, accessibility and visual amenity.

Ancillary uses

I Development proposals for ancillary uses on open space that help to improve the quality of open space and promote access to a wide range of users will be supported where they:

i. Are demonstrably ancillary to the use of land as open space;

ii. Are necessary to facilitate or support the appropriate use of the open space;

iii. Do not have a detrimental impact on the environmental function of the open space, including support for nature conservation;

iv. Respond positively to local character, including by maintaining or enhancing the visual quality of the open space and its setting;

v. Are of a scale and function that is proportionate to the nature of the open space; and

vi. Are of a high-quality design, including by following inclusive and safe design principles, and do not detract from the amenity provided by the open space.

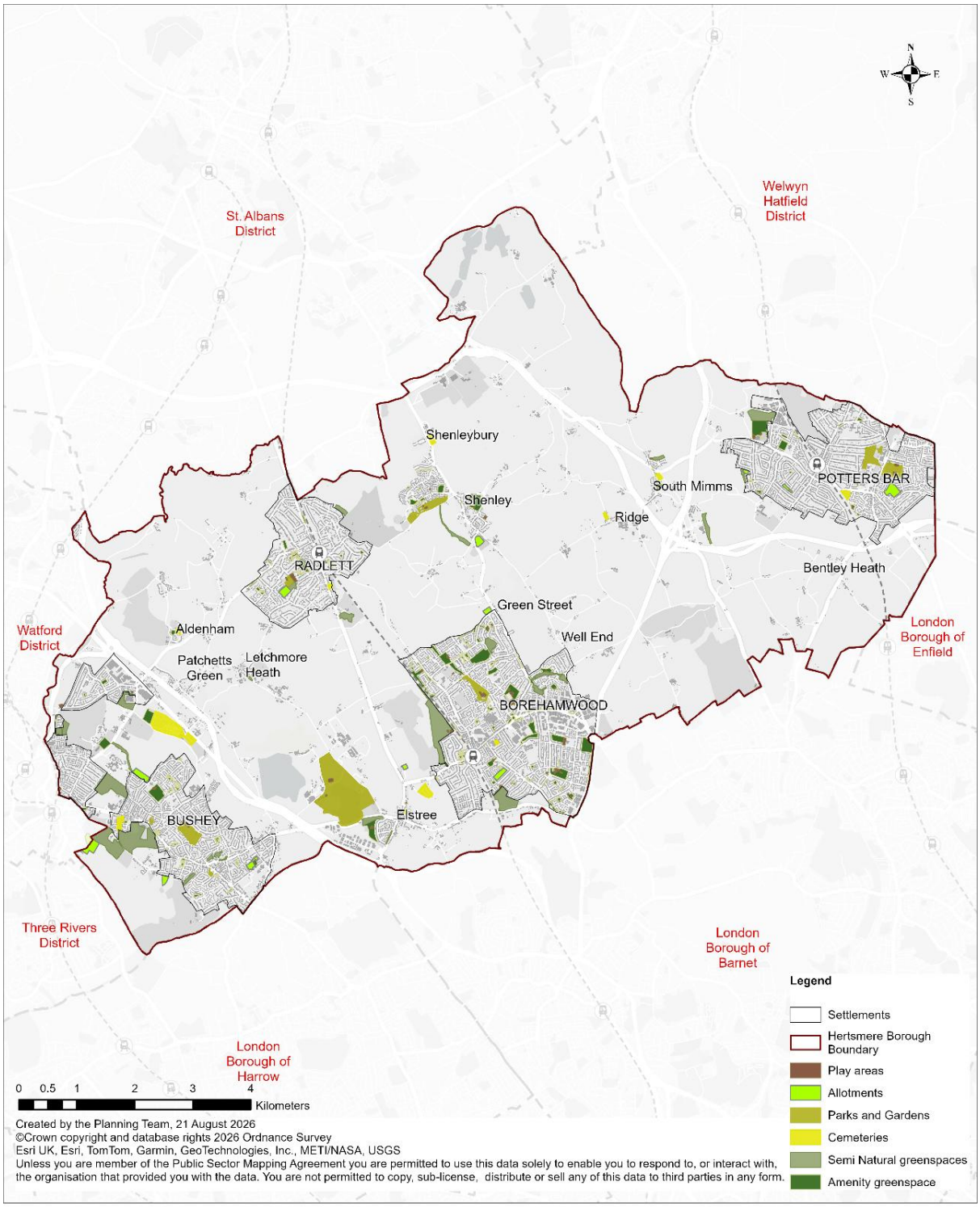


Figure 10.2: Hertsmere's Open Space Network

Explanation

10.55 Open spaces form a vital component of Hertsmere's green infrastructure network. Open spaces, including waterways and water spaces, make a significant contribution to the environmental quality and character of the Borough. They also play a key role in supporting the physical and mental health and wellbeing of the local population by providing opportunities for leisure and recreation as well as enabling people to lead active lifestyles. Hertsmere benefits from provision of a wide range of good quality open spaces. Some open spaces contain protected habitats or species and are protected under national and local designations.

10.56 As the Borough's population increases the pressure on existing parks and open spaces will invariably rise. Hertsmere Open Spaces Assessment (2026) considers the amount of open space that is needed to support the projected future population over the Plan period, based on a fixed quantity standard. This suggests that additional publicly accessible provision will be required to maintain the standard over the long-term. The Spatial Strategy seeks to deliver future growth through regeneration of the Borough's four main towns, considered release of land from the Green Belt to allow for urban extensions; and through the provision of a new settlement at Bowman's Cross. It is therefore vitally important that existing open spaces, particularly those within the four main towns, are protected, measures are taken to improve their function and quality, and that inclusive public access to open space is enhanced. In addition, the Council considers it important that major and other developments maximise opportunities to integrate new publicly accessible open space. Development proposals for publicly accessible open space must submit a desktop Health Impact Assessment in line with Policy DM6 (Health Impact Assessments).

10.57 Development proposals involving the loss of open space should be avoided and will only be permitted in exceptional circumstances, as set out in the policy above. The reconfiguration of open spaces can be an effective approach to addressing deficiencies in the quantity and quality of provision. It can also help to overcome site constraints where it would otherwise be difficult to deliver new development, such as for housing, workspace or community facilities, or area improvements. Development proposals involving the reconfiguration of open space must provide demonstrable improvements in the functional value of open space and public access to it. To ensure certainty over the protection of open space and beneficial outcomes for the wider community and the environment, all proposals for reconfiguration must be delivered through comprehensive redevelopment and in line with a site-wide masterplan.

10.58 Whilst all development proposals should investigate and maximise opportunities to enhance open space, this is particularly important in areas of deficiency. Where it is appropriate and deliverable, proposals for new development should also consider open space improvements that address existing deficiencies. This may include measures, where they are appropriate and deliverable, that increase the capacity of existing open spaces. We will expect all development proposals to refer to and engage with the Open Spaces Assessment, or any subsequent update, through the

design-led approach. Where appropriate, health impact assessments prepared in support of development proposals will consider improvements to open space access that specifically seek to address the causes of localised health and social inequalities.

10.59 New development can help to enhance access to open space even where it is not feasible to deliver new public open space on-site. Through the design-led approach development proposals should seek to deliver public realm enhancements to create new routes or improve connections to existing or planned new open spaces, particularly in areas of deficiency. New provision should be sited and located, within the proposal site, to optimise inclusive public access. Proposals that marginalise or restrict the use of open space will be resisted. Planning contributions towards open space provision may be sought, particularly where development is likely to generate additional demands on existing provision, such as through the introduction of more residential units and households. Contributions may include measures that support public access to open space along with the functional quality and amenity value of it.

10.60 National planning policy enables neighbourhood forums to designate Local Green Space through the neighbourhood plan process. Local Green Space is afforded the same level of protection as Green Belt. Forums are well placed to identify high-quality green spaces that are valued by the local community and whose protection will support the delivery of the Local Plan. Forums are encouraged to undertake detailed assessments to justify the designation of Local Green Space using a robust methodology. Assessments should be published as part of the evidence base to support the plan-making and examination process. The Council remains committed to developing positive working relationships with neighbourhood forums and the Borough's other formally constituted community groups to deliver good quality, inclusive and accessible open space. The Council will positively consider proposals, from these groups, that demonstrably deliver such improvements. The Council will consider opportunities to work with other local community groups, such as those that focus upon maintaining and improving specific open spaces, when they arise. Such opportunities will be considered on their merits and the demonstrable benefits and value that they could secure for local communities.

GI8 Communal Gardens and Food Growing

Strategic objectives

A Delivering a better future for Hertsmere
G Securing a greener Borough
J Healthy and safe communities

Non-strategic Policy

A Existing allotments and community gardens will be protected from development where they contribute to local food production, biodiversity, recreation and community wellbeing.

B The Council will support proposals which create new opportunities for food growing within urban areas, including the temporary or permanent use of vacant, under-utilised or previously developed land for allotments, community gardens, orchards and other food-growing initiatives.

C Development proposals resulting in the loss of existing allotments or community gardens will not be permitted unless:

i. there is a clearly demonstrated surplus to current and future requirements, or

ii. replacement provision of equivalent or greater quality and accessibility is secured within a suitable location.

D New food-growing spaces should be integrated into the overall layout and landscape strategy of development proposals and should:

i. be safe, accessible and inclusive for all ages and abilities;

ii. receive adequate sunlight and suitable growing conditions;

iii. provide access to water and, where appropriate, composting and water harvesting facilities; and

iv. contribute to green infrastructure, biodiversity, climate resilience and community cohesion;

v. be supported by long term management and maintenance arrangements.

Explanation

10.61 Access to local food growing opportunities is an important component of successful and sustainable place-making. Food growing opportunities promote healthy diets, improve food security, provide the opportunity for community cohesion and benefit mental health and wellbeing.

10.62 Allotments and community gardens make a valuable contribution towards the Borough's network of green infrastructure. They are an important resource for local

food production, support biodiversity and promote sustainable communities, for example, by providing opportunities for recreation and social interaction. For children and young people, food growing offers opportunities for education outside of the traditional classroom setting. Allotments and communal gardens are invaluable to those who do not have access to a private garden and therefore help to promote more inclusive communities. Whilst recognising that private gardens provide opportunities for food growing, this policy does not apply to gardens as these are dealt with separately in the Local Plan.

10.63 The provision of these facilities as part of new development could include:

- Communal growing gardens;
- Allotment plots;
- Community orchards;
- Edible landscaping;
- School and educational growing areas;
- Innovative food-growing opportunities including vertical growing;
- Temporary or meanwhile growing spaces on phased development sites.

10.64 All major development proposals for residential and community uses are encouraged to include provision for food growing. This should be considered early in the design-led approach so that provision is of a high-quality, suitably meets the needs of the intended end users, and is accessible to people of all ages and abilities. Consideration should also be given to the integration of ancillary facilities, such as storage space for equipment and connections to power and water sources, which are vital to ensuring that provision is convenient and functional.

GI9 Geodiversity

Strategic objectives

G Securing a greener Borough

Non-strategic Policy

A Development proposal should conserve, improve the understanding of and, where possible, enhance geodiversity assets and their settings within the Borough.

B Development proposals should make a positive contribution to the protection and enhancement of designated geodiversity sites and other sites of geological interest. Proposals resulting in the loss of, damage to, or adverse impact upon a geodiversity asset or Regionally Important Geological Site will be permitted where:

i. It can be demonstrated that there is no reasonable alternative for the proposed development

ii. The benefits of the development clearly outweigh the importance of the geodiversity asset; and

iii. Appropriate mitigation or compensation measures are secured.

Figure 10.3: Hertsmere's RIGs Sites

Explanation

10.65 Geodiversity comprises the variety of geological features that contribute to the Borough's landscape and character, including rocks, minerals, soils, landforms and the natural processes that shape them. It underpins biodiversity, influences landscape character and contributes to the Borough's natural and historic environment. As geodiversity is a finite resource that cannot readily be recreated or replaced, it is important that geological interests are appropriately conserved and managed.

10.66 There are two Regionally Important geological Sites in the Borough; Shenley Chalk Mine and Radlett Plantation. Shenley Chalk Mine is a natural chalk deposit which was mined as primitive fertiliser. The mine consists of three shafts as deep as 20m and a complex of tunnels. The mine now functions as an important bat hibernaculum. As the mine is situated on private land, access is limited to organised visits.

10.67 Radlett Plantation is recognised for being one of the few locations which Hertford Puddingstone is visible on the surface. Deposits are visible within shallow pebble beds and around exposed tree root systems. The site is located on private land and is not publicly accessible.

10.68 The Borough's geological assets contribute to local distinctiveness, scientific understanding and education. Development proposals should seek to avoid adverse impacts on these assets and, where appropriate, take opportunities to conserve, enhance and improve understanding of the Borough's geodiversity resource.

Chapter 11: Sustainable Design

Section

SD1 Responding to the Climate Emergency

SD2 Sustainable Design and Retrofitting

SD3 Managing Heat Risk

SD4 Minimising Green House Gas Emissions

SD5 Improving Air Quality

SD6 Energy Infrastructure

SD7 Minimising and Managing Flood Risk

SD8 Water Supply and Wastewater

SD9 Ground Conditions

SD10 Reducing and Sustainably Managing Waste

SD11 Securing a Circular Economy

SD12 Minerals Consultation Area

SD1 Responding to the Climate Emergency

Strategic Objectives

H Responding to the climate emergency

Strategic Policy

A Hertsmere Borough Council has declared a climate emergency. In response to this a strategic and coordinated approach will be taken to ensure that the Borough contributes significantly to mitigating climate change and is made more resilient to its environmental, social and economic impacts. Local actions are both necessary and integral to supporting wider regional and national actions to address global climate change.

B To contribute towards ensuring that the Borough develops in a way that is environmentally sustainable all development proposals must:

i. Help Hertsmere to become a net zero-carbon Borough;

ii. Protect and maximise opportunities to enhance the network of green and open spaces, as well as improve linkages to and between them;

iii. Conserve sites of importance for biodiversity, protect habitats and species within the local ecological network, and deliver biodiversity net gain;

iv. Implement measures to reduce flood risk and ensure resilience against the impact of flooding, and seek to improve the quality of water bodies

v. Not adversely impact on the amenity of the local population and habitats; and

vi. Contribute towards Hertfordshire achieving waste net self-sufficiency by applying the waste hierarchy and circular economy principles.

C A plan, manage and monitor approach will be used to support the successful transition to a net zero-carbon Borough. This approach will help to ensure that the Local Plan reflects current national and regional planning policy requirements and standards for carbon management, along with the Council's latest technical studies and strategies to deliver low and zero carbon outcomes

Explanation

11.1 Climate change is one of the biggest challenges the world faces today. During September 2029 Hertsmere Borough Council declared a climate emergency, recognizing the urgent need to address climate change and its impacts on the community. This declaration has been made recognising that a changing climate will have severe and enduring social, economic and environmental implications, and that tackling climate change is an issue of inequality as the greatest impact will be on the most vulnerable and those least able to protect themselves. A strategic and coordinated approach to addressing climate change is necessary.

11.2 In response the Council has committed to achieving net zero carbon emissions no later than 2050. To achieve this objective, it has adopted the Hertsmere Climate Change and Sustainability Strategy (2025 - 2030) that will:

i. Enable the Council to reduce its own emissions leading up to net-zero emissions by 2050;

ii. Enable the Council to offset its own operational emissions that are unavoidable;

iii. Further the implementation of environmental sustainability and circular economy in the operations of the Council;

iv. Influence, enable and support residents, businesses and public and third sector organisations in the Borough to reduce and offset their own emissions;

v. Help the Council and the Borough to adapt and build resilience against impacts of climate change;

vi. Promote zero carbon and environmentally sustainable growth and development of the Council;

vii. Support nature recovery in the Borough and surrounding areas;

viii. Promote a just transition to a greener economy; and

ix. Improve well-being and quality of life of the residents of the Council.

11.3 The Local Plan has a critical role and will work together with the Hertsmere Climate Change and Sustainability Strategy (2025 - 2030), in setting out a roadmap for acting on climate change across Hertsmere.

11.4 The Local Plan will play an important role in helping the Borough respond to the climate emergency. It provides the strategic framework for climate change mitigation and adaption in respect of the future use and management of land within Lewisham. It also sets out policies to ensure that new development is designed, constructed and operated in a sustainable way. These policies cut across several topic areas, many of

which are included in the following section, and reflect the complexity of matters that must be considered when planning positively for climate change resilience.

11.5 A plan, manage and monitor approach will be used to support the successful transition to a net zero-carbon Borough. We will regularly assess performance against our strategic objectives through the Authority Monitoring Report process. This will help to inform any necessary changes to the policy approaches set out in this Local Plan. In addition, we will take the opportunity to regularly review policies to ensure they reflect the latest requirements and standards at the regional and national levels, also taking account of the Council's latest technical evidence and strategies.

SD2 Sustainable Design and Retrofitting

Strategic Objectives

H Responding to the climate emergency
J Healthy and safe communities

Strategic Policy

A Proposals for development must submit a Sustainable Design Statement. This should clearly set out how the design-led approach has been used to ensure the integration of sustainable design principles, including consideration of the construction and operation phases of development. The statement should be proportionate to the nature and scale of development proposed with a sufficient level of detail to demonstrate that the relevant policy requirements have been satisfied. For major development proposals the Sustainable Design Statement should refer and complement other detailed statements including for:

i. Landscape design and urban greening;

ii. Nature conservation;

iii. Energy use and heat risk management;

iv. Air quality;

v. Flood risk and water management;

vi. Ground conditions; and

vii. Waste reduction and the circular economy.

B Proposals for new self-contained major and minor residential development should seek to achieve the BRE Home Quality Mark.

C Proposals for new non-residential development of 500 square metres gross floorspace or more, including mixed-use development, must achieve an 'Excellent' rating under the BREEAM New Construction (Non-Domestic Buildings) 2018 scheme, or future equivalent, unless it can be demonstrated that this is not feasible. Sustainable retrofitting

D The use of sustainable retrofitting measures will be encouraged and supported to improve the energy efficiency and environmental performance of housing and other buildings, as well as the quality of living spaces for their occupants. Retrofitting measures should be integrated using the 'whole house' or 'whole building' approach, which requires an understanding of how a building has been constructed, its context and all the factors affecting energy use.

E Development proposals for major residential domestic refurbishment must achieve a certified 'Excellent' rating under the BREEAM Domestic Refurbishment 2014 scheme, or future equivalent, unless it can be demonstrated that this is not feasible.

F Development proposals for major non-residential refurbishment, including mixed-use development, will be required to achieve a certified 'Excellent' rating under the BREEAM Non-Domestic Refurbishment scheme, or future equivalent, unless it can be demonstrated that this is not feasible.

G Where planning consent is required, sustainable retrofitting measures to existing buildings and other development will be supported where other place-making objectives are demonstrably satisfied, including those that relate to the historic environment and heritage assets.

Explanation

11.6 A significant step change in the design quality and environmental performance of buildings and spaces is needed to achieve the Local Plan's strategic objectives, particularly for climate change adaptation and mitigation. Sustainable design principles should therefore be considered early in the planning and design stages and be fully integrated throughout the development process, including the construction and occupation stages. The principles cut across several topic areas within the Local Plan but are most predominant in the policies included in this section. All applicants must submit a Sustainable Design Statement explaining how the proposed development positively engages with these principles. The statement should clearly identify the need for any site-specific mitigation and demonstrate that adequate measures will be delivered and effectively implemented.

11.7 The Home Quality Mark is an established and nationally recognised standard for new housing that has been established by the Building Research Establishment. It provides an indication of the expected health and well-being benefits and environmental footprint of new residential development. All proposals for new self-contained residential development should seek to achieve the Home Quality Mark, as demonstrated through an independent assessment by a qualified assessor. Proposals are strongly recommended to achieve a minimum 3-star rating and for developers and/or agents to make the Home Quality Mark assessment publicly available, for example, as part of any promotional material. Published ratings will also assist the Council with monitoring implementation of the Local Plan policies.

11.8 Proposals for new non-residential development (including refurbishments) and non-self-contained housing will be expected to meet the Building Research Establishment Environmental Assessment Methodology (BREEAM) 'Excellent' standard. BREEAM provides a nationally recognised sustainable design standard for different types of development and covers a wide range of sustainability considerations. Applications for qualifying development are encouraged to submit BREEAM pre-assessments as part of the Sustainable Design Statement, identifying the credits to be targeted and measures to achieve these. All proposals will be considered having regard to individual site circumstances and the nature of development proposed. Planning contributions, such as carbon offsetting, may be sought where it is suitably demonstrated that the policy requirements cannot be sufficiently satisfied such as for reasons of technical feasibility.

11.9 For commercial and industrial uses applicants must justify that the required 'Excellent' rating cannot be reasonably delivered on-site, including through evidence of a BREEAM preassessment. It is recognised that for some types of developments the BREEAM requirements may pose challenges, for example, where there is no defined end-user and/or the Council has agreed that buildings require a certain level of fit out. However, our expectation is that shell only and shell and core proposals, where appropriate, should be capable of meeting the BREEAM credits considering the flexibility provided by the BREEAM methodology.

11.10 Where the Home Quality Mark or BREEAM assessments are submitted, these must be prepared by a suitably qualified and independent assessor. The Council will consider applying alternative established and recognised standards in circumstances where their application demonstrably benefits the process and results in the delivery of the set objectives.

Sustainable retrofitting

11.11 Housing is a significant contributor of carbon emissions in Hertsmere, with about 24% of emissions coming from energy used within homes. Many homes in the area are poorly insulated, contributing to higher energy costs and carbon emissions. Sustainable retrofitting measures can help to improve the energy performance of existing buildings and minimise carbon emissions produced in the Borough. Even small-scale development, such as householder schemes, can incorporate measures that improve the environmental performance of buildings. This

may include internal roof, floor and wall insulation, energy efficient fixtures, or urban greening.

11.12 The most appropriate type of sustainable retrofitting measures will vary depending on the type of building, its context and location, including character setting. A 'whole house' or 'whole building' approach is one that looks at the energy performance of a building in a comprehensive and integrated way. It helps to ensure that improvements are carried out in an organised, sensible order, with installations and refit measures complementing rather than working against each other. For instance, some standard retrofitting measures can cause damage to traditional or historic buildings, causing problems with trapped moisture which may reduce energy efficiency and bring risks to the health of occupants. In addition, the budget available to householders and other developers will impact on the type and amount of retrofitting works they are able to carry out. The whole house approach can be useful to inform the most appropriate and cost-effective measures, along with phasing of works delivered over a longer period.

11.13 Householders and other developers are encouraged to refer to good practice guidance when considering retrofitting. The Council encourages developers and householders to consider, and use established and recognised guidance such as the Climate Emergency Retrofit Guide published by the London Energy Transformation Initiative (LETI). Given Hertsmere location within London's immediate hinterland this is relevant and appropriate guidance.

11.14 It is important retrofitting of historic buildings is carried out in a way that does no harm to the significance of heritage assets or their setting in line with other Local Plan policies. Where heritage assets are concerned, applicants are encouraged to refer to the latest Historic England guidance on energy efficiency and retrofit to inform their proposals. Retrofitting works to the fabric of buildings and structures that form part of the statutory list are likely to require consent. Those contemplating such works should seek guidance from the local planning authority. Failure to gain an appropriate and necessary consent may result in unlawful development.

SD3 Managing Heat Risk

Strategic Objectives

H **Responding to the climate emergency**

J **Healthy and safe communities**

K **Securing the timely delivery of infrastructure**

Strategic Policy

A Proposals for development must minimise the adverse impacts on the urban heat island through the design of buildings and spaces, as well as using materials and urban greening measures.

B All new development must be designed to reduce the potential for internal overheating and reliance on air conditioning systems. Development proposals will only be supported where there is sufficient evidence to demonstrate that priority has been given to the implementation of feasible measures at the higher level of the hierarchy.

C Major development proposals must submit an Energy Statement to demonstrate how they will meet the requirements of (A) and (B) above.

D Major development proposals incorporating public realm, including amenity and open space, should be designed to create a comfortable environment in the public realm through the provision of shade and other passive cooling measures, giving priority to urban greening measures

Explanation

11.15 In recent years Hertfordshire has experienced higher than historic average temperatures along with more severe hot weather events. Heat risk is becoming an increasingly important issue, particularly in the context of a growing population and global climate change.

11.16 The urban heat island is experienced in places where there is extensive urban development. Hertsmere's Local Plan spatial strategy is seeking to optimise the use of urban land supply to meet the Borough's development needs over the plan period. Consequently, addressing the urban heat island is a matter for successful and sustainable place-making. Buildings and spaces in these areas absorb and retain heat during the day and night. In increasingly urbanised places, such as Hertsmere's four main towns, this process results in air temperatures being several degrees warmer than its surrounding areas. The urban heat island poses a significant health risk to vulnerable groups, such as older people or those with certain health conditions, particularly during peak summer months. All new development must

therefore use the design-led approach to minimise internal heat gain and manage heat risk.

11.17 Applicants should refer the latest Chartered Institution of Building Services Engineers (CIBSE) guidance on assessing and mitigating overheating risk in new developments, including TM59 for domestic development and TM52 for non-domestic development. Proposals should undertake dynamic thermal modelling to ensure that development does not overheat, and this should address temperatures likely to be experienced over the lifetime of the development, having regard to CIBSE guidance and datasets included in document TM49.

11.18 Severe hot weather events can discourage physical and outdoor activity. Development proposals must therefore be designed to provide for a comfortable environment. This may include shaded areas integrated into the public realm or measures to ensure indoor amenity spaces are cool and well-ventilated. Planning contributions for cooling measures outside the site boundary may be necessary to mitigate heat risk generated by the development, for example, to make the public realm more comfortable, in line with the Healthy Streets Approach.

11.19 All major development proposals must submit an Energy Statement as part of the Sustainable Design Statement. This should clearly set out how measures at the higher end of the cooling hierarchy have been considered and given priority through the design-led approach. We will refuse proposals that use measures at the lower levels of the hierarchy unless there is evidence to demonstrate that this is necessary, for example, for reasons of technical feasibility.

11.20 It is recognised that the feasibility of measures in the cooling hierarchy will often depend on the nature and scale of development. Minor developments such as householder extensions may have limited scope to implement measures at the higher end of the hierarchy. The urban heat island effect can be mitigated through the cumulative positive impacts of smaller developments. For this reason, the loss of established soft landscape features without replacement will be resisted for all proposals and new soft landscaping will be encouraged wherever possible.

SD4 Minimising Green House Gas Emissions

Strategic Objectives

H Responding to the climate emergency

J Healthy and safe communities

Strategic Policy

A To help Hertsmere to become a net zero-carbon Borough development proposals must be designed to reduce greenhouse gas emissions in operation and minimise energy demand (annual and peak).

B Major development proposals must be net zero-carbon and:

i. Meet the minimum on-site reduction of carbon emissions of at least 35% beyond the baseline of Part L of the Building Regulations 2021 Future Home Standard; and

ii. Calculate and minimise emissions from any part of the development that are not covered by Building Regulations (e.g. unregulated emissions).

C Where it is clearly demonstrated that the net zero-carbon target cannot be achieved on-site, development proposals must make contributions to meet the identified shortfall through:

i. A cash-in-lieu contribution to Hertsmere's carbon offset fund. Where it can be demonstrated to the satisfaction of the Council that off-site contributions are acceptable these will be secured through planning obligations, with payments in lieu calculated using Table 11.1 (Carbon offset payments in lieu).; and/or

ii. Appropriate off-site measures where these can be demonstrated to be deliverable.

Table 11.1 Carbon offset payments in lieu

FORMULA FOR CALCULATING PAYMENTS IN LIEU
(A – B) x C) x D = X A = Target carbon emissions to meet a 35% reduction onsite B = Projected onsite contribution to carbon reductions

C = Charge for every tonne of CO2 required to be offset to meet the target figure (Hertsmere will charge £100 per year for every tonne of CO2 to be offset)

D = The assumed lifespan of the offset measures (30 years)

A worked example to illustrate the above calculation:

Development A has annual CO2 emissions of 100 tonnes. To meet the policy requirement the developer needs to reduce this by 35 tonnes, however the developer is only able to reduce carbon emissions by 30 tonnes onsite, which means 10 tonnes is required to be offset:

(35 – 30) x 104) x 30 = £31,200

D Major development proposals are encouraged to assess embodied carbon emissions and maximise opportunities to reduce these emissions.

E Details of the approach used to meet the net zero-carbon target must be clearly set out in an Energy Strategy submitted as part of the Sustainable Design Statement.

F Development proposals should minimise energy demand of the building(s) in-use by seeking to achieve the London Energy Transformation Initiative (LETI) targets for projected Energy Use Intensity (EUI)

Explanation

11.21 The Hertsmere Climate Change and Sustainability Strategy (2025 - 2030) sets the objective for Borough to become a zero-carbon place by 2050. To meet this objective and ensure that Hertsmere becomes a net zero-carbon Borough, it will be necessary for new development to maximise energy efficiency and reduce carbon emissions.

11.22 The Borough Council has sought to meet the zero-carbon target for all major developments since 2020; by publishing the Climate Change and Sustainability Interim Planning Policy Position Statement (2020). That document sought to provide guidance based on policy available at that time.

11.23 To meet the Borough's zero-carbon target, the Local Plan requires major developments to provide an on-site reduction of at least 35% beyond the baseline of Part L of the Building Regulations 2021 Future Home Standard.

11.24 Embodied carbon refers to the greenhouse gas emissions arising from the manufacturing, transportation, installation, maintenance and disposal of building materials. This is distinguished from operational carbon which refers to emissions arising from building energy consumption. To help ensure that the carbon emissions

are fully accounted and minimised during the development process, applicants are encouraged to assess and address embodied emissions through the design-led approach. Good practice guidance on this element of low carbon design should be considered and referred to as part of the development process. The Council encourages the use and application of established and recognised guidance, such as that prepared by the London Energy Transformation Initiative (LETI). The Council considers that given Hertsmere's location with London's immediate hinterland this is relevant and appropriate guidance.

11.25 New development is expected to be net-zero carbon and where this is not feasible, it should get as close as possible to zero-carbon on-site. Off-site contributions will not normally be considered as an alternative. They will only be acceptable where it is clearly demonstrated that carbon targets cannot be fully achieved on-site. These contributions must address any identified shortfall and will be secured by planning obligations. Off-site provision will be secured through planning obligations with any payments in lieu calculated using Table 11.1.

11.26 The LETI Climate Change Design Guide sets out a roadmap to zero carbon development. It recommends the use of an Energy Use Intensity (EUI) metric. The EUI is an annual measure of the total energy consumed in a building. It is a good indicator for building performance as the metric is solely dependent on how the building performs in-use; rather than carbon emissions, which also reflect the carbon intensity of the grid. EUI can be estimated at the design stage and easily monitored in-use as energy bills are based on kilowatt hour (kWh) of energy used by the building. EUI includes all the energy consumed in the building such as regulated energy (heating, hot water, cooling, ventilation, and lighting) and unregulated energy (plug loads and equipment e.g. kitchen white goods, ICT/ AV equipment). It does not include charging of electric vehicles. Development proposals should make reasonable efforts to reduce energy consumption of buildings in-use, including by reducing space heating demand. Details should be set out in the Energy Statement, where appropriate. The EUI targets in Table 11.2 are non-binding and should be used as a guide to help future-proof development, until such time EUI targets may be set out in higher level policy or Building Regulations.

Table 11.2 Targets for Energy Use Intensity by Building Type[1]

Building type	Reduce consumption to	Reduce space heating demand to
Minor Residential	35 kWh/m2/year	15 kWh/m2/year
Major Residential	35 kWh/m2/year	
Commercial Office	55 kWh/m2/year	
Education	65 kWh/m2/year	

[1] All targets are set out in kilowatt hour (kWh) per metre square (m2) per year by Gross Internal Area (GIA) and excluding renewable energy contribution. The LETI Climate Emergency Design Guide should be referred for further information.

SD5 Improving Air Quality

Strategic Objectives

A **Delivering a better future for Hertsmere**

H **Responding to the climate emergency**

J **Healthy and safe communities**

Strategic Policy

A Poor air quality can have a significant impact on public health. All new development must use the design-led approach and integrate on-site measures to improve air quality and prevent or minimise the population's exposure to poor air quality.

B Development proposals must:

i. Seek to improve air quality and be at least air quality neutral;

ii. Not lead to a further deterioration of existing poor air quality;

iii. Not create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; and

iv. Not create unacceptable risk of high levels of exposure to poor air quality.

C Air Quality Assessments must be submitted with proposals for:

i. Major development;

ii. Minor development within an Air Quality Management Area and/or Air Quality Focus Area if the development is likely to adversely impact on air quality or introduce new sensitive receptors to exposure to an area of existing poor air quality; and

iii. Community infrastructure or other uses (including public open space) that are likely to be used by large numbers of particularly vulnerable groups, such as older people and children and young people.

D Development proposals must demonstrate how they will reduce emissions from the demolition and construction of buildings.

E Development proposals will be considered having regard to their individual and cumulative impacts on air quality. Proposals that do not meet the requirements of (A) and (B) above will be refused unless it can be suitably demonstrated that adverse impacts can be mitigated to an acceptable level. Mitigation should be provided onsite. In exceptional circumstances where it is demonstrated that on-site mitigation is not feasible, off-site provision may be acceptable where equivalent air quality benefits will be delivered in the area affected by the development.

Explanation

11.27 The link between air quality and public health outcomes is well documented. Air pollution is estimated to reduce life expectancy of every person in the UK by an average of 7 to 8 months. This policy supports national planning policy objectives, set out in the NPPF which require that local plans should sustain and contribute towards compliance with the relevant limit values or national objectives for pollutants.

11.28 Hertsmere is a member of the Hertfordshire and Bedfordshire Air Pollution Monitoring Network (HBAPMN). As part of our wider Environmental Health responsibilities, we continue to regularly assess air quality across Hertsmere and compare it against national objectives. These are set out in the Government's Clean Air Strategy. These objectives relate to several pollutants including carbon monoxide, benzene, 1,3 butadiene, lead, nitrogen dioxide, particulate matter and sulphur dioxide. Where air quality is poor the Council will consider the need to declare an Air Quality Management Area (AQMA). Where it is possible local action taken to improve the air in that area. Following sustained compliance with the National Air Quality Objective for nitrogen dioxide, all six of Hertsmere Borough Council's AQMAs were revoked in May 2024.

11.29 To ensure that air quality is maintained new development must be at least ‘air quality neutral’ and not lead to a further deterioration of existing poor air quality. Development proposals must also reduce the population’s exposure to poor air quality, particularly for those groups who are most vulnerable to its impacts such as children and young people and older people. New development, as a minimum, must not cause new exceedances of legal air quality standards or compromise achievement of compliance in those areas currently in exceedance, as currently provided by the Air Quality Standards Regulations 2010. The Healthy Streets Approach should be used wherever possible to help address poor air quality. Development proposals will be considered considering individual and cumulative impacts of development in an area, consistent with national policy.

11.30 Applicants should consider the Government’s Clean Air Strategy (2019), in relation to matters of health; protecting the environment; securing clean growth and innovation;

and reducing emissions from development; where it is relevant, particularly in respect of specific pollutants.

11.31 Air Quality Assessments (AQAs) will be required for qualifying development set out in the policy and must address impacts arising during the construction, occupation and operation phases of development. They should also consider the wider cumulative impacts on air quality arising from development within the locality.

11.32 Where an AQA indicates a potential negative impact on air quality, appropriate measures that will minimise or offset impacts from the development should be identified and implemented on-site. Planning permission will be refused unless appropriate mitigation measures are adopted to reduce the impact to acceptable levels. In practice, it may not always be possible to achieve Air Quality Neutral standards or to acceptably minimise impacts using onsite measures alone. If on-site measures are insufficient to make the development acceptable, the AQA should demonstrate that it is possible to include measures in the local area with equivalent air quality benefits. Mitigation measures may be secured either by planning condition or legal agreement, where appropriate.

11.33 An AQA with full dispersion modelling is required for all proposed Biomass and CHP boilers and this must demonstrate that the impact on nearby receptors is minimal.

11.34 Development that involves significant demolition, construction or earthworks will be required to assess the risk of impacts according to the Institute of Air Quality Management Dust Guidance. Mitigation measures should be included in the Construction Management Plan. All medium and high-risk sites should include real time construction dust monitoring.

SD6 Energy Infrastructure

Strategic Objectives

H **Responding to the climate emergency**

J **Healthy and safe communities**

K **Securing the timely delivery of infrastructure**

Strategic Policy

A Proposals for development must be designed in response to a site-specific assessment of the most effective and efficient energy supply options, considering the opportunities identified through technical evidence that supports the Local Plan. For large-scale schemes such as major developments, applicants should engage at an early stage with the relevant energy suppliers and bodies to establish future energy and infrastructure requirements necessary to support the development.

B Development proposals should prioritise connection to decentralised heat networks. Major development proposals must provide a Feasibility Assessment for connecting to, and if possible, extending or interconnecting, existing or planned future heat networks located on or in proximity to the site. Proposals for minor new-build development, conversions and building alterations must demonstrate that they have investigated and maximised opportunities to connect to existing heat networks.

C Proposals for new major development should engage with UK Power Networks at an early stage in the process to assess and establish whether the primary substation network has capacity to accommodate the completed scheme. Where capacity is demonstrably an issue, proposals should seek to incorporate appropriate and proportionate measures, such as microgrids, to manage supply. Such measures will be imbedded into the master planning for the site and secured through legal agreements.

D Where a decentralised heat network is planned or likely to be delivered in the future, development proposals should be designed to enable a cost-effective connection to it, having regard to Heat Network Priority Areas identified through the Local Plan technical evidence base.

E Major development proposals within Heat Network Priority Areas should have a communal low temperature heating system.

F Development proposals for CHP and ultra-low NOx gas boiler communal or district heating systems will only be acceptable where it is demonstrated that other options in the heating hierarchy have been fully investigated and are not feasible, and there will be no adverse impact on air quality. Air Quality Assessments must include full dispersion modelling to assess impacts on nearby receptors.

G Where CHP and ultra-low NOx gas boiler systems are acceptable in line with (E) above, proposals should be designed in a way that enables, and does not preclude, the decarbonisation of the site-wide communal network in the future.

H Major housing development proposals must, and all minor housing proposals should, submit an estimated heat unit supply price (£/kWh), annual standing charges and projected annual maintenance costs for their proposed Energy Strategy. This should include information detailing any assumptions the calculations are based on

Explanation

11.36 To become a net zero-carbon Borough it will be necessary for Hertsmere to change the way in which energy is used and supplied. This means shifting from a reliance on natural gas as the main energy source to a wider range of low and zero-carbon and renewable sources. Decentralised energy covers a range of technologies that do not rely directly on the electricity transmission network or gas grid. It is expected to play an increasingly important role in London's energy supply. Decentralised energy is vital to energy security and helping the Hertsmere become more energy self-sufficient. It also offers opportunities for carbon reduction as a more sustainable energy source.

11.37 Development proposals should prioritise connection to decentralised heat networks wherever technically feasible. The Council is preparing studies to support decentralised energy network development across the Borough. This includes the... All development proposals should refer to the Council's latest energy masterplans and studies to ensure that opportunities for decentralised energy are maximised.

11.38 The Hertsmere Local Area Energy Plan (LAEP) anticipates that the Borough's electricity primary substation network will exceed its ability to supply the growth planned-for during the plan period. This may have an adverse impact on affordability of new homes, and upon the industry's ability to deliver consents in a timely manner. This is a matter that will become more prominent during the plan period as the nation's energy network, and consumer demand, is electrified. To minimise these risks, those proposing development should engage with UK Power Networks at an early stage in the process to establish local network capacity. That process should seek to identify appropriate and proportionate solutions that will be incorporated into the scheme as part of the master planning process. This approach will contribute

towards the positive management of the network and ensure that individual developments do not prejudice the delivery of the wider Local Plan.

11.39 All proposals for major residential and commercial development must submit a Feasibility Assessment to fully evaluate connecting to an existing or planned future heat network, or the opportunities for creating new networks. The assessment should evaluate technical and financial viability and consider a range of factors included but not restricted to capability of the network to supply part of the heat demand, location of development and distance to network pipes, physical barriers and other developments in the areas that may also be required to connect. For this policy, a planned future network is one that is considered by the Council likely to be operational within 3 years of the grant of planning permission.

11.40 All proposals for minor new-build development, extensions and alterations should also seek to secure connection to heat networks, where this a reasonable possibility. Major development proposals must include an Energy Statement as part of the Sustainable Design Statement. This should provide sufficient information to demonstrate that feasibility has been fully investigated. Consideration of feasibility should consider potential connections to networks both within and outside the Borough. Where it can be suitably demonstrated that other Local Plan policy requirements can be satisfied without the submission of this information at the planning application stage, the Council will seek to secure this through planning obligations or through Building Control arrangements.

11.41 In areas where there is no existing or planned district heat networks proposals should be designed for future connection to a heat network. Designs should entail a wet heating system, single point of connection into heating system, additional plant room space for thermal substation and low temperature heating systems (60 degrees Celsius or lower) to support low temperature heat networks This will help to ensure that connection is made more financially viable and technically feasible in future years.

11.42 All major development proposals within Heat Network Priority Areas should have a communal heating system served from a single energy centre, with the heat source for the system selected in accordance with the heating hierarchy. Proposals will be expected to demonstrate that the feasibility and viability of implementing options at the higher end of the hierarchy have been fully investigated before considering the use of CHP or gas boiler systems. We will refuse proposals that rely on CHP or gas boiler systems where their use is not sufficiently justified. Where the use of an ultra-low NOx is justified, this should achieve an emissions rating of <40 mg/ kWh. Furthermore, all such proposals must not result in any adverse impact on air quality, in line with other Local Plan policies.

11.43 Where development proposals including CHP and ultra-low NOx gas boiler systems are acceptable in principle, they should be designed in a way that enables, and does not preclude, the decarbonisation of the site-wide communal network in the future. Proposals should include information on the opportunities and potential measures in this respect. This could include, for example, details describing how the development

could accommodate the plant space required for such decentralised energy networks, and how the individual dwellings have been designed to enable future connections.

11.44 Where site-wide communal and district heating systems are operational, heat and energy service providers are encouraged to enter customer charters with domestic and small business customers. Heat networks and communal heating systems must be designed, constructed, commissioned and operated in accordance with CIBSE/CABE Code of Practice CP1 or equivalent. All developments that are required to connect to an existing or planned heat network in accordance with policy must demonstrate in the Energy Strategy how the scheme will comply with the above Code of Practice.

11.45 Where households and businesses are reliant on decentralised heat networks it is important that there are clear expectations for service standards. We will encourage the use of customer charters or publicly available right of challenge in a fair and independent way. Such charters and ombudsman are useful in establishing clarity on matters such as system maintenance and end user pricing and can be particularly helpful to more vulnerable uses (for example, those in or at risk of fuel poverty or start-up and microbusinesses). All developments that are required to connect to an existing or planned heat network in accordance with this policy should ensure that the future network operator will be registered with the Heat Trust Scheme (Heat Customer Protection Ltd.) The scheme sets out common customer service standards and protection requirements that are comparative to regulated utilities, drawing on legislation and good practice guidance.

SD7 Minimising and Managing Flood Risk

Strategic Objectives

H **Responding to the climate emergency**

J **Healthy and safe communities**

K **Securing the timely delivery of infrastructure**

Strategic Policy

A In those circumstances where it is necessary to minimise and manage flood risk proposals for development must:

i. Apply a sequential approach to the location of new development to avoid flood risk to the population and property whilst taking account of the long-term impact of climate change,

ii. Not increase flood risk and reduce the risk of flooding from all sources;

iii. Make space for water by providing an undeveloped setback from rivers and other watercourses;

iv. Where appropriate, carry out a condition survey of flood defence and other watercourse infrastructure and if necessary, provide for maintenance, repairs or remediation to secure its functional integrity over the lifetime of the development; and

v. Be designed to remain safe and operational under flood conditions.

B A site specific Flood Risk Assessment (FRA) will be required for all relevant development proposals within Flood Zone 2, 3a and 3b, all major development in Flood Zone 1, and elsewhere in the Borough where development may be at risk of other sources of flooding. The FRA must provide sufficient information for the Council to assess whether the requirements of the Sequential and Exception Tests have been satisfied. In circumstances where it is required the FRA must:

i. Be proportionate with the degree of flood risk posed both to and by the development;

ii. Take account of all potential sources of flooding both on and off-site;

iii. Make an appropriate allowance for the hazard posed by climate change over the lifetime of the development; and

iv. Have regard to the recommendations of the latest Hertsmere SFRA and Local Flood Risk Management Strategy.

C Where development proposals are required to satisfy the Sequential and Exception Tests, they must be designed to ensure that:

i. The most vulnerable land uses are directed to areas of the site that are at lowest risk of flooding;

ii. There is no net loss of flood storage capacity and adequate provision is made for flood storage and compensation, with priority given to on-site provision;

iii. There is no detrimental impact on the natural function of the floodplain and floodwater flow routes across the site; and

iv. Appropriate mitigation measures are incorporated to address any residual flood risk, including safe access and egress for all likely users of the development.

D Development proposals must provide a site-specific Flood Emergency Response Plan to manage actual and/or residual flood risk, where appropriate.

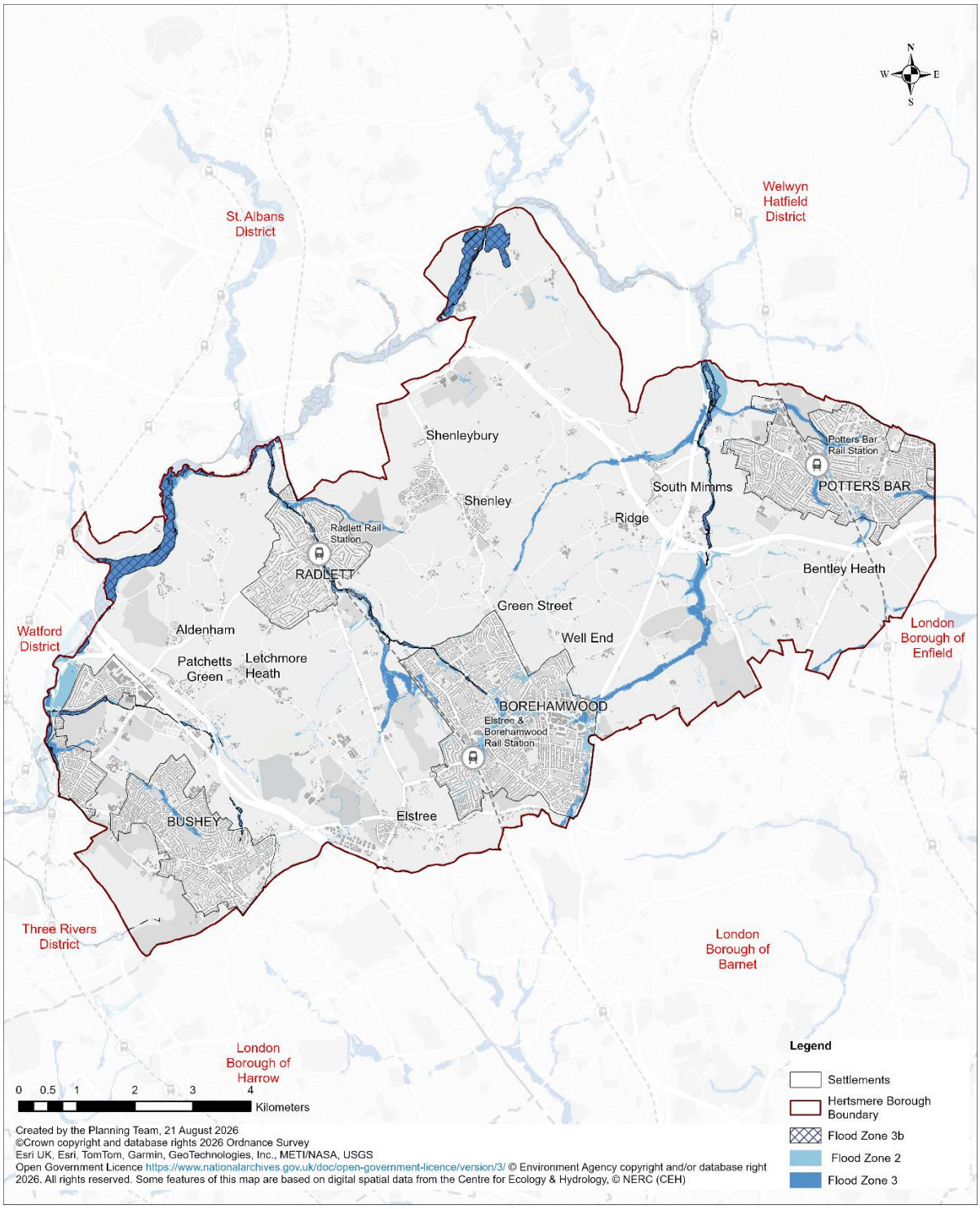


Figure 11.1: Hertsmere Flood Zones and Critical Drainage

Explanation

11.47 Hertsmere's most significant main rivers are the River Colne and Mimmshall Brook. The River Colne has the widest flood plain, with the watercourse forming the boundary between Watford and Bushey in the east. The Mimmshall Brook flows through a largely rural part of the Borough and is subsequently not a major flood risk to people and property.

11.48 Other noteworthy watercourses include the Radlett Brook, otherwise known as Tykes Water, which runs through the centre of Radlett. Its course is largely protected by a flood storage area at the upstream end of the town. The most recent Strategic Flood Risk Assessment (Level 2 June 2026), notes that the Environment Agency dataset Recorded Flood Outlines2 notes that fluvial flooding has also been recorded along the Tyke's Water in Radlett.

11.49 Elsewhere there are localised areas across Hertsmere that are at potential risk from other sources of flooding including through surface water run-off, ground water flooding, surcharge from the sewer network and the blockage of culverts and gullies.

11.50 New development must not increase flood risk to people and properties. Development proposals should proactively seek to minimise and mitigate flood risk by considering risk from all sources using appropriate and up-to-date information. Early engagement with relevant stakeholders, including the Hertfordshire County Council as Lead Local Flood Authority, the Environment Agency (EA), Thames Water Utilities and Affinity Water is strongly advised.

11.51 The Council regularly reviews the Hertsmere Strategic Flood Risk Assessment (SFRA), they are intended to be living documents which are kept up to date as information on flood risk management changes. The purpose of the Level 1 SFRA (2023) The purpose of a Level 1 SFRA is to collate and analyse the most up to date readily available flood risk information for all sources of flooding and provide an overview of flood risk issues across the Borough. The Level 1 SFRA considers the risk of flooding now and in the future because of climate change. It maps the Borough into flood zones according to the probability of flooding occurring, discounting the presence of any flood defences and alleviation measures.

11.52 Flood Zone 3b is the functional floodplain, where water must flow or be stored in times of flood. Applicants should consult the Environment Agency (EA) for site specific flood model outputs to better understand flood risk, and to establish whether the flood zones in the SFRA have been updated.

11.53 In line with national planning policy a sequential approach must be used to ensure that new development is directed to those areas of the Borough, and locations within sites, that are at the lowest risk of flooding. We will consider the appropriateness of development having regard to the Sequential and Exception Tests, and FRAs

[2] Environment Agency Recorded Flood Outlines https://www.data.gov.uk/dataset/16e32c53-35a6-4d54-a111-ca09031eaaaf/recorded-flood-outlines (Accessed August 2025)

submitted by applicants. FRAs must consider the long-term hazard posed by climate change. The latest standing advice on climate change allowances published by the EA should be referred and form the basis of assessments.

11.54 The Council has also prepared and published a Level 2 SFRA (June 2026). That document considers the detailed nature of the flood characteristics within a flood zone including, where possible flood probability; flood depth; flood velocity; rate of onset of flooding; and duration of flood. This enables users to apply the Sequential Test by identifying the severity and variation in risk within medium and high flood risk areas for all sources of flood risk; establish whether proposed site allocations or windfall sites, on which the emerging Local Plan will rely, are capable of being made safe throughout their lifetime without increasing flood risk elsewhere; and begin to consider the application of the Exception Test, where it is relevant.

11.55 National planning policy states that the Exception Test may be satisfied where development provides wider sustainability benefits to the community that outweigh flood risk. This will be considered on a case-by-case basis however all such development must be demonstrably necessary to support the delivery of the spatial strategy, for example, community or other types of infrastructure.

11.56 As part of the plan-making process the Council has undertaken a Sequential Test to assist in the site allocation selection process. Allocated sites that have passed the Sequential Test will not need to apply this test again, unless the proposed use is not consistent with the site allocation.

11.57 Where the Sequential and Exception Tests are satisfied development proposals must fully investigate opportunities to avoid, reduce, manage and mitigate flood risk through site layout and development design. This includes appropriate measures to ensure development is safe. Proposals should fully assess and address residual risk, including through flood resistant design (e.g. to prevent water from entering the building and damaging its fabric) and resilient design (e.g. to ensure the building's structural integrity is maintained and that drying and cleaning can be facilitated).

11.58 In circumstances where it is relevant and necessary proposals for development must be accompanied by a Flood Emergency Response Plan to ensure safe access and egress from actual and/or residual flooding, where appropriate. This measure is necessary to ensure that building occupiers can be made aware of the responses to various types and scale of flood threat, evacuation logistics, evacuation routes and other safety arrangements in terms of dry access, egress and refuge. Examples of such developments can include proposals with water compatible uses, alterations to existing buildings and building floor levels that have been raised, but where there is remaining flood risk under the 0.1% AEP event.

SD8 Water Supply and Wastewater

Strategic Objectives

H **Responding to the climate emergency**

J **Healthy and safe communities**

K **Securing the timely delivery of infrastructure**

Strategic Policy

A Proposals for development for new water supply and wastewater facilities or the expansion of existing facilities will be supported where the development:

i. Makes provision for infrastructure that is required within the Borough as demonstrated by an asset management or similar investment plan;

ii. Will not result in an unacceptable adverse impact on the environment, human health, public safety, amenity and local character; and

iii. Will be constructed in a timely and sustainable manner.

B Development proposals should have regard to Drainage and Wastewater Management Plans (DWMPs) and must demonstrate that the local water supply and public sewerage networks have adequate capacity both on and off-site to serve demand arising from the development; or where such capacity does not exist and there are no programmed works, arrangements are made to ensure adequate provision prior to occupation. A Water Supply and/or Drainage Strategy may be required to demonstrate that suitable arrangements are in place to serve the development.

C Development proposals should ensure the separation of surface and foul water systems, including by rectifying misconnections. Proposals should prioritise mains foul drainage and avoid the use of non-mains drainage for foul water disposal, particularly in Source Protection Zones. Where non-mains drainage is proposed for foul water the most sustainable drainage options must be implemented, as supported by a Drainage Strategy.

D Development proposals should be designed to be water efficient, reduce water consumption and minimise pressure on the combined sewer network by integrating SuDS and other relevant necessary measures. Planning conditions will be applied to ensure that water efficiency standards are met.

E Development proposals within a Source Protection Zone will only be supported where there is no risk of contamination to groundwater sources, or if a risk is

identified, it is suitably demonstrated that adequate mitigation measures will be implemented.

F Development proposals for piled foundations must ensure that disturbances to the ground will not lead to adverse impacts on water quality, including turbidity in the water supply. Development proposals on or in proximity to sites with contaminated land must not introduce new pathways for contamination materials to reach groundwater

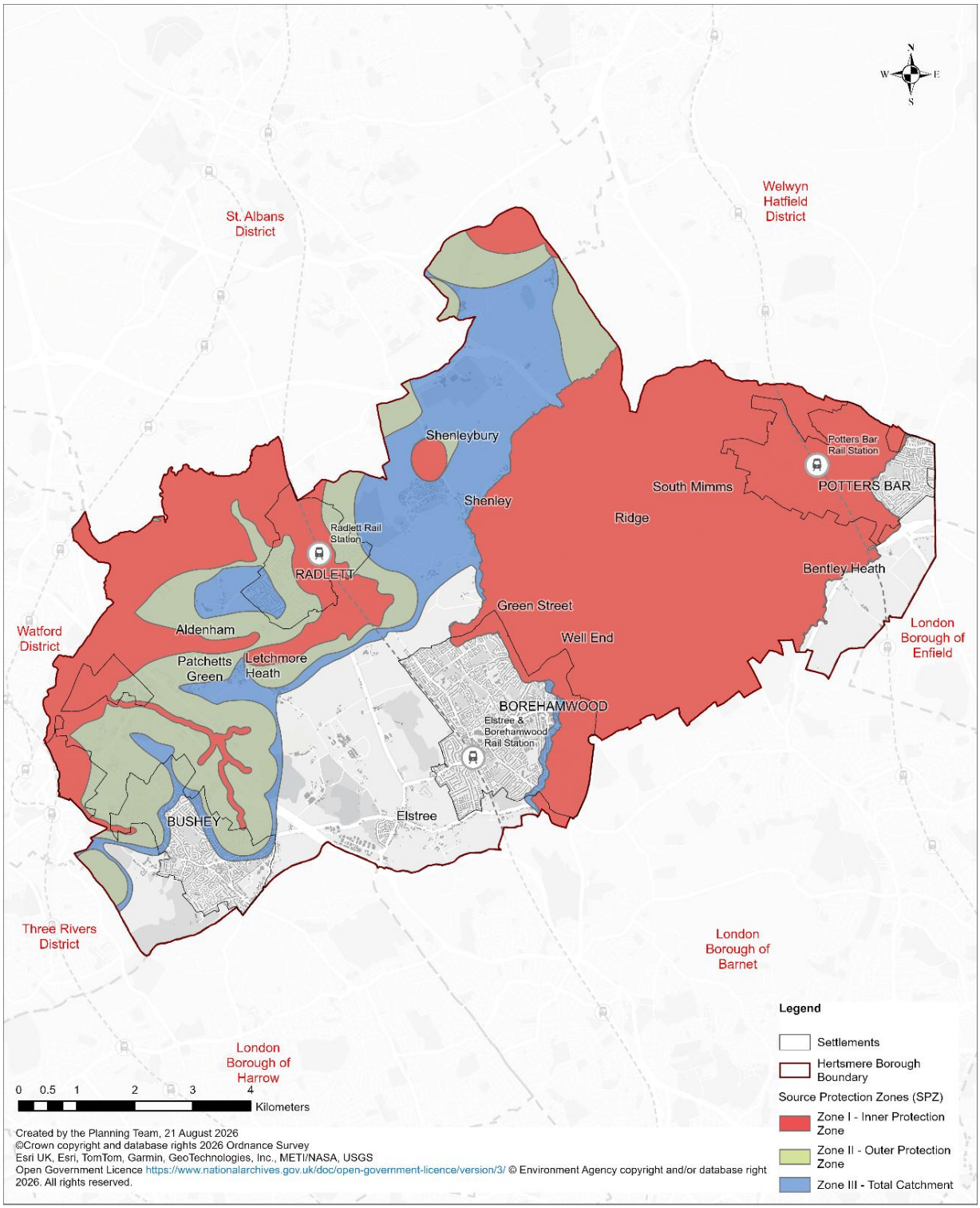


Figure 11.2: Groundwater Source Protection Zones

Explanation

11.59 Development sites and localities must be supported by efficient and well-functioning sewerage and wastewater infrastructure. The Council will continue to work with its key stakeholders, including Thames Water and other water companies, on its Infrastructure Delivery Plan. However, the short-term nature of water companies' investment plans means that it is not possible to identify all the infrastructure required over the Plan period. The Local Plan therefore supportive of new or upgraded water supply and wastewater infrastructure where required.

11.60 Hertsmere's towns, settlements and places are served by a mix of separate and combined sewer systems. Sewer flooding can arise in the foul system when surface water enters via misconnection, or where the capacity of combined systems is exceeded. In both cases this results in surcharge of contaminated surface water. Local water providers record reported sewer flooding incidents by postcode area, and this information should be referred.

11.61 Applicants should engage with the local relevant water and sewerage undertakers, early in the planning and design process. Where there is a capacity issue and there are no planned capacity works or upgrades, the applicant should agree with the infrastructure provider a programme of necessary improvements. These should be implemented prior to occupation. A Water Supply and/or Drainage Strategy may be required, such as for major development in areas where there are concerns about existing infrastructure provision. This supporting information should include a detailed model of the network capacity to determine whether mitigation is required.

11.62 New development should ensure that storm flows are attenuated or regulated into the receiving public network through on or off-site storage. Where it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Where it is proposed to discharge to a public sewer prior approval from Thames Water will be required. Connections to trunk sewers should be avoided - an alternative point of connection to a non-trunk sewer or requisition a new connection and associated pipe laying will be required. It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer as this is the major contributor to sewer flooding.

11.63 The built environment plays a significant role in the way water is consumed, distributed and disposed of. The Environment Agency has declared the Thames Water region as to be "seriously water stressed" and this trend is likely to be exacerbated by climate change. This policy supports wider objectives for delivering a sustainable and secure water supply and addressing water scarcity.

11.64 New residential development must meet the standards for mains water consumption set out in the Optional Requirement of the Building Regulations Part G. All new residential developments (including replacement dwellings) will meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, using the 'Fittings Approach' in table 2.2 as set out in Building Regulations Part G2.

Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met. Major non-residential development must meet BREEAM excellent standard for the 'Wat 01' water category, to achieve at least a 12.5% improvement over defined baseline performance standard. In addition, major developments and high or intense water use developments (such as hotels) should include a grey water and rainwater harvesting system, and applications must provide robust justification where this is not considered feasible. Planning conditions will be used to ensure water efficiency targets are met.

11.65 There are groundwater abstraction points in Hertsmere that are used for the public water supply. The Environment Agency has identified and mapped Source Protection Zones (SPZs) and aquifers within the Borough. Development proposals must assess and manage risk to groundwater contamination in these areas and elsewhere across the Borough. Proposals that present an unacceptable risk to groundwater quality will be refused.

SD9 Ground Conditions

Strategic Objectives

H Responding to the climate emergency
J Healthy and safe communities

Strategic Policy

A Proposals for development that enable contaminated sites to be brought back into beneficial use will be supported where the requirements of B-D below are satisfied.

B Development proposals must demonstrate that any risks associated with land contamination, including to human health, public safety and the environment will be adequately addressed to make the development safe.

C Development proposals on land, which is suspected of being contaminated or potentially contaminated, or if a sensitive use is proposed, must submit a Preliminary Risk Assessment (Phase 1 Study) to identify the level and risk of contamination on the site and adjacent land, and where necessary:

i. Undertake a Site Intrusive Investigation (Phase 2 Study) to provide a detailed assessment of contamination and risks to all receptors;

ii. Prepare a Risk Management and Remediation Strategy appropriate to the individual site circumstances; and

iii. Submit a Verification Plan and Closure Report prior to the occupation of the development.

D Development proposals involving the storage or use of hazardous substances, or development of a site in the vicinity of a hazardous installation, will only be permitted where it is demonstrated that appropriate safeguards are in place to ensure there is no unacceptable risk to human health, public safety and the environment.

E Planning conditions may be applied to ensure that remedial measures will be implemented, and the development is safe prior to occupation.

Explanation

Contaminated land

11.66 Contaminated land is defined within the Environmental Protection Act 1990. It refers to land that has been polluted with harmful substances to the point where it could pose an unacceptable risk to human health and the environment. Environmental health and planning legislation requires the Council to ensure that land is assessed for contamination and made suitable for current and proposed future uses. Through the planning process we will seek that all development is appropriate to its location, whilst requiring landowners and developers to fulfil their responsibility for securing safe development where a site is affected by contamination.

11.67 To appropriately identify and manage the risks associated with land contamination development proposals must undertake a series of steps to ensure that development is safe. In the first instance a Preliminary Risk Assessment must be undertaken. This should consist of a desktop study and site walkover report that shows all previous and existing uses of the site and adjacent land. It should assess the potential contamination risks to identified receptors. Following this preliminary assessment applicants will be required to submit, where appropriate:

- A Site Intrusive Investigation which provides a more detailed assessment of site characteristics and risks to receptors;
- Where contamination is present, a Risk Management and Remediation Strategy to deal with the identified hazards to human health and the environment, along with site management and monitoring arrangements;
- A Verification Plan for any remediation works, completed by a suitably qualified professional, to ensure effective measures to protect occupiers of the development and neighbouring land uses; the structural integrity of new and existing buildings; and any watercourses or aquifers; and
- A Verification/Closure Report, to be submitted prior to occupation, which demonstrates completion and validation of the works set out in the approved Risk Management and Remediation Strategy, including results of sampling and monitoring carried out in accordance with the Verification Plan.

11.68 Planning conditions may be used to secure appropriate measures prior to the commencement and occupation of development.

11.69 When contaminated land has the potential to affect watercourses or groundwater, the Environment Agency should be contacted, as in certain circumstances it is the responsible authority under the Environmental Protection Act 1990.

Hazardous substances

11.70 Hazardous installations consist of sites and facilities for chemical processing, fuel and chemical storage and pipelines. It is important that any risks associated with hazardous substances (including to human health, safety and the environment) are appropriately managed and mitigated. There are listed hazardous installations both within and in proximity to the Borough. Whilst hazardous substances are controlled by the separate need for hazardous substances consent along with health and safety regulations, the Local Plan also has a role in ensuring public safety from major accidents, consistent with the NPPF and its associated guidance.

11.71 All planning applications for hazardous installations, or the use of land in proximity to them, must suitably demonstrate that development will not constitute a risk to the population or the environment. In considering proposals and potential risks, we will apply the Health and Safety Executive (HSE) land use planning methodology and consult with the HSE, Environment Agency and other stakeholders as appropriate. Depending on individual site circumstances proposals may be required to submit a Preliminary Risk Assessment and/or a Risk Management Strategy that clearly identifies risks and sets out measures to appropriately manage and mitigate these upon implementation.

SD10 Reducing and Sustainably Managing Waste

Strategic Objectives

H Responding to the climate emergency
J Healthy and safe communities

Strategic Policy

A The Council will ensure that waste is sustainably managed in ways which protect human health and the environment. A circular economy approach will be promoted in Hertsmere to conserve and make a more efficient use of resources, to achieve increases in the re-use and recycling of materials and reductions in waste going for disposal. Development proposals must apply the waste hierarchy and follow circular economy principles.

B To help Hertsmere achieve waste net self-sufficiency, meet the Borough's strategic waste apportionment target and other requirements, the Council will work in partnership with stakeholders including Hertfordshire County Council[1]. The following are strategically safeguarded waste sites across Hertsmere: List relevant sites.

C Development proposals that will result in the loss of an existing waste site through a change of use will only be permitted where adequate replacement waste processing capacity is secured.

D Development proposals for new waste management facilities will only be permitted where:

i. They are required within the Borough to meet an identified strategic need, having regard to the proximity and self-sufficiency principles;

ii. It is demonstrated that the waste management capacity at existing safeguarded waste sites has been maximised, and there are no opportunities for appropriately increasing capacity at these sites to meet the identified need;

iii. They are located within a Strategic Industrial Location (SIL), or involve alterations or extensions to an existing facility located outside a SIL, and have high-quality supporting infrastructure necessary for the intended use;

iv. They achieve a positive carbon outcome or demonstrate that steps are in place to meet the minimum greenhouse gas performance target; and

v. They will not result in any adverse impacts on human health, the natural environment and local amenity, having regard to relevant legislation and other development plan policies.

E Development proposals for waste management facilities must be located and designed with reference to the Agent of Change principle. They should be fully enclosed on all sides and have a roof along with fast-acting doors and must be designed with these measures where the development is likely to have a significant impact on impact on local amenity.

F Where development proposals involve alterations to an existing waste management facility, they must demonstrate how they have maximised opportunities to improve the environmental performance of the facility as well as to reduce and mitigate its impact on local amenity

Explanation

11.72 The waste hierarchy is set out by the Waste Framework Directive 121[3] and provides a framework for how waste management can be made more sustainable. The aim is to move up the hierarchy away from a reliance on waste disposal. The circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste.

[3] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008L0098-20251016 and https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32025L1892&qid=1760531838376

The successful implementation of the waste hierarchy and circular economy principles are necessary to reduce the volume of waste that is produced and will need to be managed across the Hertsmere. The policy supports the Council's Waste Management Strategy 2021- 2031.

11.73 The Hertfordshire Waste Plan 2012-2026[4] sets out a vision that by 2026, Hertfordshire will be waste aware and responsible, and the county council and its partners will lead the county in its adoption, promotion and implementation of the waste hierarchy. Waste management facilities will be well designed, appropriately sized and sensitively located so that they reduce the environmental and social impacts, meet the needs of communities and businesses, and seek enhancement of the locality. Sufficient waste management facilities (to reduce, reuse, recycle) will be located as close as practicable to the origin of waste, particularly in areas where future growth is likely to occur.

11.74 To ensure a sustainable future for waste management, the Waste Plan sets out strategic objectives that include promoting the provision of well-designed facilities that reduce the volume of waste that goes to landfill; to locate facilities as close as possible to the origin of waste; to facilitate the increased use of recycled materials (e.g. aggregates); to work with all partners in the county to encourage integrated spatial planning, aligning with other local waste strategies and local authority objectives which take account of waste issues, recognising that waste management generates employment and is part of the infrastructure which supports businesses and communities.

11.75 Several sites in Hertsmere have been identified as Employment Land Areas of Search (ELAS) in the Waste Site Allocations document. These are sites that the county council considers may be compatible with waste management uses but currently have little immediate potential for redevelopment. Employment land areas that are predominantly used for general industry (B2) and storage and distribution (B8) have been included, as these areas are considered compatible with waste management uses. Where practicable, potential waste facilities should be enclosed in a building to ensure that surrounding uses are not adversely affected by noise, dust and odour generation.

ELAS021	Employment Area Cranborne Road
ELAS190	Stirling Way, Borehamwood
ELAS191	Elstree Way Employment Area
ELAS192	Otterspool Way Industrial Estate
ELAS235	The White House Commercial Centre

[4] Adopted Waste Local Plan | Hertfordshire County Council

11.76 Employment Land Areas of Search are not restricted by any particular technology or waste stream that should be on any particular site. However, whatever technology and/or waste stream being proposed should be compatible with the needs of the particular site and area.

11.77 The county council has also identified two areas in Hertsmere which are not designated as employment land in their respective local plans. As these areas contain B2/B8 uses they have been assessed as Employment Land Areas of Search which are considered to be compatible with waste uses:

ELAS230	Cantilion Haulage and Adjoining Land
ELAS233	Lismirrane Industrial Park

11.78 One site in Hertsmere is safeguarded as an existing strategic waste site. In order to achieve and maintain a sustainable distribution of waste management facilities it is important to ensure that suitable sites are not lost. Safeguarding existing sites reduces the need for new facilities and searching for new sites in a very limited environment like Hertfordshire. Safeguarding sites also contributes towards the aims of dealing with the equivalent of the county's own waste arisings. PPS10 (Planning for Sustainable Waste Management, Locational Criteria) places responsibility on planning authorities to consider the likely impact of proposed, non-waste related development on existing waste management facilities' sites and on areas allocated for waste management.

SA236	Land at Redwell Wood Farm, Ridge

11.79 Hertfordshire County Council consulted on a new Minerals and Waste Local Plan from July to September 2022 and published several evidence reports in 2024. The preparation of this new plan has not yet been completed. The Spatial Strategy in the new Waste Plan will be linked to the key locations for growth in district and borough Local Plans, as follows:

- Support proposals which meet an identified need and move waste up the waste hierarchy;
- Support in principle waste development on existing waste management sites, sites allocated for employment uses, or existing employment land within the main settlements likely to experience growth over the plan period;
- Provide additional restrictions / requirements for certain waste management methods.

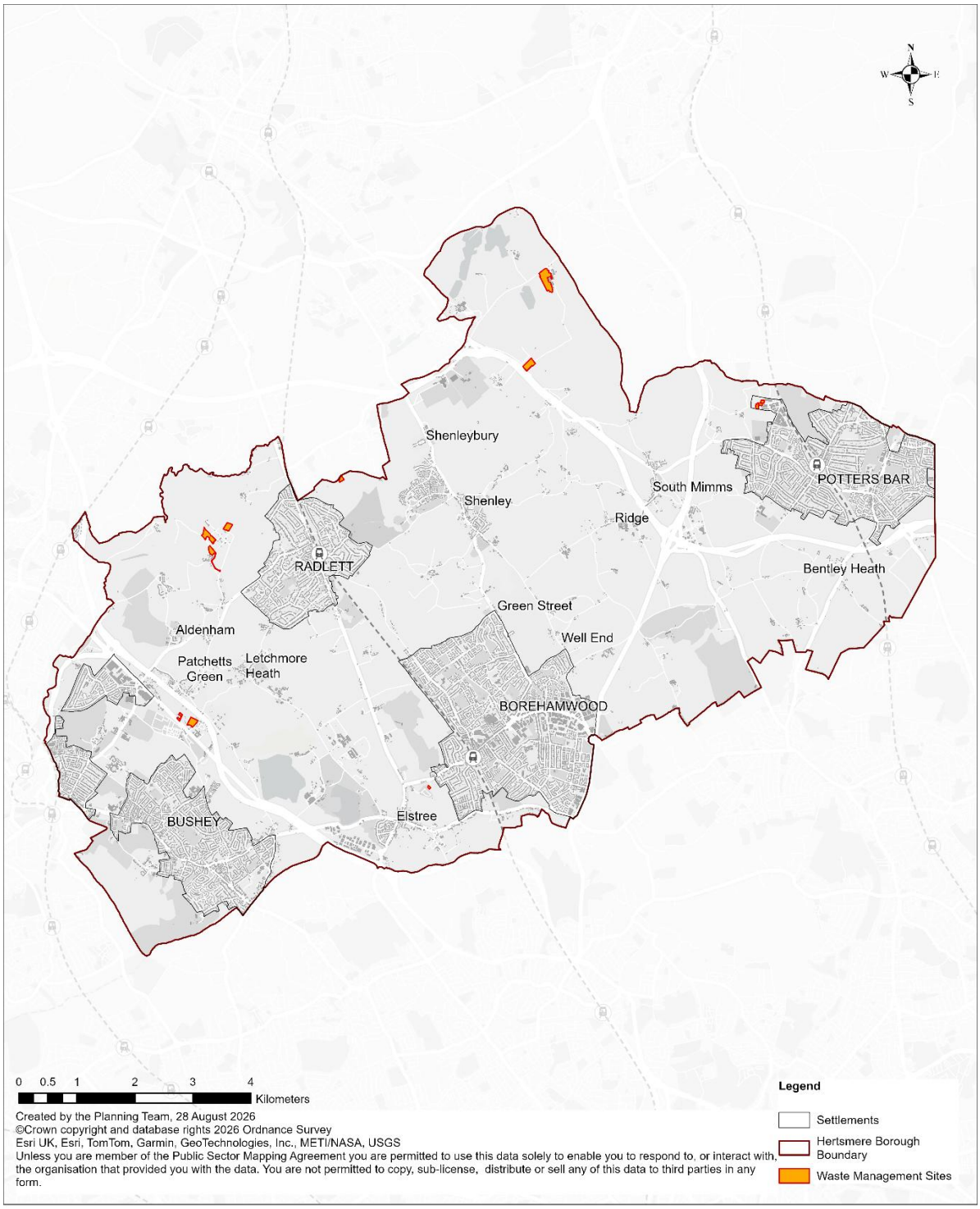


Figure 11.3: Safeguarded Waste Sites

SD11 Securing a Circular Economy

Strategic Objectives

H Responding to the climate emergency
J Healthy and safe communities

Strategic Policy

A Proposals for development should apply circular economy principles to conserve resources and improve resource efficiency.

B Major development proposals should aim to be net zero-waste.

C Development proposals must sustainably manage both the type and volume of recyclable materials and waste arising from the development during the construction and operational phases.

D Development proposals must be designed to ensure adequate on-site provision for the sorting of recyclable material, composting of organic material and the disposal of general waste during the occupation stage. They must make provision for:

i. Dedicated internal and external storage facilities, with flatted residential development including temporary storage space for each unit and communal storage for waste materials pending collection;

ii. Safe and convenient access to storage facilities, both for building occupiers and collection services;

iii. Well sited and designed development that avoids and mitigates adverse impact on the amenity of building occupiers and neighbouring site users and uses; and

iv. Separate provision for commercial and household waste where mixed-used development is proposed.

E All proposals for new multi-storey development, including flatted residential development, must also make provision for sensitively designed storage and collection systems at each floor unless it is suitably demonstrated that other designs can appropriately service the development. Proposals should avoid the use of forecourts or ground floor internal waste storage where this may adversely impact on the amenity of the building's occupiers and surrounding properties

F Where public realm is included as part of a development proposal appropriate provision for recycling and waste disposal facilities will be required. Provision should be sensitively located and designed with accessible and clearly legible facilities to enable the public to easily distinguish between options for sorting of recyclable material, disposal of general waste and where appropriate, composting of organic material.

Explanation

11.80 Major development proposals present significant opportunities for innovative design and construction. Proposals for development will be encouraged to submit a Circular Economy Statement demonstrating how the circular economy principles have been considered. This should be included as part of the Sustainable Design statement.

11.81 Development proposals should maximise opportunities to design adaptable buildings and spaces. Residential developments are unlikely to change use given housing needs and residential land values in the Borough. However, this should not discourage designs that can extend the life of developments, for example, with durable materials and adaptable spaces. Non-residential developments, such as retail and commercial uses, are likely to have shorter lifespans or a range of end-users and are therefore well suited to adaptive design.

11.82 All development proposals must consider options for sustainably managing the materials used and arising from the development using the design-led approach. This will ensure the most appropriate and practical solutions are employed during the construction and occupation stages. It is important that recycling, composting and waste management facilities are well designed, particularly in the interests of amenity. Higher intensity developments, such as the new taller buildings (flats and apartments) envisaged by the spatial strategy pose unique challenges. This is particularly the case given the number of households that will require provision, the limited space available for sorting, collection and servicing, and the unique nature of managing waste through vertically stacked buildings. However, this should not preclude occupiers benefitting from suitable and convenient access to facilities, and that waste collection services are not compromised by poorly designed and laid out buildings.

11.83 The delivery of improved public realm across the Borough's four main towns is a key regeneration objective of the Local Plan's spatial strategy. For it to be successful it must be adequately serviced with readily accessible and clearly legible recycling and waste disposal facilities, where appropriate. Public spaces should include adequate provision of facilities that encourage easy separation of recyclable and waste materials at the point of disposal. Not only will this assist with reducing waste, but it can help to protect local amenity through the avoidance of unsightly litter.

SD12 Minerals Consultation Area

Strategic Objectives

K Securing the timely delivery of infrastructure

Non-strategic policy

A The Council identifies the Mineral Consultation Area, on behalf of the Mineral Planning Authority, as a planning policy designation that forms part of Hertsmere's development plan. The extent of the Consultation Area is shown under Figure 11.4. We will seek the advice of Hertfordshire County Council as the Mineral Planning Authority on any significant proposal.

B Proposals for development within the identified Minerals Consultation Area must consider their potential impact upon the mineral extraction. Proposals within the Consultation Area must demonstrate that they will not have a harmful impact upon, sterilise or prevent mineral extraction.

C Those proposing major development within the Mineral Consultation Area must demonstrate, through evidence, how they have engaged and reached agreement with the relevant mineral planning authority.

Explanation

11.84 Proposals for new development, including those delivering homes, employment uses, and infrastructure, are encouraged to consider the reuses, retrofitting and recycling of existing building/ construction materials where it is viable and a realistic proposition. Such an approach secures a circular economy and makes a positive contribution in mitigating the adverse impacts of climate change.

11.85 Nevertheless, national planning policy requires[5] that sufficient sources of mineral supply are conserved to meet national needs. That approach is inclusive of safeguarding areas that secure on-going and future supply from extraction at source.

11.86 National planning policy states that planning policies should safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas. In Hertfordshire this is primarily the responsibility of Hertfordshire County Council, acting as the local Mineral Planning Authority. The Hertfordshire Minerals Local Plan Review 2002 -2016 was adopted in March 2007 and forms part of Hertsmere's development plan.

[5] NPPF Paragraph 222 (December 2024).

11.87 The Mineral Planning Authority has defined Mineral Consultation Areas (MCAs) as part of its Mineral Consultation Areas Supplementary Planning Document (MCASPD). A significant proportion of Hertsmere is identified in the MCASPD as a MCA for sand and gravel. This includes Harper Lane Rail Depot MCA which extends into Hertsmere.

11.88 Within Hertsmere, the Tyttenhanger Quarry at Colney Heath is identified as a source of sand and gravel supply for the period until 2032. The Quarry is being progressively extracted and infilled with inert waste as the landscape is restored. It is anticipated that the Quarry will cease to be a viable source of supply during the plan period. The restoration of the Quarry will be delivered as part of the new settlement at Bowman's Cross.

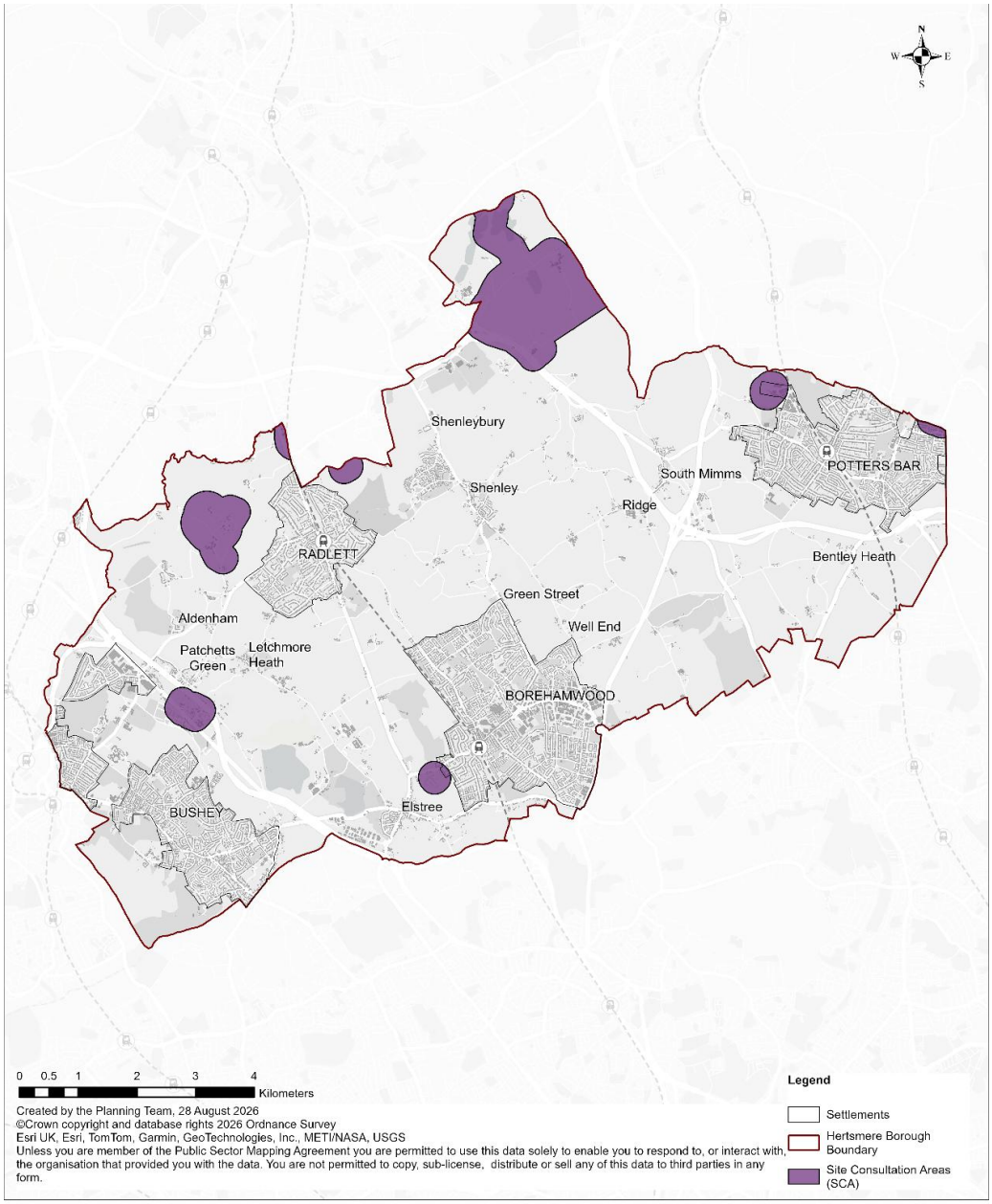


Figure 11.4: Minerals Consultations Areas

Chapter 12: Transport and Connectivity

Section

TR1 Sustainable Transport and Movement

TR2 Transport Requirements for New Developments

TR3 Parking

TR4 Deliveries, Services and Construction

TR5 Taxis and Private Hire Vehicles

TR6 Digital Connectivity

TR7 Airspace Safeguarding

TR1 Sustainable Transport and Movement

Strategic Objectives

A Delivering a better future for Hertsmere
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A The integration of land use and transport, along with an effective public transport network, are essential to delivering inclusive, safe, healthy, liveable, walkable and sustainable settlements and places across Hertsmere. Development proposals must make the most effective use of land and optimise the capacity of sites by considering connectivity and access to existing and planned future public transport. Priority should be given to reducing car use and both promoting and enabling movement by walking, cycling and the use of public transport.

B Development proposals should seek to improve and must not adversely impact on the effective functioning and safe use of Hertsmere's transport network and public realm, including walking and cycling transport infrastructure.

C Development proposals will provide protection for, not prejudice, and respond positively to the need to facilitate the delivery of, the Borough's network of transport infrastructure as set out in the Council's Infrastructure Delivery Plan. Land, buildings, space and supporting infrastructure required for the construction and operation of Hertsmere's network of strategic and other transport infrastructure will be safeguarded under planning policy.

D To encourage and enable modal shift away from car use to more sustainable transport modes, as well as to tackle local deprivation by ensuring equality of access to opportunities, the Council will work positively and in partnership with stakeholders to secure improvements to the public transport network including:

i. Secure inclusive and welcoming pedestrian networks that connect between places, inclusive of predominantly residential areas, main town centre uses, employment uses and community infrastructure;

ii. Improvements at Hertsmere's stations, including enhancements to accessibility and interchange between modes, such as step-free access;

iii. Bus priority and bus stop infrastructure; and

iv. Expansion of cycle hire.

E Development proposals should use the design-led approach to maximise opportunities to remove barriers to access and introduce measures that encourage and enable movement by walking and cycling. They must address the movement and connective function of the public realm along with its place qualities with reference to other Local Plan Policies relating to public realm and connecting places, and Healthy Streets as part of healthy neighbourhoods.

Assessing and mitigating transport impacts

F Transport Assessments, Transport Statements and/or Travel Plans must be submitted with applications for Major development and other development proposals that are likely to impact on the capacity and functioning of the transport network (including walking and cycling transport infrastructure, deliveries and servicing, and the Bakerloo line extension). These should be commensurate with the nature and scale of development proposed and provide a sufficient level of information for the Council, and other relevant authorities to assess applications, and for development proposals to adequately address impacts at the local, network-wide and strategic level where relevant.

G Development proposals that do not comply with (B) and (C) above or otherwise prohibit or prevent the necessary and safe functioning of Hertsmere's transport infrastructure and network, will be refused unless it can be demonstrated that adverse impacts will be avoided or appropriately mitigated. Proposals must deliver direct mitigation measures, with suitable alternative provision that is agreed by the relevant transport authorities and service providers, and/ or planning contributions, where appropriate.

H Development proposals will be assessed having regard to the cumulative impact of development including within Hertsmere and neighbouring local authority areas.

I Where there are identified capacity issues with respect to the additional travel demand expected to be generated by new development proposals, planning permission will be contingent on the provision of the necessary public transport and/or walking and cycling infrastructure to cater for this demand. Consideration will be given to both existing and planned transport infrastructure, considering timeframes and funding committed for any future schemes. The Council will use measures to ensure that development is appropriately phased to avoid excessive strain on the transport network and to ensure additional infrastructure demands arising from the development (including for community and green infrastructure) can be appropriately accommodated.

Explanation

12.1 An effective, resilient and safe transport network is necessary to ensure equality of access to opportunities for people across Hertsmere and to facilitate successful and sustainable growth. The integration of land use and transport is an important consideration both at the strategic Borough-wide and site level. The Local Plan seeks to rebalance the transport system away from reliance upon car use and towards more sustainable transport modes. This policy sets out our approach to facilitate this 'modal shift'. The policy also forms part of our response to the climate emergency to significantly reduce greenhouse gas emissions locally, along with tackling the associated issues of poor air quality and noise.

12.2 There is an uneven distribution of public transport provision in the Borough. The Borough's four main are served by public transport, primarily through north-to-south railway links and bus services with varying degrees of frequency. The railway services through three of the Borough's main towns - Borehamwood, Potters Bar and Radlett - have direct access to the railway network, with regular services travelling to Central London to the south, and St Albans and Cambridgeshire to the north. The Borough's other main town, Bushey, has access to the railway network via a named station located across the administrative boundary to the west.

12.3 However, other parts the Borough do not benefit from the same level of provision and connectivity to public transport. This situation, combined with the uneven distribution of public transport infrastructure, has contributed to a greater reliance on car use in those areas. This is considered unsustainable and is the reason why the Local Plan's Spatial Strategy directs growth and associated infrastructure investment towards the Borough's four main towns. The exception to this approach being the new settlement at Bowman's Cross, which provides an opportunity to both deliver growth at a scale and intensity that secures an appropriate and proportionate level of investment to make a successful and sustainable place.

12.4 Investment in transport infrastructure is necessary to support the levels of growth planned within the Borough as well as to substantially increase the proportion of journeys being made by walking, cycling and public transport. These schemes have been signposted through the Borough-wide Infrastructure Delivery, and through individual site allocations. They will play a key role in supporting the delivery of the spatial strategy for the Borough.

12.5 We will work proactively with key stakeholders, including Hertfordshire County Council and Transport for London and Network Rail, along with landowners and development industry partners to deliver new and improved transport infrastructure. This includes safeguarding the land, sites, buildings, space and associated infrastructure required to facilitate the construction and safe operation of Hertsmere's transport network. Development proposals will be required to provide adequate protection for, and respond positively to the need to facilitate, strategic and other transport infrastructure.

12.6 High-quality public realm underpins the integrated approach to land use and transport. By improving the public realm and making places and streets well-connected, greener, safer and more accessible, we aim to encourage and better enable movement by walking, cycling and public transport. Further details on public realm are set out in Policies HQD3 (Public realm and connecting places) and TR2 (Transport Requirements for New Developments).

Assessing and mitigating transport impacts

12.7 It is important that new development avoids and/ or mitigates any potential adverse impacts on the transport network. To ensure that impacts are appropriately identified and addressed through the planning process, development proposals will be required to include a Transport Assessment, Transport Statement and/or Travel Plan, where appropriate. The information should be sufficiently detailed and accurate to allow for the clear identification and assessment of specific impacts and to inform any necessary mitigation measures.

12.8 Transport Assessments should be undertaken in line with relevant good practice guidance. Transport modelling may be required to demonstrate that a proposal will not result in any adverse impacts, either individually or cumulatively in combination with other development. Healthy Streets Assessments must be included as part of the Transport Assessment for major development proposals, in line with Policy TR2 (Transport Requirements for New Developments). Where new or improved public realm is proposed within or around open spaces and biodiversity sites, this must be sensitively integrated to ensure that there will be no adverse impact on the environment.

12.9 Travel Plans must reflect the Local Plan priority given to supporting and enabling sustainable transport modes, including active travel along with use of public transport. They should address the accessibility requirements of all likely users of the development, considering the needs of disabled people and others with specialist mobility requirements.

TR2 Transport Requirements for New Developments

Strategic Objectives

A **Delivering a better future for Hertsmere**
H **Responding to the climate emergency**
J **Healthy and safe communities**
K **Securing the timely delivery of infrastructure**

Strategic Policy

A The Healthy Streets Approach will be promoted and implemented across Hertsmere to support the delivery of inclusive, healthy, welcoming, liveable, walkable and sustainable neighbourhoods. Priority will be given to approaches and measures that encourage and enable movement by walking, cycling and public transport, so that over the life of the plan they become people's preferred choice of travel in Hertsmere.

B Development proposals must demonstrate how they have applied the Healthy Streets Approach and Indicators through the design-led approach. All major development proposals must submit a Healthy Streets Assessment as part of the Transport Assessment. Proposals will be supported where they have engaged positively with the Healthy Streets Approach to deliver public realm and other improvements that support walking, cycling and the use of public transport.

C The Healthy Streets Approach will have particular importance within town centres, along and around identified areas that will support future growth and other key movement corridors that link Hertsmere's neighbourhoods and town centres with each other and those outside of the Borough.

D Development proposals must safeguard and contribute to maintaining and enhancing Hertsmere's network of walking routes and cycleways. Opportunities to enhance connections between existing and proposed future routes should be investigated and implemented wherever appropriate and feasible, including the expansion of cycle hire along these routes. Development proposals that adversely impact on the safety, quality and convenience of the Borough's network of walking routes and cycleways, and associated infrastructure (including dedicated cycle parking provision), will be refused unless appropriate mitigation measures are provided.

E High-quality public realm is integral to the delivery of the Healthy Streets Approach. In line with the Local Plan policy on public realm and connecting place development proposals must be designed to maximise the contribution

that public realm makes to encourage and enable active modes of travel. This includes measures to reduce vehicle dominance and enhance access, permeability and connectivity to and within sites by maintaining or integrating safe and legible routes for walking and cycling along with removing barriers to movement, such as gates, guardrails and stepped kerbs.

F To support the Healthy Streets Approach development proposals should provide end-of-trip facilities for cyclists that are easy to access and designed in accordance with relevant Cycling Design Standards (XXXX - an opportunity to identify good guidance). These facilities should be provided at a level that is commensurate with the nature and scale of development and the required level of cycle parking, in line with the parking standards set out in the Local Plan's car parking policy.

G To help facilitate the delivery of liveable and sustainable neighbourhoods across Hertsmere, the Council will work with stakeholders and local communities to investigate the feasibility of, and implement where appropriate, traffic management and other measures to improve the quality and amenity of residential areas. This may include interventions to reduce, re-route or calm vehicular traffic (particularly around schools and other community facilities) and/or lower speed limits in localities, as well as to enhance the quality and safety of the walking and cycle environment.

H Development proposals must be designed to ensure that the public realm is not adversely impacted by installations, including advertising columns, and seek opportunities to remove redundant installations wherever possible.

I To help facilitate modal shift the Council will work positively with its partners and stakeholders to raise awareness of active travel and to enhance opportunities for the public to access related training and funding.

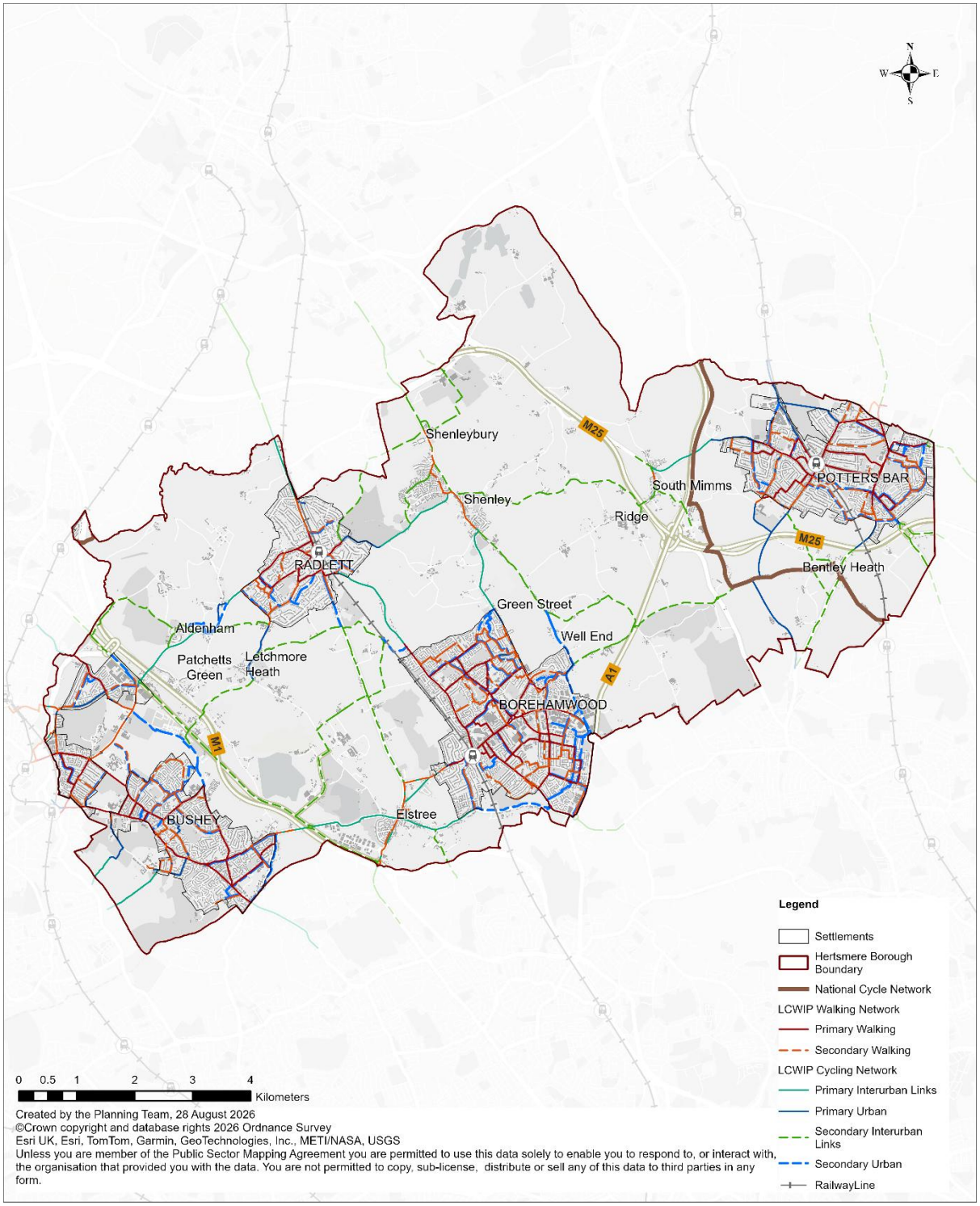


Figure 12.1: LCWIP Network

Explanation

12.10 The Healthy Streets Approach supports the Local Plan policies that seek to secure and deliver successful and sustainable growth. It will be strongly supported in Hertsmere to achieve a significant step-change away from car use to walking, cycling and the use of public transport.

12.11 Guided by the Healthy Streets Approach and its associated 'Indicators' we will work with stakeholders and development industry partners to deliver a wide range of public realm improvements. Together these will contribute to making Hertsmere's settlements and places more liveable and its streets safer, greener, less polluted, more legible and accessible to all. Development proposals should give priority to movement by walking and cycling to make active travel a more attractive option for people to move throughout the Borough.

12.12 The planned-for growth that will be delivered by the Local Plan will result in commensurate increase in Hertsmere resident population. Maintaining the current levels and high proportion of journeys made by car is not efficient or sustainable. The Borough must look forward to a new Century and must embrace innovation and change in respect of travel. Many of the Borough's settlements and places are congested and the road network has limited capacity to absorb further increases in the number of vehicles. In response to this situation, we will seek to deliver a more efficient and effective use of land. This includes rebalancing road space by promoting travel by walking, cycling and public transport.

12.13 The Healthy Streets Approach will apply to all streets in the Borough. However, to support the Spatial Strategy the Local Plan emphasises the need for public realm improvements in key locations, such as the four main town's centres and their surrounding urban areas. In addition to these, it is imperative that there is good connectivity across the four main towns, inclusive of their new urban extensions, along with improved access to community facilities and public transport nodes. This approach will also apply, from the outset, for the master planning and delivery of the new settlement at Bowman's Cross.

12.14 Development proposals should support the delivery of a fully integrated active travel and public transport network across Hertsmere. These will also secure, in circumstances where it necessary, good linkages to the countryside surrounding the four main towns and provide connectivity to neighbouring Boroughs, and settlements and places beyond.

12.15 High-quality and effectively managed public realm is integral to the successful delivery of the Healthy Streets Approach. This policy will work together with Policy HQD3 (Public realm and connecting places). Development proposals must identify and proactively respond to issues of severance, poor connectivity, amenity and pollution, including air quality, to support the creation of healthy, attractive, vibrant and accessible neighbourhoods and places. By transforming the quality of streets and other elements of the public realm, we also aim to encourage people to spend more time in public spaces. This can in turn provide more opportunities for

recreation and socialising as well as help to support the vitality and viability of town centres and other places.

12.16 By referring the Indicators of the Healthy Streets Approach, and relevant guidance, development proposals should demonstrate how buildings, including their main access points, create a positive relationship with the street and help to improve local area amenity. Proposals should explore options to increase widths to footpaths and design buildings with vehicular access sited away from adjoining street junctions. Where such interventions cannot feasibly be delivered planning contributions may be sought for public realm enhancements to help mitigate impacts.

12.17 Improving safety on Hertsmere's roads is also a key objective of this policy. Where priority is given to safe movement by walking and cycling, there is a greater likelihood of reducing car use as well as the dominance and speed of vehicles speeds.

12.18 Addressing the current high levels of inactivity among residents is a further focus of the Healthy Streets Approach. This lack of activity is a cause of many of public health issues, including Type 2 diabetes, colon cancer, coronary heart disease and depression. Implementation of this policy within the Borough will deliver people-oriented infrastructure (such as street furniture, landscaping, and cycle parking) to encourage active travel, improving the health of our local communities over the long-term.

TR3 Parking

Strategic Objectives

K Securing the timely delivery of infrastructure

Non-Strategic Policy

A Hertsmere will take a carefully managed approach to parking, particularly car parking, to support the delivery of inclusive, healthy, safe, liveable and sustainable neighbourhoods. Development proposals should be designed from the starting point that walking, cycling and public transport will become the preferred modes of travel during the life of the plan, and consequently are places that are, or are planned to be well-connected by these networks with developments elsewhere designed to be car-lite,

B Development proposals for car-free and car-lite development will be supported where they are in highly accessible and well-connected locations. Elsewhere, car-free and car-lite development will be supported where it can be suitably demonstrated that:

i. The development is appropriately located at a well-connected location with good walking and cycling access to local amenities and services; or

ii. The development is appropriately located within an area identified by the spatial strategy for future growth or town centre where the Local Plan makes provision for significant public realm enhancements that will bring about attractive conditions for walking and cycling and improve access to local amenities and services; or

iii. There is an existing Controlled Parking Zone (CPZ), or a future CPZ can be established through planning contributions; or

iv. There is sufficient capacity on the public transport network or potential for active travel interventions or implementation of Low Traffic Neighbourhoods in the local area to cater to the additional demand arising from the development, considering existing and planned transport infrastructure.

C Development proposals must not exceed parking standards set out under Appendix 7 Sustainable Parking Standards.

D Development proposals must make adequate provision for residential and non-residential disabled persons parking, recognising that car free development has no general parking but should still provide disabled persons parking. All such

provision must be in accordance with the relevant standards and the requirements for design and management of parking bays.

E Development proposals must make provision for high-quality and fit-for-purpose cycle parking in accordance with the Cycle Design Standards. This includes sufficient provision of short and long-stay spaces along with spaces to accommodate larger cycles including adapted cycles for disabled people and cargo bikes.

F Major development proposals, development proposals located within town centres and employment areas, or other developments likely to generate a significant number of visitors should integrate dedicated space for cycle hubs to accommodate provision of cycle parking including for cycle hire schemes and space for cargo bikes wherever feasible. Proposals for the comprehensive development of sites, including through masterplans, must demonstrate how they have maximised opportunities to deliver this provision in order encourage and enable cycling.

G The Council will consider the need for CPZs to manage additional or new demand arising from development across the Borough and will implement these where appropriate.

H In order to manage the parking demand associated with new development the Council will consider on a case-by-case basis whether it is appropriate to require that the development is Permit Free (except for Blue Badge holders). Proposals for new car-free development must be Permit Free. (What is the Council's position on this matter?)

I Parking Design and Management Plans (PDMPs) must be submitted with development proposals that include parking. PDMPs must also be submitted for development proposals without parking but which are likely to generate a significant demand for parking or impact on existing parking provision.

J Development proposals for residential and commercial uses will be expected to investigate opportunities to implement rapid charging points, having regard to the Council's approach towards Low Emissions Vehicle Charging.

K Surface-level car parking should be designed to be permeable, with reference to the Local Plan's Policy towards Sustainable drainage.

Explanation

12.20 An effective and well-functioning road network is essential to supporting local businesses and Hertsmere's economy, the resilience and efficiency of emergency services and the public transport network. As the population grows the road network will not be able to absorb the additional cars that would result from continued levels of car ownership and use. To achieve the Local Plan's strategic objectives for

sustainable place making by increasing the number of journeys made by walking, cycling and the use of public transport, parking must be carefully managed and controlled. Reduced car parking provision together with improved walking and cycling infrastructure can support the creation of places that are designed for people rather than vehicles.

12.21 Borough-wide sustainable parking standards will be applied including the maximum standards for car parking. These are set out under Appendix 7 Sustainable Parking Standards. The residential parking standards apply to all developments requiring planning permission involving the provision of 1 or more residential units (gross).

12.22 The non-residential parking standards will apply to all developments requiring planning permission that result in the creation of non- residential floorspace. This includes the extension and alteration of existing non- residential premises and all changes of use. Where applications for prior approval are received, these parking standards will be a material consideration in the assessment of the potential transport and highway impacts of the development, where this is one of the relevant assessment criteria in the General Permitted Development Order.

12.23 Where mixed-use, residential and commercial developments are proposed, the parking requirements for each element should be calculated individually using the standards set out under Appendix 7. Where appropriate, the Council will consider the shared use of parking between residential and commercial elements where it can be demonstrated that the relevant standards are met.

12.24 Development proposals must be designed to encourage and enable movement by walking and cycling. This will require that careful consideration is given to the design of public realm along with the provision of high-quality and dedicated facilities for cyclists, including easily accessible, and safe and secure cycle parking.

12.25 The cycle parking standards are informed by the Department for Transport Cycle Infrastructure Design Local Transport Note. There should be 5% set aside for provision of non-standard/accessible cycle parking. This may include trailers, family bikes or 3 wheelers. Accessible cycle parking spaces shall be served by a route at least 1,500mm in width and the spaces shall be wider than standard cycle parking spaces. Such spaces could be provided at the end of a rack of cycle parking.

12.26 Measures such as car clubs and electrically charged or Ultra-Low Emission vehicles can provide an alternative to car ownership and conventional gas fuelled vehicles. Development proposals should have regard to Part S of Schedule 1 and regulation 44D of the Building Regulations 2010 on Electric Vehicle Charging Points (EVCP) provision. However, within the context of the climate emergency the use of car clubs and Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions, they are carbon intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality.

12.27 Car clubs can be useful in supporting car-free development. They are best implemented in association with reductions in the overall number of parking spaces being provided in an area. Simply adding car club cars to areas with lots of parking is not an effective way to reduce car ownership or use and only serves to increase the dominance of vehicles on the streets in new developments. Consequently, car clubs should be deployed as a means to reduce the overall volume of parking, specifically in locations where they can provide for occasional car use for households that are prevented from owning their own car, where parking levels are very low, and they should include electric vehicle charging points.

TR4 Deliveries, Services and Construction

Strategic Objectives

B A thriving local economy
K Securing the timely delivery of infrastructure

Non-Strategic Policy

A Proposals for development should facilitate sustainable freight, where possible, through water, rail, and road including for 'last-mile distribution'. They must also facilitate and enable safe, clean and efficient delivery and servicing for all the development's intended occupiers and uses, including emergency services. Delivery and servicing requirements should be considered at the early stage of the design-led approach, particularly in mixed-use development, to ensure practical site layouts and building designs that protect local amenity and avoid or mitigate adverse impacts to the highway network.

B Provision of adequate space and facilities for deliveries and servicing should be made off-street, with on street loading bays or other facilities only used where it is demonstrated this is necessary due to feasibility. Major and other larger developments should make provision for well-integrated facilities to allow for deliveries to be received outside of peak hours and for secure, temporary storage of parcels or goods.

C Development proposals for commercial and industrial uses should ensure that parking provision for servicing and delivery is commensurate with the specific operational needs of the development. The level and type of parking provision will be considered on a case-by-case basis with reference to the Local Plan's Parking Policy. Proposals must provide evidence to demonstrate that the provision is appropriate to location, nature and scale of commercial or industrial use.

D Major developments and other development proposals that are likely to generate a significant number of vehicle movements from deliveries, servicing or

construction will be required to submit a Delivery and Servicing Plan and/or Construction Logistics Plan as part of the Transport Assessment. This should provide a sufficient level of detail about the servicing, delivery and freight requirements of the development from the construction to occupation stages and demonstrate that all likely adverse impacts on local amenity and the highway network have been avoided or mitigated, recognising that final details may be sought by condition. Consideration should be given to the timing of deliveries.

E For major developments and other developments which are to be delivered comprehensively through a masterplan, proposals will be required to prepare and implement a site-wide strategy for deliveries, servicing and construction. This should support the design-led approach and help to enable coordination and integration of servicing requirements across the site(s). Development proposals, particularly those including commercial uses, are encouraged to optimise the use of land by making provision for shared storage, micro-consolidation and distribution facilities appropriate to use(s), scale and location of development.

Explanation

12.28 Freight movement is an important consideration in the planning and design process. The Local Plan encourages efficient and sustainable freight movement by appropriate and suitable modes - through the consolidation of activities, modal shift and improved coordination in the timing of deliveries.

12.29 Careful consideration will need to be given to development proposals involving large-scale freight consolidation and distribution activities. All such proposals should be appropriately located, for example, in Key and Main Employment Areas. Consideration may also be given to the potential use of employment sites to support small scale, last-mile distribution. Proposals must clearly demonstrate how they will address sustainable freight movement in the Borough without adversely impacting on the road network, local amenity or the environment. Consolidation and distribution uses should also be commensurate with the role and function of the site or area within which they are located.

12.30 To support sustainable freight, we will explore options and work with stakeholders to make provision for centralised delivery hubs, including secure lockers, in appropriate locations throughout the Borough. This will support our objectives around delivering walkable places, traffic reduction and reducing road danger, with consequential benefits in terms of address traffic congestion, poor air quality and noise pollution.

12.31 Largely driven by advances in technology, the logistics and freight industry is rapidly shifting to a model of ‘last mile’ delivery. It is also adapting to changes in consumer behaviour and the rising popularity of home deliveries, including for groceries, other retail items and takeaway meals. These changes have contributed to the prevalence of delivery vehicles on the road network. They have also introduced new challenges for the design of buildings and spaces.

12.32 Delivery and servicing requirements for new development needs to be considered at the early stage of the design-led approach. Provision of adequate space and facilities should be made off-street and well-integrated into the site and locality. Larger developments, including residential and mixed-use schemes, have the capacity to generate a significant number of service and delivery trips, which will need to be addressed. Proposals should incorporate delivery receipt and storage facilities that suit the needs the intended occupiers and uses, include secure storage and where possible, containerised (cold storage). Opportunities should be taken to consolidate or coordinate provision in order reduce the number vehicle movements.

12.33 All major development proposals, and other proposals that are likely to result in a significant number of freight movements, including in the construction and operation stages will be required to submit a Delivery and Servicing Plans and/or Construction Logistics Plan.

TR5 Taxis and Private Hire Vehicles

Strategic Objectives

K Securing the timely delivery of infrastructure

Non-Strategic Policy

A Development proposals for offices, taxi ranks, and other operational space associated with taxis and private hire vehicle businesses (including minicabs) will only be supported where:

i. They are appropriately located, with priority given to sites within or near town centres and at or near stations;

ii. The development will not result in a harmful overconcentration of similar uses in the locality;

iii. It is suitably demonstrated that there will be no adverse impact on amenity and the highway network;

iv. Walking routes and cycleways will not be adversely impacted, particularly where these are used for access to bus stops, station entrances and other public transport services;

v. The development is of a high-quality design;

vi. Offices and ranks are accessible and safe during operational hours, including using appropriate lighting and CCTV; and

vii. Parking spaces delivered on-site to meet the operational use of a building (including offices, hotels, community facilities and major public facilities) have active charging points for all designated taxi spaces.

Explanation

12.34 This policy sets out requirements for new development associated with taxi and private hire vehicle businesses, including minicabs. This type of development is distinguished from the land and facilities used for car clubs or car share services, which are dealt with separately in Policy TR3 (Parking).

12.35 The Local Plan seeks to deliver inclusive, healthy liveable and sustainable neighbourhoods by encouraging and enabling active travel and the use of public transport. However, it is recognised that other modes of travel play a role in supporting residents, businesses and visitors, including taxis and private hire vehicles. Whilst taxi and private hire journeys make up a relatively small proportion of local journeys, they play an important role in the Borough's transport network;

being valuable for a wide range of users. This includes people with reduced mobility who require accessible door-to-door transport services, or who those who do not have access to reliable alternative means of travel, for example, due to the lack of public transport accessibility or infrequent services.

12.36 Taxis and minicabs also provide a safe and regulated transport option. They assist people to complete journeys beyond the reach of the bus or train network, or in many cases, provide the only safe and convenient transport option during the early morning, evening and night-time. In addition, the taxi and private hire vehicle industry plays a role in the local and wider regional economy and is a source of jobs.

12.37 A carefully managed approach is therefore necessary to ensure the appropriate management of land for transport functions, including that required for taxis and private hire vehicles. Facilities should ideally be near town centres or train stations where there are compatible land-uses, opportunities for linked trips and where journeys are most likely to originate or end. Proposals will be expected to demonstrate that development will not result in an overconcentration of similar uses in the locality. The cumulative impact of development will therefore be a consideration in the assessment of proposals.

12.38 Development proposals for taxis and private hire vehicles must be of a high-quality design. Taxi offices, ranks and other facilities should be appropriately sited and provide all users of the development with good levels of safety and security, including through sensitively integrated lighting and the use of CCTV. It is also important that facilities are designed to be accessible to all.

TR6 Digital Connectivity

Strategic Objectives

A Delivering a better future for Hertsmere
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Digital connectivity infrastructure is necessary for access to services and other opportunities, inclusive communities and growth and diversification of the local economy. The Council will work with stakeholders to address barriers to digital access and secure the provision of high-quality, fast and reliable digital infrastructure across Hertsmere.

B Development proposals will be required to take appropriate measures to enable full-fibre, or equivalent infrastructure, connectivity to all end users within new development, along with meeting the expected demand for mobile connectivity generated by the development. Proposals must demonstrate that the development will be 'connection-ready' on first occupation.

C Development proposals must demonstrate how they will improve digital connectivity on-sites located in areas where full-fibre broadband, or equivalent infrastructure, is not currently available or on-sites that are otherwise poorly served by broadband coverage, including in designated employment areas and town centres. Proposals must have regard to Hertsmere's Infrastructure Delivery Plan and other relevant information on broadband coverage.

Infrastructure and equipment design

D Development proposals for digital connectivity infrastructure and associated equipment will be supported where it can be suitably demonstrated that:

i. The infrastructure and equipment is the minimum needed to meet operational requirements, having regard to future demand or planned improvements;

ii. Opportunities for infrastructure and equipment sharing have been fully investigated and considered;

iii. There will be no significant adverse impact on the visual amenity of the occupiers of the host building, where relevant, and neighbouring occupiers;

iv. The connection and consumption of power and water supplies has a neutral impact on the wider utility network;

v. There will be no adverse impact on open space and biodiversity;

vi. If located on a main road or walking route, a minimum residual footway is provided;

vii. Detrimental impact on the external appearance of the host building or structure, street scene or space on which the equipment is located will be avoided or appropriately mitigated; and

viii. The infrastructure and equipment is sensitively located and appropriately designed, and does not detract from local area character, having regard to:

ix. The need to preserve or enhance the significance of heritage assets, including Listed Buildings and conservation areas;

x. The use of design treatments to ensure the least possible visual impact, including colour, landscape and other interventions to help screen or conceal cabling and other apparatus; and

xi. The cumulative impact of telecommunications installations on a structure, site or area.

E In order to minimise visual impact all digital connectivity infrastructure and equipment should be removed as soon as reasonably practicable once it is not required for use, and older equipment should be upgraded wherever feasible.

Explanation

12.39 Digital connectivity infrastructure, including data centres, is playing an increasingly important role in the functioning of cities and society. It is transforming how infrastructure and services are provided, with innovative ‘Smart City’ technologies that make use of information to deliver more resource and cost-efficient provision. It is also helping to facilitate different forms of communication between people as well as enabling more convenient and wider access to goods and services. In addition, digital connectivity infrastructure is important for business and now considered essential to sustainable economic development.

12.40 Digital connectivity infrastructure also has implications for physical connectivity and the transport network. For example, new technologies are changing the way in which people work and commute, often reducing the need for workers in some industries to travel. Changes in work patterns have accelerated in the aftermath of the Global pandemic, with an increased transition to online and flexible working arrangements. Further, smart technologies are supporting efficiencies in the distribution and logistics sector, with improved timing and coordination in servicing and deliveries.

Over time these technologies may have significant impacts on the transport network by helping to reduce demand and/or the volume of movements, particularly during traditional peak hours.

12.41 Digital connectivity infrastructure is necessary to support inclusive and sustainable neighbourhoods and communities. It will make a significant contribution towards the future management of wider networks – including those associated with transport, utilities and employment. Consequently, it is important that digital networks continue to be maintained and enhanced. This is to ensure equality of access to services for Hertsmere's residents and communities and to support our economic development objectives, particularly to maintain Hertsmere's position as an international centre for film and television production. Consequently, we will work with industry stakeholders and development industry partners to ensure the provision of high-quality, fast and reliable digital connectivity infrastructure across the Borough.

Infrastructure and equipment design

12.42 It is important that digital connectivity infrastructure is of a high-quality design and appropriately managed. This will ensure that development does not adversely impact on amenity, local character, heritage assets, the provision of power and water supply, open space and biodiversity and the functioning of the public realm. Development proposals should be sited and designed so to avoid or have the least detrimental visual impact and must respond positively to local character including the significance of heritage assets and their setting. Proposals should consider how to conceal equipment by using design treatments including colour, landscaping and GRP shrouds or screens. Development located on a principal street frontage must be well designed and sensitively integrated onto or within a building, structure, or space and disguised from view wherever feasible.

12.43 Proposals that seek to deliver new data centres, or ancillary digital connectivity uses, such as battery energy storage systems, will also be considered in respect of requirements set out under the Local Plan's policies relating to industrial employment uses. This is inclusive of proposals that seek to reuse existing industrial employment provision.

12.44 Proposals for development must demonstrate that they have optimised opportunities to mitigate visual impacts. Applicants should engage with neighbouring landowners, infrastructure providers and service operators to investigate the feasibility for sharing sites and equipment, such as masts and cabinet boxes. This should include consideration of any planned future improvements necessary to meet the needs of current or future occupiers within a site or area.

12.45 The Manual for Streets should be referred for guidance on appropriate residual distances where development is located on a main road. In town centres and other high traffic areas, the minimum residual distance of two metres may not be sufficient to enable appropriate pedestrian flow, and the minimum width will be determined based on the number of pedestrians per square metre and pedestrian flows per minute.

12.46 Digital connectivity infrastructure including supporting structures and equipment (such as masts, cabinet boxes, satellite and other dishes, antennae, cabling, shrouds and stands) should be removed as soon as reasonably practicable once it is not required. This will help to ensure that the quality of townscapes, streetscapes and public realm are not adversely impacted by unnecessary clutter.

TR7 Airspace Safeguarding

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
J Healthy and safe communities

Strategic policy

A Proposals for development will not be permitted where it is demonstrated that they would have an adverse impact on the operational integrity or safety of the identified safeguarded civil and military aerodromes or associated aerodrome navigation aids, radio aids or telecommunications systems.

The Council will consult the Airport Operator on proposed wind turbine developments within the Heathrow Airport Safeguarding Zone, as identified on the Policies Map.

The Council will consult with the Elstree Airport Licensee on relevant proposals for development. It will only permit development proposals which:

i. will not compromise the Aerodrome's operational integrity and general safety; and

ii. are compatible with the continued use of the site as an aerodrome.

Explanation

12.47 National planning policy requires local planning authorities to take account of the growth and role of aerodromes in serving business, leisure, training and emergency service needs.

12.48 Hertsmere's location within the Capital's hinterland places it within the safeguarded airspace around three important aerodromes: Elstree Aerodrome; Heathrow; and RAF Northolt. Proposals for development should consider their impact upon these strategic transport hubs.

Elstree Aerodrome

12.49 Elstree Aerodrome lies between Elstree and Aldenham. It is a privately operated airfield licensed by the Civil Aviation Authority (CAA) for paid passenger flights and flying instruction. The Aerodrome is also used by other aircraft and non-aircraft related businesses and provides a location for filming and other events.

12.50 The Council recognises the contribution to the local economy which businesses based at the Aerodrome make; its role in the national transport infrastructure, providing connectivity, particularly for business travellers, with locations outside the Borough; and the opportunities for access to aviation for sport and leisure that flying schools and aircraft hire companies based here offer. When considering proposals for new development it is important that the Council has regard to their compatibility with the future operation of the Aerodrome.

12.51 Elstree Aerodrome is a CAA licensed airport but not officially safeguarded. The Aerodrome Operator is however required to take all reasonable steps to ensure the Aerodrome and its airspace are safe for use by aircraft. Government advice is that aerodromes such as Elstree should agree a consultation procedure between themselves and the Local Planning Authority to protect their locations from the effects of possible adverse development (The Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002[1].

12.52 The Elstree Aerodrome Operator has provided the Council with safeguarding information in the form of a safeguarding chart indicating areas within which they wish to be consulted on specific types of proposals - either due to their height or because they involve major tree planting, mineral extraction or quarrying, a refuse tip, reservoir, sewage disposal works, nature reserve or bird sanctuary, or are connected with an aviation use. It is therefore important that the Council consults with the Aerodrome as requested to ensure that general safety around the Aerodrome and the operational integrity and safety of the Aerodrome itself are not compromised.

12.53 The detailed safeguarding chart for Elstree Aerodrome is available on the Council's website. The extent of the safeguarded airspace is shown at Figure 12.1.

Heathrow Airport

12.54 Significant areas of the Borough also fall within the 30km radius official safeguarding area for Heathrow Airport; the Council is required to consult the Airport Operator on proposed wind turbine developments within this area.

[1] Safeguarding aerodromes, technical sites and military explosives storage areas - GOV.UK

12.55 The establishment and possible updating of these safeguarded areas are not the responsibility of the local planning authority. The boundary of the Heathrow Airport official safeguarding area is shown at Figure 12.2.

RAF Northolt

12.56 RAF Northolt is a military airbase located to the north-west of London. Aircraft operating into and out of RAF Northolt fly over parts of Hertsmere. As part of operations, safeguarding zones cover the Borough. This identifies when the Ministry of Defence will act as a statutory consultee as part of the decision-taking process.

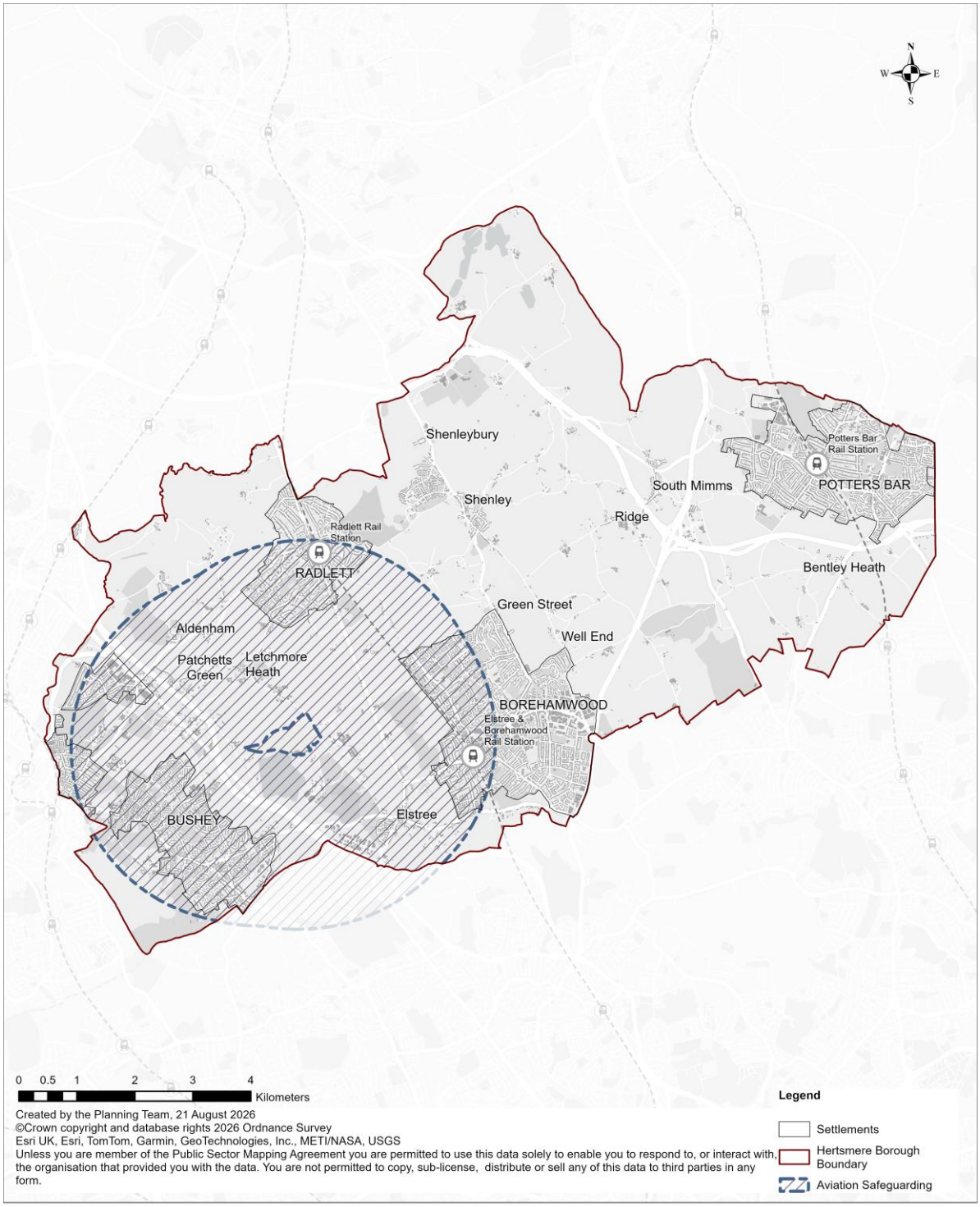


Figure 12.2: Elstree Aerodrome Safeguarding Zone Map

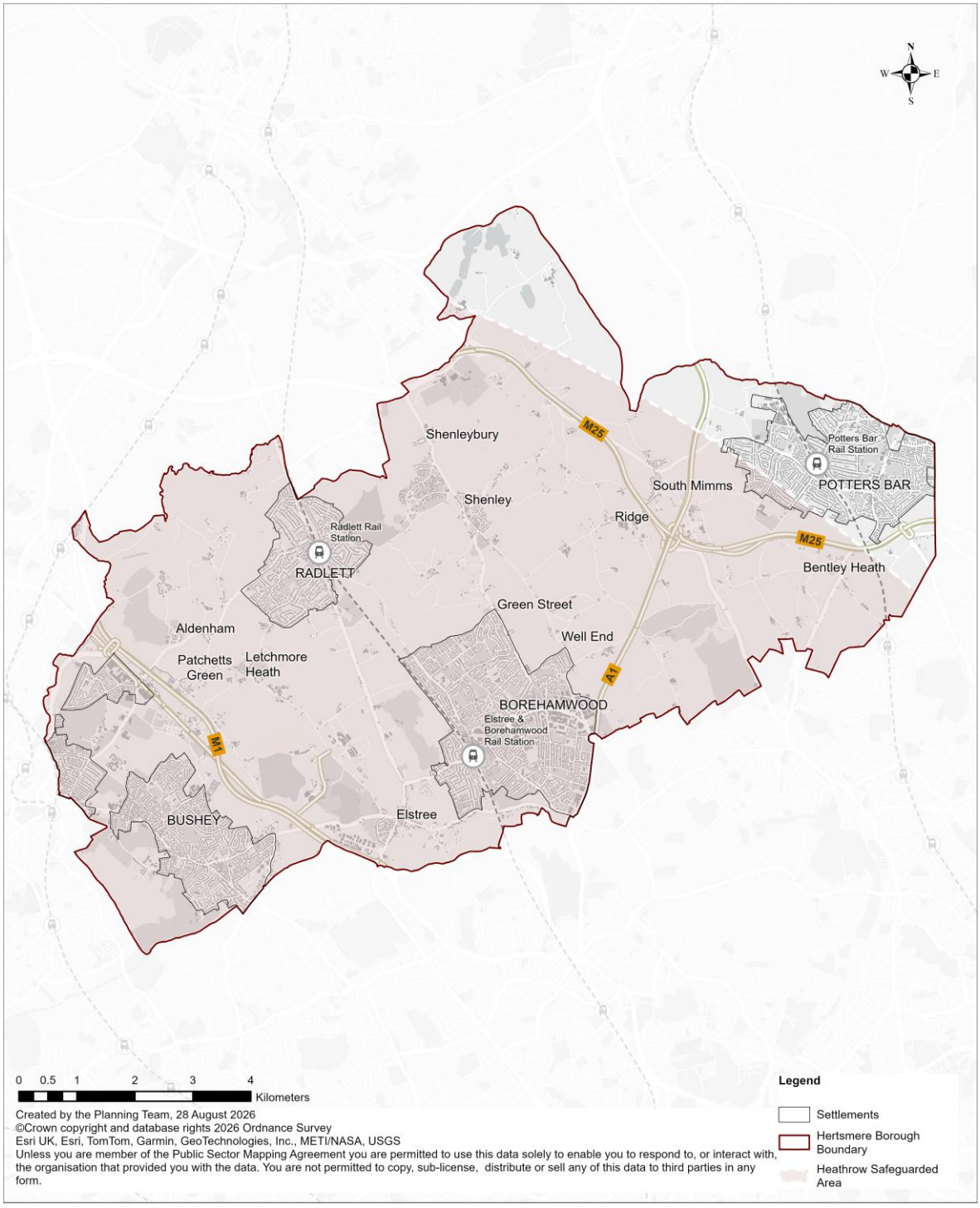


Figure 12.3: Heathrow Airport Safeguarding Zone

PART 3

Hertsmere's Towns and Places

SETTLEMENT POLICIES
SITE ALLOCATIONS

Chapter 13: Introduction - Hertsmere's Towns and Places

Section

Celebrating Hertsmere

Hertsmere in its wider context

Delivering the spatial strategy and meeting local needs

Celebrating Hertsmere

13.1 Hertsmere is a diverse borough located in the south of Hertfordshire. It is made up of towns, neighbourhoods and rural communities, each with its own identity and character. These places are shaped by their communities, historic development, built form, landscape setting, centres, green spaces and connections with neighbouring areas. Together, they create the qualities that make Hertsmere distinctive.

13.2 The Hertsmere Local Plan seeks to accommodate growth in a way that celebrates and strengthens the Borough's local distinctiveness. To achieve this objective, development must understand local context and respond positively to the character, function and needs of the place in which it is located. Respecting established character and accommodating change should not be seen as mutually exclusive. High-quality development can reinforce valued characteristics, repair weaknesses in the built environment and add a positive new layer to the identity of a place.

13.3 This part of the Local Plan is organised around Hertsmere's four principal settlement areas. These are comprised of the following towns:

- Borehamwood
- Potters Bar
- Bushey
- Radlett

13.4 These towns occupy different positions within the Borough's settlement hierarchy and have different roles, levels of accessibility, infrastructure, development opportunities and environmental constraints. This is evidenced through the Hertsmere Settlement Hierarchy and Services Study. Borehamwood is the Borough's principal settlement and focus for homes, employment and services. Potters Bar and Bushey are significant settlements with established centres and strong relationships with neighbouring areas, while Radlett is a smaller town with a well-defined centre and strong rail accessibility. The spatial strategy responds to these differences rather than applying a uniform approach to growth across the Borough.

13.5 Hertsmere's smaller settlements are also important to the Borough's identity. They provide homes, local facilities and community networks and contribute significantly to Hertsmere's historic and rural character. They are addressed through the Borough-wide policies, the settlement hierarchy, relevant site allocations and policies relating to development in the countryside and Green Belt. Their omission from the four settlement chapters does not diminish their importance or imply that their needs and relationships with the principal settlements have not been considered.

13.6 As a key part of the plan-making process, the Council prepared and published Settlement Visions for the Borough's four main towns. These have helped to

establish a place-based framework for the four principal settlements. They have been informed by baseline research and engagement with residents, community organisations and other stakeholders. The Visions identify common priorities around connectivity and active travel, sustainable growth, town centres and public realm, green and blue infrastructure, environmental resilience, community life and local prosperity. They also reflect the identity and circumstances of each place.

13.7 Borehamwood's identity is shaped by its diverse communities, its role as Hertsmere's principal town and its internationally significant film and television industries. The Vision for Borehamwood seeks to secure a better-connected network of neighbourhoods, a safer and more distinctive town centre, a wider choice of homes and improved parks, infrastructure and access to the surrounding countryside.

13.8 Potters Bar is characterised by its established residential neighbourhoods, two complementary town centres, strong rail connections, green setting and cultural focus at the Wyllyotts Theatre[1]. The Vision for Potters Bar is for brownfield-led growth, inclusive homes, better connections between its centres and green spaces, an improved public realm and a more resilient green and blue infrastructure network.

13.9 Bushey comprises a series of distinctive communities, including Bushey Village, Bushey Heath and North Bushey. Its identity is closely associated with its heritage, artistic traditions, wooded landscape, local centres and strong relationship with the surrounding countryside. The Vision for Bushey is for sensitive and pragmatic growth that supports affordable and inclusive homes, a thriving local economy and accessible connections to nature while reinforcing the character of its different neighbourhoods.

13.10 The small town of Radlett is shaped by its historic development along Watling Street, its railway connections, established neighbourhoods, conservation areas and leafy setting. The Vision for Radlett seeks sensitively managed growth, a lively and welcoming centre, safer walking and cycling routes, improved links across the railway and the protection of its heritage, local character and relationship with the countryside.

13.11 Hertsmere's Local Plan Part 3 is comprised of separate chapters for each of the four main towns. These set out the context and character of the area, a long-term vision, key spatial objectives and place-based policies. These provide the framework for directing investment, managing change and assessing how development proposals should respond to the opportunities and challenges of each settlement. The four

[1] Wyllyotts Theatre is Potters Bar's main theatre and cinema venue, providing a diverse programme of live performances, films and community activities, serving as a key cultural hub for the town.

main settlement chapters also include the site allocations that will supply and deliver much of the Borough's future growth over the plan period.

13.12 Part 3 also includes a further chapter that addresses the new settlement allocation being proposed for land at Bowman's Cross. The new settlement allocation will secure housing supply and delivery across the latter stages of the plan period into the next.

13.13 The settlement chapters must not be read in isolation and be read alongside the Borough-wide Spatial Strategy and the planning policies set out under Part 2. The Settlement Vision implementation and delivery work will also help to coordinate investment, infrastructure and regeneration activity, but does not replace the statutory policies of the Local Plan.

Hertsmere in its wider context

13.14 Hertsmere's places and communities are not defined solely by the Borough boundary. The Borough has strong social, economic, transport and environmental relationships with Watford, St Albans, Welwyn Hatfield, Three Rivers and the adjoining London Boroughs of Barnet, Enfield and Harrow. Residents travel across these boundaries for employment, education, healthcare, shopping, leisure and cultural activities, while settlements outside Hertsmere also rely on facilities and employment within the Borough.

13.15 The Borough's cross-boundary relationships are reinforced by the rail network, the M1, M25 and A1(M), other strategic roads, bus services, walking and cycling routes and networks of green and blue infrastructure. These highly accessible travel networks create shared challenges, including congestion, infrastructure pressures, environmental impacts and the need to coordinate strategic growth. The Council will continue to work with neighbouring authorities, Hertfordshire County Council and infrastructure providers to address strategic matters and support the successful delivery of the Local Plan. Hertsmere's location adjoining London and within South West Hertfordshire is an important consideration for the spatial strategy and the Visions for the four main settlements.

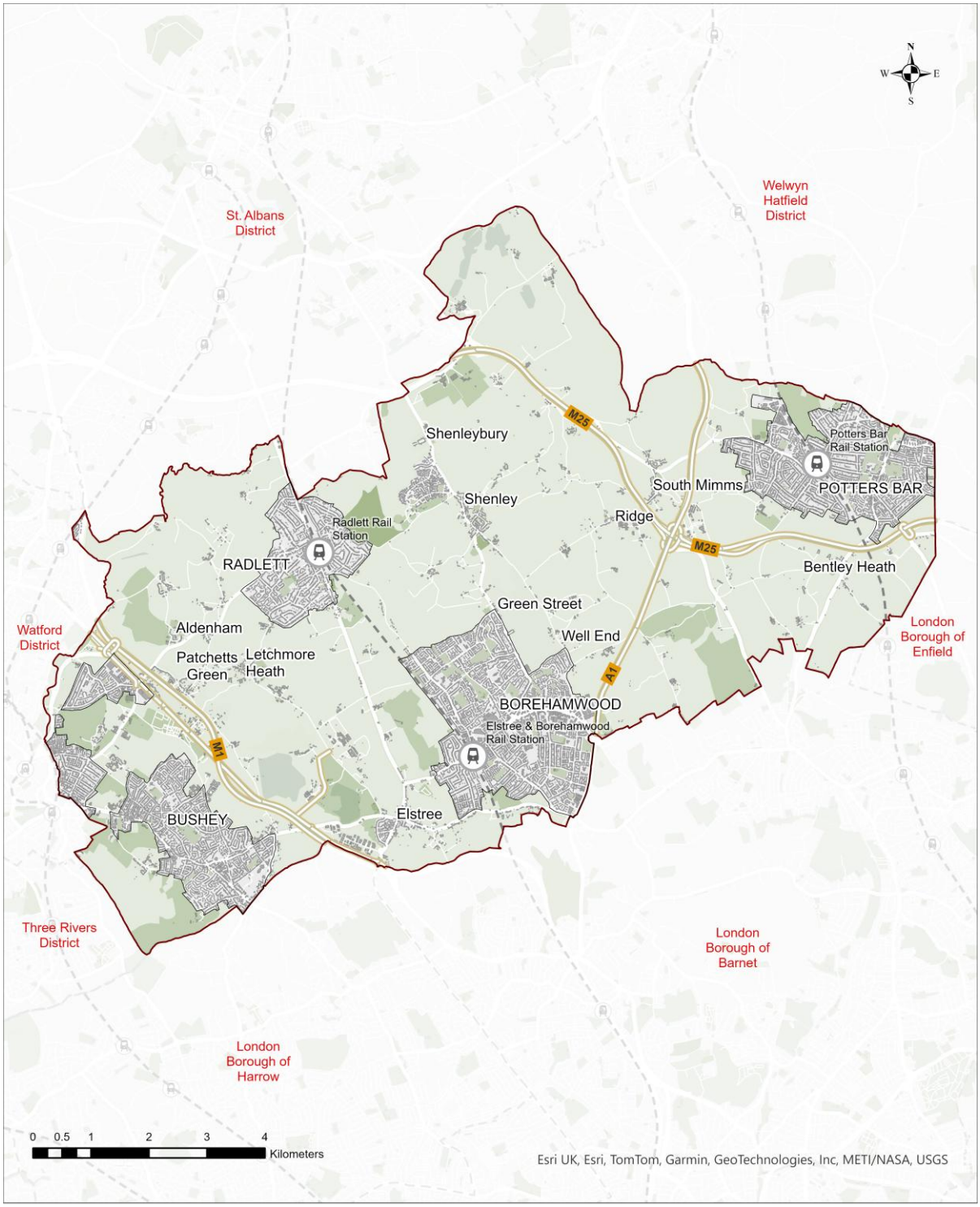


Figure 13.1: Hertsmere's principal settlement areas and wider context

Delivering the spatial strategy and meeting local needs

13.16 Hertsmere's Local Plan Part 3 settlement chapters and site allocations are central to the delivery of the Borough's Spatial Strategy. They provide the place-based framework through which the Borough will meet its needs for new homes, employment, town-centre uses and supporting infrastructure while protecting and enhancing the qualities that make its settlements distinctive.

13.17 The Spatial Strategy prioritises the effective use and regeneration of previously developed land, particularly within the four main settlements and their town centres. This includes the redevelopment of underused land and buildings, appropriate intensification, the renewal of town centre sites and the delivery of mixed-use development. This brownfield-first approach supports the delivery of new homes and jobs while enabling investment in public spaces, local centres, transport connections, community infrastructure and green infrastructure.

13.18 Evidence prepared to inform the plan-making process demonstrates that the capacity of the Borough's previously developed urban land is insufficient on its own to meet all Hertsmere's needs. The Local Plan therefore also allocates appropriate sites at the edges of existing settlements and a new settlement at Bowmans Cross. These sites have been selected having regard to the settlement hierarchy, accessibility, Green Belt and other environmental considerations, infrastructure requirements, deliverability and their ability to contribute to sustainable patterns of growth. They have been tested through Sustainability Appraisal (SA).

13.19 The Local Plan's site allocations establish the land-use principles and development requirements that are important to the delivery of the spatial strategy. Depending on their scale and location, the allocation policies identify:

- The expected uses and development capacity
- Design and place-making principles
- Access and movement requirements
- Social, transport and utility infrastructure
- Green and blue infrastructure
- Requirements for comprehensive development
- Relationships with adjoining sites and neighbourhoods
- Delivery and phasing considerations

13.20 Future development proposals will not be considered solely within the boundary of an individual allocation. Proposals should demonstrate how they contribute to the relevant settlement vision and spatial objectives, connect successfully with their surroundings and support the coordinated delivery of infrastructure and wider place-making benefits. Where sites are interdependent or require shared access, infrastructure or open space, they must be planned comprehensively in accordance with Policy DM3.

13.21 The development capacities identified in the site-allocation policies are based on the evidence available at the time the Local Plan was prepared. They are indicative and identify the scale of development that the Council expects sites to deliver and are important to demonstrating that the Plan can meet identified needs.

13.22 The site allocation capacities should not generally be treated as absolute maxima. The appropriate capacity of a site must be established through a design-led approach having regard to its context, accessibility, character, heritage, landscape, infrastructure requirements and relevant Local Plan policies. Development below the expected capacity will need to be justified by robust site-specific evidence. Proposals for additional capacity will be supported where they maintain high standards of design and place-making and do not compromise infrastructure delivery, amenity, environmental quality or the successful implementation of the wider spatial strategy.

13.23 The allocation of land does not remove the need for development to be supported by the infrastructure required to make it sustainable. The Infrastructure Delivery Plan identifies the strategic and local infrastructure necessary to support planned growth, including education, healthcare, transport, utilities, community facilities, sport and recreation and green and blue infrastructure. Allocation policies identify site-specific requirements where these are necessary to address the impacts of development or support the creation of successful and sustainable places.

13.24 Infrastructure must be planned and delivered in step with development. Larger and more complex sites will be expected to demonstrate how infrastructure, facilities and place-making improvements will be funded, phased and delivered. Development should also contribute to improvements that benefit existing communities where these are necessary and directly related to the growth proposed.

13.25 Table 13.1 summarises the minimum scale of housing, employment and town-centre development expected from the site allocations and other sources of housing and employment supply[2] over the Plan period. It should be read alongside the housing trajectory, individual allocation policies and the delivery and monitoring framework. The table demonstrates how the allocations collectively implement the Spatial Strategy and provide sufficient flexibility to respond to changes in the timing and delivery of individual sites.

[2] Including planning commitments, historic small windfall delivery trends for housing and other housing sites with capacity to deliver up to 50 homes.

Table 13.1: Settlement Areas and Development for Plan Period

Settlement Area	Homes (Net)	Employment (Gross Floorspace sqm)
Borehamwood	4,242	150,000 sqm
Potters Bar	3,369	219,000 sqm
Bushey	3,214	88,000 sqm
Radlett	2,907	9,500
Bowmans Cross	2,500	TBC
Other locations	661	15,700
Total for Plan Period	**16,893 homes**	**482,200 sqm**

13.26 The following chapters set out how each of Hertsmere's principal settlements contribute to the delivery of this strategy. They should be read as part of the Local Plan as a whole. Development that complies with an individual allocation policy must also comply with all other relevant strategic and development-management policies.

Borehamwood Area

Chapter 14: Borehamwood Area

Section

Context and Character

Vision

Elstree and Borehamwood railway station

Key Spatial Objectives for Borehamwood

HBA1 Borehamwood Principal Location for Growth

HBA2 Borehamwood Town Centre Regeneration

HBA3 Elstree Way Employment Corridor

HBA4 Sustainable Movement and Connectivity in Borehamwood

HBA5 Green Infrastructure and Landscape Setting

Context and Character

14.1 Borehamwood is Hertsmere's largest settlement and functions as the Borough's principal town and economic centre. Together with the adjoining settlement of Elstree, it forms a well-established urban area that plays a central role in delivering the Local Plan's spatial strategy. Borehamwood contains the greatest concentration of homes, employment, services, public transport infrastructure and town centre activity in Hertsmere and is therefore one of the borough's most sustainable and accessible locations for accommodating growth.

14.2 The Borough's principal town is in the south of Hertsmere, close to the boundary with Greater London. The town benefits from strong strategic and local connections, including Elstree & Borehamwood railway station, which provides direct Thameslink services to central London and other destinations. The town is also well connected by road, with access to the A1 and nearby M25, and is served by local bus routes linking Borehamwood with surrounding settlements.

14.3 The town's urban form reflects its historic growth and significant twentieth-century expansion. The town includes established residential neighbourhoods, post-war estates, commercial areas, employment sites and more recent higher-density development within and around the town centre. These areas are supported by schools, parks, community facilities and local centres. The town is also closely related to the surrounding countryside, which contributes to its landscape setting and helps maintain separation from neighbouring settlements.

14.4 Borehamwood Town Centre is Hertsmere's principal retail and service centre. It includes Shenley Road, the Boulevard Retail and Leisure Park, restaurants, cafés, leisure uses, community facilities and a range of local services. The presence of Elstree & Borehamwood railway station within the town centre area reinforces its accessibility and its role as a focus for activity, investment and regeneration.

14.5 Borehamwood is also a major employment centre within Hertsmere and the wider sub-region. The town is internationally recognised for its association with film and television production, centred on Elstree Studios and the BBC Elstree Centre. These facilities form part of a wider creative and media-related cluster that contributes significantly to the local economy, local identity and the borough's employment offer.

14.6 The adjoining settlement of Elstree forms part of the same urban area as Borehamwood, sharing services, employment opportunities and some transport connections. Elstree Village is a separate settlement and is identified as a Category V village in the settlement hierarchy. Other nearby settlements, including Shenley and Ridge, also have close social and economic links with Borehamwood, with residents often relying on the town for shops, services, employment and public transport.

14.7 The Local Plan identifies Borehamwood as the principal focus for housing-led growth and regeneration in Hertsmere. This reflects the town's role in the settlement hierarchy, its accessibility, its concentration of services and employment, and the

opportunity to make efficient use of previously developed and under-optimised land in one of the borough's most sustainable locations.

14.8 The scale of Hertsmere's housing need means that Borehamwood must play a leading role in delivering new homes over the plan period. Housing-led regeneration is therefore a central part of the strategy for Borehamwood. New homes will help unlock the renewal of under-used and under-optimised land, support the vitality and viability of the town centre, provide a larger local catchment for shops and services, improve public realm and help fund the infrastructure needed to support sustainable growth.

14.9 The Council's response towards meeting the Borough's growth needs is to take the brownfield first approach. Growth in Borehamwood will therefore focus on the redevelopment, intensification and renewal of suitable previously developed land, regeneration sites and other accessible locations within the existing urban area before considering less sustainable locations. Where development is required at the edge of the town to meet identified needs, it must be comprehensively planned, landscape-led, infrastructure-led and well connected to the existing urban area.

14.10 The Council will seek to move away from piecemeal redevelopment and towards a coordinated framework for growth, regeneration and placemaking. Housing-led mixed-use development will be expected to support, rather than displace, the town centre's retail, leisure, cultural, civic, community and employment functions. Where major sites come forward, development should be planned comprehensively and should contribute to the wider renewal of Borehamwood.

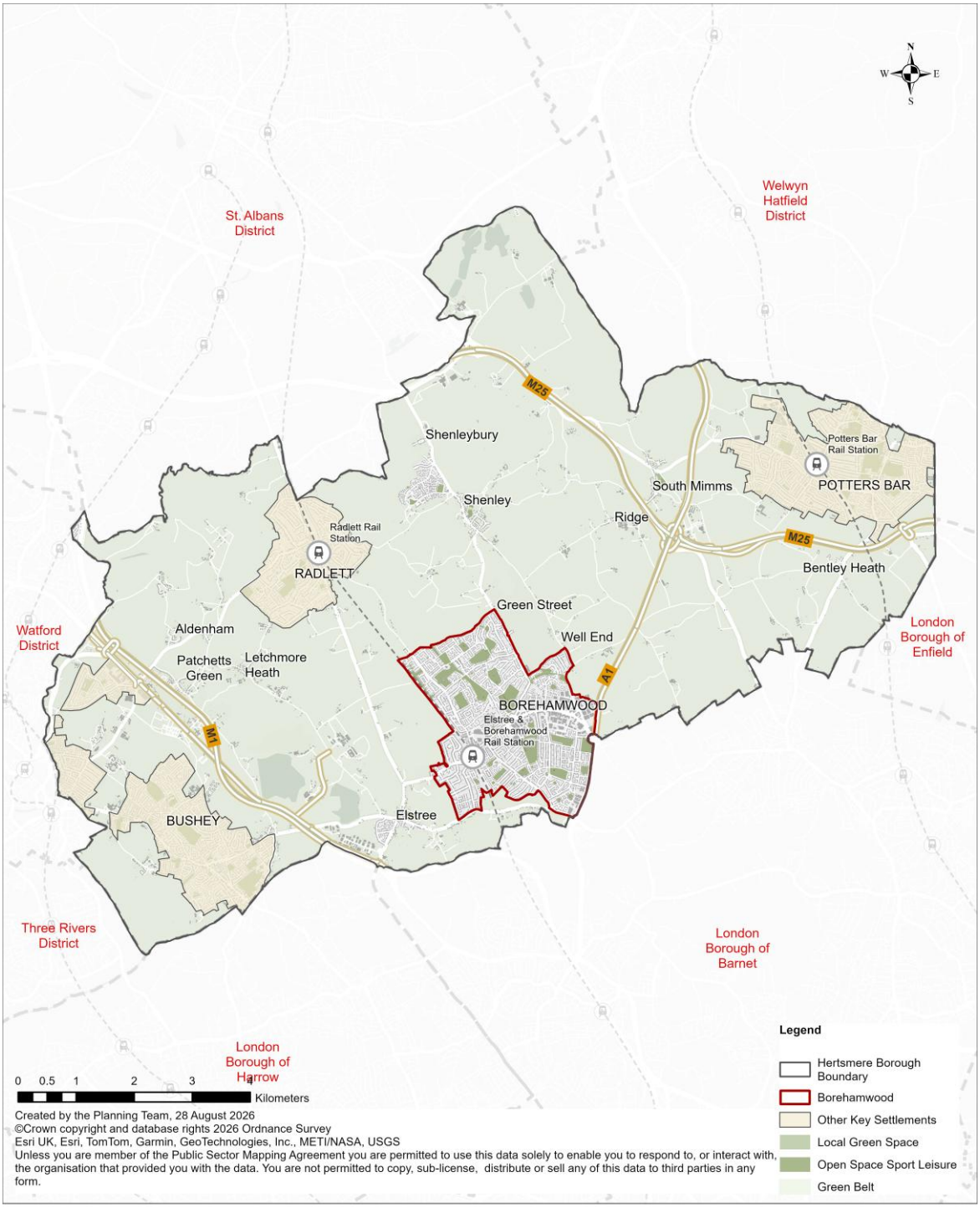


Figure 14.1: Borehamwood Area

14.11 Subsequently, Figure 14.2: Borehamwood Spatial Strategy identifies the broad spatial priorities for housing-led growth, town centre regeneration, employment and creative industry growth, sustainable movement, green infrastructure and landscape setting.

14.12 Figures 14.3 to 14.6 provide more detailed policy maps for the town centre, Elstree Way Employment Corridor, sustainable travel network and green infrastructure network.

14.13 The maps in this chapter should be read alongside the Policies Map, and site allocation policies. Figure 14.2 identifies broad spatial priorities and does not define site allocations, development boundaries or precise route alignments. Where detailed boundaries or designations are required for decision-making, these are shown on the Policies Map, site allocation policies or relevant policy maps.

14.14 The Council will prepare a new Design Code for Hertsmere. It is anticipated that this will work alongside the National Design Code, providing local guidance that is specific to Hertsmere as a place. It is anticipated that it will include guidance on movement, public realm, town centres, local centres, residential areas, building heights, active frontages, materials, parking, servicing, green infrastructure, blue infrastructure, sustainability and character areas.

Vision

14.15 Borehamwood will continue to be Hertsmere's principal town and the Borough's focus for housing-led growth, regeneration and infrastructure investment. New homes will be used as a catalyst for wider renewal, helping to deliver a more vibrant town centre, stronger local economy, improved public realm, better movement connections, enhanced green infrastructure and the community facilities needed to support a growing population.

14.16 Borehamwood Town Centre will be regenerated as a more attractive, mixed-use and accessible Borough-wide destination. Shenley Road will be strengthened as the town's main civic, commercial and social spine, supported by active frontages, improved public spaces, better walking and cycling connections, a stronger cultural and leisure offer, and provide a more welcoming arrival experience around Elstree & Borehamwood Railway Station.

Elstree and Borehamwood railway station

14.17 The town's internationally significant film and television identity will be protected, strengthened and better connected to local communities, businesses, education and the high street. The Local Plan will support the continued success of Elstree Studios, BBC Elstree and the wider creative industries cluster, while enabling opportunities for supporting businesses, creative workspace, cultural activity and local employment.

14.18 Growth in Borehamwood will be design-led and infrastructure-led. Development will be expected to make efficient use of land, deliver a wider mix of homes, including affordable homes, and contribute to high-quality streets, public spaces, sustainable transport, social infrastructure, green and blue infrastructure and improved access to services.

14.19 Borehamwood will grow as a network of connected neighbourhoods. New development will strengthen links between the town centre, station, Elstree Way, employment areas, schools, parks, community facilities and surrounding residential areas. Growth will also be expected to respect the landscape setting of the town and maintain the separate identity of surrounding settlements.

Key Spatial Objectives for Borehamwood

To achieve this vision, the key spatial objectives for Borehamwood are to:	
1	Make a significant contribution to meeting the borough's housing requirement through the redevelopment, intensification and renewal of suitable previously developed land, under-used land and regeneration sites.
2	Focus residential-led mixed-use development within Borehamwood Town Centre, around Elstree & Borehamwood railway station, along the Elstree Way Employment Corridor and in other highly accessible locations where growth can support public realm, infrastructure, employment, community facilities and sustainable transport improvements.
3	Use new housing as a catalyst for comprehensive regeneration, ensuring that development contributes to active streets, improved town centre vitality, better walking and cycling connections, high-quality public spaces and social and community infrastructure.
4	Strengthen Borehamwood Town Centre as Hertsmere's principal retail, service, leisure, cultural and civic centre.
5	Protect and strengthen Borehamwood's role as a nationally significant centre for film, television and creative industries, including through the safeguarding, modernisation and expansion of studio-related and creative employment uses.
6	Support the Elstree Way Employment Corridor as a focus for employment, creative industry growth, civic uses, social infrastructure, public realm improvement and housing-led mixed-use regeneration where appropriate.
7	Improve the quality, safety, accessibility and legibility of Shenley Road, Elstree Way, the station gateway and other key movement corridors.
8	Deliver high-quality, design-led development that responds to Borehamwood's character, provides active frontages, improves the public realm and integrates successfully with surrounding neighbourhoods.
9	Provide a wider mix of homes, including affordable housing, family housing, homes for younger people, homes for older people and accessible homes.
10	Protect and enhance green and blue infrastructure, including local parks, trees, green corridors, sustainable drainage, biodiversity assets, watercourses and access to the surrounding countryside.
11	Ensure that major development is comprehensively planned and phased so that it is supported by the necessary social, community, health, education, transport, utilities and green infrastructure.

HBA1 Borehamwood Principal Location for Growth

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Borehamwood will be the principal location for housing-led growth, regeneration and infrastructure investment in Hertsmere over the plan period.

B The Council will support residential-led mixed-use development in appropriate locations where it enables the renewal of under-optimised land, contributes to meeting the Borough's housing requirement, strengthens Borehamwood Town Centre, supports the local economy and delivers wider placemaking, infrastructure and public realm benefits.

C Development in Borehamwood will be expected to support the spatial strategy by:

i. Delivering a significant proportion of the borough's new homes through the redevelopment, intensification and renewal of suitable previously developed land, under-used land and regeneration sites;

ii. Focusing housing-led mixed-use development within Borehamwood Town Centre, around Elstree & Borehamwood railway station, along the Elstree Way Employment Corridor and in other highly accessible locations identified in Figure 14.2: Borehamwood Spatial Strategy;

iii. Making efficient and effective use of land, including through higher-density development in locations where this can be successfully accommodated by the townscape, infrastructure and public transport network;

iv. Delivering affordable housing and a mix of housing types and sizes that respond to local needs;

v. Ensuring that housing-led redevelopment contributes to town centre vitality, active streets, employment opportunities, community facilities, public realm improvements and the delivery of supporting infrastructure;

vi. Supporting the renewal and enhancement of Borehamwood Town Centre as Hertsmere's principal retail, service, leisure, cultural and civic centre;

vii. Protecting and strengthening Borehamwood's role as a major employment location, including its nationally significant film, television and creative industries cluster;

viii. Improving walking, cycling, wheeling and public transport connections between residential neighbourhoods, the town centre, the railway station, schools, employment areas, open spaces and surrounding settlements;

ix. Protecting and enhancing green and blue infrastructure, including parks, trees, green corridors, sustainable drainage, biodiversity and access to the countryside;

x. Delivering high-quality, design-led development that responds positively to local character, improves the public realm and supports a coherent townscape; and

xi. Ensuring that development is supported by the necessary infrastructure, including education, health, community, transport, utilities, green infrastructure and public realm improvements.

D Development proposals must demonstrate how they respond, where relevant and proportionate, to Map 14.2: Borehamwood Spatial Strategy, the Policies Map, and relevant site allocation policies.

E Major development must demonstrate how it contributes to the comprehensive planning of Borehamwood, including coordinated access, movement, public realm, infrastructure delivery, phasing, land use, design and relationship with adjoining sites.

F Where sites are in multiple ownerships or form part of a wider regeneration area, proposals must demonstrate that they will not prejudice the coordinated delivery of adjoining or related sites, infrastructure, public realm or placemaking objectives.

Explanation

14.20 Policy HBA1 establishes Borehamwood's role as the borough's principal focus for housing-led growth and regeneration. This reflects Borehamwood's position in the settlement hierarchy, its accessibility, its employment role, its services and facilities,

and the opportunity to make better use of previously developed and under-optimised land.

14.21 The policy is intended to ensure that housing growth is used positively as a catalyst for regeneration. New homes will help support the vitality of the town centre, increase footfall, enable investment in public realm and infrastructure, and support the delivery of more sustainable patterns of development.

14.22 Figure 14.2: Borehamwood Spatial Strategy identifies the broad spatial priorities for the town and should be read alongside the more detailed policy maps in this chapter. It provides the strategic context for housing-led growth, town centre renewal, Elstree Way, sustainable movement and green infrastructure. It does not define site allocations, development boundaries or precise route alignments.

14.23 The Council will use the Policies Map, site allocation policies, the maps in this chapter, infrastructure planning, partnership working and, where appropriate, its land ownership and regeneration functions to support comprehensive housing-led regeneration. Where proposals come forward on sites that form part of a wider regeneration area, applicants will be expected to demonstrate how development contributes to the wider spatial strategy and does not prejudice the delivery of adjoining or related sites.

14.24 Development at the edge of Borehamwood will need to be comprehensively planned, landscape-led and well connected to the existing town. Such development will need to provide necessary infrastructure, maintain a clear and defensible settlement edge, and integrate with wider walking, cycling, public transport and green infrastructure networks.

HBA2 Borehamwood Town Centre Regeneration

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
C The regeneration of Borehamwood and Potters Bar
D Support a well-educated and skilled population
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Proposals for development located within Borehamwood Town Centre, as identified on Figure 14.3: Borehamwood Town Centre Regeneration, must contribute to the housing-led mixed-use regeneration of the town centre, support active streets, improve public realm, provide or re-provide town centre uses and contribute to the infrastructure required to support growth.

B Development proposals within Borehamwood Town Centre will be supported where they:

i. Make a significant contribution to housing delivery through the redevelopment and intensification of suitable town centre sites;

ii. Deliver residential development above, behind or alongside active town centre uses where this would support town centre vitality and provide an appropriate standard of residential amenity;

iii. Maintain and enhance the vitality and viability of the town centre;

iv. Provide an appropriate mix of retail, food and drink, leisure, cultural, civic, community, workspace, employment and residential uses;

v. Provide active ground floor frontages on Shenley Road, the station approach, key public spaces and other frontages identified on Figure 14.3;

vi. Strengthen Shenley Road as the town's principal civic, commercial and social spine;

vii. Improve the arrival experience at Elstree & Borehamwood railway station, including through public realm, interchange, walking, cycling, bus and wayfinding improvements;

viii. Support a stronger evening, leisure and cultural economy where compatible with residential amenity, public safety and the role of the town centre;

ix. Retain, modernise or re-provide community, cultural, health, civic and social infrastructure, where affected by redevelopment, unless it is demonstrated that the facility is no longer required;

x. Provide high-quality shopfronts, signage and building frontages that contribute positively to townscape character;

xi. Improve the quality, safety, accessibility and attractiveness of streets and public spaces, including through better footways, crossings, greening, seating, lighting, public art and wayfinding;

xii. Manage servicing, deliveries, parking, access and waste so that these do not dominate streets or public spaces; and

xiii. Contribute to infrastructure and public realm improvements identified in Figure 14.2: Borehamwood Spatial Strategy, Figure 14.3: Borehamwood Town Centre Regeneration, the Infrastructure Delivery Plan and relevant site allocation policies

C Residential development will be supported where it forms part of a mixed-use approach that maintains or strengthens the town centre's retail, leisure, cultural, community, civic and employment role. Residential-only redevelopment of strategically important town centre sites will not be supported unless it is demonstrated that mixed-use development is not viable or is not necessary to support the role, function and vitality of the centre.

D Major development within the town centre must be accompanied by a masterplan, design and access statement, or other proportionate material demonstrating how the proposal contributes to the comprehensive regeneration of the town centre, responds to Figure 14.3: Borehamwood Town Centre Regeneration.

E Development that would result in inactive frontages, poor pedestrian environments, isolated residential blocks, car-dominated layouts, loss of important town centre uses, or fragmented development that undermines the wider town centre strategy will not be supported.

Explanation

14.25 Borehamwood Town Centre is Hertsmere's principal retail and service centre and is the most appropriate location in the borough for significant housing-led mixed-use regeneration. The town centre benefits from strong accessibility, including proximity to Elstree & Borehamwood railway station, and contains several sites where redevelopment and intensification can make a significant contribution to housing delivery and place-making.

14.26 Policy HBA2 ensures that new homes are delivered as part of a wider mixed-use approach. Residential development should increase footfall, support shops and services, contribute to the evening and leisure economy, and help fund improvements to streets, public spaces, community infrastructure and movement networks.

14.27 Housing-led regeneration must not result in the loss of the town centre's role or function. Development should support active frontages, maintain or re-provide important town centre uses, and contribute to a more attractive and welcoming town centre. Strategically important town centre sites should be planned comprehensively and should not come forward as isolated residential schemes unless robustly justified.

14.28 Shenley Road will remain the main civic, commercial and social spine of Borehamwood. Development should support its role through active frontages, improved shopfronts, better public realm, enhanced pedestrian and cycle movement, and a stronger cultural, leisure, community and evening economy offer.

14.29 Figure 14.3: Borehamwood Town Centre Regeneration identifies the broad area and priorities to which Policy HBA2 applies. It should be read alongside Figure 14.2: Borehamwood Spatial Strategy, the Policies Map, and relevant site allocation policies.

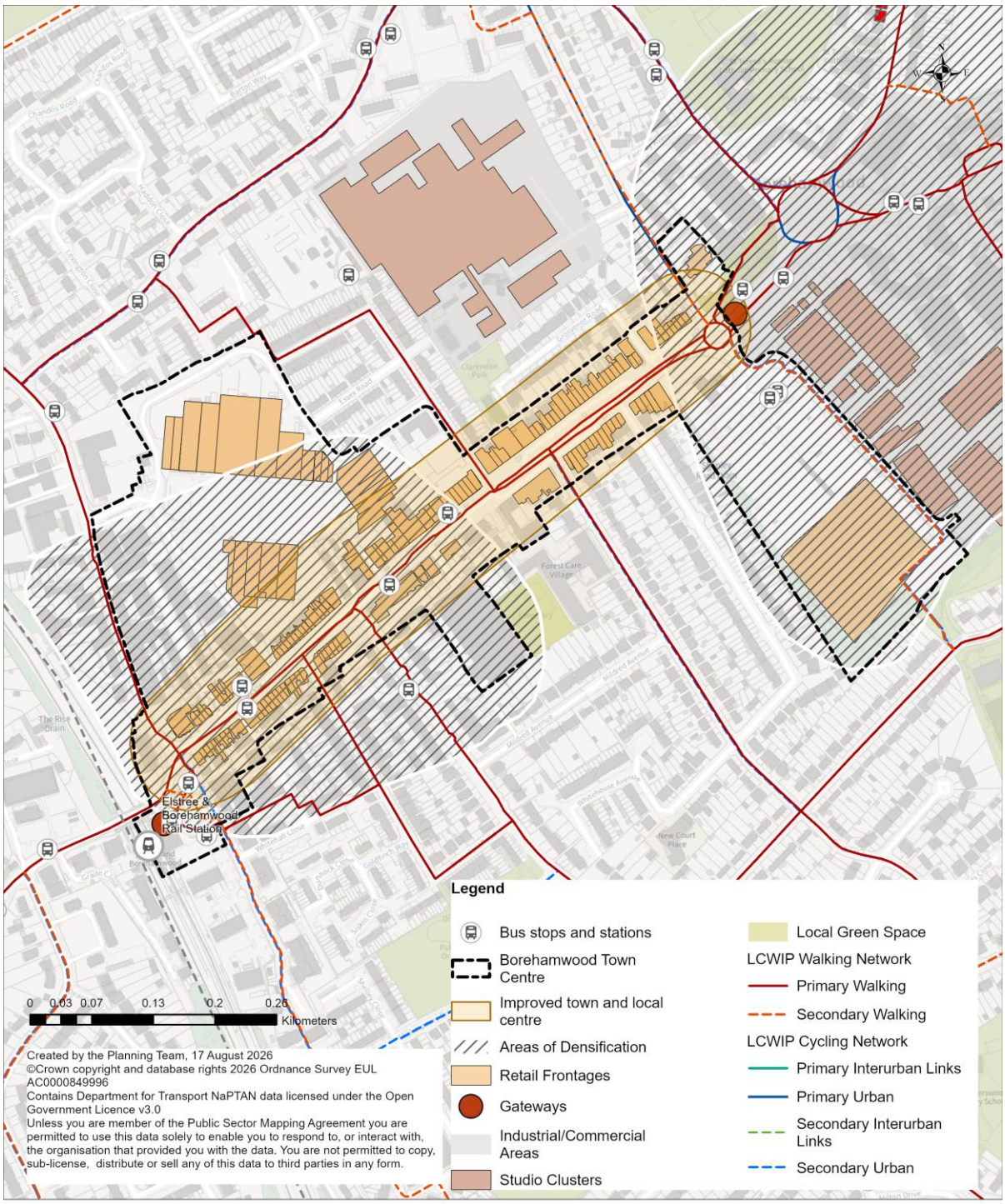


Figure 14.3 Borehamwood Town Centre Regeneration

HBA3 Elstree Way Employment Corridor

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
H Responding to the climate emergency
I Celebrating our local identity
K Securing the timely delivery of infrastructure

Strategic Policy

A The Elstree Way Employment Corridor, as identified on Figure 14.4: Elstree Way Employment Corridor, will be planned as a mixed-use employment, creative, civic and housing-led regeneration corridor linking Borehamwood Town Centre, civic facilities, employment areas, studio-related activity and surrounding neighbourhoods.

B Development will be expected to deliver new homes alongside workspace, social infrastructure, public realm improvements and better connections between the town centre, station, studios, employment areas and surrounding neighbourhoods.

C Development proposals within the Elstree Way Employment Corridor will be supported where they:

i. Deliver an appropriate mix of homes, employment floorspace, workspace, community infrastructure, health facilities, education or training uses, and public realm improvements;

ii. Support residential-led mixed-use redevelopment of suitable under-used or under-optimised sites where this would contribute to the wider regeneration of Borehamwood;

iii. Protect, modernise and intensify employment land and premises where these contribute to Borehamwood's economic role;

iv. Support the growth of film, television, digital, technical, production and wider creative industries;

v. Provide flexible workspace, affordable workspace, studios, workshops, co-working space and supporting supply-chain uses where appropriate;

vi. Provide active lower floors and avoid blank frontages along Elstree Way and other key routes;

vii. Improve walking, cycling and public transport connections between the town centre, station, civic facilities, employment areas, schools, studios and residential neighbourhoods;

viii. Provide a coherent public realm, including street trees, planting, seating, wayfinding and safe crossings;

ix. Integrate social and community infrastructure into mixed-use development where this would support local needs and service accessibility;

x. Provide an appropriate transition in scale, height and massing between the town centre, employment areas and adjoining residential neighbourhoods;

xi. Contribute to infrastructure and public realm improvements identified in Figure 14.2: Borehamwood Spatial Strategy, Figure 14.4: Elstree Way Employment Corridor, the Infrastructure Delivery Plan and relevant site allocation policies; and

xii. Demonstrate how development contributes to the wider regeneration of Borehamwood rather than functioning as a stand-alone scheme.

D Proposals involving the loss of employment floorspace, creative workspace, community infrastructure or public-sector facilities must demonstrate that the loss is justified and that appropriate replacement, reprovision or mitigation is secured where required by other policies in the Plan.

E Residential-led redevelopment within the Elstree Way Employment Corridor will be expected to support, and not displace, the corridor's employment, civic, creative and community functions.

F Major development within the Elstree Way Employment Corridor must demonstrate consistency with Figure 14.4: Elstree Way Employment Corridor.

Explanation

14.30 Elstree Way is a key corridor between Borehamwood Town Centre, civic facilities, employment areas, residential neighbourhoods and the town's wider film and television cluster. It contains a range of sites capable of supporting new homes, employment, workspace, community infrastructure, education, health, leisure and public realm improvements.

14.31 Policy HBA3 seeks to ensure that Elstree Way evolves as a coordinated mixed-use employment corridor rather than as a series of isolated redevelopment sites. Housing-led mixed-use development will be supported where it helps renew under-optimised land, improves the public realm, delivers infrastructure and strengthens connections with the town centre and employment areas.

14.32 The corridor also has an important employment function. Development should support the continued success of Borehamwood's creative economy, including film, television, digital, technical and production-related businesses. Where employment land or floorspace is affected, proposals will need to demonstrate that the change is justified and that the corridor's economic role is protected or strengthened. Developers will be encouraged to engage with the Hertsmere Creative Strategy1 to ensure that its objectives for culture and creativity are met.

14.33 Development along Elstree Way should provide active frontages, improved walking and cycling routes, better crossings, street greening and a coherent public realm. It should also provide appropriate transitions in height and massing to neighbouring residential areas.

14.34 Figure 14.4: Elstree Way Employment Corridor identifies the broad area and priorities to which Policy HBA3 applies. It should be read alongside Figure 14.2: Borehamwood Spatial Strategy, the Policies Map, relevant site allocation policies, and the Infrastructure Delivery Plan.

[1] Hertsmere Creative Strategy (pdf 3.8 Mb)

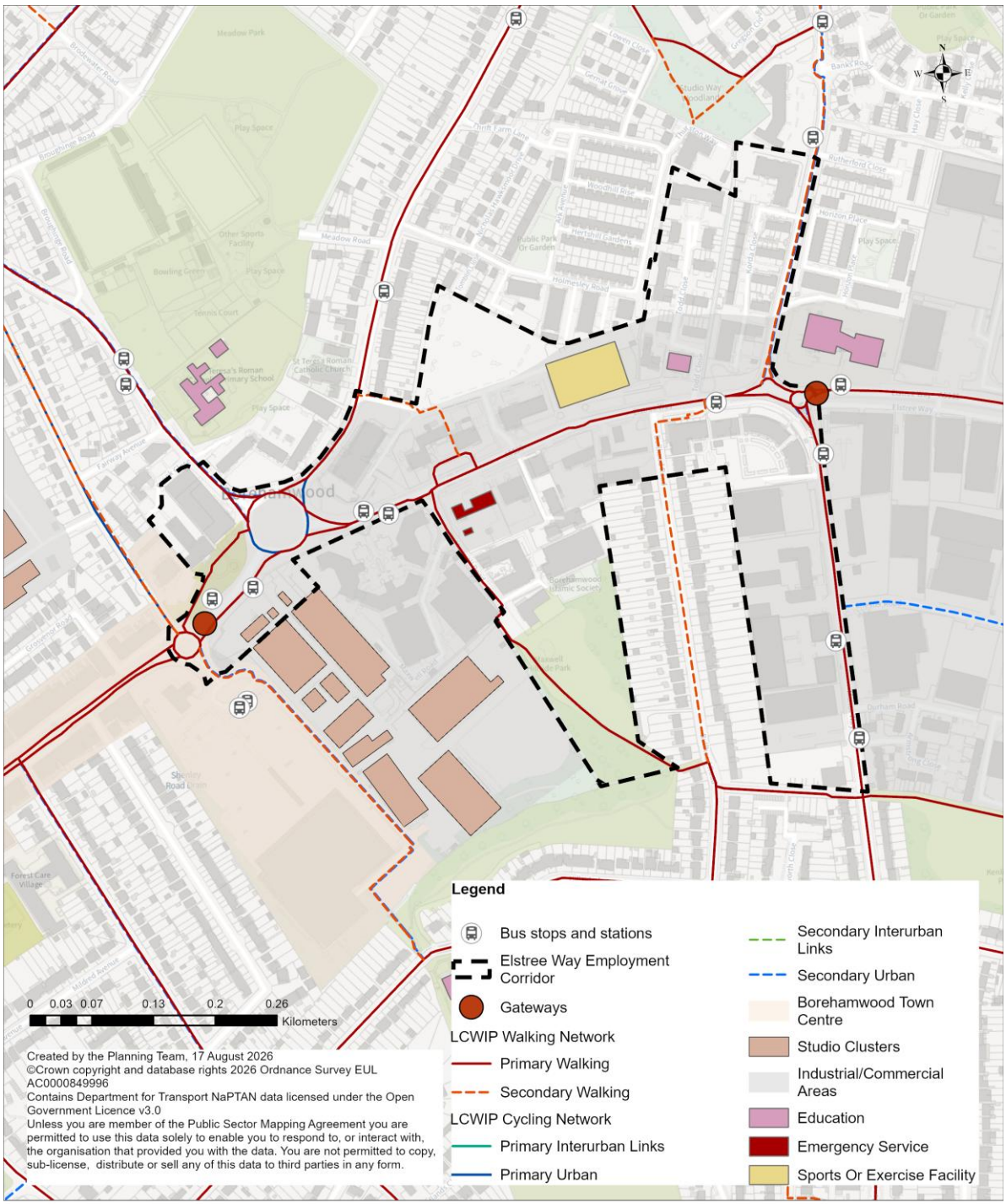


Figure 14.4: Elstree Way Employment Corridor

HBA4 Sustainable Movement and Connectivity in Borehamwood

Strategic Objectives

A **Delivering a better future for Hertsmere**
C **The regeneration of Borehamwood and Potters Bar**
H **Responding to the climate emergency**
I **Celebrating our local identity**
J **Healthy and safe communities**
K **Securing the timely delivery of infrastructure**

Strategic Policy

A Development in Borehamwood must contribute to a safer, more accessible and more sustainable movement network.

B Development proposals across Borehamwood should:

i. Prioritise walking, cycling, wheeling and public transport in accordance with the transport user hierarchy;

ii. Provide safe, direct, attractive and accessible routes to Elstree & Borehamwood railway station, Shenley Road, schools, parks, community facilities, employment areas and local centres;

iii. Improve east-west and north-south connections across the town, including connections across or around barriers created by major roads, the railway and large development blocks;

iv. Improve the station gateway as a safe, legible and accessible arrival point and interchange;

v. Contribute to public realm and highway improvements that reduce traffic dominance and improve pedestrian and cyclist safety;

vi. Provide high-quality cycle parking and support facilities in accessible and overlooked locations;

vii. Integrate with existing and planned walking and cycling networks, including priorities identified through the Hertsmere Local Cycling and Walking Infrastructure Plan and other relevant transport evidence;

viii. Support improved public transport access, bus stop improvements and interchange improvements where required;

ix. Manage parking, servicing, deliveries and construction impacts so that they do not undermine pedestrian safety, public realm quality or the operation of the local highway network;

x. Provide appropriate disabled parking and accessible drop-off arrangements close to key destinations;

xi. Contribute to transport infrastructure and mitigation measures identified through the Infrastructure Delivery Plan, Transport Assessment, site allocation policies and other relevant evidence; and

xii. Respond, where relevant and proportionate, to the routes, links, corridors and opportunities identified on Figure 14.5: Sustainable Travel Networks and Opportunities Across Borehamwood.

C Major development must demonstrate how its layout, access, street design and public realm will support reduced car dependency and increased use of walking, cycling, wheeling and public transport.

D Where development forms part of a wider regeneration area or group of related sites, proposals must demonstrate how access and movement arrangements have been coordinated with adjoining sites, Figure 14.2: Borehamwood Spatial Strategy and Figure 14.5: Sustainable Travel Networks and Opportunities Across Borehamwood.

E Development that would prejudice identified walking, cycling, public transport, station gateway or public realm improvements will not be supported.

Explanation

14.35 Borehamwood's role as a focus for housing-led growth means that sustainable movement improvements are essential. New development must be planned so that walking, cycling, wheeling and public transport are attractive, safe and convenient choices for local journeys.

14.36 The railway station, Shenley Road, Elstree Way, employment areas, schools, parks and surrounding neighbourhoods are key destinations within the town. Development should strengthen connections between these places and help address severance caused by major roads, the railway and large development blocks.

14.37 Major development will be expected to demonstrate how it contributes to a coordinated movement network. This includes improved pedestrian and cycle routes, better crossings, high-quality cycle parking, bus stop and interchange improvements, and public realm measures that reduce traffic dominance.

14.38 Figure 14.5: Sustainable Travel Networks and Opportunities Across Borehamwood identifies existing and proposed sustainable travel routes and opportunities across Borehamwood, including connections to the town centre, railway station, local

centres, employment areas, schools, parks, community facilities and surrounding settlements. It should be read alongside Figure 14.2: Borehamwood Spatial Strategy, the Policies Map, relevant site allocation policies, the Infrastructure Delivery Plan, and transport evidence.

14.39 Transport mitigation should not be limited to site access and highway capacity. Development should contribute to the wider placemaking and regeneration objectives for Borehamwood by creating streets and spaces that are safe, attractive and accessible for all users.

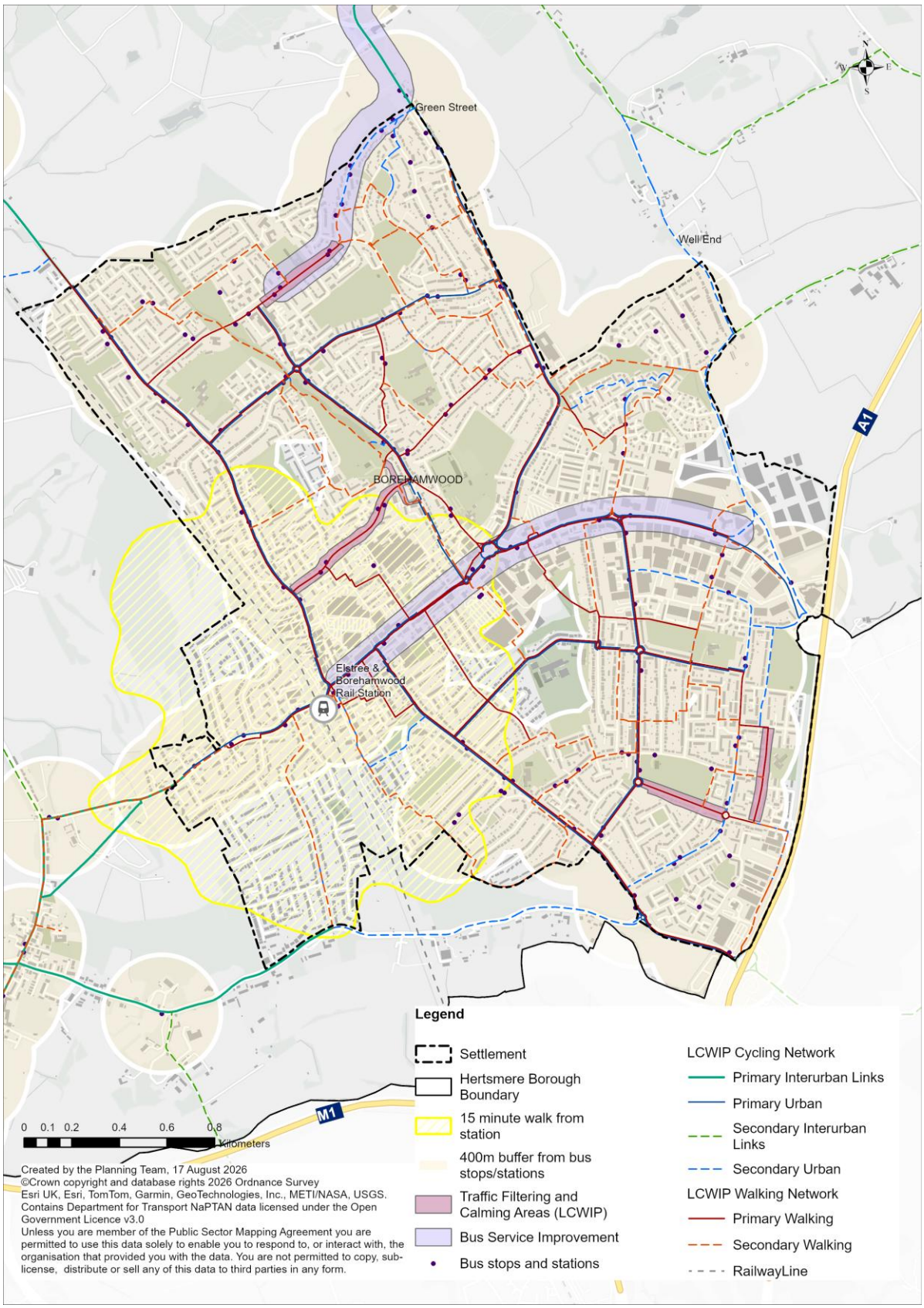


Figure 14.5: Borehamwood Sustainable Travel Networks and Opportunities

HBA5 Green Infrastructure and Landscape Setting

Strategic Objectives

A Delivering a better future for Hertsmere
C The regeneration of Borehamwood and Potters Bar
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Development in Borehamwood must protect, enhance and extend the town's green and blue infrastructure network.

B Development proposals across Borehamwood should:

i. Protect existing parks, open spaces, trees, hedgerows, green corridors, habitats, watercourses and landscape features;

ii. Provide new or enhanced green infrastructure where required to support growth, improve health and wellbeing, increase biodiversity and respond to climate change;

iii. Improve walking and cycling links between neighbourhoods, the town centre, parks, schools, community facilities and the surrounding countryside;

iv. Incorporate street trees, planting, sustainable drainage, biodiversity enhancements and urban greening as integral components of design;

v. Support the creation or enhancement of green corridors identified in Figure 14.6: Borehamwood Green Infrastructure Network;

vi. Improve access to high-quality open space in areas of deficiency or where growth increases demand;

vii. Maintain the landscape setting of Borehamwood and avoid unacceptable coalescence with nearby settlements;

viii. Use landscape buffers, green edges and publicly accessible open space to define the relationship between new development and the surrounding countryside;

ix. Explore opportunities to restore, re-naturalise or improve constrained watercourses where feasible;

x. Avoid unacceptable recreational pressure on sensitive habitats and open spaces, or provide appropriate mitigation where required; and

xi. Contribute to green and blue infrastructure priorities identified in Figure 14.2: Borehamwood Spatial Strategy and Figure 14.6: Borehamwood Green Infrastructure Network.

C Development at the edge of Borehamwood must be landscape-led and must demonstrate how it will create a clear, defensible and attractive settlement edge. Such development must provide appropriate green infrastructure, active travel connections and open space as part of a comprehensive design approach.

D Development that would fragment the green infrastructure network, reduce access to open space, harm important landscape features, increase flood risk, or fail to provide appropriate mitigation for increased recreational pressure will not be supported.

Explanation

14.40 Green and blue infrastructure will be an essential part of Borehamwood's growth and regeneration. As the town accommodates new homes, jobs and services, development must protect existing green assets and provide new or enhanced green infrastructure to support health, wellbeing, biodiversity, climate resilience and access to open space.

14.41 Borehamwood's parks, open spaces, trees, green corridors and surrounding countryside contribute to the quality of life of existing and future residents. Development should improve connections between neighbourhoods, the town centre, schools, community facilities, parks and the countryside.

14.42 Higher-density and mixed-use development in accessible locations will need to be supported by high-quality public realm, street greening, sustainable drainage, biodiversity enhancements and access to open space. Green infrastructure should be integrated from the outset of the design process rather than treated as residual landscaping.

14.43 Figure 14.6: Borehamwood Green Infrastructure Network identifies the broad green and blue infrastructure network and opportunities relevant to Borehamwood. It should be read alongside Figure 14.2: Borehamwood Spatial Strategy, the Policies

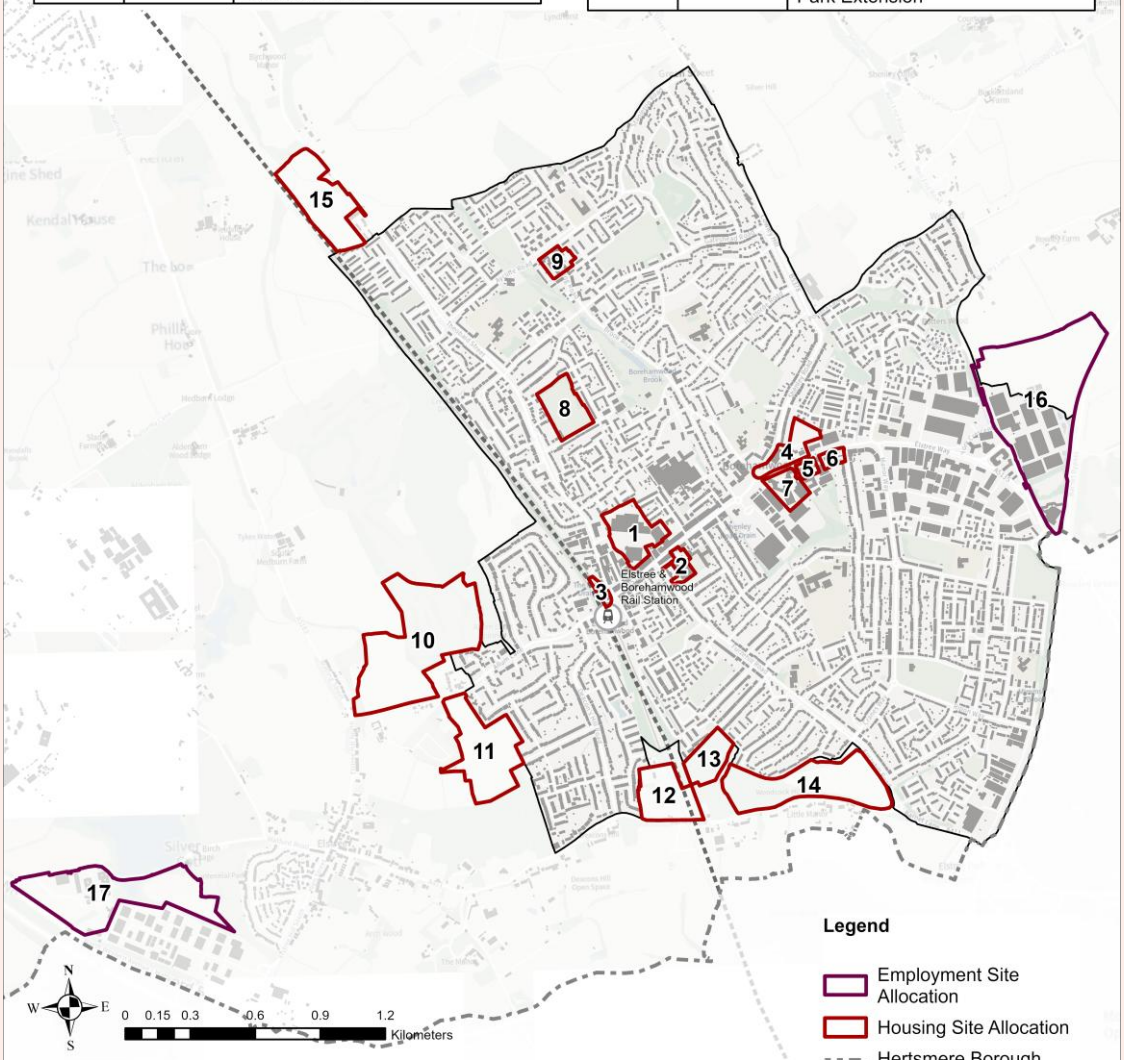
Map, relevant site allocation policies, open space and green infrastructure evidence, and the Infrastructure Delivery Plan.

14.44 Development at the edge of Borehamwood must be carefully planned to protect the town's landscape setting and to avoid unacceptable coalescence with nearby settlements. Landscape buffers, green edges, active travel routes and publicly accessible open space should be used to create a clear and attractive long-term settlement edge.

Figure 14.6: Borehamwood Green Infrastructure Network

Number	Reference	Site Name
1	HBA6	Retail Park Borehamwood
2	HBA7	The Point, Shenley Road
3	HBA8	Regent House & Car Park, Theobald Street
4	HBA9	Hertsmere Civic Offices Cluster, Elstree Way, Borehamwood
5	HBA10	Borehamwood Fire Station and Job Centre Cluster, Elstree Way
6	HBA11	Elstree Way Cluster (comprised of office building, Shell Garage and Kwik Fit)
7	HBA12	Imperial Place, Elstree Way
8	HBA13	Old Haberdasher's Sports Ground, Croxdale Road

Number	Reference	Site Name
9	HBA14	Aycliffe Road and Leeming Road Local Centre
10	HBA15	Golf Course Site and North of Allum Lane
11	HBA16	Land south of Allum Lane
12	HBA17	Land East of Hartfield Avenue and Fronting onto Barnet Lane
13	HBA18	Land West of Vale Avenue
14	HBA19	Land north of Barnet Lane
15	HBA20	Organ Hall Farm, Theobald Street
16	HBA21	Borehamwood Industrial Area Extension
17	HBA22	Lismirrane Industrial Park Extension



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Chapter 14: Borehamwood Site Allocations

Section

HBA6 Retail Park, Borehamwood

HBA7 The Point, Shenley Road, Borehamwood

HBA8 Regent House & Car Park, Theobald Street, Borehamwood

HBA9 Hertsmere Civic Offices Cluster, Elstree Way, Borehamwood

HBA10 Borehamwood Fire Station and Job Centre Cluster, Elstree Way, Borehamwood

HBA11 Elstree Way Cluster, Borehamwood

HBA12 Imperial Place, Elstree Way, Borehamwood

HBA13 Old Haberdasher's Sports Ground, Croxdale Road, Borehamwood

HBA14 Aycliffe Road and Leeming Road Local Centre

HBA15 North of Allum Lane, Elstree, Borehamwood

HBA16 Land South of Allum Lane, Elstree, Borehamwood

HBA17 Land North of Barnet Lane (West), Elstree, Borehamwood

HBA18 Land West of Vale Avenue, Borehamwood

HBA19 Land north of Barnet Lane, Borehamwood

HBA20 Organ Hall Farm, Theobald Street, Borehamwood

HBA21 Borehamwood Industrial Area Extension

HBA22 Lismirrane Industrial Park Extension

HBA6 Retail Park, Borehamwood

Site Address	**Retail Park Borehamwood**		
Site Characteristics	**Site Size ha** 5.01 ha	**Setting** Urban	**Ownership** Public and Private
Current Uses	The site is comprised of approximately 20,000 sqm of main town centre floorspace**,** principally comprised of large-format retail units, together with leisure and health uses. The site also includes The Grove Surgery, gym provision, extensive surface customer parking and servicing areas.		
How Site was Identified	Identified through the Council's Local Plan urban capacity and site-selection process and assessed through the HELAA.		
Planning Designations and Site Considerations	Strategic urban redevelopment site within Borehamwood Town Centre and forming a substantial component of the proposed Primary Shopping Area; the culverted Borehamwood Brook/Main River beneath part of the existing car park; reservoir and other flood risk.		
Planning Status	No recent relevant planning history.		
Indicative Development Capacity	500 dwellings Reprovision of 20,000 sqm of main town centre uses		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

B A thriving local economy
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
H Responding to the climate change
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Site Allocation

14.46 Borehamwood Town Centre Retail Park is allocated for comprehensive mixed-use redevelopment comprising residential development together with an appropriate quantum and range of main town centre uses, including retail; and compatible leisure, employment, health, commercial and community uses. The re-provided town centre will be supported by new public realm, public open space and green and blue infrastructure. The site allocation will deliver at least 500 new homes during the latter stages of the plan period.

14.47 Development must maintain and strengthen the site's important contribution to the vitality and viability of Borehamwood Town Centre while transforming its existing low-density and car-dominated urban form.

Opportunities

14.48 The site forms a substantial part of Borehamwood Town Centre and the Primary Shopping Area but is currently characterised by single-use large-format retail buildings, extensive surface parking and a relatively inward-looking urban form.

14.49 Comprehensive redevelopment provides an opportunity to create a more efficient and sustainable mixed-use part of the town centre while retaining and modernising its important retail and other town-centre functions.

14.50 Development provides opportunities to deliver a range of regeneration objectives. These include substantial new housing in one of the Borough's most accessible locations; retention and modernisation of important appropriate and compatible retail, employment, health, leisure and community functions. It will also deliver the re-establishment of a traditional town centre street and block structure with active ground-floor uses and residential development above. This will secure the improvement of physical and visual connections with Shenley Road; the creation of new east-west and north-south pedestrian and cycle routes through the site; the substantial reduction in the dominance of surface parking. It will also secure the delivery of new public spaces, landscaping and urban greening; the enhancement

in the relationship with Borehamwood Brook and explore opportunities for de-culverting or naturalisation where technically feasible.

14.51 The redevelopment must be planned as a coherent whole rather than as a series of disconnected redevelopment parcels. The masterplan should establish the overall spatial and land-use framework, development parcels and phasing, movement hierarchy, public realm and blue-green infrastructure, building heights and massing, parking and servicing strategy and infrastructure requirements.

14.52 Given the importance of the existing Shopping Park to Borehamwood's retail offer, the masterplan must demonstrate how redevelopment can be phased while maintaining an appropriate critical mass of retail and other town-centre activity.

Development Requirements

14.53 Development must be planned comprehensively in accordance with Policy DM3 (Masterplans and comprehensive development). A site-wide masterplan must demonstrate how the allocation will deliver a coordinated mix of residential, retail, leisure, commercial, health, community and other compatible town centre uses.

14.54 Landowners and other relevant interests must work positively together in preparing and delivering the masterplan. The lead landowner or developer bringing forward the site-wide masterplan must demonstrate that reasonable efforts have been made to undertake positive and meaningful engagement with other landowners, occupiers and interests whose land is necessary for or may be affected by the comprehensive redevelopment of the allocation.

14.55 The masterplan must establish the overall spatial framework for the allocation, including:

- The distribution and relationship of uses;
- Development parcels and phasing;
- The street and movement hierarchy;
- Connections to Shenley Road, Theobald Street and surrounding neighbourhoods;
- Public realm and open space;
- Green and blue infrastructure;
- Building heights and massing;
- Parking, servicing and delivery arrangements; and
- Infrastructure requirements and their delivery.
- The masterplan must demonstrate how individual phases can be delivered without prejudicing the comprehensive redevelopment of remaining parts of the allocation or the achievement of the wider regeneration objectives for Borehamwood Town Centre.

14.56 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high intensity mixed-use development that provides positive frontages that address key routes and public spaces. This will incorporate high-quality and high-density residential, active ground floor frontages

in line with the Retail and Town Centre policies and incorporate new and improved public realm and open space.

14.57 The masterplan must contain a site wide design code consistent with policy HQD1(K) and undergo assessment through the Design Review Panel.

14.58 Greater height and density are appropriate in principle within this highly accessible town-centre location. Taller elements should be located through the master planning process having regard to townscape, public realm, movement, daylight and sunlight, microclimate and transitions to adjoining lower-rise residential areas. The site is located within the Borehamwood Town Centre Tall Building Suitability Zone. This identifies a maximum building height of 20-storeys. This is not an assumed target height, and remains subject to townscape, heritage, microclimate and amenity evidence.

14.59 Development must retain and strengthen the site's main town centre function and re-provide an appropriate quantum and range of retail and other main town centre floorspace. The amount and type of retail, leisure, health and community floorspace to be justified against the Retail and Town Centres evidence and the objective of maintaining town-centre vitality.

14.60 The phasing strategy must demonstrate how an appropriate retail and service offer will be maintained during redevelopment so that the vitality and viability of Borehamwood Town Centre is not unacceptably harmed.

14.61 The site must be fully reintegrated with the surrounding street network, with substantially improved access and permeability between Shenley Road, Theobald Street and surrounding neighbourhoods.

14.62 Development must establish a hierarchy of new routes through the site, including strong east-west and north-south pedestrian and cycle connections linking redevelopment directly with Shenley Road.

14.63 Development must provide positive and active ground-floor frontages within the Primary Shopping Area and along principal new streets and public spaces.

14.64 A site-wide public realm strategy must deliver new and improved public spaces, street trees, landscaping, urban greening and high-quality pedestrian environments and complement wider improvements to Borehamwood Town Centre.

14.65 The culverted Borehamwood Brook, flood risk and drainage constraints must inform the masterplan from the outset. The masterplan must investigate opportunities to de-culvert, naturalise or otherwise enhance the watercourse where technically feasible and environmentally beneficial. The masterplan should explore opportunities for Borehamwood Brook to become a positive component of the public realm and blue-green infrastructure network rather than remaining solely as buried infrastructure. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

14.66 Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied.

14.67 Development adjoining existing residential areas must provide appropriate transitions in scale and protect residential amenity.

14.68 Existing health and community facilities, including The Grove Surgery where a continuing need is demonstrated, must be retained, appropriately re-provided or relocated to suitable modern accommodation as part of redevelopment.

Development Guidance

14.69 Development should create a new piece of Borehamwood Town Centre rather than simply rebuild the existing retail park.

14.70 The masterplan should generally establish a street-based urban form, with main town centre and other active uses concentrated at ground and lower levels and residential development above.

14.71 A range of building footprints should be provided to accommodate larger-format retail uses alongside smaller retail, leisure, commercial, health and community premises. Buildings should be designed to allow adaptation and subdivision over time.

14.72 Higher development may be appropriate towards the central and more accessible parts of the allocation, with scale generally stepping down towards sensitive residential edges.

14.73 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that secures maximum standards for the site that will secure a shift towards a car-lite / car-free future.

14.74 Phasing should be integral to the masterplan. Early phases must establish routes, public spaces and development parameters that enable rather than constrain subsequent phases.

HBA7 The Point, Shenley Road, Borehamwood

Site Address	**The Point, Shenley Road, Borehamwood**		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	1.02 ha	Urban	Public
Current Uses	Single-storey commercial building containing leisure uses (cinema, gym and bingo hall), with rooftop public car parking.		
How Site was Identified	Call for sites and HELAA		
Planning Designations and Site Considerations	Consideration should be given to the re-provision of the existing public (local authority) car parking and leisure uses (cinema and gym), either on-site or elsewhere within Borehamwood Town Centre. The site is within the setting of a Locally Listed church and adjoins its cemetery.		
Planning Status	No recent relevant planning history.		
Indicative Development Capacity	200 Dwellings		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

B A thriving local economy
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Site Allocation

14.75 The Point is allocated for comprehensive residential-led mixed-use redevelopment that will deliver at least 200 new homes together with compatible main town centre, leisure and community uses. Development should contribute to the wider regeneration of Borehamwood Town Centre, and improve the relationship between the site, Shenley Road, Centenary Place and Furzehill Road. This could include a public square or appropriate public space fronting Shenley Road.

14.76 Redevelopment should make more efficient use of this previously developed site while maintaining an appropriate town-centre leisure offer and addressing the future role of public car parking as part of the wider town-centre strategy.

Opportunities

14.77 The site provides an opportunity to replace a large-footprint, predominantly single-storey building with a more efficient mixed-use development. Public ownership, by the Council, provides an opportunity to coordinate redevelopment with adjoining public assets, including 80 Shenley Road, and to improve the currently weak backland relationship with the High Street.

14.78 Redevelopment can provide new housing, including genuinely affordable homes, in a highly accessible location, improve public routes and spaces, strengthen activity around Centenary Place and support the evening and leisure economy. There is the opportunity to create public space where the site interacts with Shenley Road

Development Requirements

14.79 Development must be planned and delivered comprehensively in accordance with Policy DM3. A site-wide masterplan must be prepared demonstrating how the urban redevelopment will deliver a mix of new homes and main town centre uses in accordance with the site allocation. Development must be planned

comprehensively across the allocation and, where relevant, coordinated with adjoining Council-owned land so that individual proposals do not prejudice a more effective wider regeneration scheme.

14.80 The masterplan must use the design-led approach to achieve a high intensity mixed-use development that includes positive frontages that address key routes and public spaces. This will incorporate high-quality, medium-density, town centre homes, active ground floor frontages in line with the Retail and Town Centre policies, and new and improved public realm and open space which addresses existing rights of way.

14.81 The masterplan must consider the site and its surroundings. Development must deliver a significantly improved pedestrian connection between Shenley Road, Centenary Place and the site, with a safe and legible relationship to Furzehill Road. Routes must be accessible, overlooked and integrated with the wider town-centre public realm.

14.82 Existing leisure uses must be retained, modernised or appropriately re-provided within Borehamwood Town Centre where continuing need is demonstrated. The phasing of redevelopment must maintain a reasonable continuity of leisure provision where replacement is required.

14.83 Development must conserve the significance and setting of All Saints Church, its graveyard and other relevant heritage assets. Layout, height, massing and roofscape must demonstrate how the heritage context and adjoining residential development have informed the design.

14.84 Servicing, deliveries, refuse and vehicle access must be integrated into the scheme so that they do not dominate Centenary Place, principal pedestrian routes or new public spaces.

Development Guidance

14.85 Development should generally be mid-rise rather than tall. Building height should respond to the site's backland position, heritage context and adjoining lower-rise housing, with any increase in height justified through townscape and heritage analysis and demonstrated not to cause unacceptable enclosure, overlooking or loss of daylight.

14.86 Active and flexible non-residential uses should be concentrated at ground and lower levels along the principal pedestrian routes. Entrances and active frontages should strengthen the relationship with Centenary Place and encourage activity throughout the day and evening.

14.87 The layout should create outward-facing streets and spaces rather than an inward-looking residential enclave. New public routes should be direct, legible and naturally supervised, and should connect into the wider pedestrian network towards Shenley Road and the town centre.

14.88 Public realm should be designed as an integral part of the redevelopment and include high-quality paving, seating, lighting, wayfinding, planting and urban

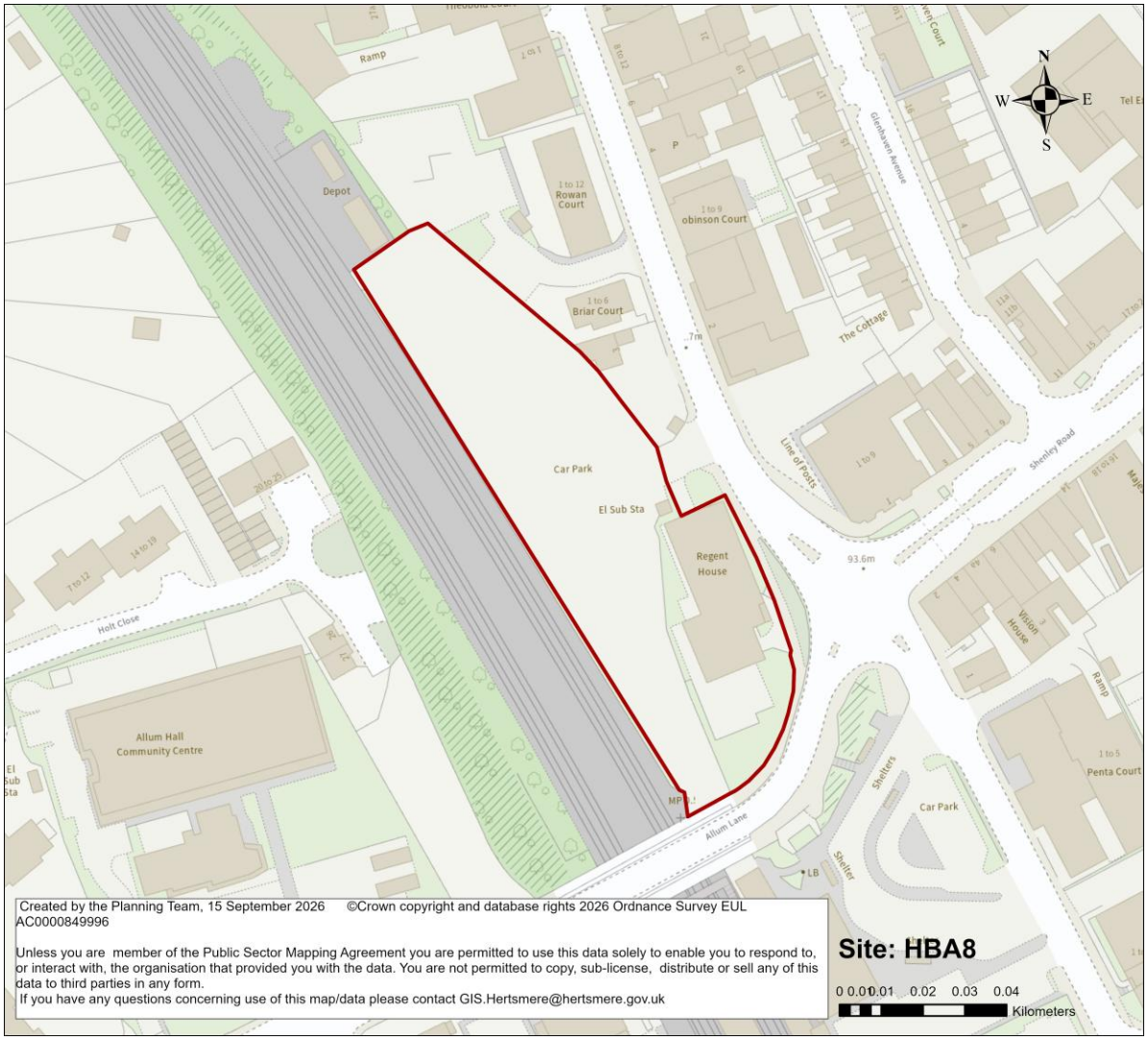
greening. The design should reinforce Centenary Place as a clear arrival point from Shenley Road.

14.89 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

14.90 Parking and servicing should wherever practicable be incorporated within or behind built development so that they are visually subordinate to the pedestrian environment. Opportunities to reduce overall parking demand through the site's central location and access to public transport should be considered alongside the Car Park Study.

14.91 Any redevelopment incorporating adjoining Council-owned land should use the additional frontage and site depth to improve permeability, development form and viability rather than simply increasing the quantum of development without corresponding public-realm benefits.

HBA8 Regent House & Car Park, Theobald Street, Borehamwood



Site Address	Regent House & Car Park, Theobald Street, Borehamwood		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	0.55 ha	Urban	Mixed, private ownership of Regent House and public ownership of the rear car park.
Current Uses	Office building with car parking that serves Elstree and Borehamwood Railway Station.		
How Site was Identified	Regulation 18 candidate site through the Council's site-selection process.		
Planning Designations and Site Considerations	Urban redevelopment opportunity for residential development and public realm, with potential vertical intensification. Development has potential to affect the setting of the Grade II listed Manor House. Its location close to the railway station gives the site strong sustainable-transport credentials.		
Planning Status	No recent relevant planning history identified in the reviewed evidence.		
Indicative Development Capacity	55 dwellings		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
G Securing a greener Borough
I Celebrating our local identity
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Site Allocation

14.92 Regent House and the associated car-park land are allocated for residential-led redevelopment. It will deliver at least 55 homes, together with public realm and other compatible main town centre uses appropriate to this highly accessible station-edge location.

14.93 Development must make efficient use of the site while conserving the significance and setting of the Grade II listed Manor House and maintaining an appropriate approach to station access, parking and servicing.

Opportunities

14.94 Redevelopment provides an opportunity to intensify an under-used urban site close to one of Hertsmere's most important public transport nodes. It can improve the townscape of the Allum Lane/Theobald Street junction and strengthen the pedestrian route between the station, nearby neighbourhoods and the wider town centre.

14.95 The site also provides an opportunity to reduce the visual dominance of surface parking, create a stronger built frontage and improve walking and cycling conditions around the station area.

Development Requirements

14.96 Development must be planned and delivered comprehensively in accordance with Policy DM3. A site-wide masterplan must be prepared demonstrating how the urban redevelopment will deliver a mix of new homes and main town centre uses in accordance with the site allocation.

14.97 The masterplan must use the design-led approach to achieve a high intensity mixed-use development that includes positive frontages that address key routes and public spaces. This will incorporate high-quality, medium-density, town centre

homes, active ground floor frontages in line with the Retail and Town Centre policies, and new and improved public realm and open space.

14.98 Landowners and other relevant interests must work positively together in preparing and delivering the masterplan. The lead landowner or developer bringing forward the site-wide masterplan must demonstrate that reasonable efforts have been made to undertake positive and meaningful engagement with other landowners, occupiers and interests whose land is necessary for or may be affected by the comprehensive redevelopment of the allocation.

14.99 Consistent with policy HQD4(D) any application must address comprehensive treatment of the two sites, so that development of one interest does not prejudice optimisation of the whole site.

14.100 A heritage assessment must demonstrate how the significance and setting of the Grade II listed Manor House have informed the layout, scale, height, massing, materials and treatment of important views.

14.101 Development must improve pedestrian and cycle connections to Elstree & Borehamwood railway station, Allum Lane and Theobald Street and contribute, where proportionate, to the wider station-gateway and sustainable-movement improvements identified for Borehamwood.

14.102 Development adjoining the railway line should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with Network Rail.

14.103 Vehicle access, servicing, cycle parking and refuse must be arranged so that they do not dominate the Allum Lane or Theobald Street frontages and do not create conflict with the principal pedestrian routes to the station.

Development Guidance

14.104 Development should have a distinctly urban, station-oriented character, with density reflecting the site's accessibility while remaining sensitive to the listed building and the scale of adjoining development.

14.105 Built form should positively define the Allum Lane/Theobald Street junction and establish clear entrances and active residential frontages. Blank elevations, exposed service areas and extensive surface parking on principal frontages should be avoided.

14.106 Building height should be established through a design-led approach. Greater height may be appropriate where it helps define the junction or station approach, provided there is an appropriate transition to the heritage asset and surrounding lower-scale development and acceptable daylight, sunlight and amenity outcomes are demonstrated.

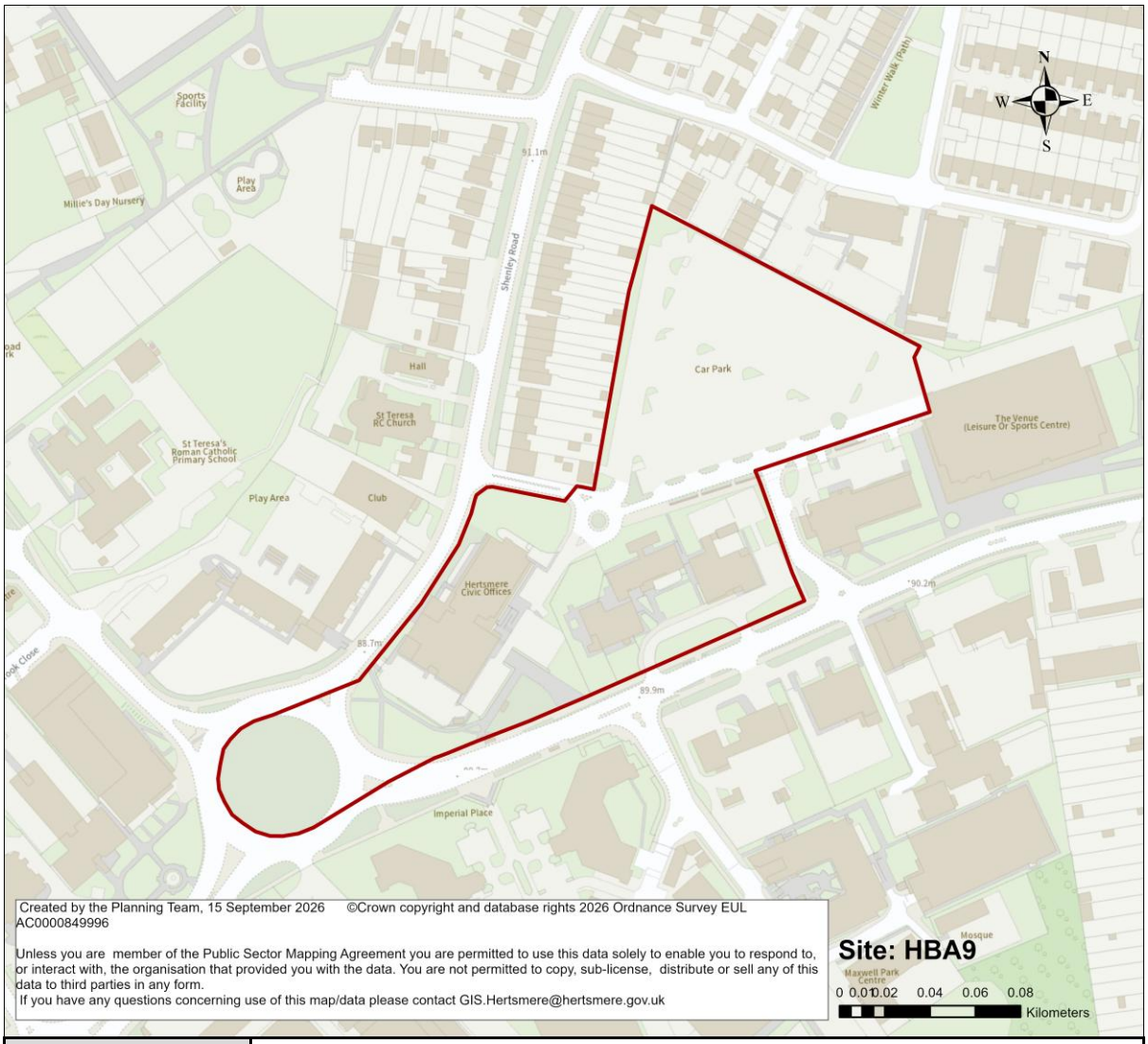
14.107 Public realm should reinforce the route to the station through widened or improved pedestrian space where feasible, high-quality landscaping, secure cycle parking, legible wayfinding and safe crossing arrangements.

14.108 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

14.109 Any loss or reduction of station-related or public car parking must be justified through the Car Park Study and a site-specific parking and station-access assessment. The proposal must demonstrate that parking changes will not unacceptably displace demand onto surrounding streets or undermine station accessibility.

14.110 If station parking is reduced, the development should support sustainable access to the station through measures such as improved cycle parking, pedestrian access, bus interchange or other travel-plan measures appropriate to the final parking strategy.

HBA9 Hertsmere Civic Offices Cluster, Elstree Way



Site Address	Hertsmere Civic Offices Cluster, Elstree Way, Borehamwood		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	2.23 ha	Urban	Public
Current Uses	Civic offices, police/public-service facilities, NHS/health facilities, children's nursery, community pantry/community uses and public surface car park..		
How Site was Identified	Call for sites and HELAA		
Planning Designations and Site Considerations	Culverted watercourse (Main River) runs beneath the existing car park area. Reservoir flooding.		
Planning Status	No recent relevant planning history identified for the component sites.		
Indicative Development Capacity	345 dwellings social and community floorspace.		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objective

B A thriving local economy
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
H Responding to the climate emergency
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Site Allocation

14.111 The Hertsmere Civic Offices Cluster is allocated for comprehensive mixed-use regeneration that will deliver at least 345 homes together with appropriate and compatible civic, health, community and other uses, public realm and green infrastructure.

Opportunities

14.112 The cluster provides an opportunity to transform an area dominated by public buildings and surface parking into a more efficient mixed-use quarter at one of the principal gateways to Borehamwood Town Centre.

14.113 Consolidation and modernisation of public services can release under-used land for housing while providing better civic and community facilities, active lower floors, new public spaces and stronger walking and cycling links between Shenley Road, Elstree Way, Maxwell Park and surrounding neighbourhoods.

Development Requirements

14.114 Development must be planned and delivered comprehensively in accordance with Policy DM3. A site-wide masterplan must be prepared demonstrating how the urban redevelopment will deliver a mix of new homes and main town centre uses in accordance with the site allocation.

14.115 The masterplan must use the design-led approach to achieve a high intensity mixed-use development that includes positive frontages that address key routes and public spaces. It must demonstrate that early phases will not prejudice the comprehensive redevelopment of later phases or adjoining related sites.

14.116 Existing health, nursery, community, civic and public-service functions must be retained, modernised or appropriately re-provided where a continuing need is demonstrated. The location and form of replacement facilities should maximise accessibility and opportunities for shared or flexible use.

14.117 Development must be phased so that required public services remain operational until suitable replacement provision is available. Where facilities are relocated outside the allocation, the delivery mechanism and timing must be secured before the existing facility is lost.

14.118 Development must create active and outward-facing frontages to Elstree Way and the principal junction and provide a clear hierarchy of streets and pedestrian routes through the cluster. Blank civic or residential frontages and large areas of exposed surface parking should not define the public realm.

14.119 Developers will engage with Hertfordshire County Council Highways (or successor highway authority) at an early stage in the master planning process to gain an understanding of the cumulative traffic impacts of growth and how it can be managed. This work should demonstrably set out a sustainable transport approach to the strategic urban extension, in respect of connectivity and mitigation of highway impacts. It is anticipated that mitigation will include necessary off-site works to rationalise the local highway, reduce severance and enhance sustainable connectivity to services and facilities. Development must contribute to substantial walking, cycling, crossing and public-realm improvements at the Shenley Road/Elstree Way/Brook Road gateway and connect effectively with the town centre, Maxwell Park and the wider Elstree Way corridor.

14.120 Flood risk and surface-water drainage must inform the masterplan from the outset. More vulnerable uses should be directed away from areas of greater risk and multifunctional SuDS should be integrated with public space, landscape and biodiversity measures. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

14.121 Development must provide new or improved public space, street trees, planting and green infrastructure appropriate to the scale of development, with routes and spaces designed to be safe, overlooked and accessible throughout the day.

Development Guidance

14.122 Greater height and density are appropriate in principle within this highly accessible town-centre location. Taller elements may be appropriate at the principal Elstree Way gateway and on the most accessible parts of the cluster. Proposals for tall buildings will consider townscape, public realm, movement, daylight and sunlight, microclimate and transitions to adjoining lower-rise residential areas.

14.123 The masterplan should use buildings to define Elstree Way as an urban street rather than an area of freestanding buildings behind parking. Entrances, active uses, street trees and pedestrian space should strengthen the corridor’s role as a civic and mixed-use connection to the town centre.

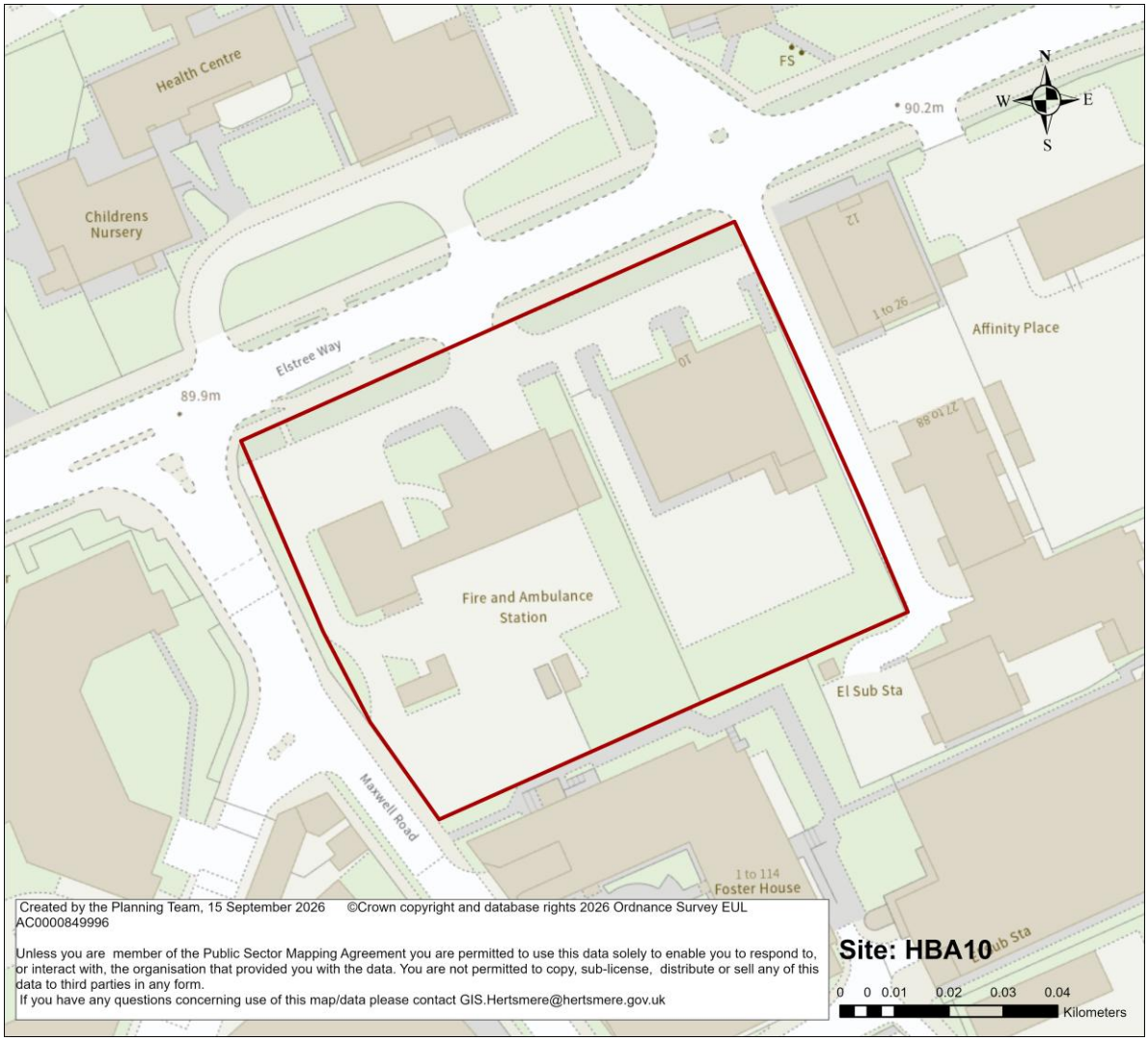
14.124 Ground and lower floors should be designed with sufficient flexibility to accommodate civic, health, community, workspace or other active uses over the life of the development. Principal public-service entrances should be clearly visible from public streets and spaces.

14.125 Public realm should be coordinated across ownerships and phases so that paving, landscape, lighting, seating, wayfinding and crossing arrangements read as a coherent whole rather than being delivered as disconnected schemes.

14.126 Development should improve the relationship with Maxwell Park and other nearby green spaces through direct, attractive and overlooked walking and cycling connections and through street planting that strengthens the wider green-infrastructure network.

14.127 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

HBA10 Borehamwood Fire Station and Job Centre Cluster, Elstree Way



Site Address	Borehamwood Fire Station and Job Centre Cluster, Elstree Way, Borehamwood		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	0.63 ha	Urban	Public, multiple public-sector interests.
Current Uses	Fire Station and Job Centre/public-service accommodation		
How Site was Identified	Regulation 18 candidate sites.		
Planning Designations and Site Considerations	Fire-station relocation would be necessary before its redevelopment. Flood Zone 2 affects the vicinity of the site access.		
Planning Status	No recent relevant planning history identified for the component sites.		
Indicative Development Capacity	63 dwellings with non-residential floorspace at ground floor level		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A Delivering a better future for Hertsmere
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Site Allocation

14.128 The Fire Station and Job Centre Cluster is allocated for comprehensive residential-led mixed-use redevelopment that will deliver at least 134 homes during the plan period. It will also secure improved appropriate public, community, social or other active uses.

Opportunities

14.129 Combining the component sites provides an opportunity to achieve a more coherent urban block, coordinated access and servicing, improved public realm and a stronger frontage to Elstree Way than would be possible through piecemeal redevelopment.

14.130 Redevelopment can also improve connections towards Maxwell Road and Maxwell Park and make more efficient use of centrally located public-sector land while retaining appropriate public-service functions within Borehamwood.

Development Requirements

14.131 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how this urban site will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

14.132 The masterplan must use the design-led approach to achieve a high intensity mixed-use development that includes positive frontages that address key routes and public spaces. This will incorporate high-quality, medium-density, town centre homes, active ground floor frontages in line with the Retail and Town Centre policies, and new and improved public realm and open space.

14.133 Landowners and other relevant interests must work positively together in preparing and delivering the masterplan. The lead landowner or developer bringing forward the site-wide masterplan must demonstrate that reasonable efforts have been made to undertake positive and meaningful engagement with other landowners, occupiers and interests whose land is necessary for or may be affected by the comprehensive redevelopment of the allocation.

14.134 The Fire and Rescue Service must be satisfied that operational requirements are maintained. Where relocation of the fire station is necessary, suitable replacement accommodation must be secured and available before the existing facility is lost, unless an alternative arrangement has been formally agreed with the relevant service provider.

14.135 Other public-service functions, including the Job Centre or successor services, must be retained or appropriately re-provided where continuing need is demonstrated. Replacement facilities should be accessible by walking, cycling and public transport.

14.136 Flood Zone 2 and surface-water flood risk must inform the layout and phasing of development. More vulnerable uses should be directed towards areas of lower risk and SuDS should be integrated with landscape and public realm from the earliest design stage. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

14.137 New landscape and SuDS should contribute to the wider green-infrastructure network and improve the connection towards Maxwell Park, including street trees and planting along principal routes.

14.138 Development must investigate and, where necessary, remediate potential land contamination associated with historic operational uses or neighbouring activities before sensitive uses are occupied.

14.139 Development must provide an active and well-defined Elstree Way frontage and improve pedestrian and cycle connections towards Maxwell Road, Maxwell Park and the wider town centre. Vehicle access and emergency-service requirements must be designed so that they do not undermine pedestrian safety or public-realm quality.

Development Guidance

14.140 Mid-rise development is appropriate in principle in this part of Elstree Way, with the potential for increased height at suitable locations where this responds to the corridor townscape and is compatible with adjoining development. The final scale should be tested through townscape, daylight/sunlight and microclimate analysis.

14.141 Ground floors should be capable of accommodating public, community, employment or other active uses where appropriate (including appropriate main town centre uses defined under Class E). Building layouts should allow public service uses to be accessed independently and to adapt over time.

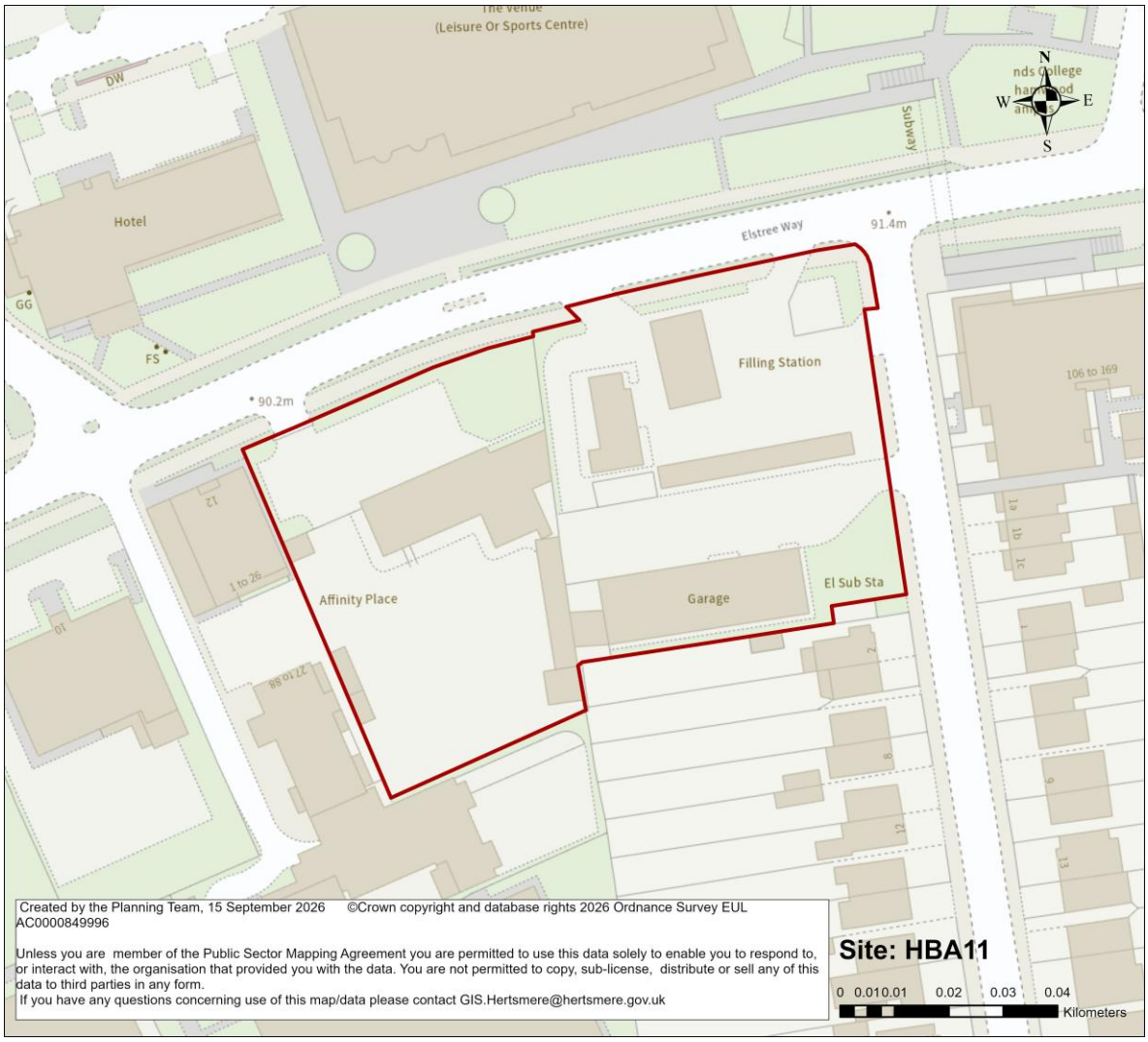
14.142 The site should be designed as part of the Elstree Way corridor rather than as an isolated housing scheme. Building lines, landscape, active frontages and public space should align with neighbouring regeneration sites and contribute to a coherent urban street.

14.143 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The

masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future. Parking, servicing, loading and refuse must be coordinated across the allocation and located so that they do not dominate Elstree Way or principal pedestrian routes.

14.144 Where emergency-service access is retained, the design should clearly separate operational movements from principal pedestrian and cycle routes while maintaining rapid and reliable access to the highway network.

HBA11 Elstree Way Cluster



Site Address	Elstree Way Cluster (comprised of office building, Shell Garage and Kwik Fit), Borehamwood		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	0.74 ha	Urban	Private
Current Uses	Former police/office building, petrol filling station and motor-repair premises		
How Site was Identified	Regulation 18 candidate urban-regeneration site.		
Planning Designations and Site Considerations	Historic petrol-filling and vehicle-repair activities mean ground conditions should be appropriately investigated as part of redevelopment.		
Planning Status	No recent relevant planning history identified in the reviewed material.		
Indicative Development Capacity	170 dwellings with employment/main town centre uses on ground floor and potentially other lower levels.		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A **Delivering a better future for Hertsmere**
B **A thriving local economy**
C **The regeneration of Borehamwood and Potters Bar**
E **Meet the Borough's housing needs by delivering homes for everyone**
K **Securing the timely delivery of infrastructure**

Non-Strategic Policy

Site Allocation

14.145 The Elstree Way Cluster is allocated for comprehensive residential-led mixed-use redevelopment. It will deliver at least 170 new homes together with retained or re-provided employment, workspace or other compatible active uses at ground and lower levels.

14.146 Development must support the wider employment, creative and mixed-use role of Elstree Way and should replace the existing fragmented and vehicle-oriented layout with a coherent urban form.

Opportunities

14.147 The site provides an opportunity to replace low-intensity office, petrol filling and motor-repair uses with a more efficient mixed-use development that creates a stronger frontage to Elstree Way and contributes to the corridor's regeneration.

14.148 Redevelopment of the site allocation could provide flexible workspace for SMEs, creative, digital or production-related businesses, improve public realm and reduce the visual dominance of forecourts, vehicle servicing and surface parking.

Development Requirements

14.149 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban site will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

14.150 The masterplan must use the design-led approach to achieve a high intensity mixed-use development that includes positive frontages that address key routes and public spaces. This will incorporate high-quality, medium-density, town centre homes, active ground floor frontages in line with the Retail and Town Centre policies, and new and improved public realm and open space.

14.151 Landowners and other relevant interests must work positively together in preparing and delivering the masterplan. The lead landowner or developer bringing forward the site-wide masterplan must demonstrate that reasonable efforts have been made to undertake positive and meaningful engagement with other landowners, occupiers and interests whose land is necessary for or may be affected by the comprehensive redevelopment of the allocation.

14.152 Development must retain or re-provide an appropriate employment/ workspace component and demonstrate how the scheme supports rather than displaces the economic function of the Elstree Way corridor.

14.153 Development must establish an active ground-floor frontage to Elstree Way, with principal entrances and non-residential uses positioned to animate the street and avoid long blank elevations.

14.154 A proportionate ground investigation and remediation strategy must address potential contamination associated with historic petrol-filling, vehicle-repair and related activities before residential or other sensitive uses are occupied.

14.155 Flood risk and surface-water drainage must be assessed at site level and must inform the layout where relevant. SuDS should be integrated with landscape and public realm rather than treated solely as engineered infrastructure. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

Development Guidance

14.156 Built form should establish a clear urban street edge to Elstree Way. Height and massing should respond to the emerging corridor scale while providing an appropriate transition towards lower-rise residential areas and neighbouring uses.

14.157 Ground and lower floors should be designed as flexible commercial space capable of subdivision or combination over time. Uses that support SMEs, creative industries, studios, workshops or co-working should be encouraged where compatible with residential amenity.

14.158 The layout should minimise exposed vehicle forecourts and service areas. Where parking or servicing is required at ground level, it should be placed behind or within development and screened from Elstree Way through building orientation and landscape.

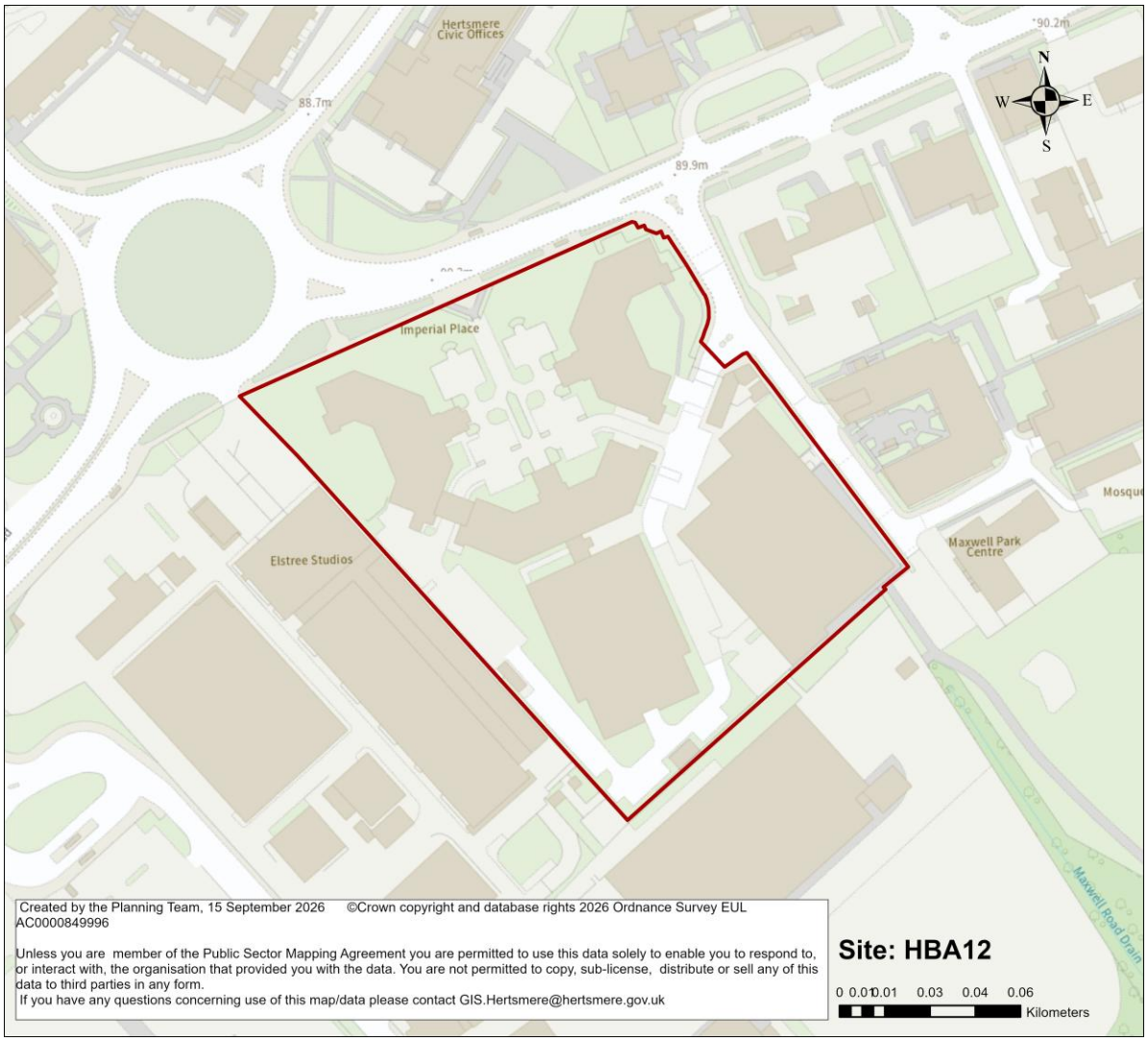
14.159 Public realm should include street trees, planting, pedestrian space, lighting and secure cycle parking and should align with the treatment of adjoining Elstree Way sites so that the corridor reads as a coherent place.

14.160 Residential entrances and amenity space should be separated from servicing, deliveries and any retained commercial operations to ensure acceptable living conditions without constraining legitimate employment activity.

14.161 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The

masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future. Parking, servicing, loading and refuse must be coordinated across the allocation and located so that they do not dominate Elstree Way or principal pedestrian routes.

HBA12 Imperial Place, Elstree Way



Site Address	Imperial Place, Elstree Way, Borehamwood		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	2.2 ha	Urban	Private
Current Uses	Office buildings and associated multi-storey car park.		
How Site was Identified	Regulation 18 candidate regeneration site		
Planning Designations and Site Considerations	Public right of way adjoining the site; culverted watercourse on the eastern boundary; the multi-storey car park lies within Flood Zones 2 and 3 and much of the site is affected by surface-water flood risk.		
Planning Status	No recent relevant planning history.		
Indicative Development Capacity	550 Dwellings, and commercial, retail floorspace		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

B A thriving local economy
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
G Securing a greener Borough
H Responding to the climate emergency
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Site Allocation

14.162 Imperial Place is allocated for comprehensive mixed-use regeneration. It will deliver at least 550 new homes during the first half of the plan period. It will also secure retained, re-provided or intensified employment and workspace uses, public realm and green infrastructure.

Opportunities

14.163 The scale of Imperial Place provides an opportunity to renew an established office location, substantially reduce land devoted to parking and create a new network of streets, spaces and mixed-use buildings within the Elstree Way corridor.

14.164 The culverted watercourse, flood-risk areas and existing public right of way provide an opportunity to structure a stronger blue-green and active-travel network. The site can also provide modern flexible workspace supporting Borehamwood's film, television, digital and wider creative economy.

Development Requirements

14.165 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the strategic urban site will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

14.166 The masterplan must use the design-led approach to achieve a high intensity mixed-use development that includes positive frontages that address key routes and public spaces. This will incorporate high-quality, medium-density, town centre homes, active ground floor frontages in line with the Retail and Town Centre policies, and new and improved public realm and open space.

14.167 Development must safeguard and strengthen the site's employment role. An appropriate quantum of modern employment or workspace must be retained or re-

provided, with proposals demonstrating how the development supports the wider Elstree Way employment and creative cluster.

14.168 Development must respond appropriately to the operational requirements of Elstree Studios and other neighbouring employment uses. Residential amenity must be secured without imposing unreasonable constraints on established lawful employment activity.

14.169 Flood Zones 2 and 3, surface-water flood risk and the culverted watercourse must shape the masterplan from the outset. More vulnerable development should be directed to areas of lower risk and a sequential approach applied within the site. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

14.170 The masterplan must investigate opportunities to enhance the watercourse corridor, including de-culverting or ecological improvement where technically feasible, and integrate SuDS with public realm, biodiversity and landscape.

14.171 The adjoining public right of way must be retained and enhanced as part of a safe, overlooked and accessible walking and cycling network connecting Elstree Way, Maxwell Road and surrounding destinations.

14.172 Development must respond positively to the site's Areas that Could Become of Importance for Biodiversity designation and deliver biodiversity net gain through a connected landscape and habitat framework. Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS.

Development Guidance

14.173 Greater height and density are appropriate in principle within this highly accessible town-centre location. Taller elements may be appropriate at the principal Elstree Way gateway and on the most accessible parts of the cluster. Proposals for tall buildings will consider townscape, public realm, movement, daylight and sunlight, microclimate and transitions to adjoining lower-rise residential areas.

14.174 The masterplan should use buildings to define Elstree Way as an urban street rather than an area of freestanding buildings behind parking. Entrances, active uses, street trees and pedestrian space should strengthen the corridor's role as a civic and mixed-use connection to the town centre.

14.175 The masterplan should create a clear hierarchy of streets, pedestrian routes and public spaces, with active employment or other non-residential uses focused along Elstree Way and the most important internal routes.

14.176 Employment floorspace should be flexible and adaptable, capable of accommodating offices, studios, workshops, co-working or other creative and technical businesses. Ground-floor depths and servicing arrangements should allow genuine long-term commercial occupation.

14.177 The eastern watercourse corridor should be treated as a positive placemaking feature rather than a residual service edge. Landscape, SuDS and habitat improvements should be coordinated with walking and cycling where compatible with flood and ecological functions.

14.178 Building and landscape design should ensure that new residential uses can coexist with Elstree Studios and other employment activity, including through appropriate orientation, acoustic design, separation and internal layout where necessary.

14.179 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

HBA13 Old Haberdasher's Sports Ground, Croxdale Road

Site Address	Old Haberdasher's Sports Ground, Croxdale Road, Borehamwood		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	4.1 ha	Urban	Public (leased to a third party)
Current Uses	Sports ground		
How Site was Identified	Regulation 18 candidate site		
Planning Designations and Site Considerations	Existing sports/open-space use. The site lies north of Shenley Road and west of Aberford Park and has good accessibility to local facilities and public transport.		
Planning Status	No recent relevant planning history.		
Indicative Development Capacity	200 dwellings		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

E **Meet the Borough's housing needs by delivering homes for everyone**
G **Securing a greener Borough**
H **Responding to the climate emergency**
J **Healthy and safe communities**
K **Securing the timely delivery of infrastructure**

Non-Strategic Policy

Site Allocation

14.180 Old Haberdasher's Sports Ground is allocated for the development of at least 200 new homes. It will also deliver publicly accessible open space, green infrastructure, sustainable drainage, biodiversity enhancement and associated infrastructure.

14.181 Development will only be acceptable where the redevelopment of the existing sports and recreation provision has been satisfactorily addressed in accordance with national policy and the relevant Local Plan policies. This is inclusive of equivalent or better replacement provision unless robust and up-to-date evidence demonstrates that the existing provision is surplus to requirements.

Opportunities

14.182 The site lies wholly within the existing Borehamwood urban area and is surrounded principally by residential development. It provides an opportunity to deliver additional homes without extending the built-up area, inclusive of consequential Green Belt release, and benefits from relatively good access to local services, buses and the town centre.

14.183 Redevelopment also provides an opportunity to create a design-led residential scheme with new publicly accessible green space, improved biodiversity, multifunctional SuDS and stronger walking and cycling connections towards Aberford Park and surrounding neighbourhoods. These benefits must be considered alongside the site's current role as valued sports and green space.

Development Requirements

14.184 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the site will deliver new homes in accordance with the site allocation.

14.185 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. Layout,

scale, density and massing must respond sensitively to adjoining residential properties and protect reasonable levels of privacy, daylight, sunlight and outlook.

14.186 Prior to the loss of the existing playing fields or sports facilities, development must demonstrate compliance with national and Local Plan policy relating to existing open space, sport and recreation. The assessment must be informed by the Council's most up-to-date Open Space Assessment and Outdoor Sports and Playing Pitch Study.

14.187 In circumstances where evidence demonstrates that the existing sports provision is surplus to requirements, equivalent or better replacement provision must be secured in terms of quantity and quality at a suitable and accessible location. Replacement facilities must be available for use before the existing provision is lost unless an alternative phasing arrangement has been agreed that maintains appropriate continuity.

14.188 The location, specification, funding, delivery arrangements and long-term management of replacement sports provision must be demonstrated through the planning application and secured through appropriate planning obligations. Replacement provision must not be deferred to an unspecified later project.

14.189 Development must provide an appropriate amount and range of publicly accessible open space, play space and green infrastructure within the site, reflecting identified local needs. This is additional to any off-site replacement provision required specifically to address the loss of existing sports facilities.

14.190 Surface-water flood risk must inform the layout from the earliest design stage. Development should avoid areas at greatest risk where practicable and incorporate multifunctional SuDS, landscape and open space that manage water while contributing to climate resilience, biodiversity and amenity. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

14.191 Development must protect and enhance the site's ecological network and respond positively to its Areas that Could Become of Importance for Biodiversity status. Existing protected and other important boundary trees and vegetation must be retained wherever practicable and incorporated into a connected habitat framework delivering biodiversity net gain. Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS.

14.192 Development must provide safe and attractive walking and cycling connections to Croxdale Road and surrounding residential streets and should improve connections towards Borehamwood Town Centre and nearby parks. The internal street network must prioritise walking and cycling and provide secure cycle parking.

Development Guidance

14.193 Development should be landscape-led, with retained trees, new planting, open space and SuDS forming the organising framework rather than residual areas around housing parcels. The layout should retain an appreciable green character across the site in recognition of its current recreation and climate-adaptation role.

14.194 Residential development should generally be low to medium rise and should respond to the established scale and character of surrounding streets. Any increase in height or density should be focused where it can be accommodated without unacceptable effects on neighbouring amenity or the open-space framework.

14.195 New public open space and walking routes should be overlooked by homes, provide good natural surveillance and connect clearly with surrounding streets and green spaces. The design should avoid isolated rear boundaries or inaccessible strips of residual landscape.

14.196 SuDS should be integrated into usable landscape and, where appropriate, include swales, rain gardens or attenuation features that also provide habitat and visual amenity. The design should retain permeability and avoid unnecessary hard surfacing. Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied.

14.197 Development should take advantage of the site's relatively good sustainable accessibility. Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

14.198 The relationship between new on-site open space and any off-site replacement sports facility should be explained clearly so that the allocation delivers both a satisfactory residential environment and a demonstrable overall recreation outcome.

HBA14 Aycliffe Road and Leeming Road Local Centre

Site Address	Aycliffe Road and Leeming Road Local Centre, Borehamwood		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	1.42 ha	Urban	Public for the main commercial/ maisonette blocks; adjoining residential land has different ownership interests.
Current Uses	Local centre comprising ground-floor shops/services with residential accommodation above, adjoining residential blocks, parking, garages/service areas and amenity/open space.		
How Site was Identified	Regulation 18 urban-regeneration opportunity		
Planning Designations and Site Considerations	Existing local-centre function must be maintained or re-provided; adjacent public right of way and surface-water issues; brook to the south; multiple residential/leasehold interests and need to maintain retail operation during redevelopment.		
Planning Status	No recent relevant planning history.		

Indicative Development Capacity	200 dwellings

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Site Allocation

14.200 Aycliffe Road and Leeming Road Local Centre is allocated for phased residential-led mixed-use regeneration. It will deliver at least 200 homes, an improved local centre, comprised of main town centre uses that include community uses where appropriate, public realm, open space and green infrastructure.

14.201 Development must maintain and strengthen the local centre's role in meeting day-to-day convenience retail needs and should be planned comprehensively where redevelopment affects multiple blocks, landowners or phases.

Opportunities

14.202 The allocation provides an opportunity to modernise an established local centre, deliver high-quality new homes on previously developed land and improve the quality of the public realm, parking, landscaping and communal spaces.

14.203 Redevelopment will also make more efficient use of under-performing rear service areas and residential blocks, improve children's play and communal amenity and strengthen biodiversity and drainage through a connected green-infrastructure approach.

Development Requirements

14.204 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban regeneration site will deliver new homes in accordance with the site allocation. and other compatible uses in accordance with the site allocation.

14.205 The masterplan must use the design-led approach to achieve a high intensity mixed-use development that includes positive frontages that address key routes

and public spaces. This will incorporate high-quality, medium-density, town centre homes, active ground floor frontages in line with the Retail and Town Centre policies, and new and improved public realm and open space.

14.206 Development must maintain and strengthen the role and function of Leeming Road Local Centre. Existing shops and services must be retained, re-provided or replaced with an equivalent or improved offer unless robust evidence demonstrates that a particular use is no longer required.

14.207 The redevelopment must be phased to maintain reasonable continuity of local-centre trading and access to essential services. A phasing strategy must address temporary arrangements where shops, community facilities or access are disrupted during construction.

14.208 Where existing residential tenants or leaseholders are affected, proposals must demonstrate a credible phasing and rehousing strategy and show how redevelopment can proceed without creating isolated retained blocks or prejudicing later phases.

14.209 Development must improve pedestrian accessibility, public realm, landscaping and the arrangement of parking and servicing throughout the local centre. Principal routes and entrances must be legible, overlooked and accessible to people of all ages and abilities.

14.210 New and improved communal open space and children's play provision must be integrated into the redevelopment and designed to receive appropriate daylight, natural surveillance and convenient access from homes.

14.211 Surface-water flood risk must inform the layout and a site-wide drainage strategy. SuDS should be integrated with public realm, planting and any open-space improvements and should be designed to reduce runoff while providing biodiversity and amenity benefits. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

14.212 Development must respond positively to the site's Areas that Could Become of Importance for Biodiversity status and provide biodiversity net gain through new planting, habitat features and connected green infrastructure, including links to nearby ecological and drainage corridors where feasible. Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS.

14.213 Development must provide an appropriate parking and servicing strategy that supports the local centre while reducing vehicle dominance and avoiding conflict with pedestrian routes, shopfronts and residential amenity.

Development Guidance

14.214 A mix of refurbishment, infill and comprehensive redevelopment may be appropriate. The masterplan or development framework should identify which buildings can be retained or improved and where redevelopment is necessary to achieve better homes, shops, movement and public space.

14.215 Redeveloped local-centre frontages, at ground floor level, may accommodate increased height where this helps provide modern main town centre use space and housing above. Decisions on this matter will be subject to appropriate transitions to surrounding residential streets, daylight/ sunlight and securing high-quality design.

14.216 New retail and community units should have flexible floorplates, servicing and ceiling heights that allow a range of uses over time. Shopfronts and entrances should directly address the principal public spaces and routes.

14.217 Landscape and SuDS should be used to improve the quality of communal courtyards, routes and parking areas. Opportunities for rain gardens, additional tree planting and habitat features should be incorporated where compatible with utilities and servicing.

14.218 Rear service courts and parking areas should be reorganised to support safer pedestrian routes and, where appropriate, may accommodate carefully designed infill or mews development provided servicing, refuse, fire access and residential amenity are satisfactorily resolved.

14.219 Given the local centre's bus accessibility and the relatively urban character of the site, development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future. Convenient cycle parking should be provided for residents,

HBA15 North of Allum Lane, Elstree

Site Address	Land North of Allum Lane / Golf Course Site, Borehamwood		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	22.18 ha	Urban Extension	Private
Current Uses	Undeveloped land and golf course.		
How Site was Identified	Call for Sites process		
Planning Designations and Site Considerations	A public right of way exists across the site. Proximity to existing Allum Lane allotments. Surface water flood risk through the site. Development potential to impact the setting of two Grade II listed buildings at Nicoll Farm. Individual Tree Preservation Orders present. Adjacent to Local Wildlife Site. Pockets of surface water flood risk and limited areas of Flood Zone 2.		
Planning Status	26/0318/OUT: Outline planning application (with all matters reserved except access) for residential development of 136 dwellings, including affordable housing (Class C3), associated parking, infrastructure, landscaping and open space including allotments, and creation of new vehicular access from Allum Lane.		

Indicative Development Capacity	486 dwellings

Timeframe for delivery

Strategic objectives

C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
K Securing the timely delivery of infrastructure

Non-strategic policy

Existing Planning Consents

14.220 Planning application 26/0318/OUT seeks outline consent (with all matters reserved except for access) for residential development of 136 dwellings, including affordable housing (Class C3), associated parking, infrastructure, landscaping and open space including allotments, and creation of new vehicular access from Allum Lane.

Site Allocation

14.221 The site allocation proposes development for at least 486 homes that will provide an urban extension to Borehamwood. It is anticipated that it will deliver medium-density, low-rise residential dwellings, including new genuinely affordable homes during the first half of the plan period. The development of the site provides an opportunity to deliver on-site connectivity improvements for active travel, substantial green infrastructure, public open space and biodiversity enhancement.

14.222 The allocation is located within the Metropolitan Green Belt. The Borough-wide Green Belt Assessment Stage 2 further considers the site's contribution to the purposes of the Green Belt. Whilst the site contributes towards both Purpose A and B, and is not defined as grey belt, the Council considers that meeting Hertsmere's housing needs in such an accessible location provides an exceptional circumstance for its release. The comprehensive development of the urban extension must secure a defensible Green Belt Boundary along the site's western and northern extent.

Opportunities

14.223 This urban extension is in an accessible location, near to Elstree and Borehamwood train station and Borehamwood high street. It provides a genuine opportunity to contribute to meeting Borehamwood's housing needs, particularly in

terms of the provision of new genuinely affordable homes, in a sustainable location during the early years of the plan period. The development of the site also provides an opportunity to deliver on-site biodiversity enhancements and active travel improvements to the Public Rights of Way network.

14.224 The delivery of the site provides an opportunity to enhance the walking and cycling provision along Allum Lane, in line with the LCWIP. The site should provide funding for the creation of a proposed shared-use path on the northern-side of Allum Lane.

14.225 Landowners should work together to ensure that a suitable access point servicing the whole site can be provided off Allum Lane and works in tandem with active travel infrastructure.

Development Requirements

14.226 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

14.227 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. The design and layout of the development must address the existing housing typologies to the south-east of the site, specifically The Stables and Blattner Close.

14.228 The urban extension will be integrated into Borehamwood's existing transport infrastructure networks. Improvements will maximise access and permeability for active travel modes, pedestrian, cycle and vehicular access from Theobald Street, improved walking and cycling provision along Theobald Street. These will be in accordance with the proposals in the Local Cycling and Walking Infrastructure Plan (LCWIP). The improvements will provide a connection with Footpath Aldenham 54 to the south.

14.229 Development must be phased to ensure the timely provision of the infrastructure necessary to support the urban extension that contributes to Borehamwood being a self-sustaining place. This must include the timely investment in community infrastructure to meet demand arising from the development.

14.230 The delivery of the urban extension will provide new and improved public realm and suitable open space in accordance with a site-wide public realm strategy. This must incorporate, retain and enhance the row of mature field-edge trees located on the site's southeastern boundary to form a defensible Green Belt boundary in the long term. The public realm strategy will also secure the retention of existing tree and hedge cover along Theobald Street. This will benefit of biodiversity by providing a link to other areas of enhanced habitat within and adjoining the site.

Development Guidance

14.231 The delivery of the urban extension must take account of the flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation

measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

14.232 Development must deliver biodiversity net gain (BNG) and enhancement of the habitat network in line with the actions identified in the Hertfordshire Local Nature Recovery Strategy (LNRS). Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain incorporate the relevant actions in the LNRS.

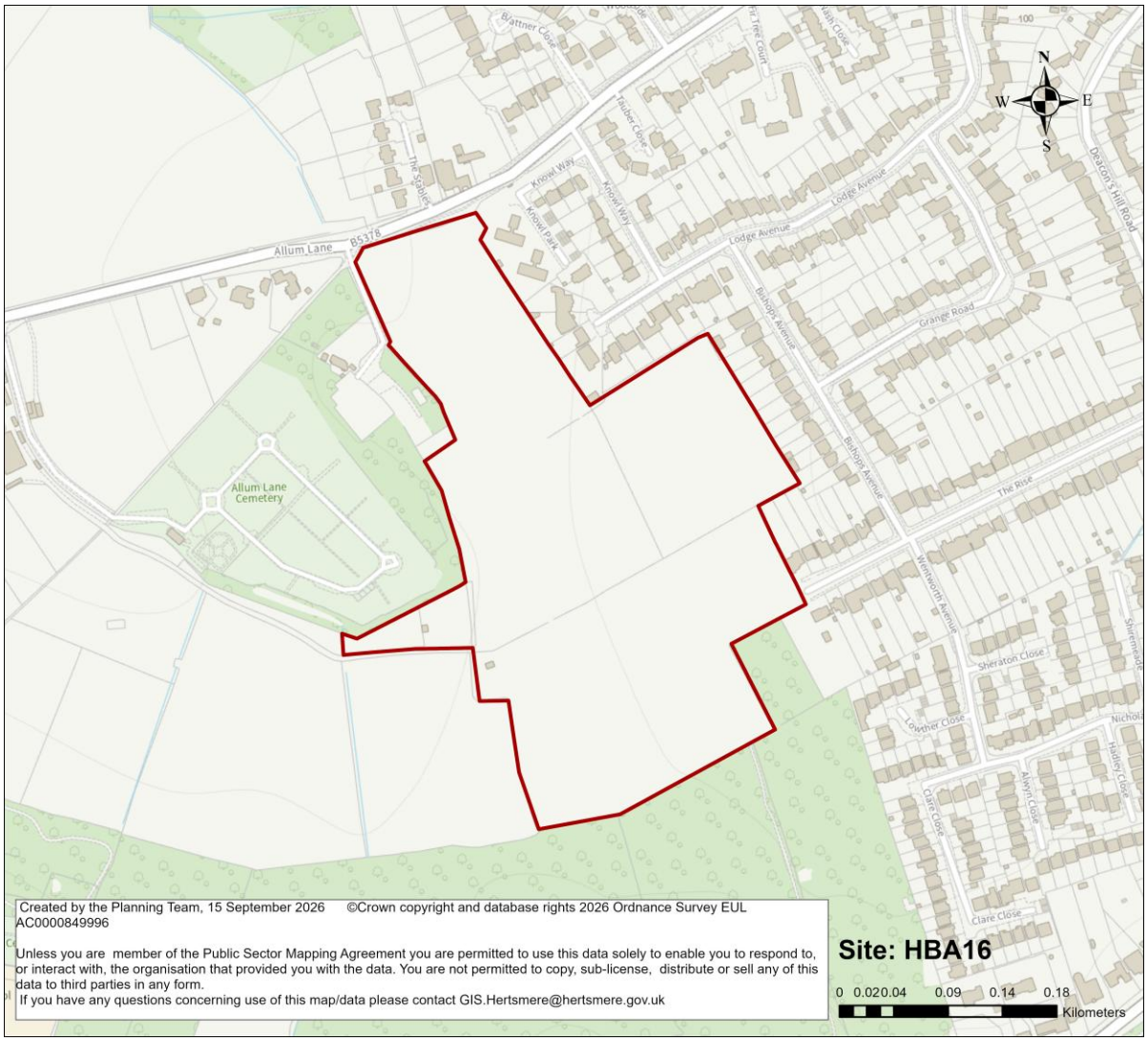
14.233 Applicants should engage with Thames Water early in the design process, and work in partnership with them to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied.

14.234 Development must respond positively to heritage assets including nearby listed buildings at Christchurch, Watling Street and the Cat and Fiddle (former public house), Watling Street and the Radlett South Conservation Area (which covers Watling Street at the junction of Theobald Street). Proposals must address impacts on the significance of these heritage assets and their setting, including the impact on views from within the Conservation Area.

14.235 Development should be designed to improve connectivity with, and maximise the value of, nearby open space King George V Recreation Ground, including Wellhouse Dell, and celebrate the site's location on the edge of Hertsmere's beautiful countryside. The site will deliver a link with Footpath Aldenham 54, which connects with King George V Recreation Ground and on to Watling Street and other Public Right of Way (PROW) links into the countryside on the southern edge of Radlett, providing residents with opportunities for improving their health and well-being.

14.236 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

HBA16 Land South of Allum Lane, Elstree



Site Address	Land South of Allum Lane, Elstree		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	10.46 ha	Urban Extension	Private
Current Uses	Open/agricultural land, including horticultural or equine uses in parts.		
How Site was Identified	Call for Sites / HELAA 2025 CFS-2025-065 and Regulation 18 site-selection work.		
Planning Designations and Site Considerations	Green Belt release/settlement-edge site. Public right of way across the site; TPOs near site edges; archaeological site ARCH-17; potential effects on the setting of two Grade II listed buildings at Nicoll Farmhouse; limited surface-water flood risk and Flood Zone 2 near the eastern edge. The landscape gap between Borehamwood and Elstree Village is a key strategic consideration.		
Planning Status	24/0442/FUL for an Integrated Retirement Community of 150 homes, associated facilities and relocation/provision of a doctor's surgery affects most of the site. The allocation extends beyond the application area.		
Indicative Development Capacity	150 dwellings and healthcare and community provision		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic objectives

C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
K Securing the timely delivery of infrastructure

Non-strategic policy

Existing Planning Consents

14.237 Planning application 24/0442/FUL seeks to gain full consent for an Integrated Retirement Community of 150 homes, associated facilities and relocation/provision of a doctor's surgery affects most of the site. The site allocation relates to a wider area.

Site Allocation

14.238 Land South of Allum Lane is allocated to deliver at least 150 news homes, including specialist accommodation for older people, together with healthcare/community facilities, public open space, green infrastructure and associated infrastructure. Delivery is anticipated to take place during the first half of the plan period.

14.239 The allocation is located within the Metropolitan Green Belt. The Borough-wide Green Belt Assessment Stage 2 further considers the site's contribution to the purposes of the Green Belt. It is noted that the site makes a moderate contribution towards both Purpose A and B and is defined as provisional grey belt. The comprehensive development of the urban extension must secure a defensible Green Belt Boundary along the site's western and southern extent.

Opportunities

14.240 This urban extension is in an accessible location, near to Elstree and Borehamwood train station and Borehamwood high street. It provides an opportunity to deliver specialist housing and a new or relocated GP surgery together with additional housing on the wider allocation during the first half of the plan period.

14.241 Comprehensive planning provides an opportunity to establish a high-quality landscape edge, retain a meaningful gap towards Elstree Village, integrate existing rights of way and trees and improve walking and cycling connections to the station, town centre and surrounding neighbourhoods.

Development Requirements

14.242 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation. Early development must not prejudice access, landscape, infrastructure, housing capacity or connections required by later phases.

14.243 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. Development must retain and reinforce a strong landscape separation between Borehamwood and Elstree Village. The extent, scale and landscape treatment of development must establish a durable settlement edge and avoid visual or physical coalescence.

14.244 The significance and setting of the Grade II listed buildings at Nicoll Farmhouse must inform the layout, landscape, building scale, materials and important views. A heritage assessment must address cumulative effects across the whole allocation rather than only individual phases.

14.245 Archaeological significance, including the proximity of ARCH-17, must be appropriately investigated. Evaluation and mitigation must be undertaken at a stage that allows significant archaeology to influence the masterplan and disposition of development.

14.246 Existing TPO trees, important hedgerows and other landscape features must be retained wherever practicable and incorporated into the green-infrastructure framework. Replacement planting must reinforce the long-term settlement edge and ecological connectivity.

14.247 The existing public right of way must be retained and enhanced within a safe, direct and overlooked walking network. Development must provide high-quality walking and cycling connections towards the railway station, town centre and Elstree Village.

14.248 Flood Zone 2 and surface-water flood risk must inform the layout. Vulnerable uses must be directed towards areas of lower risk and SuDS integrated with landscape and public open space. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

14.249 The healthcare facility proposed as part of the site must be appropriately located, accessible by sustainable modes and delivered in accordance with identified primary-care needs and the phasing of development.

14.250 The Borough wide Stage 2 Green Belt Assessment identifies the site as provisional grey belt. Development must establish a strong and permanent Green Belt boundary along the western and southern edges of the released land, using retained hedgerows, woodland and other permanent landscape features. The

landscape framework must maintain an effective physical and visual distinction between Borehamwood and Elstree Village.

Development Guidance

14.251 Where the wider allocation is delivered in separate phases, design parameters, landscape structure, access and infrastructure should be fixed through the site-wide framework so that later phases form a coherent extension rather than a visually and functionally separate scheme.

14.252 The character of development should be predominantly design-led and residential, with building scale stepping down towards the more sensitive Elstree Village and countryside edges. Higher density should be focused on the most accessible parts of the allocation where it can be accommodated without harm to heritage or landscape separation.

14.253 Specialist housing should be integrated into the wider neighbourhood rather than designed as an isolated institutional campus. Streets, paths, open space and community facilities should be shared and legible, while specialist accommodation should retain appropriate privacy, accessibility and care requirements.

14.254 The GP surgery or other healthcare provision should occupy a visible and accessible location close to principal walking, cycling and public-transport routes. Parking and servicing should be arranged so that the facility can operate effectively without dominating the public realm.

14.255 Development should use retained trees, hedgerows and new structural planting to define neighbourhood edges and frame views. These should be identified through the master planning process. Landscape buffers should perform multiple functions, including biodiversity, SuDS, recreation and visual separation. Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS.

14.256 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

14.257 The public right of way and new active-travel routes should connect directly to internal streets and public spaces and should not be confined to narrow rear corridors. Routes should be overlooked and designed for year-round use.

HBA17 Land North of Barnet Lane (West), Elstree

Site Address	Land East of Hartfield Avenue and Fronting onto Barnet Lane, Elstree Land North of Barnet Lane (West)		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	5.8 ha	Urban Extension	Private
Current Uses	Paddocks/ open land		
How Site was Identified	Regulation 18 candidate site		
Planning Designations and Site Considerations	Part of site above railway tunnels; Local Wildlife Site covers more than half of the site; group TPO; registered Village Green within the site which must be retained and protected.		
Planning Status	23/0053/OUT for up to 74 dwellings, landscaping, amenity space, self/custom-build, SuDS and associated works, allowed on appeal. 25/1122/REM subsequently submitted for 73 dwellings.		
Indicative Development Capacity	74 dwellings		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic objectives

C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
K Securing the timely delivery of infrastructure

Non-strategic policy

Existing Planning Consents

14.258 The site benefits from a consent, gained at appeal, under reference 23/0053/OUT. This consents a proposal for up to 74 dwellings, and includes landscaping, amenity space, self/custom-build, SuDS and associated works, allowed on appeal.

14.259 The site is the subject of a further proposal under reference 25/1122/REM, which seeks consent for 73 dwellings.

Site Allocation

14.260 The site is allocated for at least 74 homes together with public and private amenity space, green infrastructure, biodiversity enhancement, sustainable drainage and associated infrastructure. Delivery will take place during the first five years of the plan period.

14.261 Development should proceed broadly in accordance with the approved outline consent or a subsequent permission that achieves an equivalent or improved landscape, ecological, housing and infrastructure outcome.

14.262 The allocation is located within the Metropolitan Green Belt. The Borough-wide Green Belt Assessment Stage 2 further considers the site's contribution to the purposes of the Green Belt. It is noted that the site makes a moderate contribution towards both Purpose A and B and is defined as grey belt. The comprehensive development of the urban extension must secure a defensible Green Belt Boundary along the site's southern boundary.

Opportunities

14.263 The extant permission establishes the principle and broad scale of residential development. The principal opportunity is therefore to secure timely housing delivery while permanently protecting and enhancing the site's substantial ecological and open-space assets.

14.264 Delivery of the site allocation can secure improved walking and cycling links to Barnet Lane and surrounding neighbourhoods. It can also secure the retention of

the adjoining Village Green, Local Wildlife Site and trees to create a distinctive landscape setting for the new homes.

Development Requirements

14.265 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

14.266 No built development or private residential curtilage must encroach onto the registered Village Green or designated Village Green replacement land. These areas must remain protected and managed for their intended open-space function.

14.267 The Local Wildlife Site must be protected and enhanced. Built development must be concentrated on the genuinely developable parts of the allocation and appropriate ecological buffers, habitat management and biodiversity net gain must be secured. Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS.

14.268 Existing important trees and TPO groups must be retained and integrated into the layout. Root-protection areas and long-term growth must inform building positions, streets, drainage and utilities rather than being addressed as a later landscaping issue.

14.269 Development must demonstrate that railway tunnels and associated infrastructure are safeguarded. The relevant railway infrastructure bodies must be engaged were construction, drainage, loading or landscape works could affect tunnel integrity, access or operational requirements. Developers should demonstrate that they have undertaken engagement with Network Rail.

14.270 SuDS must be integrated with the site's green infrastructure and biodiversity framework and must not compromise the Village Green, Local Wildlife Site or retained trees. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

14.271 Development must provide safe and attractive walking and cycling connections to Barnet Lane and surrounding neighbourhoods and should connect with the wider LCWIP network where feasible. The layout should avoid unnecessary cul-de-sacs or barriers to active travel.

14.272 Affordable housing, self-build/custom-build and other housing obligations secured through the extant permission should be retained unless an alternative is approved through a subsequent permission and is consistent with current Local Plan policy.

14.273 Development must establish a clear and durable Green Belt boundary along the southern edge of the released land, using the existing woodland edge, mature vegetation and other permanent landscape features. The retained woodland and

associated green infrastructure must provide a substantial transition between the development and the remaining Green Belt.

Development Guidance

14.274 The layout should be landscape and ecology-led, with the Village Green, Local Wildlife Site, retained trees and habitat buffers forming the principal spatial framework. Homes should front and overlook green spaces and routes where compatible with ecological sensitivity.

14.275 Built form should generally respond to the scale of adjoining residential development and avoid unnecessary visual intrusion into retained open land. Any higher or more compact elements should be located where they do not harm the landscape setting or ecological functions of the site.

14.276 Boundaries adjoining ecological or Village Green land should use landscape and natural surveillance rather than continuous high fencing wherever security and habitat requirements allow. Private gardens should not create unmanaged pressure for encroachment into protected land.

14.277 Streets, parking and drainage should be designed to minimise fragmentation of the green network. Parking should be integrated into the built form and landscape so that the retained open areas remain the dominant visual feature of the development.

14.278 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

14.279 The relationship with Barnet Lane should include a safe pedestrian frontage, appropriate crossing connections and landscape treatment that reinforces the settlement edge and links with the wider active-travel network.

HBA18 Land West of Vale Avenue

Site Address	Land West of Vale Avenue, Borehamwood		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	3.4 ha	Urban Extension	Private
Current Uses	Open fields		
How Site was Identified	Call for Sites (CFS-2025-080) and HELAA (HEL-0511-2)		
Planning Designations and Site Considerations	Green Belt; adjoining designated Local Wildlife Sites; TPO/tree constraints; LNRS area; adjacent railway tunnel. The site contributes to the rural break between Elstree and Borehamwood.		
Planning Status	Planning application: Resolution to grant subject to S106 agreement 25/1615/FUL for 98 homes comprising houses and apartment buildings up to three storeys, parking, cycle parking, refuse, substation, communal amenity and landscaping.		
Indicative Development Capacity	98 dwellings		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

E **Meet the Borough's housing needs by delivering homes for everyone**
G **Securing a greener Borough**
H **Responding to the climate emergency**
K **Securing the timely delivery of infrastructure**

Non-Strategic Policy

Existing Planning Consents

14.281 The site allocation benefits from a resolution to grant permission (from the Council) for a proposal under reference 25/1615/FUL. This seeks to develop the site for 98 homes comprising houses and apartment buildings up to three storeys, parking, cycle parking, refuse, substation, communal amenity and landscaping.

Site Allocation

14.282 Land West of Vale Avenue is allocated for at least 98 homes, which it is anticipated will be delivered during the first five years of the plan period. Delivery will also secure public and communal open space, landscape, biodiversity enhancement, sustainable drainage and associated infrastructure.

14.283 Development should proceed broadly in accordance with the approved or resolved planning framework unless a subsequent proposal demonstrates an equivalent or improved housing, landscape, biodiversity and infrastructure outcome.

14.284 The allocation is located within the Metropolitan Green Belt. The Borough-wide Green Belt Assessment considers the site's contribution to the purposes of the Green Belt. It is noted that the site is defined as grey belt. The comprehensive development of the urban extension must secure a defensible Green Belt Boundary along the western and southern edges of the released land.

Opportunities

14.285 The site adjoins the existing built edge of Borehamwood and benefits from an active development proposal that provides an opportunity for early housing delivery. Early delivery can also establish a strengthened and permanent landscaped edge to the settlement and improve habitat connectivity between adjoining wildlife areas.

14.286 The site's layout and landscape can create publicly accessible green space, retain important trees and use structural planting to reinforce the distinction between Borehamwood and the more sensitive Elstree landscape.

Development Requirements

14.287 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

14.288 Development must deliver approximately 98 homes unless a subsequent permission demonstrates that a different capacity makes equally effective use of the site and achieves an equivalent or better landscape, biodiversity, affordable-housing and infrastructure outcome.

14.289 A strong structural landscape framework must establish a durable Green Belt boundary along the western and southern edges of the released land, using retained mature vegetation and other permanent landscape features, and maintain a clear physical and visual distinction between Borehamwood and Elstree.

14.290 The layout must protect and enhance adjoining Local Wildlife Sites and other important habitats. Appropriate buffers, biodiversity net gain and habitat connectivity must be secured, and development must avoid recreational, lighting or drainage impacts that would undermine ecological value. Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS.

14.291 Existing mature and protected trees must be retained wherever practicable and incorporated into the landscape framework. New structural planting must reinforce the settlement edge and be established early enough to mature alongside the development.

14.292 Structural planting should be established early, particularly along the Green Belt and ecological edges. Planting should use species and habitat types that reinforce local landscape character and support the adjoining wildlife network.

14.293 Development must demonstrate that railway tunnels and associated infrastructure are safeguarded. Construction, drainage and landscaping must be designed in consultation with the relevant railway infrastructure body where necessary. Developers should demonstrate that they have undertaken engagement with Network Rail.

14.294 Access through Vale Avenue must be designed to operate safely alongside attractive walking and cycling routes. Development must provide convenient connections to surrounding streets and the wider Borehamwood active-travel network.

14.295 Public and communal open space, play, SuDS and biodiversity measures must be integrated into a coherent green-infrastructure network rather than provided as disconnected residual areas. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

Development Guidance

14.296 The current planning proposal for buildings up to three storeys provides an appropriate starting point for the site's landscape-sensitive edge character. Taller building heights should be justified by the final design context and must not erode the intended transition to the countryside.

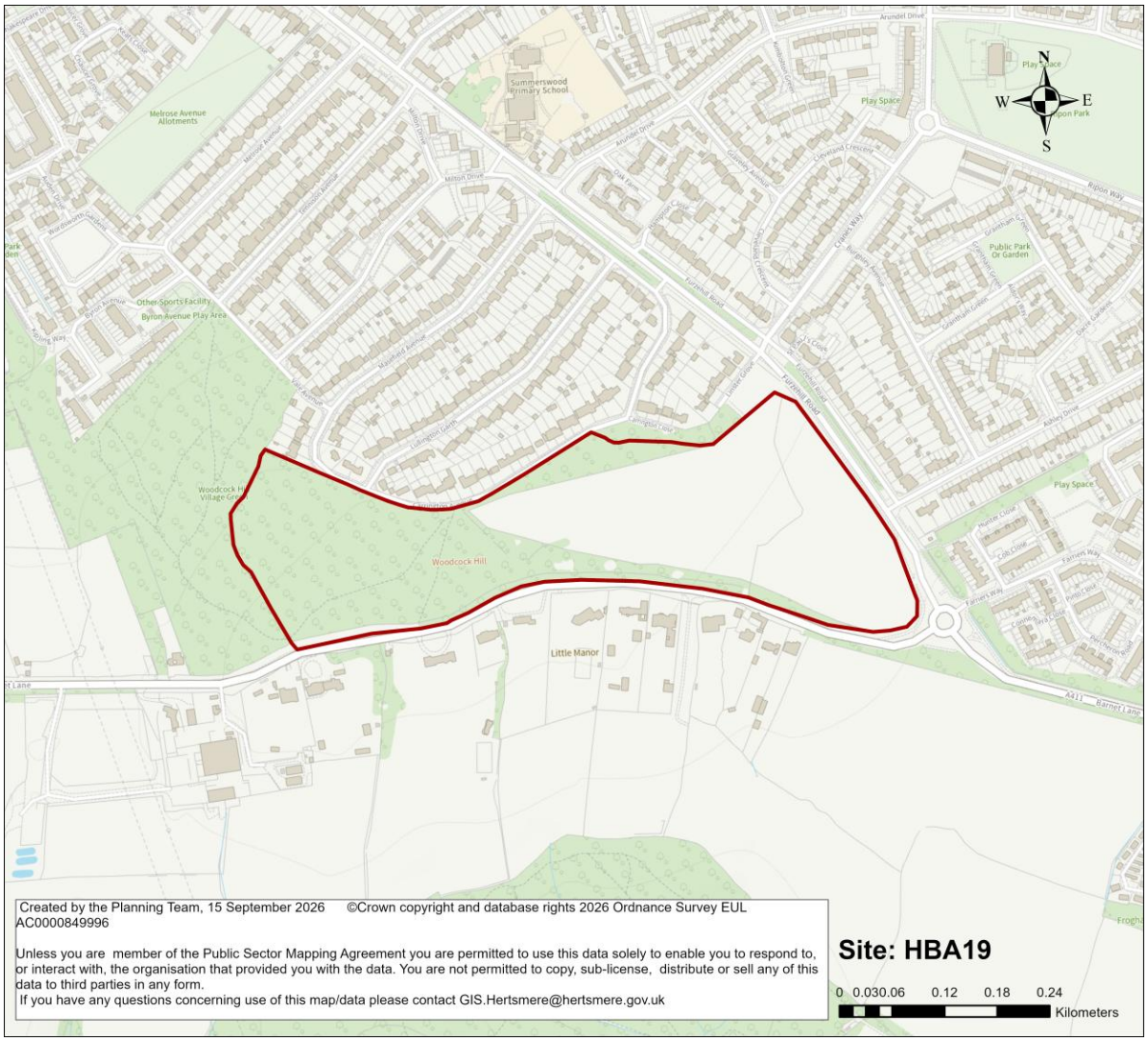
14.297 Development should front streets and green spaces and create a clear outward-facing neighbourhood. Rear boundaries should not form the principal edge to retained countryside or ecologically sensitive land where a landscape-led frontage can be achieved.

14.298 The relationship with existing homes on Vale Avenue should be managed through appropriate building setbacks, orientation, landscape and traffic design while maintaining clear and convenient connections between the existing and new neighbourhoods.

14.299 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

14.300 Parking should be integrated into streets and plots and screened by buildings and landscape. The public realm should prioritise walking and cycling and avoid a car-dominated settlement edge.

HBA19 Land north of Barnet Lane



Site Address	Land north of Barnet Lane, Borehamwood		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	12.55 ha	Urban Extension	Private
Current Uses	Semi-improved grassland/pasture, broad-leaved woodland, scrub and managed grassland.		
How Site was Identified	Regulation 18 candidate site.		
Planning Designations and Site Considerations	Local Wildlife Site; part of Woodcock Hill Village Green; significant groups of TPO trees; public right of way; pockets of surface-water flood risk. The Village Green and sensitive ecological areas are not part of the developable area..		
Planning Status	23/0937/OUT, up to 220 dwellings, 50% affordable housing, self/custom-build plots, green infrastructure, public open space, play, landscaping, SuDS and access works, allowed on appeal. 25/1554/REM subsequently submitted for 220 dwellings.		
Indicative Development Capacity	220 dwellings		

Timeframe for delivery

Strategic Objectives

E **Meet the Borough's housing needs by delivering homes for everyone**
F **Delivering affordable homes**
G **Securing a greener Borough**
J **Healthy and safe communities**
K **Securing the timely delivery of infrastructure**

Non-Strategic Policy

Existing Planning Consents

14.301 The site allocation benefits from a consent, granted at appeal, under reference 23/0937/OUT. That consent seeks to develop the site for up to 220 dwellings, 50% affordable housing, self/custom-build plots, green infrastructure, public open space, play, landscaping, SuDS and access works.

Site Allocation

14.302 Land north of Barnet Lane is allocated for at least 220 homes, which will be delivered during the first half of the plan period. Development will also deliver substantial green infrastructure, public open space, play, ecological enhancement, sustainable drainage and associated transport infrastructure.

14.303 Development should proceed broadly in accordance with outline permission 23/0937/OUT and subsequent reserved matters, or an alternative permission that secures an equivalent or improved housing, landscape, ecological, movement and infrastructure outcomes.

14.304 The allocation is located within the Metropolitan Green Belt. The Borough-wide Green Belt Assessment Stage 2 considers the site's contribution to the purposes of the Green Belt. It is noted that the site is defined as grey belt. The comprehensive development of the urban extension must secure a defensible Green Belt Boundary along the southern edges of the released land.

Opportunities

14.305 The permission provides an opportunity to deliver a substantial number of homes, including affordable and self/custom-build housing, while securing long-term ecological enhancement of Woodcock Hill Village Green and a comprehensive green-infrastructure framework.

14.306 Development can create new walking and cycling links between Barnet Lane, Furzehill Road, Carrington Avenue and surrounding neighbourhoods and use the retained Village Green, woodland and ecological areas to form a strong landscape setting for the new neighbourhood.

Development Requirements

14.307 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

14.308 Development must provide an appropriate transition to existing homes around the site and protect residential amenity through the disposition of buildings, landscape, access, lighting and parking.

14.309 Woodcock Hill Village Green and the associated Local Wildlife Site must be retained, protected and enhanced. Built development, private gardens, utilities and access must not encroach into protected areas except where specifically authorised through the extant permission or required for agreed ecological or access works. Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS.

14.310 Existing woodland, significant TPO trees and other important vegetation must be retained and incorporated into the green-infrastructure framework. Development must secure appropriate buffers, long-term management and biodiversity enhancement consistent with the approved ecological strategy or an equivalent updated strategy.

14.311 Structural planting should reinforce the settlement edge and connect retained woodland and habitat areas. Species selection and management should support biodiversity, climate resilience and the long-term character of the site.

14.312 The Borough wide Stage 2 Green Belt Assessment identifies the site as grey belt. Development must establish a clear and durable Green Belt boundary along the southern edge of the released land, using the existing woodland edge, mature vegetation and other permanent landscape features. The retained woodland and associated green infrastructure must provide a substantial transition between the development and the remaining Green Belt.

14.313 Public open space, children’s play, habitat creation and ecological enhancement must be delivered in accordance with the extant permission or an equivalent or improved subsequent scheme and must be phased so that residents have access to necessary open-space infrastructure as the development is occupied.

14.314 Existing public rights of way must be retained and integrated into the movement network. New routes must be direct, safe, overlooked and connected with Barnet Lane, Furzehill Road and adjoining neighbourhoods.

14.315 Development must provide the planned multimodal access from Furzehill Road and pedestrian/cycle/emergency connections from Carrington Avenue, or alternative arrangements demonstrated to be safe, deliverable and at least equivalent in sustainable-transport terms.

14.316 Surface-water flood risk must be managed through integrated SuDS that work with the open-space and ecological framework. Drainage features must avoid adverse effects on retained woodland, the Village Green and Local Wildlife Site. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

Development Guidance

14.317 The Village Green, woodland and Local Wildlife Site should form the visual and functional core of the development rather than being treated as peripheral constraints. New homes should front and overlook public green space where this is compatible with ecological objectives.

14.318 Residential development should generally be low to medium rise, with scale and density responding to the established surrounding character and the landscape edge. More compact forms may be appropriate near the principal access or internal focal points where they do not harm important views, trees or adjoining amenity.

14.319 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. Streets and paths should create a legible network linking homes with public open space and existing neighbourhoods. The development should avoid long cul-de-sacs and rear boundaries facing principal green routes where a positive frontage can be achieved. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future. Parking should be integrated into streets and plots so that it does not dominate the public realm or green-space edges. Visitor and accessible parking should be located conveniently while maintaining clear pedestrian and cycle routes.

14.320 Ecological management should address recreational pressure as well as habitat creation. Access points, paths, play and lighting should be positioned to enable public enjoyment without undermining sensitive habitats within Woodcock Hill.

HBA20 Organ Hall Farm, Theobald Street, Borehamwood

Site Address	Organ Hall Farm, Theobald Street, Borehamwood		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	8.9 ha	Urban extension	Private
Current Uses	The site is comprises of an undeveloped greenfield site.		
How Site was Identified	Planning consent / Regulation 18 candidate site		
Planning Designations and Site Considerations	Urban extension; Development comprised of higher density residential and open space uses. Flood Zones 2 and 3 flood risk. Public right of way through the site. Gas mains through the site.		
Planning Status	22/2149/OUT, up to 110 dwellings and 800 sqm medical centre. Reserved matters 25/1412/REM for 102 dwellings, medical centre, amenity space, custom/self-build housing, landscaping and SuDS.		
Indicative Development Capacity	102 dwellings		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

E **Meet the Borough's housing needs by delivering homes for everyone**
G **Securing a greener Borough**
H **Responding to the climate emergency**
K **Securing the timely delivery of infrastructure**

Non-Strategic Policy

Existing Planning Consent

14.321 The site allocation benefits from an existing planning consent under the reference 22/2149/OUT. The consent commits to the delivery of up to 110 dwellings and 800 sqm medical centre.

14.322 A further reserved matters application has been submitted under reference 25/1412/REM, which seeks to develop the site for 102 dwellings, a medical centre, amenity space, custom/self-build housing, landscaping and SuDS

Site Allocation

14.323 Organ Hall Farm is allocated for residential development of at least 110 new homes during the first half of the plan period. The site allocation will also deliver a new medical centre, landscaping, public and private amenity space, custom/self-build housing, sustainable drainage and associated infrastructure.

14.324 Development should proceed broadly in accordance with outline permission 22/2149/OUT and the approved or subsequently approved reserved matters, or a successor permission that secures an equivalent or improved housing and infrastructure outcome.

14.325 The allocation is located within the Metropolitan Green Belt. The Borough-wide Green Belt Assessment Stage 2 considers the site's contribution to the purposes of the Green Belt. It is noted that the site is defined as grey belt. The comprehensive development of the urban extension must secure a defensible Green Belt Boundary to the north of the site, and along the alignment of the adjoining railway line and road.

Opportunities

14.326 The site provides an opportunity for early delivery of homes and a new medical facility at the northern edge of Borehamwood. The scale of the site also allows flood management, landscape, biodiversity and public access to be incorporated into a coherent framework.

14.327 Redevelopment can improve access through the site, provide new open space and address the future of existing allotments in the context of identified allotment needs within Elstree and Borehamwood.

Development Requirements

14.328 Development must be planned and delivered comprehensively in accordance with a masterplan, to ensure the appropriate co-ordination, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).

14.329 The development must be design-led and consider how the capacity of the site can be optimised to deliver high intensity mixed-use development that provides positive frontages that address key routes and public spaces.

14.330 Development must deliver the medical centre and associated infrastructure in accordance with the planning permission and agreed phasing. The facility must be accessible by walking, cycling and public transport and available at the stage required to serve the new and existing community.

14.331 The effect of development on existing allotment provision must be addressed in accordance with the Council's latest Open Space Assessment and relevant Local Plan policies. Where allotments are lost or displaced, appropriate replacement, mitigation or other provision must be secured and delivered at the required stage.

14.332 Flood Zones 2 and 3 must inform the layout and vulnerable development must be directed towards areas of lower risk. A comprehensive SuDS strategy must manage surface water, work with the site's topography and provide landscape and biodiversity benefits. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

14.333 The existing public right of way must be retained and appropriately integrated into a safe, overlooked and accessible walking network. New routes should connect the development with Theobald Street and surrounding neighbourhoods.

14.334 Development must safeguard the gas main and any required easements, access or safety zones. Buildings, landscape, drainage and other infrastructure must be coordinated with the relevant utility operator before detailed design is fixed.

14.335 Development must provide high-quality open space, landscaping, play and biodiversity enhancement consistent with the approved development framework. Open-space provision must be usable, well overlooked and connected with SuDS and active-travel routes where appropriate.

14.336 Custom and self-build provision secured through the planning permission should be retained unless an acceptable subsequent permission provides an equivalent or improved response to identified housing needs.

14.337 The Borough wide Stage 2 Green Belt Assessment identifies the site as grey belt. Green Belt release must establish a durable new settlement boundary using the

railway corridor, existing roads and other permanent landscape features wherever they coincide with the allocation boundary. Where the release boundary follows a less substantial field or landscape edge, substantial structural planting must reinforce it and provide a clear transition to retained Green Belt.

Development Guidance

14.338 The site should be designed as a design-led urban extension, with flood-management areas, retained vegetation, open space and SuDS structuring the layout rather than being confined to residual edges.

14.339 Residential development should generally be low to medium rise and respond to the transition between the existing built-up area and the more open northern edge. Building heights should be coordinated with landscape and views rather than applied uniformly.

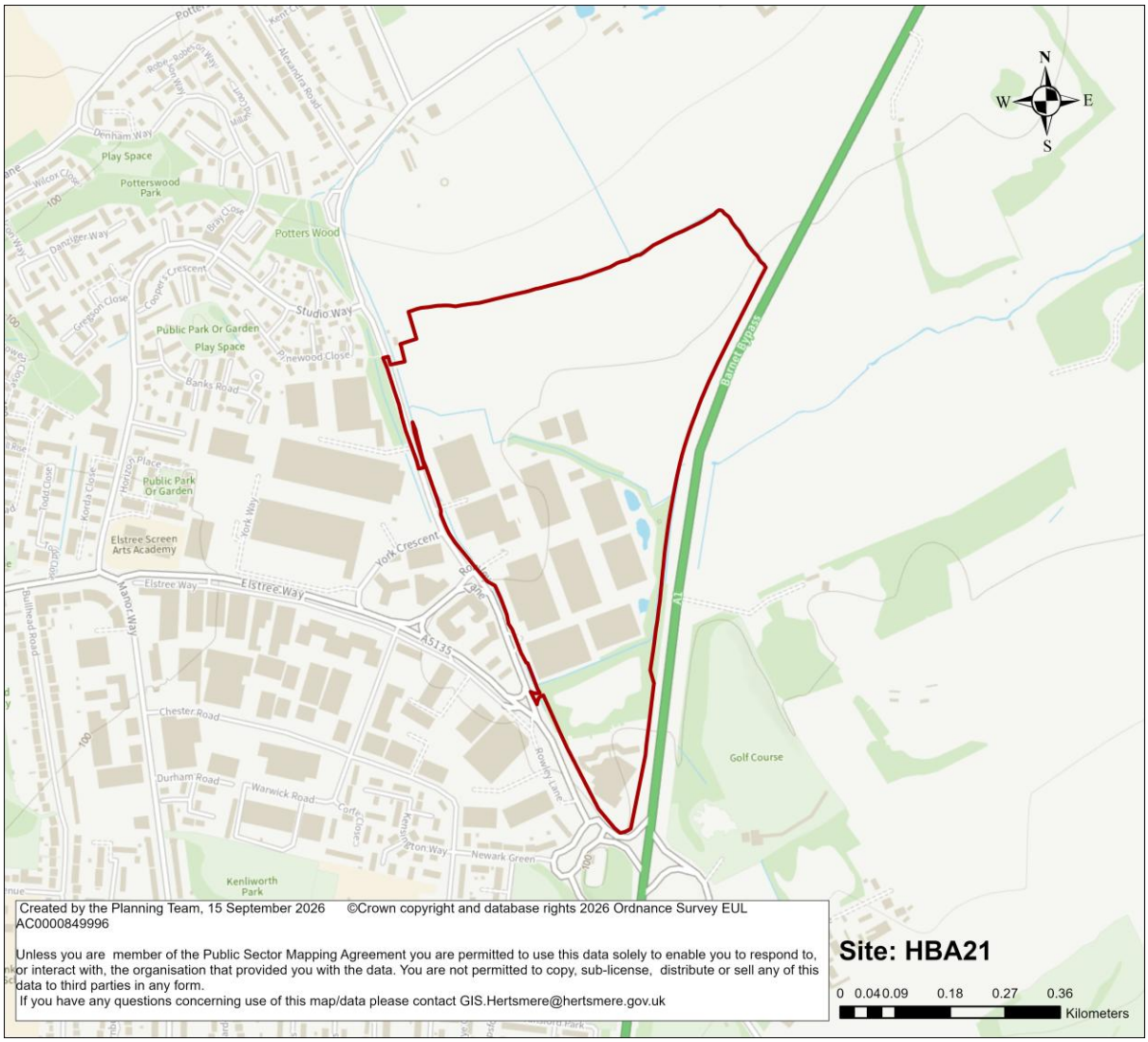
14.340 The medical centre should occupy a legible and accessible location with a clear public entrance and convenient walking, cycling and public-transport access. Its parking and servicing should be arranged so that it does not dominate the public realm or create conflict with residential streets.

14.341 The public right of way should be integrated into the development as a positive green route, with appropriate width, surveillance, landscape and connections rather than retained as a narrow route between rear boundaries.

14.342 Gas-main and flood constraints should wherever possible be incorporated into multifunctional landscape corridors that contribute to open space, biodiversity and movement while maintaining operational and safety requirements.

14.343 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future. Parking should be integrated within streets and plots, with tree planting and landscape used to reduce visual dominance. Secure cycle parking should be convenient for homes, the medical centre and public open space.

HBA21 Borehamwood Industrial Area Extension



Site Address	**Borehamwood Industrial Area Extension, Borehamwood**		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	29.92 ha	Urban (employment)	Private
Current Uses	Predominantly undeveloped agricultural and paddock land, including open fields immediately north of Sky Studios Elstree and undeveloped employment land within the Rowley Lane corridor. The site adjoins the established Sky Studios Elstree complex and the wider Borehamwood employment area.		
How Site was Identified	Identified through the Council's employment land and site-selection work, including the Call for Sites and HELAA process. The site was identified as candidate employment allocation HEM SA03 at Regulation 18. The principle of substantial employment development across the allocation is also established through live planning permissions.		
Planning Designations and Site Considerations	The site is currently within the Metropolitan Green Belt. The northern part of the allocation, comprising land north of Sky Studios Elstree, was found by the Secretary of State to comprise grey belt land for the purposes of national planning policy when planning permission was granted on appeal in September 2025. The site adjoins the existing Sky Studios Elstree employment complex and is closely related to the Elstree Way/Borehamwood		

	employment cluster. Key considerations include its relationship with the Barnet By-pass (A1/A1(M)) and the A1/A5135 Rowley Lane junction; the Mimmshall Brook and areas of fluvial and surface-water flood risk; landscape sensitivity and the transition to retained countryside; mature trees and hedgerows; nearby residential properties; nearby designated heritage assets, including listed buildings at Well End; Heathrow Airport safeguarding; drinking-water safeguarding; and the need for high-capacity energy and digital infrastructure appropriate to strategic employment uses.
Planning Status	No recent relevant planning history. 22/1526/FULEI: film and television production studio (Use Class E(g)(ii)) with ancillary floorspace, backlot, new access arrangements, parking, landscaping, infrastructure and associated works. Appeal allowed 22 September 2025. 23/0478/OUT: flexible B2/B8 employment development including ancillary office floorspace, parking, loading docks, servicing, landscaping and substation. Permission granted 9 April 2025.
Indicative Development Capacity	About 88,504 sqm of employment floorspace, comprising approximately 63,405 sqm associated with the permitted film and television studio expansion and approximately 25,099 sqm associated with flexible B2/B8 employment development.

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
D Support a well-educated and skilled population
H Responding to the climate emergency
I Celebrating our local identity
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Existing Planning Consents

14.344 The site allocation benefits from two extant consents. The first of these is under reference 23/0478/OUT. This provides flexible B2/B8 employment development including ancillary office floorspace, parking, loading docks, servicing, landscaping and substation.

14.345 The second extant consent, gained at appeal, is under reference 22/1526/FULEI. This provides for film and television production studio (Use Class E(g)(ii)) with ancillary floorspace, backlot, new access arrangements, parking, landscaping, infrastructure and associated works.

Site Allocation

14.346 The Borehamwood Industrial Area Extension is allocated as a Strategic Industrial Employment Site for approximately 88,504 sqm of employment floorspace, principally comprising film and television production and associated research/ development uses, light and general industrial uses, storage/distribution, ancillary offices and other compatible employment uses.

14.347 The allocation will form a strategic extension to the established Sky Studios and Borehamwood employment cluster and must maintain a strong primary employment function. Residential development and unrelated main town centre uses will not be appropriate where they would compromise the operation, capacity or future development of the employment area.

14.348 Development should be delivered broadly in accordance with the approved development parameters established by 22/1526/FULEI. Materially different redevelopment or re-planning of the site must demonstrate an equivalent or improved employment, landscape, ecological, transport, infrastructure and sustainability outcome and, where appropriate, comply with Policy DM3.

14.349 The allocation is located within the Metropolitan Green Belt. The Borough-wide Green Belt Assessment Stage 2 considers the site's contribution to the purposes of the Green Belt. It is noted that the site is defined as provisionally grey belt. The comprehensive development of the urban extension must secure a defensible Green Belt Boundary along the site allocation's northern edge.

Opportunities

14.350 The allocation provides a significant opportunity to expand one of Hertsmere's principal employment locations and reinforce Borehamwood and Elstree's nationally and internationally significant film and television cluster. The site can support clustering, shared skills, production infrastructure and specialist supply-chain activity.

14.351 The allocation also provides an opportunity to deliver modern industrial and logistics premises, flexible accommodation for businesses of different sizes, apprenticeships and training, sustainable transport improvements and a high-quality landscape and blue-green edge to the retained countryside.

Development Requirements

14.352 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how development will deliver strategic industrial employment uses that are in accordance with the site allocation. A masterplan must coordinate access, freight and servicing, land uses, landscape, green and blue infrastructure, utilities and phasing with Sky Studios and adjoining employment land.

14.353 The master plan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density industrial

employment uses. The master plan will demonstrate how buildings, access, servicing, parking, utilities, drainage, landscape and green infrastructure will be coordinated across the site. Where development is phased, individual phases must not prejudice efficient development of the remainder of the allocation.

14.354 The master plan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density industrial employment uses. The master plan will demonstrate how access, internal roads, servicing, construction traffic and emergency access will be coordinated across the site. The development must deliver the highway works and sustainable-transport measures required through the outline permission and subsequent approvals, including safe pedestrian and cycle routes and improvements to the public-rights-of-way network.

14.355 Development must safeguard the allocation for strategic employment purposes and support the function of the wider Borehamwood and Elstree employment cluster, including film and television production and associated creative, technical and supply-chain activities.

14.356 Development should deliver approximately 88,504 sqm of employment floorspace unless an alternative quantum or mix is demonstrated to make equally effective use of the land and maintain or increase the site's contribution to identified employment needs. Proposals must not result in a material loss of strategic industrial capacity.

14.357 The permitted film and television studio development and flexible B2/B8 development provide the basis for early delivery. Proposals that materially depart from the approved framework must demonstrate that they will not prejudice the strategic employment function, infrastructure, access or landscape mitigation required across the wider allocation.

14.358 Development must be supported by a transport and access strategy prepared in partnership with Hertfordshire County Council and National Highways. It must identify and deliver measures necessary to address impacts on the A1(M)/ A5135 Rowley Lane junction, the A1(M) corridor and the local road network and ensure safe and efficient goods vehicle, staff and visitor movements.

14.359 Walking, cycling and public transport must be improved as realistic alternatives to private-car travel. Development must provide safe active-travel connections within the employment area and contribute to links towards Borehamwood Town Centre, Elstree & Borehamwood station and surrounding neighbourhoods.

14.360 Mimmshall Brook, fluvial flood risk and surface-water risk must inform the layout. Appropriate buffers and access to watercourses must be maintained and SuDS must be integrated with landscape, biodiversity and water-quality measures and must not increase flood risk elsewhere. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

14.361 Development must retain and enhance important trees, hedgerows and habitat features where practicable and deliver biodiversity net gain within a coordinated landscape and green-infrastructure framework. Structural planting must provide an appropriate transition between large-scale employment buildings and retained countryside.

14.362 Building scale, height, massing, materials and external lighting must respond to the site's landscape setting and nearby residential and heritage receptors. Noise, lighting, air quality, plant, servicing and operational effects must be appropriately mitigated while allowing legitimate employment uses to operate effectively.

14.363 Sufficient electricity, digital communications, water, wastewater and other utilities must be secured in step with development. High-capacity energy and digital requirements associated with film/television production and industrial uses must be identified early so that utility infrastructure does not constrain later phases.

14.364 Development must secure appropriate local employment, skills, apprenticeships and training opportunities associated with construction and operation, consistent with the Council's economic-development and employment policies.

14.365 The Borough wide Stage 2 Green Belt Assessment examined the site as three separate assessment areas (labelled BO-008, BO-009 and BO-010). These areas are identified respectively as provisional grey belt, grey belt and provisional grey belt, reflecting the differing heritage and flood-risk constraints across the site. Green Belt release must establish a robust and readily recognisable long-term boundary to the strategic employment area, making use of the A1/Barnet By-pass, Mimmshall Brook, existing development and other permanent landscape features wherever practicable. Structural landscaping must reinforce those parts of the boundary adjoining retained countryside and prevent incremental outward expansion beyond the allocated employment area.

Development Guidance

14.366 Development should create a coherent strategic employment campus and industrial area rather than a collection of isolated plots. Buildings, streets, service yards, landscape and infrastructure should reinforce the relationship with Sky Studios and the wider Borehamwood employment cluster.

14.367 The northern part of the allocation should continue to support film and television production and related uses, including stages, workshops, production support, ancillary offices and backlot activities where consistent with the extant permission. Other parts should provide a flexible range of modern industrial and employment premises.

14.368 Building forms and plots should be capable of subdivision, adaptation or combination where practicable so that businesses can expand or contract without leaving the area. Smaller units and workspace should be considered where they support creative, technical and production supply-chain businesses.

14.369 The largest and tallest buildings should be located and designed with particular regard to topography and views from surrounding countryside and residential

areas. Building mass should be broken down through siting, articulation, materials and landscape, while functional requirements of studios and industrial uses are recognised.

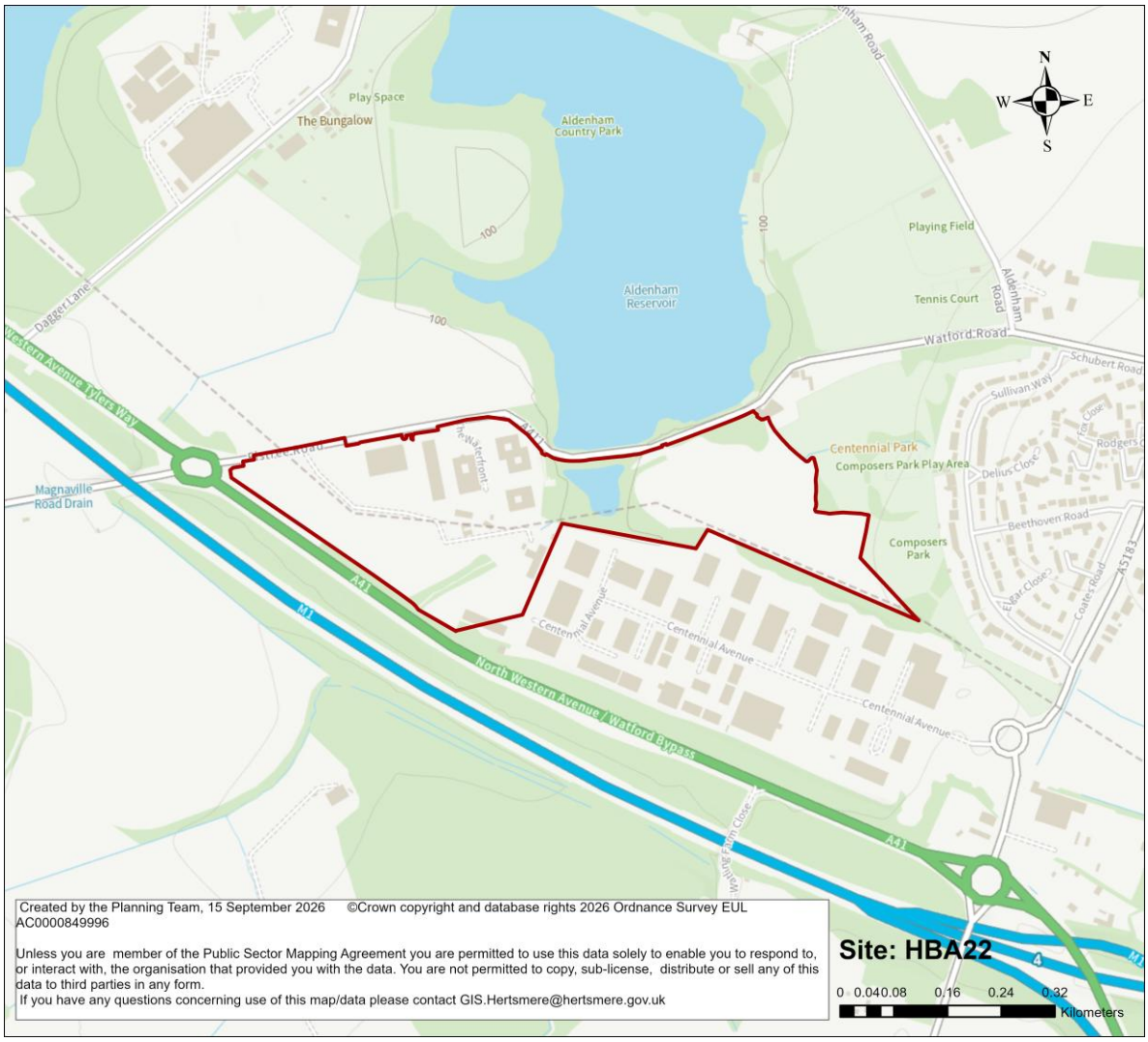
14.370 Loading docks, service yards, HGV waiting areas, refuse storage and external plant should be integrated into plot layouts and screened through building orientation and landscape. They should not dominate prominent site edges or employee walking routes.

14.371 A substantial structural landscape framework should be established early in development. Existing trees and hedgerows should inform the framework and Mimmshall Brook and SuDS should be treated as part of a connected green and blue infrastructure network rather than residual land around employment plots.

14.372 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future. Employee walking and cycling routes should be safe, direct and legible and connect to bus stops and the wider active-travel network. Cycle parking, showers, lockers and changing facilities should be provided at a scale appropriate to the workforce.

14.373 Buildings should be designed for efficient long-term operation and adaptability, with opportunities for on-site renewable energy, shared energy infrastructure, water efficiency and high-quality digital connectivity considered at site-wide scale where practicable.

HBA22 Lismirrane Industrial Park Extension



Site Address	Lismirrane Industrial Park Extension		
	Site Size ha	**Setting**	**Ownership**
Site Characteristics	16.34 ha	Urban Extension (employment)	**Private, multiple land interests**
Current Uses	Predominantly open and undeveloped land adjoining existing employment areas, together with some existing commercial and office buildings, car parking, small sheds/outbuildings and other employment-related uses within the wider allocation. Part of the land adjacent to Lismirrane includes open fields, parking and a dog day-care use, while Caspian and Tasman House comprise existing commercial office accommodation.		
How Site was Identified	Identified through previous Local Plan and Call for Sites processes and subsequent employment land assessments.		
Planning Designations and Site Considerations	The allocation is currently within the Metropolitan Green Belt and adjoins Lismirrane Industrial Park and the wider Centennial Park employment cluster. The existing Lismirrane Industrial Park is identified as an important employment site and the emerging Local Plan proposes that the wider area, including the extension, forms a Key Employment Site. Key considerations include proximity to the M1 and A41 and associated strategic-road		

	connectivity; the rural and landscape setting north of the strategic roads; maintaining separation from Elstree Village; areas of Flood Zones 2 and 3 and surface-water flood risk within parts of the allocation; reservoir flood risk, Heathrow Airport safeguarding, nearby listed buildings and conservation areas landscape sensitivity to large-scale commercial and distribution development, integration with adjoining employment areas, and the need for high-quality landscape, drainage and biodiversity infrastructure.
Planning Status	22/2147/OUT: industrial/distribution floorspace within Classes E/B2/B8, flexible office/hub building, access, parking and landscaping. Permission granted 3 July 2024. 23/0439/FUL**:** E(g)(iii), B2 and B8 development with ancillary offices, access, parking, servicing and landscaping. Resolution to grant subject to S106 and Secretary of State referral, 18 September 2025. 23/0547/FUL**:** demolition of existing buildings and construction of B2/B8 buildings with ancillary office provision and associated access, parking and landscaping. Permission granted 30 September 2025. 22/1127/FUL**:** office and vertical-farming facility. Permission granted 5 September 2023.
Indicative Development Capacity	Approximately 35,000 sqm of net additional flexible employment floorspace

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
D Support a well-educated and skilled population
H Responding to the climate emergency
I Celebrating our local identity
K Securing the timely delivery of infrastructure

Non-Strategic Polic

Existing Planning Consents

14.374 The site allocation benefits from several extant consents. The first of these is under reference 22/2147/OUT. This provides an outline consent for industrial/ distribution floorspace within Use Classes E, B2 and B8, a flexible office/ hub building, access, parking and landscaping.

14.375 Subsequent proposals have either been consent or given a resolution to grant. This includes a proposal under 23/0439/FUL which seeks to develop the site for E(g)(iii), B2 and B8 development with ancillary offices, access, parking, servicing and landscaping. A further proposal, under 23/0547/FUL was granted consent for demolition of existing buildings and construction of B2/B8 buildings with ancillary office provision and associated access, parking and landscaping.

Site Allocation

14.376 The Extension to Lismirrane Industrial Park is allocated as a Strategic Industrial Employment Site for light industrial, general industrial, storage/distribution, research and development, ancillary office/flexible workspace and other compatible employment use that reinforce the strategic function of the Lismirrane and Centennial Park employment cluster.

14.377 Development must maintain the site's primary employment function and provide modern, adaptable and high-quality premises capable of responding to a range of business and occupier requirements. Residential development and unrelated uses that would compromise the operation or future development of the employment area will not be supported.

Opportunities

14.378 The allocation provides an opportunity to expand an established employment location with strong strategic-road connections and an existing concentration of industrial, office, technology and professional-service businesses.

14.379 Development can create a larger and more coherent employment cluster, modernise older stock, provide flexible premises for SMEs and growing businesses, accommodate industrial/logistics and technology uses and establish a stronger landscape and green-infrastructure framework around the employment area.

Development Requirements

14.380 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how development will deliver strategic industrial employment uses that are in accordance with the site allocation. Development proposals must demonstrate that individual parcels will not prejudice the effective development, access, servicing, utilities, landscape or long-term employment capacity of adjoining parts of the allocation.

14.381 The master plan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density industrial employment uses. The master plan will demonstrate how buildings, access, servicing, parking, utilities, drainage, landscape and green infrastructure will be coordinated across the site. Where development is phased, individual phases must not prejudice efficient development of the remainder of the allocation.

14.382 Development must reinforce the function of Lismirrane Industrial Park and Centennial Park and safeguard the allocation for employment. The mix of uses should respond flexibly to identified needs while retaining a predominantly industrial, technology and employment-generating character.

14.383 The highway and servicing strategy must provide safe and efficient access for commercial vehicles and good vehicles and demonstrate that development can be

accommodated on the local and strategic road networks. Access arrangements must be coordinated across adjoining employment sites where this reduces conflict or duplication.

14.384 Development must improve sustainable access for employees through walking, cycling and public transport measures appropriate to the site's location. Internal pedestrian and cycle routes must be safe and direct and connect with surrounding employment areas and available public-transport services.

14.385 Parking, loading docks, operational yards, goods vehicles manoeuvring and servicing must be integrated into the site layout and must not compromise highway safety, pedestrian/cycle movement or landscape quality.

14.386 Flood Zones 2 and 3, surface-water and reservoir flood risk must inform the layout where applicable. More vulnerable development must be directed to areas of lower risk, and a coordinated SuDS strategy must be integrated with landscape and biodiversity measures. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

14.387 Development must establish a coordinated landscape and green-infrastructure framework that retains important vegetation where practicable, provides structural planting around larger buildings, delivers biodiversity net gain and creates an appropriate transition to retained countryside and Elstree Village.

14.388 Building scale, massing, materials, external lighting and operational areas must respond appropriately to the edge-of-countryside setting and nearby heritage and residential receptors. Large warehouse and industrial buildings must be designed and landscaped to minimise unacceptable visual effects while retaining functional efficiency.

14.389 Development must provide sufficient electricity, digital, water, wastewater and other utility infrastructure to support employment uses and must coordinate infrastructure across the allocation where practicable so that early phases do not constrain later development.

14.390 Development should provide opportunities for local employment, training, apprenticeships and skills development in accordance with the relevant employment and economic-development policies.

14.391 Where Green Belt land is released through the Local Plan, development must establish a robust and enduring Green Belt boundary and contribute towards appropriate compensatory improvements to retained Green Belt land.

Development Guidance

14.392 Development should create a coherent extension to the Lismirrane/ Centennial Park employment cluster rather than a series of unrelated industrial compounds. Plot layout, landscape, streets and servicing should allow movement and visual continuity across the wider employment area.

14.393 A range of flexible unit sizes should be provided where practicable, allowing accommodation for smaller businesses alongside medium and larger industrial/distribution occupiers. Buildings should be capable of subdivision, extension or reconfiguration as occupier requirements change.

14.394 High-quality office, research and development, collaborative or flexible workspace should be encouraged where it complements the industrial function and supports technology, digital, scientific and professional-service businesses associated with the wider cluster.

14.395 Parking, loading and service yards should be positioned and screened so that operational infrastructure does not dominate principal frontages, employee routes or sensitive site boundaries. Shared or coordinated access and servicing should be used where it improves efficiency and landscape outcomes.

14.396 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future. Walking and cycling routes should be safe, legible and direct, with secure cycle parking, showers and changing facilities appropriate to employment use. Employee amenities may be provided where proportionate and supportive of the employment area without creating a competing retail or leisure destination.

14.397 Buildings should achieve high standards of energy and resource efficiency and incorporate renewable and low-carbon technologies where feasible. Opportunities for coordinated energy, digital and utility infrastructure across the wider cluster should be investigated.

14.398 Development adjoining the M25 Motorway should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with National Highways.

Potters Bar Area

Chapter 15: Potters Bar Area

Section

Context and Character

Vision

Key Spatial Objectives for Potters Bar

HPBA1 Potters Bar Town Centres

HPBA2 Movement and Connectivity in Potters Bar

HPBA3 Character, Green Infrastructure and Setting

Context and Character

15.1 Potters Bar is one of Hertsmere's main towns and plays an important role within the borough's settlement hierarchy as a significant residential community, local service centre and well-connected settlement. Located in the eastern part of Hertsmere, the town provides a range of homes, shops, services, community facilities, employment opportunities and cultural assets. It also serves a wider catchment including surrounding villages and nearby communities.

15.2 Potters Bar benefits from strong transport connections. Potters Bar railway station provides direct rail services to central London and other destinations on the East Coast Main Line. The town is also well connected to the strategic road network, lying close to the M25 and A1(M), and is served by bus routes linking the town with some nearby settlements and neighbouring boroughs. These connections support access to employment, education and services and reinforce Potters Bar's role as one of Hertsmere's more sustainable locations for growth.

15.3 Potters Bar has a distinctive character shaped by its suburban form, green setting and relationship with the surrounding countryside. Much of the town developed during the twentieth century and is characterised by established residential neighbourhoods, tree-lined streets, open spaces and local community infrastructure. The surrounding countryside provides an important landscape setting and reinforces the town's semi-rural character.

15.4 Potters Bar contains two main town centre areas: Darkes Lane, focused on the town's railway station, and the High Street. Together these centres provide shops, cafés, restaurants, services, community facilities and employment opportunities for residents and visitors. The Wyllyotts Theatre and cultural hub provide an important focus for community and cultural life.

15.5 The two town centres have different roles and characters. Darkes Lane benefits from its relationship with the railway station and has a traditional retail, service and station gateway role. The High Street has a different character and function, with opportunities to strengthen local services, improve public realm, support mixed-use development and build on existing local economic activity, including homeware, furniture, interior design and related businesses.

15.6 As a town, Potters Bar is primarily residential in character, but it also supports a range of employment uses, including local businesses, professional services, smaller industrial and commercial activities, and employment areas around Station Close, Barnet Road, Hollies Way and Cranborne Industrial Estate. These uses contribute to a balanced local economy and provide opportunities for employment close to where people live.

15.7 The Local Plan identifies Potters Bar as a key location for housing-led regeneration, town centre renewal and infrastructure investment. This reflects the town's accessibility, the role of its two town centres, the presence of under-optimised

brownfield and town centre sites, and the need to make efficient use of sustainable locations to help meet Hertsmere's housing needs.

15.8 Housing-led regeneration will be central to the future of Potters Bar. New homes will help support the vitality and viability of Darkes Lane and the High Street, increase local footfall, support shops and services, provide a larger local catchment for community and cultural facilities, and help unlock public realm, movement, green infrastructure and infrastructure improvements.

15.9 The Council will seek to move away from piecemeal redevelopment and towards a more coordinated approach to growth and place-making. Development in Potters Bar's town centres and opportunity areas should be planned comprehensively, making efficient use of brownfield and under-optimised land while supporting local employment, community infrastructure, public realm improvements and sustainable movement.

15.10 Figure 15.1: Potters Bar Area identifies the geographic extent of the Potters Bar area for the purposes of this chapter. Figure 15.2: Potters Bar Spatial Strategy identifies the broad spatial priorities for housing-led growth, town centre regeneration, sustainable movement, green infrastructure, blue infrastructure and landscape setting. Figure 15.3: Potters Bar Town Centre Regeneration and Figure 15.4: Sustainable Travel Networks and Opportunities Across Potters Bar provide more detailed policy maps for the town centres and sustainable movement network.

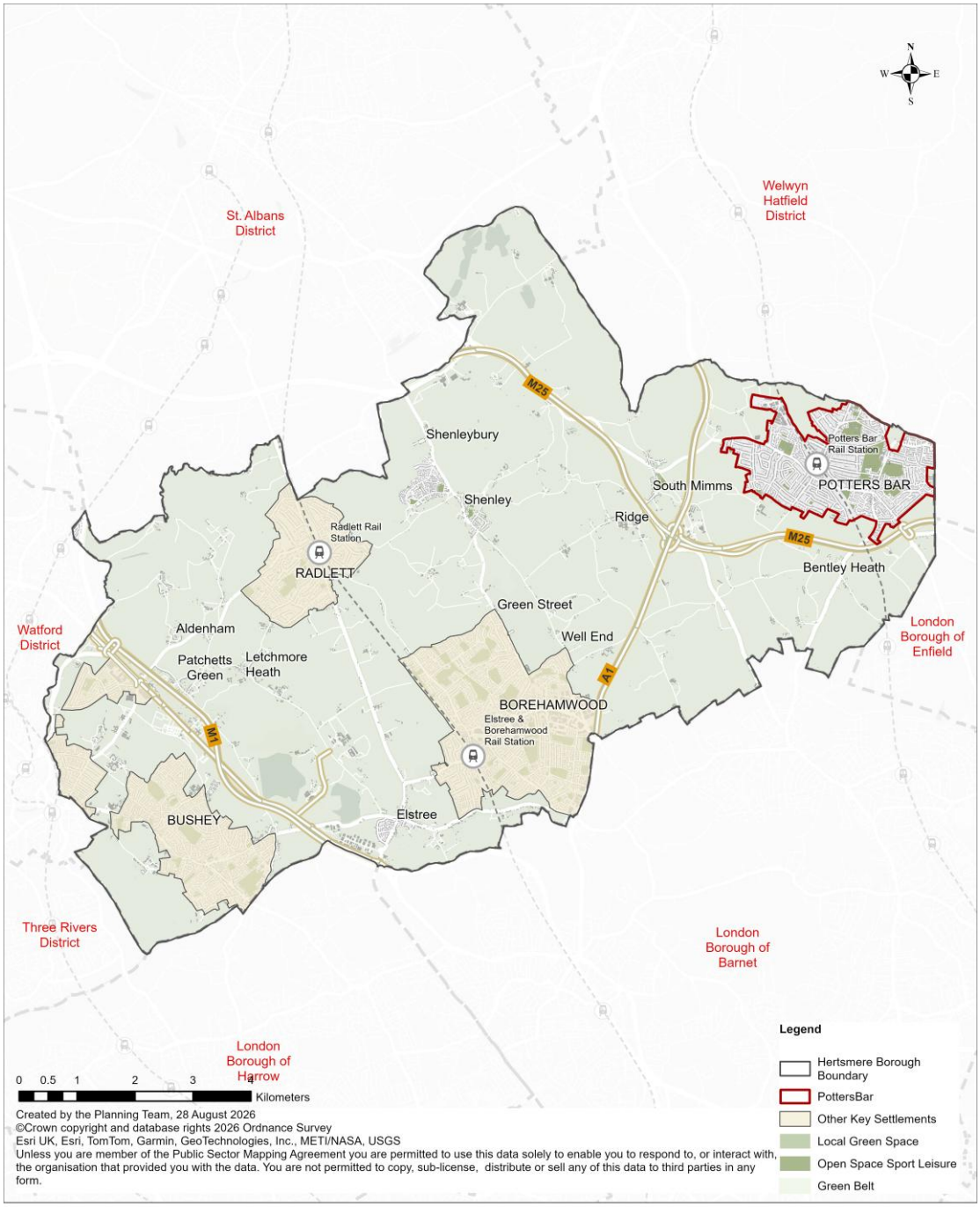


Figure 15.1 Potters Bar Area in Hertsmere

15.11 The maps in this chapter should be read alongside the Policies Map, and site allocation policies.

15.12 Figure 15.2 identifies broad spatial priorities and does not define site allocations, development boundaries or precise route alignments. Where detailed boundaries or designations are required for decision-making, these are shown on the Policies Map, site allocation policies or relevant policy maps.

Vision

15.13 Potters Bar will continue to evolve as a vibrant, well-connected and resilient town that supports new homes, local employment, community life and access to green spaces. Growth will be focused on housing-led regeneration of the town centres and appropriate brownfield and under-optimised sites, supported by improvements to public realm, walking and cycling, public transport, green infrastructure and local services.

15.14 The two town centres at Darkes Lane and the High Street will be strengthened as complementary centres with distinct roles. Darkes Lane will be enhanced as a station-linked retail, service and mixed-use centre with a more welcoming arrival experience. The High Street will be strengthened as a local service, community, homeware, employment and mixed-use centre, with improved streets, public spaces and connections to surrounding neighbourhoods.

15.15 Housing-led mixed-use development will provide the principal mechanism for renewing under-used and under-optimised land in the town centres. New homes will be expected to support active streets, local shops and services, employment opportunities, community infrastructure, public realm improvements and sustainable movement. Residential-only redevelopment of strategically important town centre sites will not be supported where a mixed-use approach is needed to secure town centre vitality and local employment.

15.16 Over the plan period it is anticipated that Potters Bar will become easier, safer and more attractive to move around. Development will help connect Darkes Lane and the High Street, improve links to Potters Bar railway station, Wyllyotts Theatre, Furzefield Leisure Centre, the Royal Veterinary College, schools, parks and surrounding neighbourhoods, and reduce the severance caused by traffic-dominated streets and major roads.

15.17 Potters Bar’s green setting, suburban character, heritage assets and local identity will be protected and enhanced. Growth will be expected to respond positively to local character, support biodiversity, improve access to open spaces and countryside, address flood risk, and strengthen the network of green and blue infrastructure, including Potters Bar Brook.

15.18 Through this approach, Potters Bar will accommodate growth in a way that supports housing delivery, town centre vitality, local employment, cultural and community life, environmental resilience and sustainable placemaking.

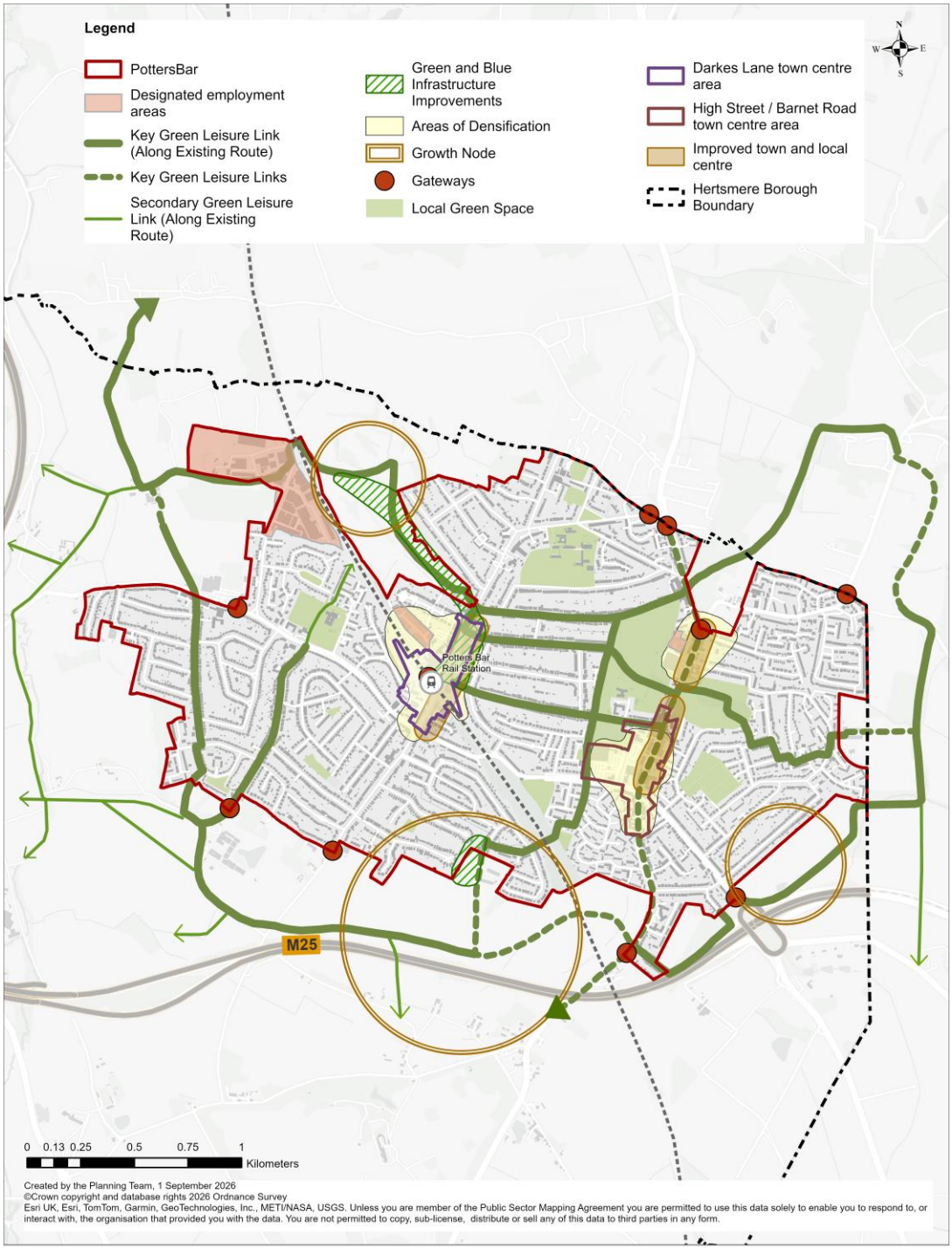


Figure 15.2: Potters Bar Spatial Strategy

Key Spatial Objectives for Potters Bar

To achieve this vision, the key spatial objectives for Potters Bar are to:	
1	Support Potters Bar's role as one of Hertsmere's main towns and as a sustainable location for housing-led growth, town centre renewal and infrastructure investment.
2	Deliver housing-led mixed-use regeneration within Darkes Lane, the High Street and other suitable town centre and opportunity area sites, making efficient use of previously developed and under-optimised land.
3	Strengthen Darkes Lane and the High Street as complementary town centres, each with a distinct role, character and offer.
4	Use new housing as a catalyst for town centre renewal, ensuring that development contributes to active frontages, local services, employment opportunities, community infrastructure, public realm improvements and sustainable movement.
5	Support a wider mix of homes, including affordable housing, homes for younger people, family homes, downsizer homes and accessible homes, in locations well served by shops, services and public transport.
6	Protect and strengthen Potters Bar's local economy, including independent businesses, professional services, local employment space, light industrial uses and existing economic clusters.
7	Improve the relationship between Darkes Lane, the High Street, Potters Bar railway station, Wyllyotts Theatre, Furzefield Leisure Centre, the Royal Veterinary College, schools, parks and surrounding neighbourhoods.
8	Reduce severance caused by traffic-dominated streets and major roads, and prioritise safe, accessible and attractive walking, cycling, wheeling and public transport.
9	Enhance Potters Bar railway station and its surroundings as a safe, attractive and accessible arrival point and mobility hub.
10	Protect and enhance Potters Bar's character, heritage assets, suburban townscape, green setting and relationship with the surrounding countryside.
11	Strengthen green and blue infrastructure, including Potters Bar Brook, parks, trees, open spaces, biodiversity corridors, sustainable drainage and countryside access.

HPBA1 Potters Bar Town Centres

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Potters Bar's two town centres at Darkes Lane and the High Street will be the primary focus for housing-led mixed-use regeneration, town centre renewal and public realm improvement within Potters Bar.

B Development proposals within Potters Bar's town centres and opportunity areas, as identified on Figure 15.3: Potters Bar Town Centre Regeneration, must contribute to housing-led mixed-use regeneration, support active streets, improve public realm, provide or re-provide town centre and employment uses, and contribute to the infrastructure required to support growth.

C Development proposals within Potters Bar's town centres and opportunity areas will be supported where they:

i. Make a significant contribution to housing delivery through the redevelopment, intensification and renewal of suitable previously developed, under-used or under-optimised sites;

ii. Deliver residential development above, behind or alongside active town centre, employment, community or commercial uses where this would support town centre vitality and provide an appropriate standard of residential amenity;

iii. Maintain and enhance the vitality and viability of Darkes Lane and the High Street;

iv. Provide an appropriate mix of retail, food and drink, leisure, cultural, community, workspace, employment, service and residential uses;

v. Provide active ground floor frontages on key streets, routes, junctions and public spaces identified in Figure 15.3: Potters Bar Town Centre Regeneration;

vi. Improve the quality, safety, accessibility and attractiveness of streets and public spaces, including through better footways, crossings, greening, seating, lighting, cycle parking and wayfinding;

vii. Support independent businesses, local services and a stronger day and evening economy where compatible with residential amenity and community safety;

viii. Improve the appearance, quality and consistency of shopfronts, signage, lighting and building frontages;

ix. Rationalise surface parking, servicing and highway space where this can support better public realm, active travel, greening and development capacity;

x. Retain, modernise or re-provide community, cultural, health, civic and social infrastructure where affected by redevelopment, unless it is demonstrated that the facility is no longer required;

xi. Protect, modernise or re-provide employment floorspace where it contributes to Potters Bar's local economic role;

xii. Provide appropriate disabled parking, servicing and accessible access to shops, services and facilities; and

xiii. Contribute to infrastructure and public realm improvements identified in Figure 15.2: Potters Bar Spatial Strategy, Figure 15.3: Potters Bar Town Centre Regeneration, the Infrastructure Delivery Plan and relevant site allocation policies.

D Within Darkes Lane, development should support its role as a station-linked retail, service and mixed-use centre. Proposals should:

i. Enhance the station gateway and arrival experience;

ii. Improve walking, cycling, bus, taxi, drop-off and interchange arrangements around Potters Bar railway station;

iii. Support the sensitive redevelopment, intensification or retrofitting of under-used sites, including surface car parks, Station Close and other sites identified in Figure 15.3: Potters Bar Town Centre Regeneration;

iv. Support residential and office uses above or alongside active ground floor uses where appropriate;

v. Improve pedestrian movement, dwell time, seating, planting, lighting and wayfinding; and

vi. Improve the setting, accessibility and visibility of Wyllyotts Theatre and other community and cultural facilities.

E Within the High Street, development should support a coordinated approach to town centre renewal and mixed-use regeneration. Proposals should:

i. Strengthen the High Street's role as a local service, convenience, homeware, interior design, employment and community-focused centre;

ii. Support town centre living, professional workspace, flexible workspace and mixed-use redevelopment on suitable sites;

iii. Improve the pedestrian environment, reduce traffic dominance and rationalise slip roads, parking and wide junctions where appropriate;

iv. Create or contribute to a defined civic space or public square where identified in Figure 15.3: Potters Bar Town Centre Regeneration;

v. Support the coordinated redevelopment or intensification of suitable sites around the High Street, Barnet Road, Southgate junction and the Canada Life development area;

vi. Retain important local services, including convenience, food shopping and postal services where required to support daily needs; and

vii. Respond sensitively to heritage assets, conservation areas, locally important buildings and the historic townscape.

F Residential development will be supported where it forms part of a mixed-use approach that maintains or strengthens the role, function and vitality of the town centres. Residential-only redevelopment of strategically important town centre, employment or opportunity area sites will not be supported unless it is demonstrated that mixed-use development is not viable or is not necessary to support the role, function and vitality of the centre.

G Major development within either town centre or opportunity area must be accompanied by a masterplan, design and access statement, or other proportionate material demonstrating how the proposal contributes to the comprehensive regeneration of Potters Bar, and responds to Figure 15.3: Potters Bar Town Centre Regeneration.

H Where sites are in multiple ownership or form part of a wider regeneration area, proposals must demonstrate that they will not prejudice the coordinated delivery

of adjoining or related sites, infrastructure, public realm or placemaking objectives.

l Development that would result in inactive frontages, poor pedestrian environments, car-dominated layouts, loss of important local services or employment uses, isolated residential blocks, or fragmented site-by-site development that undermines the wider town centre strategy will not be supported.

Explanation

15.19 Policy HPBA1 delivers Key Spatial Objectives 1 to 6 by establishing Darkes Lane and the High Street as the primary focus for housing-led mixed-use regeneration in Potters Bar. This reflects the town's role in the spatial strategy, its rail and road accessibility, the function of its town centres, and the opportunity to make better use of previously developed and under-optimised land.

15.20 Housing-led regeneration is central to the policy. New homes will help increase footfall, support shops and services, provide a stronger local catchment for cultural and community facilities, and help enable investment in public realm, movement and infrastructure. However, housing growth must support and not displace the town centre functions that make Potters Bar a successful place.

15.21 The policy requires a mixed-use approach on strategically important town centre and opportunity area sites. Residential development will be supported where it is integrated with active ground floor uses, employment, community infrastructure, workspace, local services, improved public realm and sustainable movement. Residential-only schemes will not be appropriate where they would undermine the function of the town centres or prejudice wider regeneration objectives.

15.22 Darkes Lane and the High Street have different but complementary roles. Darkes Lane benefits from its proximity to Potters Bar railway station and provides opportunities for station gateway improvements, mixed-use development, car park rationalisation, employment renewal and enhanced links to Wyllyotts Theatre. The High Street provides opportunities for more coordinated renewal around Barnet Road, Southgate junction, the Canada Life development area and related opportunity sites.

15.23 Figure 15.3: Potters Bar Town Centre Regeneration identifies the broad area and priorities to which Policy HPBA1 applies. It should be read alongside Map 15.2: Potters Bar Spatial Strategy, the Policies Map, relevant site allocation policies, and the Infrastructure Delivery Plan.

15.24 The Council will use the Policies Map, site allocation policies, the maps in this chapter, infrastructure planning, partnership working and, where appropriate, its land ownership and regeneration functions to support coordinated delivery. Development

proposals will be expected to demonstrate how they contribute to the wider town centre strategy and do not prejudice the delivery of adjoining or related sites.

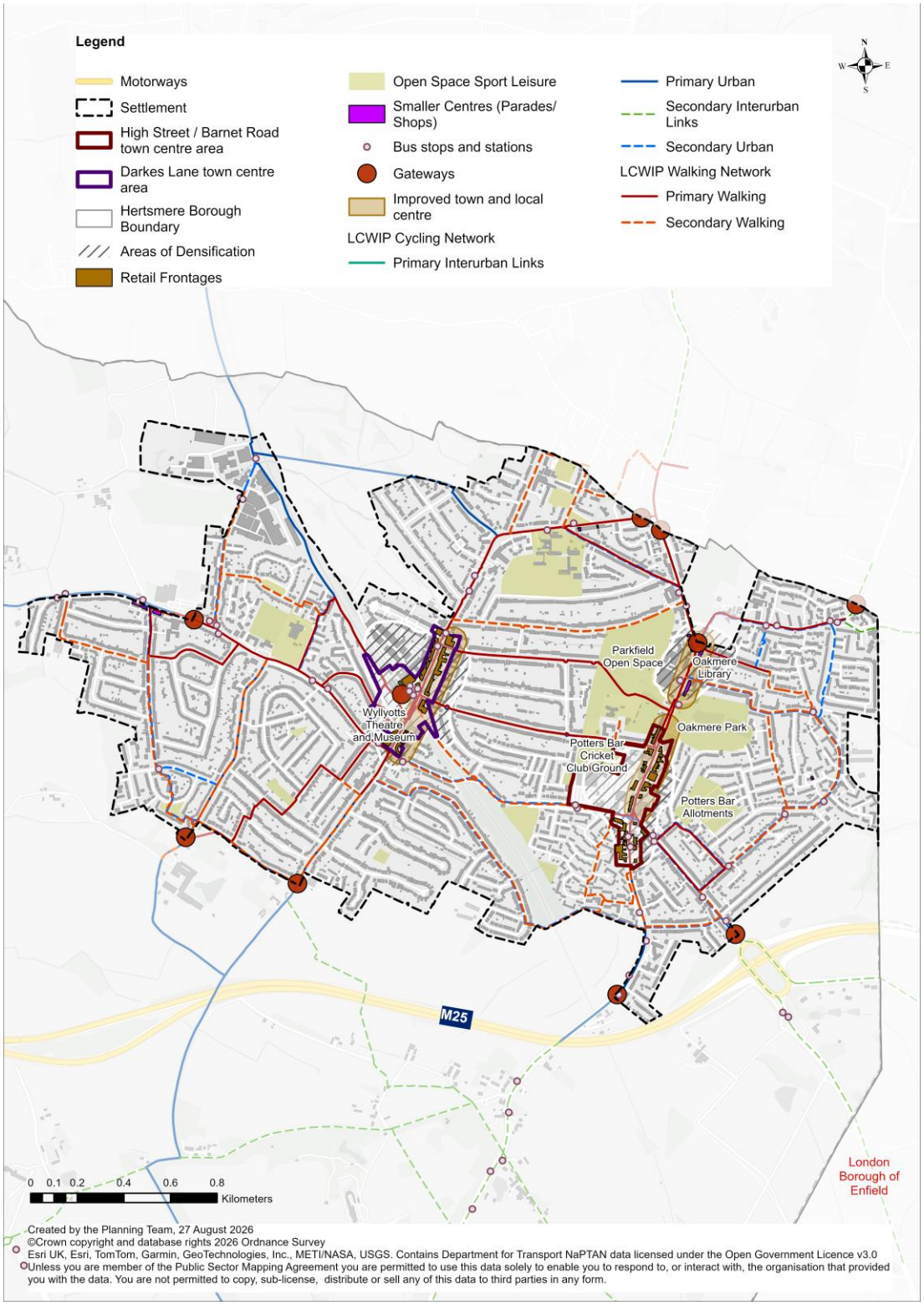


Figure 15.3 Potters Bar Town Centre Regeneration

HPBA2 Movement and Connectivity in Potters Bar

Strategic Objectives

A Delivering a better future for Hertsmere
C The regeneration of Borehamwood and Potters Bar
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Development in Potters Bar must contribute to a safer, more accessible and more sustainable movement network.

B Development proposals will be expected to:

i. Prioritise walking, cycling, wheeling and public transport in accordance with the transport user hierarchy;

ii. Improve links between Darkes Lane, the High Street, Potters Bar railway station, Wyllyotts Theatre, Furzefield Leisure Centre, the Royal Veterinary College, schools, parks and residential neighbourhoods;

iii. Support a clear, safe and attractive route between Darkes Lane and the High Street, including through improvements to The Walk, Byng Drive, Billy Lows Lane and other routes identified in Figure 15.2: Potters Bar Spatial Strategy and Figure 15.4: Sustainable Travel Networks and Opportunities Across Potters Bar;

iv. Reduce severance caused by traffic on the High Street, A1000, B556 and other key routes;

v. Provide safe, direct and accessible pedestrian crossings, continuous footways and improved junction treatments;

vi. Contribute to a coherent settlement-wide cycle network, including links to National Cycle Route 12 and routes to Potters Bar railway station;

vii. Support the creation of a green loop around Potters Bar, connecting residential areas, parks, countryside routes and Public Rights of Way;

viii. Improve the station forecourt as a safe, attractive and accessible mobility hub, including walking, cycling, bus interchange, cycle parking, wayfinding, seating and greening;

ix. Provide high-quality cycle parking and support facilities in accessible and overlooked locations;

x. Support improved bus stop accessibility, shelters, real-time information and service reliability where required to mitigate development impacts;

xi. Manage parking, servicing, deliveries and construction impacts so that they do not undermine pedestrian safety, public realm quality or the operation of the local highway network;

xii. Provide sufficient disabled parking and accessible drop-off arrangements in appropriate locations;

xiii. Support the rationalisation of surface parking and service roads where this would enable public realm, active travel, greening or development benefits;

xiv. Contribute to transport infrastructure and mitigation measures identified through the Infrastructure Delivery Plan, Transport Assessment, Local Cycling and Walking Infrastructure Plan, site allocation policies and other relevant evidence; and

xv. Respond, where relevant and proportionate, to the routes, links, corridors and opportunities identified on Figure 15.4: Sustainable Travel Networks and Opportunities Across Potters Bar.

C Major development must demonstrate how its layout, access, street design and public realm will support reduced car dependency and increased use of walking, cycling, wheeling and public transport.

D Where development forms part of a wider regeneration area or group of related sites, proposals must demonstrate how access and movement arrangements have been coordinated with adjoining sites, Figure 15.2: Potters Bar Spatial Strategy and Figure 15.4: Sustainable Travel Networks and Opportunities Across Potters Bar.

E Development proposals that would prevent or frustrate the delivery of identified walking, cycling, public transport, station gateway or public realm improvements will not be supported.

Explanation

15.25 Policy HPBA2 delivers Key Spatial Objectives 7 to 9 by ensuring that housing-led growth and town centre regeneration are supported by a safer, more accessible and more sustainable movement network.

15.26 The town's two-centre structure creates a particular need to improve connections between Darkes Lane and the High Street. Figure 15.2: Potters Bar Spatial Strategy and Figure 15.4: Sustainable Travel Networks and Opportunities Across Potters Bar identify the importance of stitching the centres together through improved links, including The Walk, Byng Drive and Billy Lows Lane, and by making the High Street and Darkes Lane more comfortable and accessible for pedestrians and cyclists.

15.27 Potters Bar railway station is a key asset and should function as a high-quality gateway and mobility hub. Development around Darkes Lane and the station should improve the arrival experience, interchange, pedestrian crossings, cycle parking, bus access, drop-off arrangements, wayfinding, seating and greening.

15.28 Movement improvements should not be limited to site access or highway capacity. Development should contribute to wider placemaking objectives by reducing traffic dominance, improving public realm, providing safer crossings, connecting parks and neighbourhoods, supporting access to schools and community facilities, and linking the town to surrounding countryside routes.

15.29 Figure 15.4: Sustainable Travel Networks and Opportunities across Potters Bar identifies existing and proposed sustainable travel routes and opportunities across Potters Bar, including connections to the town centres, railway station, leisure facilities, schools, parks, community facilities, countryside routes and surrounding areas. It should be read alongside Figure 15.2: Potters Bar Spatial Strategy, the Policies Map, relevant site allocation policies, the Infrastructure Delivery Plan, and transport evidence.

15.30 Proposals will be expected to coordinate with the Policies Map, site allocation policies, the maps in this chapter, the Infrastructure Delivery Plan, the Local Cycling and Walking Infrastructure Plan and other relevant transport evidence. Where development affects wider opportunity areas or related sites, applicants must demonstrate how movement arrangements will support comprehensive regeneration and not prejudice future improvements.

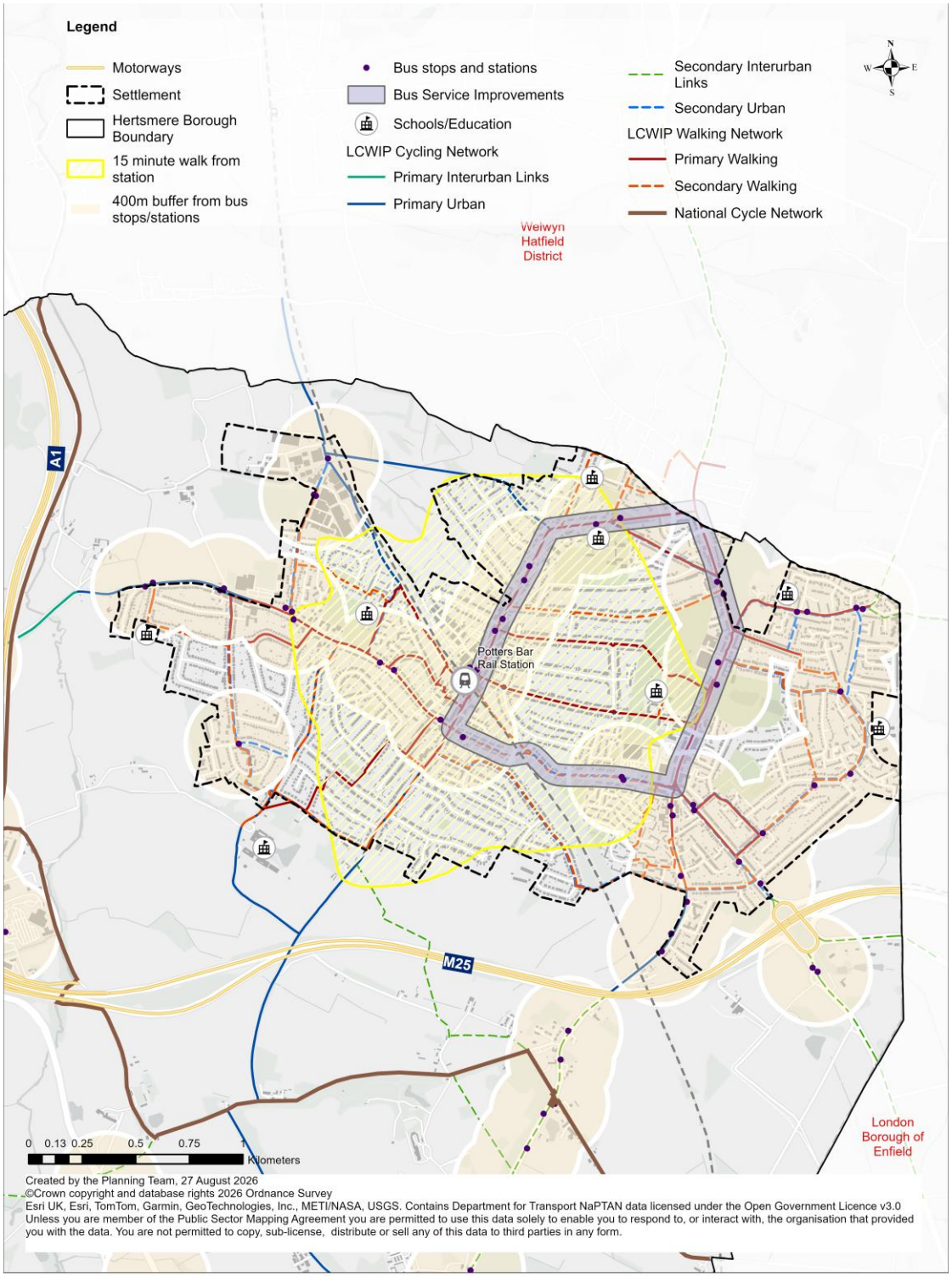


Figure 15.4 Potters Bar Sustainable Travel Networks

HPBA3 Character, Green Infrastructure and Setting

Strategic Objectives

A Delivering a better future for Hertsmere
C The regeneration of Borehamwood and Potters Bar
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Development in Potters Bar must protect and enhance the town's character, heritage, green infrastructure, blue infrastructure and landscape setting.

B Development proposals will be expected to:

i. Respond positively to the scale, form, grain, materials, roofscape, townscape, heritage and landscape character of their surroundings;

ii. Protect and enhance designated and non-designated heritage assets and their settings;

iii. Maintain and enhance the distinct roles, character and identity of Darkes Lane and the High Street;

iv. Locate taller buildings and higher-density development only where they can be successfully integrated into the townscape, respond to heritage and landscape constraints, and support public realm, legibility and placemaking;

v. Provide appropriate transitions in height, massing and scale to adjoining residential neighbourhoods and sensitive edges;

vi. Support sensitive infill, backland and small-site development where this respects local character, amenity, access, trees, drainage, biodiversity and townscape;

vii. Support the adaptive reuse, retrofitting or conversion of existing buildings where this would retain embodied carbon, protect local character or bring under-used buildings into beneficial use;

viii. Protect existing parks, open spaces, mature trees, hedgerows, habitats, green corridors, watercourses and landscape features;

ix. Improve ecological connectivity between Furzefield Wood, Oakmere Park, Parkfield, Morven Park, King George V Recreation Ground, surrounding countryside and other green spaces;

x. Protect and enhance Potters Bar Brook as a blue-green spine, including opportunities for daylighting, de-culverting, naturalisation, improved public access, biodiversity and public realm where feasible;

xi. Provide sustainable drainage systems as an integral part of site layout, landscape design and public realm;

xii. Ensure sustainable drainage and surface water management respond to local geology, groundwater conditions, source protection zones and flood risk;

xiii. Contribute to flood risk mitigation and surface water management, including upstream attenuation, floodable landscapes and nature-based solutions where appropriate;

xiv. Improve walking and cycling links between neighbourhoods, town centres, parks, schools, community facilities, countryside and Public Rights of Way;

xv. Support the creation of a green loop around Potters Bar where identified in Figure 15.2: Potters Bar Spatial Strategy and Figure 15.4: Sustainable Travel Networks and Opportunities Across Potters Bar;

xvi. Incorporate street trees, planting, rain gardens, urban greening and biodiversity enhancements into streets and public spaces, particularly within Darkes Lane, the High Street and opportunity areas;

xvii. Protect the landscape setting of Potters Bar and avoid unacceptable coalescence with nearby settlements; and

xviii. Create a clear, defensible and attractive settlement edge where development is proposed at the edge of the town.

C Development at the edge of Potters Bar must be landscape-led and comprehensively planned. It must maintain the town's landscape setting, provide active travel connections, deliver appropriate green infrastructure and open space, and define a clear long-term settlement edge.

D Development proposals must demonstrate consistency with Figure 15.2: Potters Bar Spatial Strategy, and relevant site allocation policies.

E Development proposals that would fragment the green infrastructure network, reduce access to open space, increase flood risk, harm important landscape

features, erode local character, or fail to provide appropriate mitigation for increased recreational pressure will not be supported.

Explanation

15.31 Policy HPBA3 delivers Key Spatial Objectives 10 to 12 by ensuring that growth and regeneration are design-led, landscape-led and responsive to Potters Bar's character, heritage and green setting.

15.32 Housing-led regeneration in the town centres and opportunity areas will require some intensification, which must be carefully managed. Taller buildings and higher-density development will only be appropriate where they can be integrated successfully into the townscape, provide appropriate transitions to surrounding neighbourhoods, protect heritage and landscape settings, and deliver clear public benefits through public realm, movement, infrastructure and placemaking.

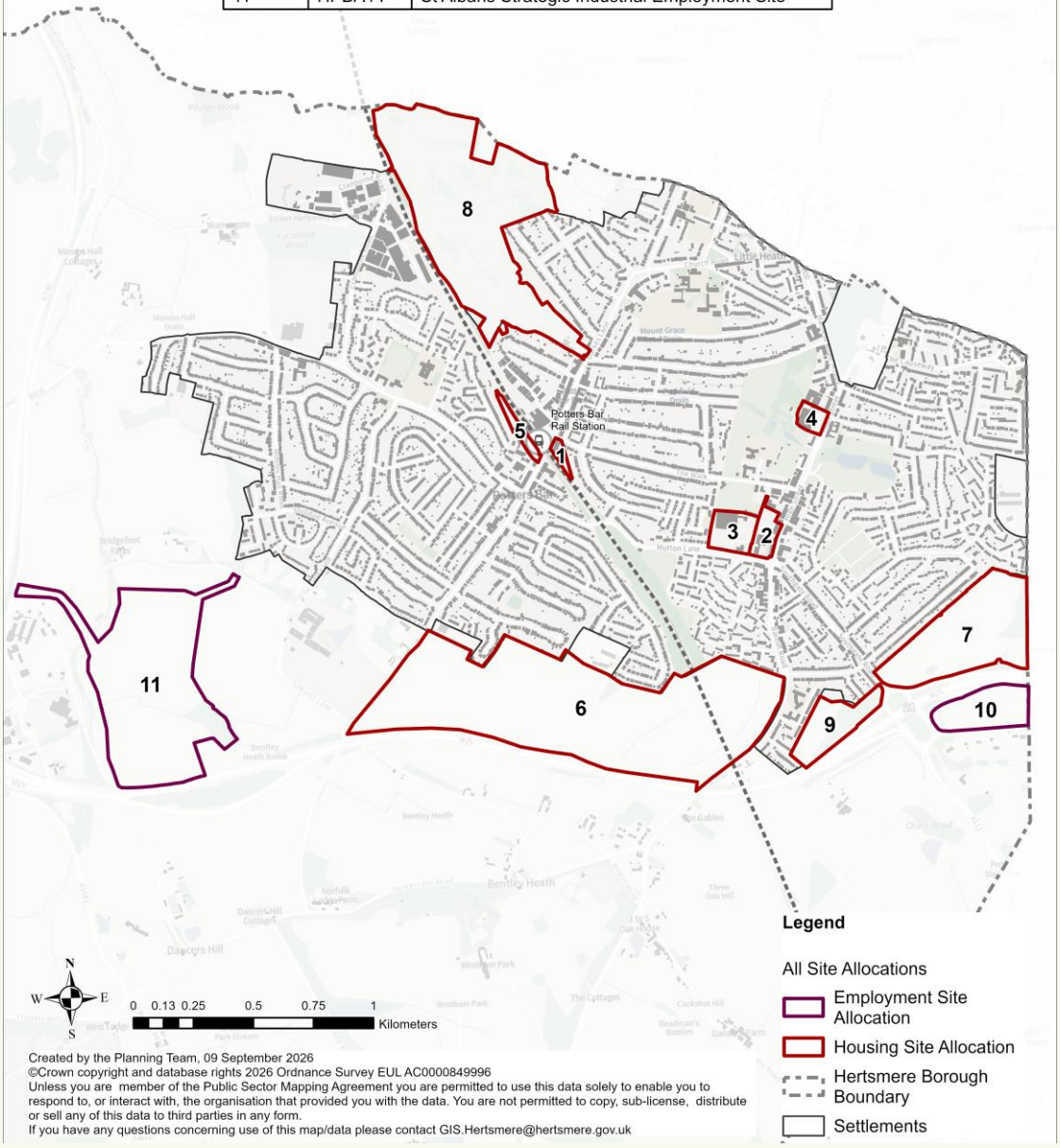
15.33 Green and blue infrastructure will be central to the future of Potters Bar. Figure 15.2: Potters Bar Spatial Strategy identifies broad opportunities to improve ecological connectivity, strengthen links between parks and countryside, create a green loop around the town, enhance street greening and restore Potters Bar Brook as a blue-green spine. Development should contribute to these objectives proportionate to its scale and location.

15.34 Potters Bar Brook and associated flood risk provide both a constraint and an opportunity. Development should avoid increasing flood risk and should integrate sustainable drainage, flood attenuation, naturalised water features and biodiversity enhancements from the outset of the design process. Where feasible, opportunities should be taken to daylight, de-culvert or naturalise sections of Potters Bar Brook and to use water management as a public realm and ecological asset.

15.35 Development at the edge of Potters Bar must maintain the town's landscape setting and avoid unacceptable coalescence with surrounding settlements. New development should create a clear and attractive long-term settlement edge, supported by landscape buffers, publicly accessible open space, active travel links and biodiversity improvements.

15.36 Figure 15.2: Potters Bar Spatial Strategy should be read alongside the Policies Map, site allocation policies, open space and green infrastructure evidence, and the Infrastructure Delivery Plan. Together, these documents provide the framework for securing high-quality, character-led and landscape-led development in Potters Bar.

Number	Reference	Site Name
1	HPBA4	11 Darkes Lane, Potters Bar
2	HPBA5	Canada Life Place, Potters Bar
3	HPBA6	Tesco Superstore, Mutton Ln, Potters Bar EN6 2PB
4	HPBA7	Bus Garage, High Street, Potters Bar
5	HPBA8	Potters Bar Railway Station Car Park, Darkes Lane
6	HPBA9	Barnet Road Strategic Urban Extension
7	HPBA10	Land rear of Park Avenue, Potters Bar
8	HPBA11	Former Potters Bar Golf Course
9	HPBA12	Dove Lane, Potters Bar
10	HPBA13	Land South East of Junction 24 (M25)
11	HPBA14	St Albans Strategic Industrial Employment Site



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Chapter 15: Potters Bar Site Allocations

Section

HPBA4 Metropolitan House, 3 Darkes Lane

HPBA5 Canada Life Place

HPBA6 Tesco, Potters Bar

HPBA7 Bus Garage, High Street

HPBA8 Potters Bar Station Car Park

HPBA9 Barnet Road Strategic Urban Extension

HPBA10 Land rear of Park Avenue

HPBA11 Former Potters Bar Golf Course

HPBA12 Dove Lane

HPBA13 Land Southeast of Junction 24 Strategic Industrial Employment Site

HPBA14 St Albans Road Strategic Industrial Employment Site

HPBA4 Metropolitan House, 3 Darkes Lane

Site Address	Metropolitan House, 3 Darkes Lane, Potters Bar		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	0.58 ha	Urban	Private
Current Uses	The site is currently occupied by a part 8-storey, part 3-storey office building with main town uses at ground floor level.		
How Site was Identified	Site promoted through the Call for Sites process, and Planning Applications have been submitted.		
Planning Designations and Site Considerations	The site is within Flood Zone 2, with a culverted water course along the south-western boundary and measurable surface water flood risk. There are potential heritage considerations in respect of the setting of Grade II Listed buildings Wyllyotts Manor (The Old Manor Public House) and 37 Baker Street, and it is within 750m of The Royds Conservation Area. The western boundary of the sites adjoins the railway network, giving rise to possible noise mitigation considerations. The site lies within a drinking water safeguard area.		
Planning Status	26/0496/PD56M - Status: PD56 -Prior Approval Given - Change of use from Office (Class E) to Residential (Class C3) for 96 flats.		

	26/0494/FUL - Status: Application - Permission Granted - Alterations to external fenestration including replacement windows, curtain walling, facing brick and render (additional plan received on 26.05.2026).
Indicative Development Capacity	96 dwellings with main town centre uses at ground and lower level to frontage and to rear.

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

B A Thriving local economy
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
K Securing the timely delivery of infrastructure
J Healthy and safe communities

Non-strategic policy

Existing planning consent

15.37 The site allocation benefits from two relevant extant consents

- 26/0496/PD56M - Status: PD56 - Prior Approval Given - Change of use from Office (Class E) to Residential (Class C3) for 96 flats and
- 26/0494/FUL - Status: Application - Permission Granted - Alterations to external fenestration including replacement windows, curtain walling, facing brick and render.

15.38 Together, the two consents permit the change of use from the existing office use to residential accommodation; with alterations to the external appearance of the building. The consents retain the ground floor commercial uses and convert the office space above into residential apartments comprising a mix of 1 bed, 2 person flats and 1 person studios.

15.39 The delivery of the extant consents will contribute towards meeting the objectives of the spatial strategy by securing sustainably located residential accommodation and delivering a level of site regeneration through alterations to the external appearance of the existing building. However, it is noted that there is limited need for the proposed dwelling mix, and an improved design and layout of the site could be sought and achieved through the allocation of the site in the Local Plan.

Site allocation

15.40 The site allocation proposes an urban redevelopment that will deliver at least 96 homes during Years 1-5 of the plan period. It will be comprised of comprehensive mixed-use redevelopment with main town centre uses on the ground floor and residential above, with the potential for new compatible and complimentary main town centre uses to rear of the site. It will deliver high-quality public realm and amenity space, and the design-led scheme will take full account of the constraints of the site, including the proximity to the railway line and the need to account for flood risk. The development will secure other social and community infrastructure improvements, including proportionate investment in local public transport, public realm, and environmental enhancements. The latter is anticipated to include sustainable drainage solutions, improvements for nature in line with the aims of the LNRS.

Opportunities

15.41 The delivery of this accessible urban site provides an opportunity to achieve successful and sustainable place-making comprised of comprehensive mixed-use redevelopment that includes active main town centre uses at ground floor level and residential above. The delivery of the site allocation in accordance with the allocation provides an opportunity to include genuinely affordable homes and possible employment opportunities[1]. The latter could follow a railway arch typology, alongside improved public realm and space for nature, and will respond positively to the challenges of balancing growth and securing a thriving economy with minimising the impacts of the climate emergency.

Development requirements

15.42 Development must be planned and delivered comprehensively in accordance with a masterplan in line with Policy DM3 (Masterplans and comprehensive development). A site-wide masterplan must be prepared demonstrating how the urban redevelopment will deliver a mix of new homes and main town centre uses in accordance with the site allocation.

15.43 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high intensity mixed-use development that provides positive frontages that address key routes and public spaces. This will incorporate high-quality and high-density residential, active ground floor frontages in line with the Retail and Town Centre policies and incorporate new and improved public realm and open space.

15.44 The masterplan must consider the site and its surroundings, including the adjoining railway line, surface water flood risk and the culverted watercourse, the relationship to Darkes Lane Local Town Centre, and the significance of nearby

[1] The Council anticipates that such employment uses could be delivered as Class E (g) (ii) and (iii) main town centre uses.

heritage assets. These factors will inform the siting and massing of built form, open space and important views.

15.45 Residential accommodation must be of high-quality design and include at least 20% Affordable Housing in line with Policy H3 (Genuinely affordable housing).

15.46 The site will be fully integrated with the surrounding street network to improve access and permeability through onto Darkes Lane, with fully consideration given to realising the potential for enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods. This may require reconfiguration of the site layout to achieve an appropriate hierarchy of routes that clearly articulate east-west and north-south corridors.

15.47 The site will deliver space for nature, including the provision of SuDS, Biodiversity Net Gain and urban greening in line with the relevant policies in Chapter 10 Green and Blue Infrastructure.

Development guidelines

15.48 Existing buildings should be retained wherever possible to reduce the environmental impact of the proposals in terms of embodied carbon. However, this should be balanced with the need to provide a high-quality environment within the development and its surroundings in this prominent town centre location, and the need for the layout of the site to better-address its surroundings and allow access to any new commercial development to the rear.

15.49 Development should provide a site-wide public realm strategy that aligns with and complements the regeneration of the wider Darkes Lane Local Town Centre.

15.50 All residential units should benefit from positive aspects, orientation, daylight and ventilation, and the development should be well-integrated with the Darkes Lane Local Town Centre.

15.51 High-quality public spaces should be created within and around the development which are addressed by positive and/or active building frontages. These should incorporate residential amenity space and play provision that addresses local shortfalls and is accessible to all, and appropriate planting for biodiversity benefit and urban greening as set out in Chapter 10 Green and Blue Infrastructure.

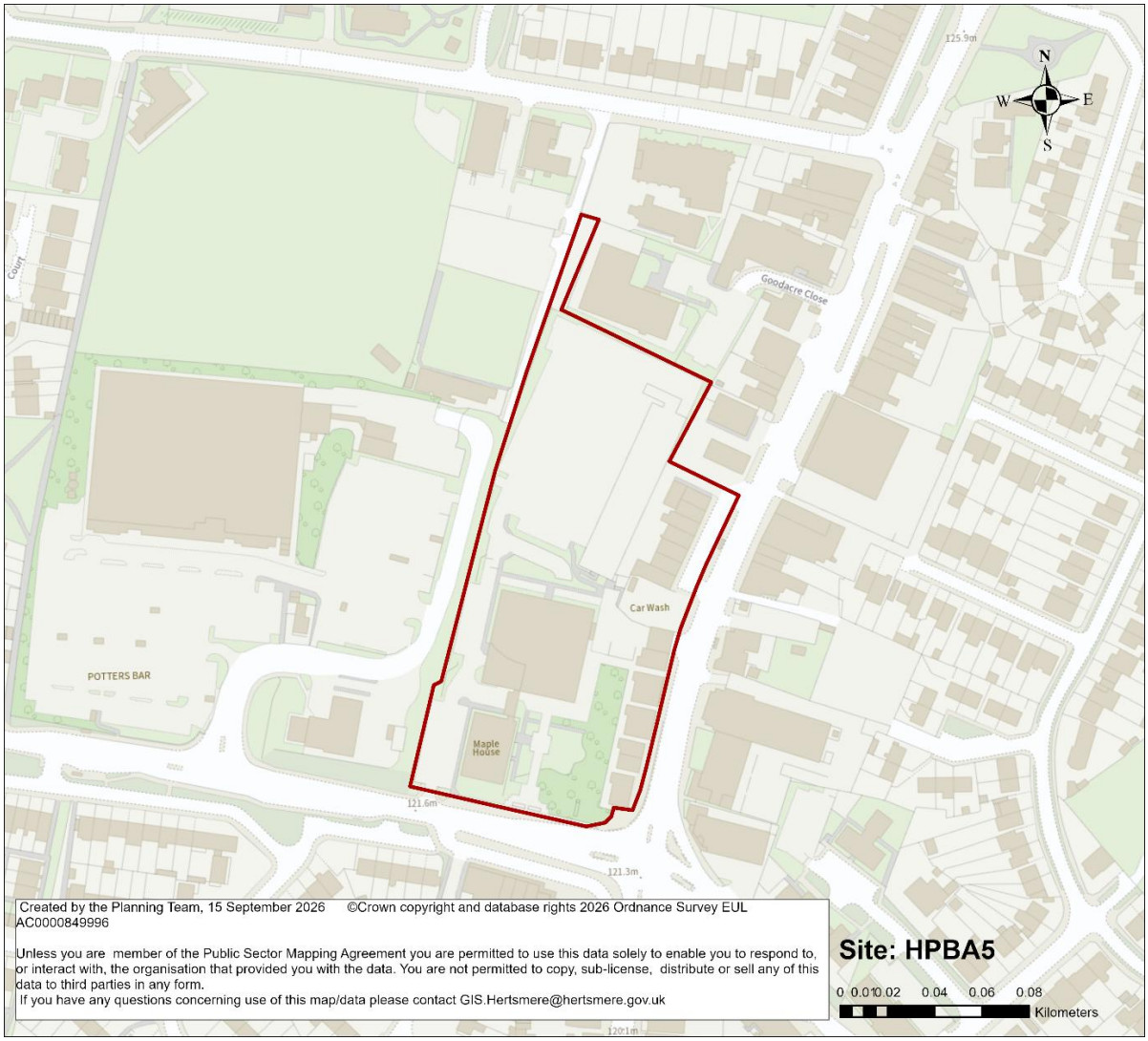
15.52 Development adjoining the railway line should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with Network Rail.

15.53 Development must respond positively to heritage assets, including seeking to enhance the setting and significance of nearby listed buildings The Old Manor Public House and 37 Baker Street.

15.54 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that secures maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

15.55 The site has a measurable level of flood risk, albeit at a low level, and will be subject to the Sequential and possibly the Exception Test. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

HPBA5 Canada Life Place



Site Address	Canada Life Place, Mutton Lane, Potters Bar		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	1.84 ha	Urban	Private
Current Uses	Comprised of one 13-storey office building on Mutton Lane, one 6-storey office building to the rear of the site, and several pairs of 2.5-storey buildings including residential uses and ground floor retail uses on High Street.		
How Site was Identified	Call for Sites process		
Planning Designations and Site Considerations	The site includes trees that are subject to TPOs. There are heritage considerations in respect of the setting of three Grade II Listed buildings, and potential considerations relating to two further Grade II Listed buildings. There is a degree of measurable surface water flood risk. The site lies within the Sand and Gravel and Drinking Water Safeguard Areas.		
Planning Status	25/1764/PD56M (Canada Life House only): Change of use from Class E (commercial) to 74no. Class C3 dwellinghouses. (Deemed consent; expiry: 09 Feb 2029).		

	26/0764/FUL (Canada Life House only): External alterations to facade and fenestration, removal of rooftop plant enclosure, and associated landscaping works. (Permission granted; expiry: 06 Aug 2029). Section 62A Planning Application: S62A/2026/0159/ (Maple House and High Street buildings only) Partial demolition of existing buildings (with retention of existing two-storey car park and substation) and redevelopment of the site to provide a mixed-use development comprising residential apartments (class C3) and flexible commercial floorspace (class E) across 4 blocks and associated internal roads, parking, drainage, landscaping, amenity space and associated works. (Awaiting decision – target date 05/11/2026)
Indicative Development Capacity	369 dwellings with main town centre uses

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

B A Thriving local economy
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-strategic policy

Existing planning consents

15.56 The site allocation benefits from two relevant extant consents. These relate to the redevelopment of Canada Life House for 76 residential units, with alterations to the façade and landscaping works:

- 25/1764/PD56M (Canada Life House only): Change of use from Class E (commercial) to 74no. Class C3 dwellinghouses. (Deemed consent; expiry: 09 Feb 2029), and
- 26/0764/FUL (Canada Life House only): External alterations to facade and fenestration, removal of rooftop plant enclosure, and associated landscaping works. (Permission granted; expiry: 06 Aug 2029).

15.57 A planning application has been submitted (under Section 62A of the Town and Country Planning Act 1990) directly to the Secretary of State for the mixed-use

redevelopment of the buildings along the street frontage of the site, including the 13-storey Maple House (Mutton Lane) and the buildings along the High Street:

- S62A/2026/0159: the proposal includes 1,742 sqm of flexible Class E commercial floorspace within smaller units fronting the High Street and Mutton Lane; 293 dwellings comprising 14 x studios, 83 x 1-bed flats, 150 x 2-bed flats and 46 x 3-bed flats, within four residential blocks of between 4-15 storeys in height, situated around central courtyards; open space including LAPS and intergenerational play, and an ecologically rich landscaping strategy; and 125 car parking spaces in a retained 2-storey car park.

Site Allocation

15.58 The site allocation proposes an urban redevelopment that will deliver at least 369 homes during Years 1-10 of the plan period. It will be comprised of comprehensive mixed-use redevelopment including residential units and main town centre, commercial, leisure and cultural uses on the ground floor fronting High Street and Mutton Lane. It will deliver high-quality public realm and amenity space, and the design-led scheme will take full account of the constraints of the site, including the proximity of several Grade II Listed buildings and surface water flood risk. The development will secure other social and community infrastructure improvements, including proportionate investment in local public transport, public realm, and environmental enhancements. The latter is anticipated to include sustainable drainage solutions, improvements for nature in line with the aims of the LNRS.

Opportunities

15.59 The delivery of this accessible urban site provides an opportunity to achieve successful and sustainable place-making comprised of comprehensive mixed-use redevelopment that include active main town centre uses at ground floor level and residential above. It will include genuinely affordable homes, investment in social and community infrastructure, improved public realm, and open space incorporating space for nature and will respond positively to the challenges of balancing growth and securing a thriving economy with minimising the impacts of the climate emergency.

Development Requirements

15.60 Development must be planned and delivered comprehensively in accordance with a masterplan, to ensure the appropriate co-ordination, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). The implementation of the extant planning consent must be fully integrated with the rest of the site, particularly the relationship between building entrances, positive frontages, public spaces, the gateway to the High Street, and the approach to enhancing the setting and significance of nearby heritage assets.

15.61 The development must be design-led and consider how the capacity of the site can be optimised to deliver high intensity mixed-use development that provides positive frontages that address key routes and public spaces. This will incorporate high-

quality and high-density residential, active ground floor frontages in line with the Retail and Town Centre policies, and new and improved public realm and open space.

15.62 The masterplan must consider the site and its surroundings, including surface water flood risk, the relationship to High Street District Centre, and the significance of nearby heritage assets, particularly Ladbrooke School. These considerations will inform the siting and massing of built form, open space and important views. The key location on the corner of the High Street and Mutton Lane will be addressed with a design that respects the existing urban form and better-defines the southern entrance to the High Street District Centre.

15.63 Residential accommodation must be of high-quality design and include at least 20% Affordable Housing in line with Policy H3 (Genuinely affordable housing).

15.64 The site will be fully integrated with the surrounding street network to improve access and permeability through onto the High Street, with enhanced walking and cycle connections including a functional link with the neighbouring Tesco Supermarket site. This may require reconfiguration of the site layout to achieve a hierarchy of routes that clearly articulate movement along east-west and north-south corridors.

15.65 The delivery of the site allocation will enable transformative public realm enhancements to improve connections throughout the wider town centre area. provides an opportunity to support the comprehensive regeneration of Potters Bar High Street District Centre. The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Potters Bar. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of Potters Bar's regeneration.

15.66 Development must be phased to ensure the timely provision of the infrastructure necessary to support the densification of this central urban site. This must include the timely investment in community infrastructure to meet demand arising from the development.

15.67 The site will deliver space for nature, including the provision of SuDS, Biodiversity Net Gain and urban greening in line with the relevant policies in Chapter 10 Green and Blue Infrastructure.

Development Guidelines

15.68 Existing buildings should be retained wherever possible to reduce the environmental impact of the proposals in terms of embodied carbon, however this should be balanced with the need to provide a high-quality development that fully addresses its location as a gateway to the High Street District Centre, and connects in with the neighbouring allocation at Tesco, Mutton Lane.

15.69 Development should provide a site-wide public realm strategy that aligns with and complements the regeneration of the wider High Street District Centre.

15.70 All residential units should benefit from positive aspects, orientation, daylight and ventilation, and the development should be well-integrated with the High Street District Centre and nearby heritage assets, in particular the Grade II Listed Ladbrooke School and Cask and Stillage pub.

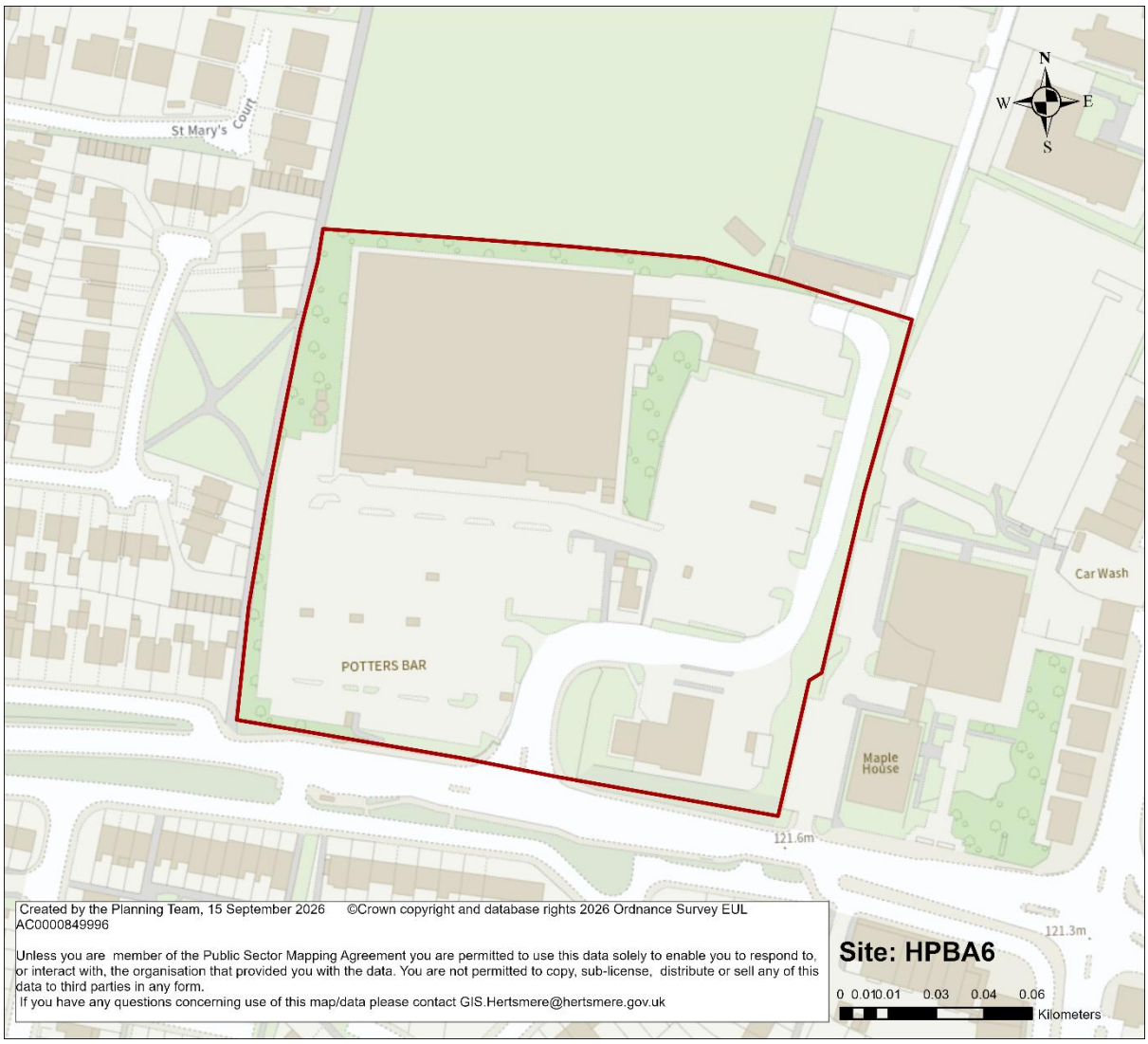
15.71 High-quality public spaces should be created within and around the development which are addressed by active building frontages. These should incorporate residential amenity space and play provision that addresses local shortfalls (LAPs), and appropriate planting for biodiversity benefit and urban greening as required by the policies in the Green and Blue Infrastructure section of this Plan.

15.72 Development must respond positively to heritage assets including nearby listed buildings including Ladbrooke School, High Street; The White Horse Public House (Cask & Stillage), 19 High Street; and The Lion Public House (Potty's Diner), 2 Barnet Road. Consideration must also be given to two further Grade II listed buildings: Salisbury House, 82 High Street and War Memorial at St John's Churchyard, High Street.

15.73 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

15.74 The site has a low level of measurable level of surface water flood risk and will be subject to the Sequential and possibly the Exception Test. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

HPBA6 Tesco, Potters Bar



Site Address	Tesco, Mutton Lane, Potters Bar		
Site Characteristics	**Site Size ha** 2.9 ha	**Setting** Urban	**Ownership** Private
Current Uses	The site is occupied by a supermarket and associated car park and petrol filling station.		
How Site was Identified	Identified by the Council.		
Planning Designations and Site Considerations	The site includes trees that are subject to TPOs. There is a degree of measurable surface water flood risk. The site lies within Drinking Water and Sand and Gravel Safeguard Areas.		
Planning Status	No recent relevant planning history.		
Indicative Development Capacity	588 dwellings and reprovision of the existing food store.		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

B A Thriving local economy
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
K Securing the timely delivery of infrastructure
J Healthy and safe communities

Non-Strategic Policy

Site Allocation

15.75 The allocation proposes the comprehensive redevelopment of an urban site that is currently in a single low-intensity use. The delivery of the site will secure at least 588 homes and the reprovision of the existing foodstore. It is anticipated that this will be achieved during the latter years of the plan period.

15.76 The delivery of the site allocation provides an opportunity to secure comprehensive regeneration for Potters Bar High Street District Centre. Comprehensive redevelopment will secure the reconfiguration of spaces to facilitate a street-based layout that considers the re-provided foodstore fronting Mutton Lane, and the provision of new and improved routes into and through the site, public realm and environmental enhancements.

15.77 Redevelopment of the site will apply a design-led approach that takes full account of the site's constraints, including the surface water flood risk. The development will secure other social and community infrastructure improvements, including proportionate investment in local public transport, public realm, and environmental enhancements. The latter is anticipated to include sustainable drainage solutions, improvements for nature in line with the aims of the LNRS.

Opportunities

15.78 The delivery of this urban site provides an opportunity to achieve comprehensive mixed-use redevelopment comprised of the re-provided foodstore, other active main town centre, community and employment uses at ground floor level and residential above, and the integration of the site within the regular street pattern of the area. It will include genuinely affordable homes that are supported by compatible education, health, community, leisure and recreation facilities. On-site improvements will include improved public realm, and amenity space incorporating

space for nature, and will respond positively to the challenges of balancing growth and securing a thriving economy with minimising the impacts of the climate emergency.

Development Requirements

15.79 Development must be planned and delivered comprehensively in accordance with Policy DM3. A site-wide masterplan must be prepared demonstrating how the urban redevelopment will deliver a mix of new homes and main town centre uses in accordance with the site allocation.

15.80 Residential accommodation must be of high-quality design and include at least 20% Affordable Housing in line with Policy H3 (Genuinely affordable housing).

15.81 Development must be fully integrated with the surrounding street network to improve access and permeability through onto the High Street, with enhanced walking and cycle connections including a functional link with neighbouring Canada Life Place. This may require reconfiguration of the site layout to achieve a hierarchy of routes that clearly articulate movement across east-west and north-south corridors.

15.82 Delivery of new and improved public realm and open space in accordance with a site-wide public realm strategy that aligns with and complements the regeneration of the wider High Street District Centre and incorporates space for nature including SuDS and urban greening in line with the relevant policies in the Green and Blue Infrastructure section of this plan.

15.83 The masterplan must consider the site and its surroundings, including surface water flood risk, the two-storey houses on Mutton Lane to the west, and the relationship with the neighbouring development at Canada Life Place to the east. These factors will inform the siting and massing of built form, open space and important views. The entrance onto the site from the High Street is identified as a key location within the allocation. Development will deliver a design-led solution that respects the existing urban form and better-defines the southern entrance to the High Street District Centre.

15.84 Development will enable transformative public realm enhancements to improve connections throughout the wider town centre area. The Council has identified the potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site. These are set out as part of the Vision for Potters Bar. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of Potters Bar's regeneration. Development must be phased to ensure the timely provision of the infrastructure necessary to support the densification of this central urban site.

Development Guidelines

15.85 Existing buildings should be retained wherever possible to reduce the environmental impact of the proposals in terms of embodied carbon, however this should be balanced with the need to provide a high-quality within the development and its surroundings in this prominent town centre location, and to connect with the neighbouring allocation at Canada Life Place.

15.86 Development should provide a site-wide public realm strategy that aligns with and complements the regeneration of the wider High Street District Centre.

15.87 All residential units should benefit from positive aspects, orientation, daylight and ventilation, and the development should be well-integrated with the High Street District Centre.

15.88 High-quality public spaces should be created within and around the development which are addressed by positive and/or active building frontages. These should incorporate residential amenity space and play provision that addresses local shortfalls and is accessible to all, and appropriate planting for biodiversity benefit and urban greening as set out in Chapter 10 Green and Blue Infrastructure.

15.89 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

15.90 The site has a small but measurable level of flood risk and will be subject to the Sequential and possibly the Exception Test. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

HPBA7 Bus Garage, High Street

Site Address	Bus Garage, High Street, Potters Bar		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	1.2 ha	Urban	Public
Current Uses	The site is in use as a bus depot		
How Site was Identified	Identified by the Council		
Planning Designations and Site Considerations	The site is within the setting of several Grade II Listed Buildings and adjoins a locally listed wall. The site adjoins Hollies Way Locally Significant Employment Site. The site lies within Drinking Water and Sand and Gravel Safeguard Areas.		
Planning Status	No recent relevant planning history.		
Indicative Development Capacity	119 dwellings and main town centre uses		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

B A Thriving local economy
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
K Securing the timely delivery of infrastructure
J Healthy and safe communities

Non-strategic policy

Site Allocation

15.91 The allocation proposes the comprehensive redevelopment of an urban site that is currently in a single low-intensity use. The delivery of the site will secure at least 119 homes and compatible employment, main town centre uses and community uses at ground floor/ lower level. It is anticipated that this will be achieved during the latter years of the plan period.

15.92 Development will involve the demolition of existing buildings and reconfiguration of the site to facilitate a street-based layout with improved routes into and through the site. Development will deliver high-quality public realm and amenity space. The application of the design-led approach will take full account of the constraints of the site, including the locally listed wall to the southern boundary. The development will secure other social and community infrastructure improvements, including proportionate investment in local public transport, public realm, and environmental enhancements. The latter is anticipated to include sustainable drainage solutions, improvements for nature in line with the aims of the LNRS.

Opportunities

15.93 The delivery of this accessible urban site provides an opportunity to achieve comprehensive mixed-use redevelopment comprised of active main town centre, community and employment uses at ground floor level and residential above, and the integration of the site within the regular street pattern of the area. It will include genuinely affordable homes that are supported by compatible education, health, community, leisure and recreation facilities. On-site improvements will include improved public realm, and amenity space incorporating space for nature, and will respond positively to the challenges of balancing growth and securing a thriving economy with minimising the impacts of the climate emergency.

15.94 Development also provides an opportunity to secure an improved bus garage facility that contributes to the long-term evolution of sustainable transport network provision for the Borough and beyond. It is anticipated that the new facility will be at another location. The Council commits to working with Transport for London and development industry partners to secure this opportunity.

Development Requirements

15.95 Development must be planned and delivered comprehensively in accordance with Policy DM3. A site-wide masterplan must be prepared demonstrating how the urban redevelopment will deliver a mix of new homes and main town centre uses in accordance with the site allocation.

15.96 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high intensity mixed-use development with positive frontages that address key routes and public spaces. This will incorporate high-quality and high-density residential, active ground floor frontages in line with the Retail and Town Centre policies, and new and improved public realm and open space.

15.97 The masterplan must consider the site and its surroundings, including the relationship the wider High Street District Centre, and the significance of nearby heritage assets including the adjoining locally listed wall. These factors will inform the siting and massing of built form, open space and important views.

15.98 Developers must engage with and work partnership with Transport for London and the Council to identify, secure and deliver replacement bus garaging provision that meets the long-term sustainable transport needs for the Borough and beyond.

15.99 The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Potters Bar. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of Potters Bar's regeneration.

15.100 Development must be fully integrated with the surrounding street network to improve access and permeability through onto the High Street, with enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods. This will consider improved connections through the site including the creation of new east-west connections between Parkfield Open Space and High Street.

15.101 The site will deliver space for nature, including the provision of SuDS, Biodiversity Net Gain and urban greening in line with the relevant policies in Chapter 10 Green and Blue Infrastructure.

Development Guidelines

15.102 Development should provide a site-wide public realm strategy that aligns with and complements the regeneration of the wider High Street District Centre.

15.103 All residential units should benefit from positive aspects, orientation, daylight and ventilation, and the development should be well-integrated with the High Street District Centre.

15.104 High-quality public spaces should be created within and around the development which are addressed by positive and/or active building frontages. These should incorporate residential amenity space and play provision that addresses local shortfalls and is accessible to all, and appropriate planting for biodiversity benefit and urban greening as set out in Chapter 10 Green and Blue Infrastructure.

15.105 Development must respond positively to heritage assets, including seeking to enhance the setting and significance of nearby listed buildings The Green Man Public House, High Street and Oakmere House, High Street. The locally listed wall that runs along the southern boundary of the site should be retained and the development should enhance its significance.

15.106 Due to the vehicle garaging, fuelling and maintenance uses present across the site, ground surveys may be required to identify the nature and extent of possible ground contamination and environmental pollution. Should these be encountered, remedial works and/or mitigation measures will need to be implemented, where necessary, in partnership with relevant bodies.

15.107 Development must avoid harm to the adjoining Locally Significant Employment Area at Hollies Way located to the site to the north. The design of development must include appropriate mitigation to ensure that future residents of the development site are not impacted by existing businesses operating out of Hollies Way, in line with the Agent of Change principle.

HPBA8 Potters Bar Railway Station Car Park

Site Address	Potters Bar Station Car Park, Darkes Lane, Potters Bar		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	1 ha	Urban	Public
Current Uses	Car park associated with the railway station.		
How Site was Identified	Call for Sites process.		
Planning Designations and Site Considerations	The railway line adjoins the western site boundary, giving rise to considerations around noise mitigation. There are possible heritage considerations in respect of the setting of Grade II Listed buildings. Some degree of measurable surface water flood risk across the site. The site lies within a drinking water safeguard area.		
Planning Status	23/1003/FUL Redevelopment of existing site to provide residential development (Use Class C3) with commercial space at ground floor (Class E) with associated amenity space, car parking, cycle storage and landscaping. (Allowed on appeal)		
Indicative Development Capacity	55 dwellings, main town centre uses and car parking		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
K Securing the timely delivery of infrastructure

Non-strategic policy

Existing Planning Consent

15.108 The site benefits from the following extant consent:

- 23/1003/FUL Redevelopment of site for 55 residential units in a building of up to 10 storeys, commercial units at ground floor, with associated amenity space, car parking, cycle storage and landscaping.

Site Allocation

15.109 The allocation proposes the comprehensive redevelopment of an urban site that is currently in a single low-intensity use. The delivery of the site will secure at least 55 flats and secure the re-provision of an appropriate quantum of car parking necessary to provide access to the railway station in the long-term. It is anticipated that this will be achieved during the latter years of the plan period.

15.110 Comprehensive redevelopment of this highly accessible site will deliver medium-density residential accommodation that will include new genuinely affordable homes. There will also be an opportunity to provide compatible main town centre uses at ground floor level. The development of the site provides an opportunity to optimise and intensify land available across the town centre area. It will deliver on-site amenity space, car and cycle parking and green infrastructure improvements. The latter is anticipated to include sustainable drainage solutions and improvements for nature in line with the aims of the LNRS.

Opportunities

15.111 The delivery of this highly accessible urban site provides an opportunity to achieve comprehensive mixed-use redevelopment comprised of residential development with active main town centre uses at ground floor level, and car parking in continuation of the existing use of the site. There is an opportunity to deliver improvements to the townscape by filling a gap in the street frontage, which will contribute to a more vibrant town centre environment in this location alongside

urban greening to improve the value of the site for biodiversity and the health and wellbeing of residents.

Development Requirements

15.112 Development must be planned and delivered comprehensively in accordance with Policy DM3. A site-wide masterplan must be prepared demonstrating how the urban redevelopment will deliver a mix of new homes and main town centre uses in accordance with the site allocation.

15.113 The masterplan must use the design-led approach to achieve a high intensity mixed-use development that includes positive frontages that address key routes and public spaces. This will incorporate high-quality, medium-density, town centre homes, active ground floor frontages in line with the Retail and Town Centre policies, and new and improved public realm and open space which addresses existing rights of way.

15.114 The masterplan must consider the site and its surroundings, including the adjoining railway line, surface water flood risk, the relationship to Darkes Lane Local Town Centre, and the significance of nearby heritage assets, especially Wyllyotts Manor to the south. These factors will inform the siting and massing of built form, open space and important views.

15.115 Developers must engage and work in partnership with Network Rail, and with the relevant rail operator, to ensure that an appropriate level of car parking provision necessary for the railway stations continued operation is maintained during the delivery of the site. Developers must ensure that replacement parking provision meets operational needs for the long-term future of the station, specifically within the context of evolved private car ownership and use.

15.116 The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Potters Bar. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of Potters Bar's regeneration.

15.117 Development must be fully integrated with the surrounding street network to improve access and permeability, particularly between Darkes Lane and the pedestrian footpath beside the railway line that links with Cranbourne Industrial Estate. This must include enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods.

15.118 The site will deliver space for nature, including the provision of SuDS, Biodiversity Net Gain and urban greening in line with the relevant policies in Chapter 10 Green and Blue Infrastructure.

Development guidelines

15.119 Residential dwellings should benefit from positive aspects, orientation, daylight and ventilation, and the development should make the most of the opportunity to enhance this area of Darkes Lane Local Town Centre, as a key street frontage on the pedestrian journey between the railway station and the Wyllyotts Theatre.

15.120 High-quality public spaces should be created within and around the development which are addressed by active building frontages. These should incorporate residential amenity space and play provision that addresses local shortfalls (LAPs), and appropriate planting for biodiversity benefit and urban greening as required by the policies in the Green and Blue Infrastructure section of this Plan.

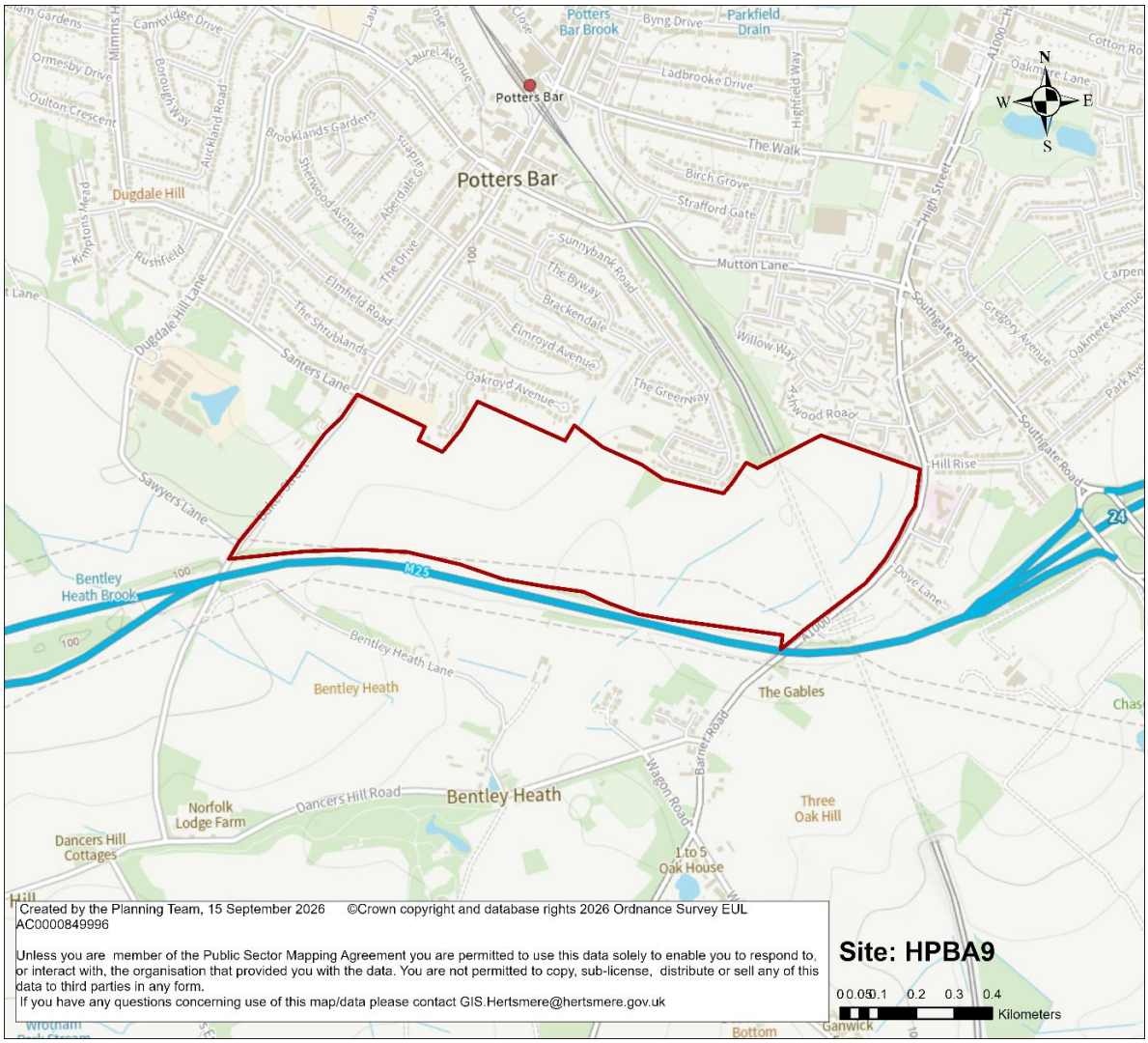
15.121 Development adjoining the railway line should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with Network Rail.

15.122 Development must respond positively to local heritage assets, including seeking to enhance the setting and significance of nearby listed buildings The Old Manor Public House and 37 Baker Street.

15.123 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

15.124 The site has a low level of measurable level of flood risk and will be subject to the Sequential and possibly the Exception Test. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

HPBA9 Barnet Road Strategic Urban Extension



Site Address	Barnet Road Strategic Urban Extension, Potters Bar (Land to the south of Potters Bar, east of Baker Street and west of Barnet Road)		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	63.4 ha	Strategic Urban Extension	Private
Current Uses	Agricultural land.		
How Site was Identified	Call for Sites process.		
Planning Designations and Site Considerations	The M25 adjoins the southern site boundary, giving rise to considerations around noise and air quality mitigation. Pylons and power lines run across the site. The East Coast Main Line runs through a tunnel beneath the east of the site. The site falls within the Heathrow Safeguarding Area. The site adjoins The Royds Conservation Area. There is a small but measurable level of surface water flood risk to eastern side of site.		
Planning Status	Permission Refused. Appeal in progress. 24/1101/OUTEI. Outline application (with all matters reserved except for means of access) for a new neighbourhood comprising up to 900 dwellings		

	(Use Class C3) (including affordable housing), a neighbourhood centre and community facilities (Use Class E (a), Class E (e) and F2 (b), a primary school (Use Class F1 (a)), land for an up to 80-bed care home (Use Class C2), strategic and informal open space, landscaping, parking, associated infrastructure and works, with vehicle and pedestrian accesses from Baker Street and Barnet Road (Amended plans and additional documents received).
Indicative Development Capacity	900 dwellings

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A Delivering a better future for Hertsmere
B A Thriving local economy
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
K Securing the timely delivery of infrastructure
J Healthy and safe communities

Non-strategic policy

Site Allocation

15.125 The site allocation proposes a strategic urban extension to Potters Bar that will deliver at least 900 homes during the plan-period. It will comprise comprehensive mixed-use developments with compatible residential, commercial, community and main town centre uses. It will deliver new walkable neighbourhoods with a neighbourhood centre comprising a proportionate range of community, local retail and employment space, accessed via an integrated network of walking and cycling routes. Improved active travel networks will access Potters Bar Darkes Lane Local Town Centre, the railway station and have the potential to extend beyond to adjoining settlements. Development will also secure other social and community infrastructure improvements and proportionate investment in local public transport; public realm and environmental enhancements. The latter is anticipated to include new public open space and improvements for nature in line with the aims of the LNRS.

15.126 The Borough-wide Green Belt Assessment Stage 2 further considers the site's contribution to the purposes of the Green Belt. It concludes that the site is defined as grey belt. The comprehensive development of the strategic urban extension must secure a defensible Green Belt Boundary to the south and west to retain the

visual separation between Potters Bar and Greater London. This is largely secured by the presence of the M25 motorway and Baker Street, although these boundaries could be visually enhanced through the incorporation of a natural buffer consisting of trees and open space.

Opportunities

15.127 The delivery of the strategic urban extension provides an opportunity to create a new successful and sustainable community located to the south of Potters Bar. It will be a walkable place, with a diverse mix of homes, including genuinely affordable homes that are supported by compatible education, health, community, leisure and recreation facilities. The new neighbourhood will respond positively to the challenges of balancing growth and securing a thriving economy with minimising the impacts of the climate emergency. These new uses will be linked by a comprehensive high-quality green and blue infrastructure network.

Development Requirements

15.128 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the strategic urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

15.129 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. It is anticipated that higher intensity mixed-use development could be delivered as part of the new community's local centre and other appropriate locations across the site where higher density homes may be appropriate.

15.130 The masterplan must consider the site and its surroundings, including the adjoining motorway, surface water flood risk, the relationship to Darkes Lane Local Town Centre, and the significance of nearby heritage assets especially The Royds Conservation Area. These factors will inform the siting and massing of built form, open space and important views.

15.131 As a strategic urban extension, development proposal must be prepared in accordance with Policy HQD1(K) and must be supported by a site-wide Design Code prepared in alignment with the National Model Design Code, or successor guidance. The site-specific design code will be coordinated with the masterplan required by Policy DM3.

15.132 Development must be phased to ensure the timely provision of the infrastructure necessary to support the strategic urban extension. The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Potters Bar. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of Potters Bar's regeneration.

15.133 Developers will engage with Hertfordshire County Council Highways (or successor highway authority) at an early stage in the master planning process to gain an

understanding of the cumulative traffic impacts of growth and how it can be managed. This work should demonstrably set out a sustainable transport approach to the strategic urban extension, in respect of connectivity and mitigation of highway impacts. It is anticipated that mitigation will include necessary off-site works to rationalise the local highway, reduce severance and enhance sustainable connectivity to services and facilities. The development must be fully integrated with the surrounding street network, with vehicular access from both Barnet Road and Baker Street, to improve access and permeability through into Potters Bar Darkes Lane Local Town Centre, with enhanced walking and cycle connections between public spaces and surrounding neighbourhoods.

15.134 Delivery of the strategic urban extension will secure a natural landscaped boundary that is informed by the development's master plan and landscape plan. Specifically, development will provide a defensible Green Belt Boundary to the site's southern and western edges to retain the visual separation between Potters Bar and Greater London. In particular, the southern boundary of the site that adjoins the M25 and the western boundary with Baker Street should be reinforced to ensure the boundary is visually strong and defensible in perpetuity.

15.135 Developers will work collaboratively with the education authority (Hertfordshire County Council) to determine the requirements for school place provision arising from the delivery of the strategic urban extension. This includes any on-site provision that arises from the strategic urban extension. The developers will work with the education authority to ensure that any agreed on-site provision is delivered in a timely manner to enhance Potters Bar as a sustainable and walkable town.

15.136 The delivery of the strategic urban extension must take account of the flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

15.137 Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied. Developers must work positively with the Council and Thames Water to identify any appropriate design-focussed avoidance or mitigation measures relating to the neighbouring Blackbirds Farm Sewage Works.

15.138 Applicants and developers are required to carry out necessary geophysical survey and archaeological evaluation to reveal the archaeological potential of the site.

15.139 Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS.

Development Guidelines

15.140 Development should provide for complementary and distinctive character areas across the strategic urban extension that link in with and complement the masterplan across this site and existing neighbourhoods to the north. The design and layout of the development should reflect and reinforce the hierarchy of streets and open/green spaces, with a differentiation in design, density, scale and massing, including a range of plot sizes and building heights, with reference to the established character of Potters Bar and in particular the adjoining Conservation Area at The Royds.

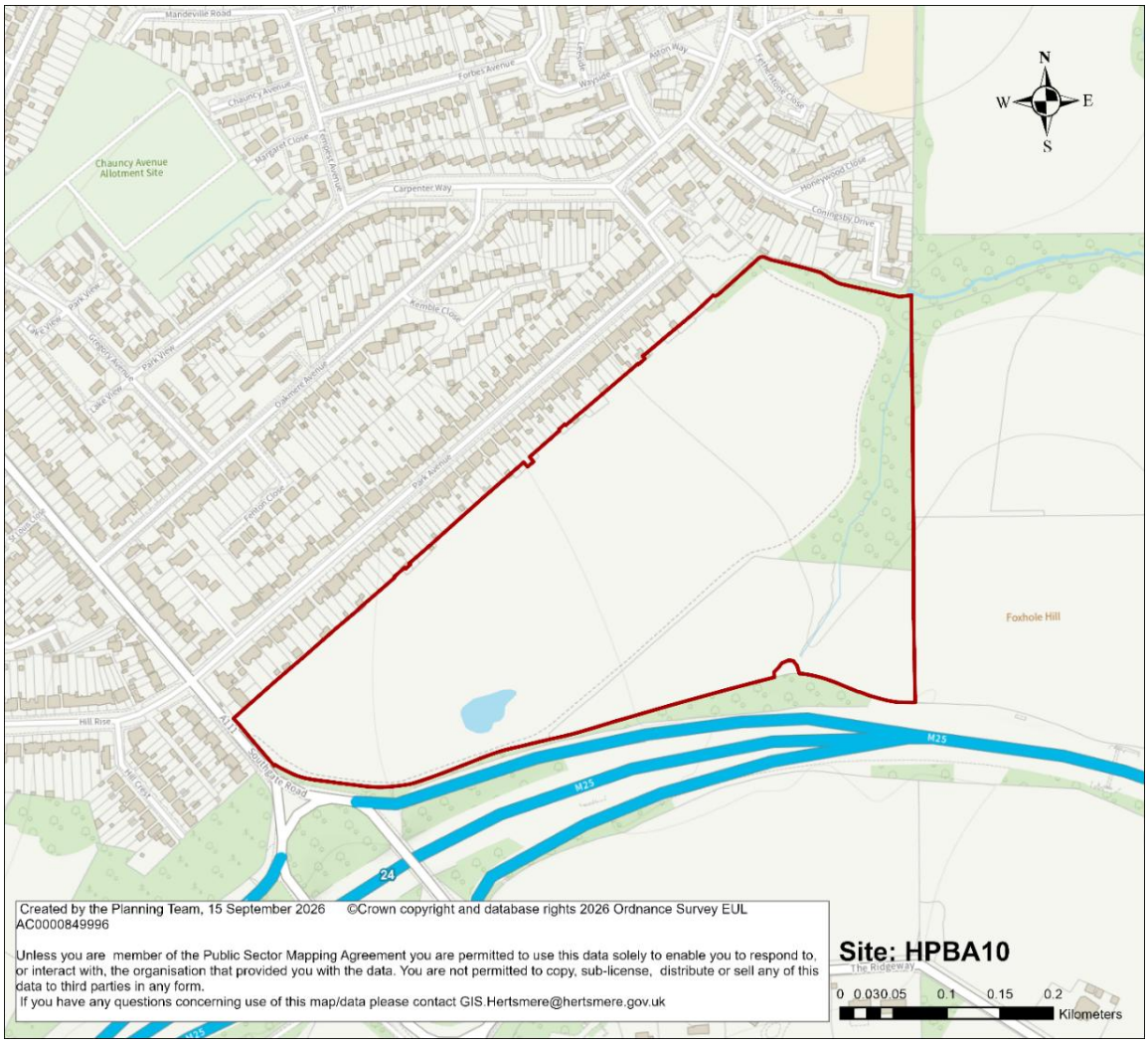
15.141 Developers will engage with Hertfordshire County Council Highways (or successor highway authority) at an early stage in the master planning process to gain an understanding of the cumulative traffic impacts of growth and how it can be managed. This work should demonstrably set out a sustainable transport approach to the strategic urban extension, in respect of connectivity and mitigation of highway impacts. It is anticipated that mitigation will include necessary off-site works to rationalise the local highway, reduce severance and enhance sustainable connectivity to services and facilities. The development must be fully integrated with the surrounding street network to improve access and permeability through to both of Potters Bar's town centres and the railways station, with enhanced walking and cycle connections between public spaces and surrounding neighbourhoods.

15.142 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

15.143 Technical assessments will be required including noise, air quality, flood risk, traffic and landscape visual impact assessments. Given the long boundary along the M25 that abuts the site, it is anticipated that an appropriate planted and landscaped buffer from the developable area will be required.

15.144 The site has a measurable level of flood risk and will be subject to the Sequential Test and possibly the Exception Test. If passed, sites at the higher end of the range will require site layouts to avoid areas of flood risk.

HPBA10 Land rear of Park Avenue



Site Address	Land rear of Park Avenue, Potters Bar (Land East of Southgate Road, Potters Bar)		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	17.4 ha	Urban Extension	Public
Current Uses	Agricultural land.		
How Site was Identified	Call for Sites process.		
Planning Designations and Site Considerations	The M25 adjoins the southern site boundary, giving rise to considerations around noise and air quality mitigation. There are vehicular access limitations to the access from Southgate Road due to proximity to M25 Junction 24. There is a small but measurable level of surface water flood risk to the north-eastern corner of the site. The site is subject to some surface water flood risk, particularly around the entrance to the site off Park Avenue. The site is within the Sand & Gravel and Drinking Water Safeguard Areas.		
Planning Status	No relevant planning history		

Indicative Development Capacity	260 dwellings

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A **Delivering a better future for Hertsmere**
E **Meet the Borough's housing needs by delivering homes for everyone**
F **Delivering affordable homes**
G **Securing a greener Borough**
H **Responding to the climate emergency**
K **Securing the timely delivery of infrastructure**
J **Healthy and safe communities**

Non-strategic policy

Site Allocation

15.145 The site allocation proposes an urban extension to Potters Bar that will deliver at least 260 homes during the plan-period. It will be comprised of comprehensive mixed-use developments with compatible residential, community and open space uses. It will deliver new walkable neighbourhoods with an integrated network of walking and cycling routes, including improved active travel networks that access Potters Bar High Street District Centre. The delivery of the urban extension will also secure other social and community infrastructure improvements, including proportionate investment in local public transport; public realm and environmental enhancements. The latter is anticipated to include new public open space and improvements for nature in line with the aims of the LNRS.

15.146 The Borough-wide Green Belt Assessment Stage 1 confirms the site's grey belt status. It concludes that the site (which fully-comprises sub-area PB-05) forms only a small part of the gap between Potters Bar and Greater London and could be developed without the loss of visual separation between the two built-up areas. Whilst the M25 forms a strong defensible boundary to the site's southern edge, the trees and planting that demarcate its eastern edge must be reinforced to ensure that the boundary remains as such in perpetuity.

Opportunities

15.147 The delivery of this urban extension provides an opportunity to create a new successful and sustainable community located to the south of Potters Bar, within walking distance of the High Street District Centre. It will be a walkable place, with a diverse mix of homes, including genuinely affordable homes that are supported by compatible education, health, community, leisure and recreation facilities. The new neighbourhood will respond positively to the challenges of balancing growth

and securing a thriving economy with minimising the impacts of the climate emergency. These new uses will be linked by a comprehensive high-quality green and blue infrastructure network

Development Requirements

15.148 Development must be planned and delivered comprehensively in accordance with Policy DM3. A site-wide masterplan must be prepared demonstrating how the urban redevelopment will deliver a mix of new homes and main town centre uses in accordance with the site allocation.

15.149 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. It is anticipated that high intensity mixed-use could be delivered as part of the new community's local centre and other appropriate locations across the site where higher density homes may be appropriate.

15.150 The masterplan must consider the site and its surroundings, including the adjoining motorway, and the element of flood risk on the site. These factors will inform the siting and massing of built form, open space and important views.

15.151 The site has a measurable level of flood risk and will be subject to the Sequential Test and possibly the Exception Test. If passed, sites at the higher end of the range will require site layouts to avoid areas of flood risk.

15.152 The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Potters Bar. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of Potters Bar's regeneration.

15.153 The site will deliver space for nature, including the provision of SuDS, Biodiversity Net Gain and urban greening in line with the relevant policies in Chapter 10 Green and Blue Infrastructure.

Development Guidelines

15.154 The delivery of the urban extension must take account of the small but measurable surface water flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

15.155 The delivery of the urban extension will provide new and improved public realm and suitable open space in accordance with a site-wide public realm strategy. This must incorporate, retain and enhance the row of mature field-edge trees located on the site's southeastern boundary, which, along with the M25, will form a defensible Green Belt boundary in the long term. The public realm strategy will also secure the retention of existing tree and hedge cover along the southeastern edge of the site.

15.156 Development must deliver biodiversity net gain (BNG) and enhancement of the habitat network in line with the actions identified in the Hertfordshire Local Nature Recovery Strategy (LNRS). Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain incorporate the relevant actions in the LNRS.

15.157 Development adjoining the M25 Motorway should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with National Highways.

15.158 Vehicular access from Southgate Road requires a junction that will not impact on the safety of the existing Junction 24 of the M25. This could include access from Park Avenue to provide a secondary access point that it is outside of the area affected by flood risk to the far eastern edge of the site.

15.159 The delivery of the site provides an opportunity to enhance the walking and cycling provision along Southgate Road and Barnet Road/the High Street, in line with the LCWIP.

HPBA11 Former Potters Bar Golf Course

Site Address	Former Potters Bar Golf Course, Darkes Lane, Potters Bar		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	41.2ha	Strategic Urban Extension	Private
Current Uses	Open land, previously used as a golf course. The former club house in use as a gym, and the car park is used for occasional markets.		
How Site was Identified	Call for Sites process		
Planning Designations and Site Considerations	The site is subject to a high level of flood risk; a watercourse runs through the site, and the functional floodplain (FZ 3b) intersects with the proposed vehicular access point onto Darkes Lane. The railway line adjoins the western boundary of the site and, Cranbourne Industrial Estate is located close to the site boundary on the other side of the railway line. An area Tree Preservation Order (TPO) applies to all trees on the site. There are several relevant heritage assets, including Listed Buildings and Darkes Lane West Conservation Area to the north-east, and locally listed structures on-site.		

Planning Status	Live planning application (at 21/09/2026): 26/0427/OUTEI. Outline planning application (with all matters reserved except access) for the phased erection of up to 550 residential dwellings including affordable housing and plots of self-build/custom build homes (Class C3); a community hub building and other community facilities (Class E); green and blue infrastructure; a primary vehicular access from Darkes Lane; a pedestrian and cycle access (and also serving as an emergency access) from Darkes Lane; pedestrian accesses via the Hertfordshire Way; service and utility structures including substations and demolition of the existing club house building and two dwellings. Not yet determined.
Indicative Development Capacity	550 dwellings

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A Delivering a better future for Hertsmere
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
K Securing the timely delivery of infrastructure
J Healthy and safe communities

Non-strategic policy

Site Allocation

15.160 The site allocation proposes a strategic urban extension to Potters Bar that will deliver at least 550 homes during the plan-period. It will comprise a sustainable new neighbourhood delivering a mix of dwelling sizes, tenures and types to include at least 40% of all new dwellings as genuinely affordable homes and a proportion of specialist supported and extra care housing, alongside an appropriate mix and quantity of compatible commercial, community and main town centre uses.

15.161 The development of the site provides an opportunity to deliver improvements for active travel, flood risk mitigation, and green and blue infrastructure including re-naturalising Potters Bar Brook watercourse. It will deliver new walkable neighbourhoods with an integrated network of walking and cycling routes, including improved active travel networks that access Darkes Lane Local Town Centre and the railway station, and have the potential to extend beyond to adjoining settlements and places, in particular Brookmans Park via the existing right of way alongside the railway line. The delivery of the strategic urban extension will also

secure other social and community infrastructure improvements, including reserve land for a primary school, and proportionate investment in local public transport; public realm and environmental enhancements. The latter is anticipated to include new public open space and improvements for nature in line with the aims of the LNRS.

15.162 The Borough-wide Green Belt Assessment Stage 2 further considers the site's contribution to the purposes of the Green Belt. It concludes that the site is classified as having provisional grey belt status. This is because of the presence of heritage assets across the site. The comprehensive development of the strategic urban extension must secure a defensible Green Belt Boundary to the site's northern edge to retain the visual separation between Potters Bar and Hatfield. In particular, the existing hedgerows that demarcate the northern edge of the site must be reinforced to ensure the boundary is strong and defensible in perpetuity.

Opportunities

15.163 The delivery of the strategic urban extension provides an opportunity to create a new successful and sustainable community located to the north of Potters Bar. It will be a walkable place, with a diverse mix of homes, including genuinely affordable homes that are supported by compatible education, health, community, leisure and recreation facilities. The new neighbourhood will respond positively to the challenges of balancing growth and securing a thriving economy with minimising the impacts of the climate emergency and managing and mitigating flood risk on the site. These new uses will be linked by a comprehensive high-quality green and blue infrastructure network centred around the re-naturalisation of the Potters Bar Brook Main River that runs through the site.

Development Requirements

15.164 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

15.165 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. It is anticipated that higher intensity mixed-use development could be delivered as part of the new community's local centre and other appropriate locations across the site where higher density homes may be appropriate. The design and layout of the development should reflect and reinforce the hierarchy of streets and open/green spaces, with a differentiation in design, density, scale and massing, including a range of plot sizes and building heights, with reference to the existing character of Potters Bar.

15.166 As a strategic urban extension, development proposal must be prepared in accordance with Policy HQD1(K) and must be supported by a site-wide Design Code prepared in alignment with the National Model Design Code, or successor

guidance. The site-specific design code will be coordinated with the masterplan required by Policy DM3.

15.167 The masterplan must consider the site and its surroundings, including the adjoining motorway, surface water flood risk, the relationship to Darkes Lane Local Town Centre, and the significance of nearby heritage assets especially the Grade II Listed Duty Stone and Darkes Lane West Conservation Area. These factors will inform the siting and massing of built form, open space and important views.

15.168 Development must be phased to ensure the timely provision of the infrastructure necessary to support the strategic urban extension. The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Potters Bar. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of Potters Bar's regeneration.

15.169 Developers will engage with Hertfordshire County Council Highways (or successor highway authority) at an early stage in the master planning process to gain an understanding of the cumulative traffic impacts of growth and how it can be managed. This work should demonstrably set out a sustainable transport approach to the strategic urban extension, in respect of connectivity and mitigation of highway impacts. It is anticipated that mitigation will include necessary off-site works to rationalise the local highway, reduce severance and enhance sustainable connectivity to services and facilities. The development must be fully integrated with the surrounding street network and facilitate access and permeability through into Potters Bar Darkes Lane Local Town Centre and the station, with enhanced walking and cycle connections between public spaces and surrounding neighbourhoods.

15.170 Delivery of the strategic urban extension will secure a natural landscaped boundary that is informed by the development's master plan and landscape plan. Specifically, development will provide a defensible Green Belt Boundary to the site's northern and western edges to retain the visual separation between Potters Bar and Hatfield. The railway line constitutes a strong and permanent Green Belt boundary to the west of the site, and the northern edge of the site is formed of existing trees and hedgerows which can be reinforced with additional native planting to ensure the boundary is visually strong and defensible in perpetuity.

15.171 Developers will work collaboratively with the education authority (Hertfordshire County Council) to determine the requirements for school place provision arising from the delivery of the strategic urban extension. This includes any on-site provision that arises from the strategic urban extension. The developers will work with the education authority to ensure that any agreed on-site provision is delivered in a timely manner to ensure that Potters Bar remains a sustainable and walkable town.

15.172 The delivery of the strategic urban extension must take account of the flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk

attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk, especially around the main access point to the site from Darkes Lane.

15.173 Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied. Developers must work positively with the Council and Thames Water to identify any appropriate design-focussed avoidance or mitigation measures relating to the neighbouring Blackbirds Farm Sewage Works.

15.174 Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS. This will include the retention and integration of existing on-site TPOs.

Development Guidelines

15.175 Development adjoining the railway line should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with Network Rail.

15.176 Development must respond positively to heritage assets including the Grade II listed Duty Stone on the administrative boundary to the northwest of the former Golf Course, and listed buildings at 23 The Avenue and Tiverton, Darkes Lane as well as the Darkes Lane West Conservation Area which directly abuts the north-eastern site boundary. Proposals must address impacts on the significance of these heritage assets and their setting, including the impact on views from within the Conservation Area. Focus should be given to enhancing and revealing the setting and significance of the Duty Stone, which is currently visible from the site, but is not readily accessible being hidden on Network Rail land close to the railway line.

15.177 Applicants will undertake early engagement and work collaboratively with Hertfordshire County Council to explore, identify and agree the potential for the delivery of a new specialised residential provision. This may include the on-site delivery of new provision for children; older persons (to potentially include extra care accommodation); and adults with learning, autism and physical disabilities.

15.178 High-quality public spaces should be created within and around the development which are addressed by positive and/or active building frontages. These should incorporate residential amenity space and play provision that addresses local shortfalls and is accessible to all, and appropriate planting for biodiversity benefit and urban greening as set out in Chapter 10 Green and Blue Infrastructure.

15.179 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

15.180 Developers will be required to carry out necessary geophysical survey and archaeological evaluation to reveal the archaeological potential of the site.

HPBA12 Dove Lane

Site Address	Land north-east of Dove Lane, Potters Bar		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	5.4 ha	Urban Extension	Public
Current Uses	Open agricultural land and woodland.		
How Site was Identified	Call for Sites process.		
Planning Designations and Site Considerations	The site adjoins the M25 motorway along its southern boundary. There is a wooded area within southern part of the site. There are TPO trees located on the rear boundary of gardens in Powis Court.		
Planning Status	26/0619/FUL. Redevelopment of the site for the erection of 112 dwellings, site access, roads, parking, open space, SuDs and associated infrastructure. Submitted May 2026. Awaiting Decision.		
Indicative Development Capacity	112 dwellings.		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-strategic policy

Site Allocation

15.181 The site allocation proposes an urban extension to Potters Bar that will deliver at least 112 homes during the plan period. It is anticipated that it will deliver medium-density, low-rise residential dwellings, including new genuinely affordable homes. The development of the site provides an opportunity to deliver on-site connectivity improvements for active travel, and enhancements to benefit biodiversity.

15.182 The Borough-wide Green Belt Assessment Stage 2 concludes that the site is classified as grey belt. It concludes that the site forms only a small part of the gap between Potters Bar and Greater London and could be developed without the loss of visual separation between the two built-up areas. The site is contained within existing build form at the edge of the urban area and the M25, both of which form strong and defensible boundaries in perpetuity.

Opportunities

15.183 The delivery this urban extension provides an opportunity to create a new successful and sustainable community located to the south of Potters Bar that will be within walking distance of Potters Bar High Street District Centre. It will be a walkable place, with a diverse mix of homes, including genuinely affordable homes that are supported by compatible community, leisure and recreation facilities. The new neighbourhood will respond positively to the challenges of balancing growth and securing a thriving economy with minimising the impacts of the climate emergency. These new uses will be linked by a comprehensive high-quality green and blue infrastructure network.

Development Requirements

15.184 Development must be planned and delivered comprehensively in accordance with Policy DM3. A site-wide masterplan must be prepared demonstrating how the urban redevelopment will deliver a mix of new homes and main town centre uses in accordance with the site allocation.

15.185 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high intensity mixed-use development that provides positive frontages that address key routes and public spaces. This will incorporate high-quality and high-density homes, active ground floor frontages in line with the Retail and Town Centre policies and incorporate new and improved public realm and open space.

15.186 The masterplan must consider the site and its surroundings, including the adjoining motorway and surface water flood risk. These factors will inform the siting and massing of built form, open space and important views.

15.187 Access will be taken from Dove Lane with secondary pedestrian access to be from Dove Lane, Hill Crest and Byers Close. Development should include the provision of a cycle/pedestrian route from the site to Barnet Road via Hill Crest and Hill Rise and facilitate a connection to National Cycle Route 12. Layout of development needs to respond to noise sensitivities of the site, with appropriate noise mitigation measures proposed, to include landscaping, ventilation and M25 acoustic barrier. Existing woodland to be retained.

15.188 The delivery of the urban extension will provide new and improved public realm and suitable open space in accordance with a site-wide public realm strategy. This will establish a connected, multi-functional green and blue infrastructure network incorporating strategic open space, parks, sport and play provision, ecological corridors, woodland, hedgerows, ponds, sustainable drainage and public rights of way. The delivery of the strategic urban extension must protect and seek to enhance green infrastructure, including the existing Local Wildlife Site, and deliver Biodiversity Net Gain in accordance with the relevant Local Plan policies and legislation. This includes delivery of new strategic open space provision that addresses local shortfalls in natural and semi-natural greenspace and in smaller, more local children's play provision (LAPs and LEAPs), and a space for allotments to serve the new population.

15.189 Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS. This will include the retention and integration of existing on-site TPOs and Local Wildlife Site.

Development Guidelines

15.190 Development should provide for complementary and distinctive character areas across the urban extension that link in with and complement the masterplan across this site and existing neighbourhoods to the north. The design and layout of the development should reflect and reinforce the hierarchy of streets and open/green spaces, with a differentiation in design, density, scale and massing, including a range of plot sizes and building heights, with reference to the existing character of Potters Bar.

15.191 The delivery of the urban extension must take account of the small but measurable surface water flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

15.192 High-quality public spaces should be created within and around the development which are addressed by positive and/or active building frontages. These should incorporate residential amenity space and play provision that addresses local shortfalls and is accessible to all, and appropriate planting for biodiversity benefit and urban greening as set out in Chapter 10 Green and Blue Infrastructure. This must incorporate, retain and enhance the row of mature field-edge trees located on the site's southeastern boundary, which, along with the M25, will form a defensible Green Belt boundary in the long term. The public realm strategy will also secure the retention of existing tree and hedge cover along the southeastern edge of the site.

15.193 Developers will engage with Hertfordshire County Council Highways (or successor highway authority) at an early stage in the master planning process to gain an understanding of the cumulative traffic impacts of growth and how it can be managed. This work should demonstrably set out a sustainable transport approach to the strategic urban extension, in respect of connectivity and mitigation of highway impacts. It is anticipated that mitigation will include necessary off-site works to rationalise the local highway, reduce severance and enhance sustainable connectivity to services and facilities. The development must be fully integrated with the surrounding street network to improve access and permeability through Potters Bar High Street District Centre, with enhanced walking and cycle connections between public spaces and surrounding neighbourhoods.

15.194 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

15.195 Development adjoining the M25 Motorway should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with National Highways.

15.196 Developers will be required to carry out necessary geophysical survey and archaeological evaluation to reveal the archaeological potential of the site.

HPBA13 Land Southeast of Junction 24 Strategic Industrial Employment Site

Site Address	Land Southeast of Junction 24 (M25), North of The Ridgeway, Potters Bar		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	6ha within Hertsmere, cross boundary landholding is approximately 11 ha in total	Urban extension (employment)	Public
Current Uses	Open agricultural land.		
How Site was Identified	Call for Sites and HELAA process (reference CFS-2025-027 / HEL814).		
Planning Designations and Site Considerations	Metropolitan Green Belt, good-quality agricultural land, Hertfordshire LNRS Area that Could become of Particular Importance for Biodiversity (ACIB); air-quality constraint identified through the HELAA; Conservation Area considerations; limited areas of surface-water flood risk; high landscape sensitivity to large-scale commercial, industrial and distribution development; immediate relationship with M25 Junction 24; nearby residential, agricultural		

	and education uses; and the cross-boundary relationship with land within the London Borough of Enfield.
Planning Status	No relevant planning permission identified.
Indicative Development Capacity	The strategic industrial development will deliver c. 30,000 sqm employment floorspace comprising industrial, storage and distribution and other compatible strategic employment uses.

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

B A Thriving local economy
D Support a well-educated and skilled population
H Responding to the climate emergency
K Securing the timely delivery of infrastructure
J Healthy and safe communities

Non-strategic policy

Site Allocation

15.197 Land Southeast of Junction 24 (M25) is allocated as a Strategic Industrial Employment Site for approximately 30,000 sqm of employment floorspace, comprising industrial, storage and distribution and other compatible strategic employment uses. This may include the provision of a data-centre development where its infrastructure, environmental and operational requirements can be satisfactorily accommodated. The site allocation is one half of a larger site that extends eastwards beyond the Borough's administrative boundary into the adjoining London Borough of Enfield.

15.198 Development must make efficient use of the site while responding to its Green Belt, landscape and cross-boundary context. The site should be planned comprehensively in accordance with Policy DM3 where necessary to coordinate built development, access, servicing, utilities, landscape, drainage and phasing.

Opportunities

15.199 The site allocation's immediate proximity to Junction 24 of the M25 provides an opportunity to meet identified demand for strategic industrial employment uses which benefit from having direct access to the motorway and wider strategic road network.

15.200 The development of the site provides an opportunity to contribute towards Hertsmere's requirement for additional industrial, logistics and data-centre land, including forms of development which can be difficult to accommodate within

established urban employment areas because of their scale, servicing or infrastructure requirements.

15.201 The site allocation forms one half of a wider landholding that collectively provides an opportunity for the coordinated delivery of new industrial employment provision that meets needs in both Hertsmere and Enfield. The land located within Enfield has been identified and proposed for strategic industrial employment uses. Delivery of the site allocation provides an opportunity to secure integrated access, landscape, servicing and infrastructure. Developers will be strongly encouraged to work in partnership with both local planning authorities to comprehensively deliver the site allocation.

15.202 The existing rural landscape and southern site boundary provide an opportunity to establish a substantial landscape framework which screens and integrates development, strengthens the long-term Green Belt boundary and contributes to biodiversity enhancement and climate resilience.

Development Requirements

15.203 Development must provide approximately 30,000 sqm of strategic employment floorspace and maintain the site's primary employment function. An appropriate range of strategic industrial employment uses that could be classified under Classes E(g)(iii), B2, and B8 will be supported. These uses including data-centre development where they are demonstrably appropriate.

15.204 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how development will deliver strategic industrial employment uses that are in accordance with the site allocation. The master plan must cover both sites – inclusive of the development site located in the London Borough of Enfield. The master plan should ensure that the two sites share a coherent approach to access, internal movement, landscape, drainage and utilities.

15.205 The master plan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density industrial employment uses. The master plan will demonstrate how buildings, access, servicing, parking, utilities, drainage, landscape and green infrastructure will be coordinated across the site. Where development is phased, individual phases must not prejudice efficient development of the remainder of the allocation.

15.206 Developers must work in partnership with both local planning authorities in bringing he site allocation forward.

15.207 Development must be informed by a site-specific Landscape and Visual Impact Assessment. The location, height, scale and massing of buildings, external plant, yards and associated infrastructure must respond to the site's high sensitivity to large-scale employment development and minimise effects on surrounding countryside and sensitive receptors.

15.208 Development must protect and enhance the site's ecological network, including its identification as an LNRS ACIB, and deliver biodiversity net gain. Existing vegetation should be integrated with new habitat and structural landscaping to provide connected ecological corridors.

15.209 Development must establish a robust and enduring Green Belt boundary and deliver appropriate compensatory improvements to the environmental quality and accessibility of retained Green Belt land in accordance with national policy. A substantial structural landscape framework must be established around the site, with particular attention to the southern boundary and the interface with retained Green Belt. Existing boundary vegetation should be retained and strengthened where practicable and new structural planting should be capable of providing effective long-term screening and habitat connectivity.

15.210 Development must be supported by a transport assessment and travel plan addressing access, servicing and the effects of commercial and HGV traffic on Junction 24 of the M25 and the surrounding highway network. Safe walking and cycling access and realistic opportunities for sustainable employee travel must be incorporated into the scheme, including improvements for active travel along The Ridgeway, and improved public transport links with Potters Bar and Hadley Wood stations. Developers should demonstrate that they have undertaken engagement with National Highways.

15.211 Noise and air-quality effects associated with the M25, and the operation of employment uses must inform the layout and design. Proposals must demonstrate that acceptable conditions can be achieved for employees and nearby sensitive receptors, including dwellings on The Ridgeway, and that development will not result in unacceptable effects on local air quality. The Agent of Change principle will be applied.

15.212 Surface-water drainage must be managed through a site-wide sustainable drainage strategy integrated with landscape and biodiversity measures. Development must not increase flood risk on or off the site. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

15.213 Development must demonstrate that power, digital, water and wastewater infrastructure required by the proposed uses can be provided in step with development. Where a data centre or other infrastructure-intensive use is proposed, its energy and water requirements and any necessary network reinforcement must be identified and demonstrated to be deliverable at an early stage. Developers must work with relevant infrastructure providers to ensure that these requirements can be met within the constraints of their network capacities.

15.214 Development must consider possible impacts on the historic environment, including Conservation Area and other heritage considerations identified in the evidence base, and must demonstrate that the scale, siting, access and landscape

treatment of development conserve the significance and setting of affected heritage assets.

15.215 Development should provide opportunities for local employment, apprenticeships, training and skills development in accordance with relevant Local Plan policies.

Development Guidance

15.216 Building elevations and roofs should use materials, colours and finishes which reduce the visual prominence of large building forms. The height and mass of buildings should decrease towards the southern and western site boundaries. Loading areas, external storage, plant and service yards should be located and screened so that they do not dominate sensitive boundaries or principal views.

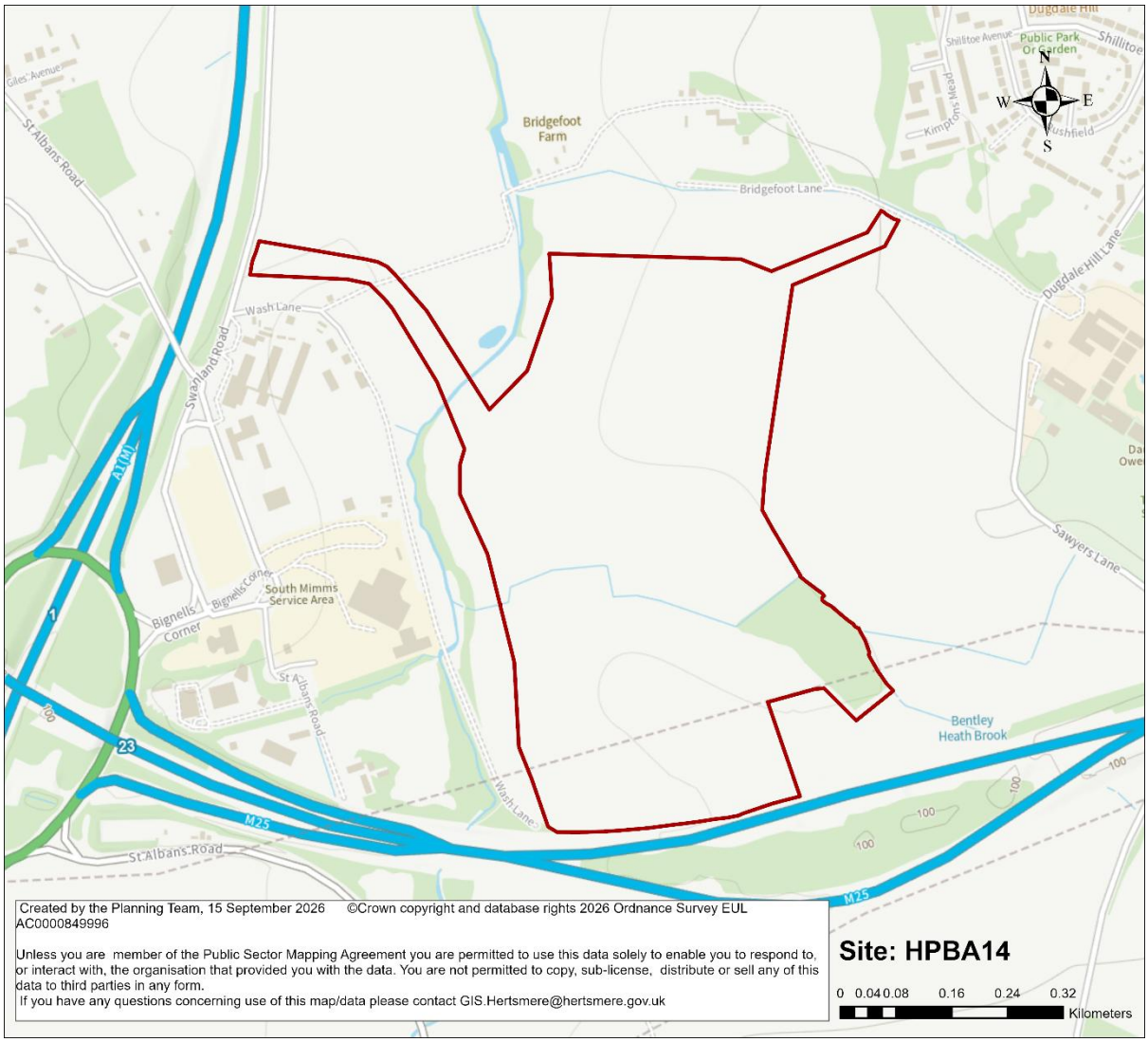
15.217 Buildings should be designed for long-term adaptability and efficient use of land. In the case that data-centre development is proposed, opportunities for low-carbon energy, heat recovery and efficient use of energy and water should be considered as part of the site-wide infrastructure strategy.

15.218 External lighting should be designed as part of the overall landscape and ecological strategy for the wider site. This should seek to minimise unnecessary light spill towards surrounding countryside, habitats and nearby sensitive uses.

15.219 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

15.220 Development adjoining the M25 Motorway should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with National Highways.

HPBA14 St Albans Road Strategic Industrial Employment Site



Site Address	Land east of South Mimms Services, St Albans Road, South Mimms		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	35.8 ha	Strategic urban extension (employment)	Private
Current Uses	Agricultural land that includes areas of woodland, hedgerows, watercourses and associated rural landscape features.		
How Site was Identified	Call for Sites and HELAA process.		
Planning Designations and Site Considerations	There is a wooded area within the site; and the wider site is covered by an Area TPO. It adjoins an existing Key Employment Area at South Mimms Services. There is a Local Wildlife Site located to the west of the site boundary at Wash Lane Common. There is medium and high fluvial flood risk to the west of the site (Bentleyheath Brook cuts across the site and joins Mimmshall Brook to the west). There are public rights of way cross the site (footpaths). The site falls within a Sand and Gravel Safeguard Area; a Drinking Water Safeguard Area; and the London Luton Airport Safeguarding		

	Zone. Access onto the site is close to South Mimms Conservation Area. There are overhead pylons and gas pipeline located within the site.
Planning Status	**26/1187/REM.** Application for the approval of reserved matters relating to site-wide advanced infrastructure and enabling works (Phase 1a), including a permanent vehicular access off Swanland Road which will facilitate a temporary access during construction, a permanent emergency vehicle access off Bridgefoot Lane, pedestrian and cycle routes, internal roads, car and cycle parking, hard and soft landscaping, on-site water attenuation, temporary and permanent campus bridges, utilities and services, a security gatehouse, substations, ancillary buildings and service yards, the creation of development platforms to support the phased data centre development, and all associated infrastructure pursuant to outline planning permission reference 24/1152/OUTEI. Received August 2026. Awaiting decision (at 09/09/2026). **24/1152/OUTEI.** Outline planning permission with all matters reserved (access, appearance, landscaping, layout and scale) for phased development of Data Centre (Use Class B8) comprising of up to 187,000 sqm GEA. Development to include ancillary offices, internal and external plant and equipment (including flues) and substation (external plant excluded from maximum floorspace). Provision of car parking; servicing areas; associated services (including waste, refuse, cycle storage, lighting); laying out building, routes and open spaces within the development. Development to include all associated works and operations including but not limited to: demolition; earthworks; provision of attenuation infrastructure, engineering operations. This application is for a phased development, each phase being an independent act of development, capable of coming forward in distinct and separable phases and/or plots in a severable way. Development shall be in accordance with the approved development parameters schedule and plans. Permission granted Feb 2025.
Indicative Development Capacity	**Employment floorspace** 187,000 sqm B8 storage and distribution use.

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

B A Thriving local economy
D Support a well-educated and skilled population
H Responding to the climate emergency
K Securing the timely delivery of infrastructure
J Healthy and safe communities

Non-strategic policy

Existing Planning Consents

15.221 Planning permission 24/1152/OUTEI provides for the phased development of a data centre within Use Class B8 comprising up to 187,000 sqm GEA, together with

ancillary offices, internal and external plant and equipment, a substation, parking, servicing, landscaping, open space, attenuation infrastructure and associated works.

Site Allocation

15.222 Land East of South Mimms Services is allocated as a Strategic Industrial Employment Site for up to 187,000 sqm of data-centre floorspace within Use Class B8, together with ancillary offices and the energy, digital, water, transport, landscape and other infrastructure necessary to support its operation. The site allocation will be delivered during the plan period.

15.223 The allocation forms an extension to the adjoining South Mimms Services employment area and should be designated as part of the Key Employment Area in accordance with Policy EC2.

15.224 Development should be delivered broadly in accordance with the approved development parameters established by 24/1152/OUTEI. Materially different redevelopment or re-planning of the site must demonstrate an equivalent or improved employment, landscape, ecological, transport, infrastructure and sustainability outcome and, where appropriate, comply with Policy DM3.

Opportunities

15.225 The allocation provides an opportunity to deliver strategic digital infrastructure and significant investment in a location with direct access to the M25 and A1(M) and proximity to existing power and digital infrastructure.

15.226 Development provides an opportunity to consolidate South Mimms as a strategic employment location and create stronger physical and functional connections between the new campus and the existing motorway-services employment area.

15.227 The scale of the site and the approved development framework provide an opportunity to establish a substantial landscape and green and blue infrastructure network, incorporating watercourses, flood-management areas, habitat enhancement, woodland and structural planting.

15.228 Development also provides opportunities to improve public rights of way and employee walking and cycling routes and to provide skills, training and employment opportunities associated with construction, engineering, digital technology and operation of the data centre.

15.229 The scale of the development provides an opportunity to deliver high standards of energy and resource efficiency and to investigate opportunities for district heating or beneficial use of waste heat where technically and economically feasible.

Development Requirements

15.230 Development must be delivered as a comprehensively planned and phased data-centre campus. Individual phases must accord with the approved site-wide development parameters and must not prejudice the delivery of access, utilities,

drainage, landscape, ecological mitigation or other infrastructure necessary to support later phases.

15.231 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how development will deliver strategic industrial employment uses that are in accordance with the site allocation.

15.232 The master plan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density industrial employment uses. The master plan will demonstrate how buildings, access, servicing, parking, utilities, drainage, landscape and green infrastructure will be coordinated across the site. Where development is phased, individual phases must not prejudice efficient development of the remainder of the allocation.

15.233 The master plan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density industrial employment uses. The master plan will demonstrate how access, internal roads, servicing, construction traffic and emergency access will be coordinated across the site. The development must deliver the highway works and sustainable-transport measures required through the outline permission and subsequent approvals, including safe pedestrian and cycle routes and improvements to the public-rights-of-way network.

15.234 Development proposals must demonstrate that sufficient power and digital infrastructure can be provided for each phase and for the campus. Necessary improvements to substations, network reinforcement and other power infrastructure must be incorporated into the design and landscape framework and delivered without prejudicing later development.

15.235 Development must demonstrate that adequate water supply, wastewater capacity, firefighting provision and drainage infrastructure can be provided in step with each phase. Developers must work with relevant infrastructure providers to ensure that these requirements can be met within the constraints of their network capacities.

15.236 Development must be informed by a site-specific Landscape and Visual Impact Assessment. The location, height, scale and massing of buildings, external plant, yards and associated infrastructure must respond to the site's high sensitivity to large-scale employment development and minimise effects on surrounding countryside and sensitive receptors.

15.237 Development must protect and enhance the site's ecological network, including its identification as an LNRS ACIB, and deliver biodiversity net gain. Existing vegetation should be integrated with new habitat and structural landscaping to provide connected ecological corridors. Biodiversity net gain and the long-term management of retained and created habitat must be integrated with the landscape, drainage and open-space strategy.

15.238 Mimmshall Brook, Bentleyheath Brook and other watercourses, together with areas of fluvial and surface-water flood risk, must inform the layout and phasing of the development. Appropriate watercourse buffers, flood-management measures and multifunctional sustainable drainage must be incorporated into the site-wide green and blue infrastructure network. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

15.239 Development must establish a robust and enduring Green Belt boundary and deliver appropriate compensatory improvements to the environmental quality and accessibility of retained Green Belt land in accordance with national policy. A substantial structural landscape framework must be established around the site, with particular attention to the southern boundary and the interface with retained Green Belt. Existing boundary vegetation should be retained and strengthened where practicable and new structural planting should be capable of providing effective long-term screening and habitat connectivity.

15.240 Development must conserve the significance and setting of affected heritage assets, including Grade II listed Bridgefoot Farmhouse and other identified assets, and respond sensitively to the relationship between site access and South Mimms Conservation Area.

15.241 Existing overhead electricity infrastructure, gas infrastructure and associated easements and safety requirements must be incorporated into the site-wide layout and must not be compromised by individual development phases. Developers should engage and work in partnership with relevant power utility providers to ensure that the delivery of the site allocations does not harm their operational requirements of network infrastructure.

15.242 Development must meet high standards of energy and resource efficiency and be supported by the sustainability, whole-life-carbon and energy information required by the outline permission and relevant Local Plan policies. Opportunities for district heating and beneficial utilisation of waste heat should be investigated.

15.243 Development should deliver local employment, apprenticeships, training and skills opportunities, including opportunities associated with construction, engineering, digital infrastructure and operation of the completed campus.

Development Guidelines

15.244 Building elevations and roofs should use materials, colours and finishes which reduce the visual prominence of large building forms. The height and mass of buildings should decrease towards the southern and western site boundaries. Loading areas, external storage, plant and service yards should be located and screened so that they do not dominate sensitive boundaries or principal views.

15.245 Buildings should be designed for long-term adaptability and efficient use of land. In the case that data-centre development is proposed, opportunities for low-carbon

energy, heat recovery and efficient use of energy and water should be considered as part of the site-wide infrastructure strategy.

15.246 External lighting should be designed as part of the overall landscape and ecological strategy for the wider site. This should seek to minimise unnecessary light spill towards surrounding countryside, habitats and nearby sensitive uses.

15.247 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

15.248 Development adjoining the M25 Motorway should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with National Highways.

Bushey Area

Chapter 16: Bushey Area

Section

Context and Character

Vision

Key Spatial Objectives

HBUSA1 Bushey Local Centres

HBUSA2 Movement and Connectivity in Bushey

Context and Character

16.1 Bushey is one of Hertsmere's principal settlements and plays an important role within the Borough's settlement hierarchy as a well-established residential community with a strong local identity. Located in the south-west of the borough, close to Watford and the London Borough of Harrow, Bushey forms part of a wider urban area while retaining a distinctive character shaped by its historic village core, suburban neighbourhoods, landscape setting and surrounding countryside.

16.2 The settlement is made up of several distinct neighbourhoods, including Bushey Village, Bushey Heath and North Bushey. Each has its own identity, heritage, pattern of development and relationship with the surrounding landscape. Bushey Village contains a significant concentration of historic buildings and forms an important conservation area, reflecting the settlement's historic origins and its association with the Arts and Crafts movement. Bushey Heath performs an important local service role for surrounding residential areas, while North Bushey has strong functional relationships with Watford and adjoining communities.

16.3 It benefits from a strong local service offer and good connectivity with surrounding places. Bushey railway station lies to the west of the main settlement and provides access to London and other destinations. The settlement is also served by bus routes linking Bushey with Watford, Stanmore, Harrow and other nearby centres. These cross-boundary connections are important to Bushey's role as a sustainable settlement and should be recognised in planning for future growth, movement and infrastructure.

16.4 Bushey contains a network of local centres and parades that provide shops, cafés, services, community facilities and employment opportunities for residents. Bushey Village and Bushey Heath are the principal local centres. Bushey Village is the historic and cultural heart of the settlement, with a strong heritage character and links to Bushey Museum, Bushey Manor Field and nearby historic assets. Bushey Heath provides an important local convenience and service role for residents in the eastern part of the settlement. Other smaller local parades, including at Bushey Mill Lane and Bushey Hall Road, also support day-to-day needs.

16.5 The settlement is predominantly residential in character, with a mix of historic buildings, established suburban neighbourhoods, later twentieth-century housing and more recent residential development. Its housing areas vary in density, form and character, but the settlement is strongly defined by its green setting, trees, gardens, parks, recreation grounds and access to surrounding countryside.

16.6 Bushey's relationship with surrounding open land is a defining feature of its character. The countryside around Bushey helps maintain separation between Bushey Village, Bushey Heath, North Bushey, Watford and other nearby settlements. Semi-rural gaps, green edges, wooded areas, hedgerows and open views contribute to the identity of the settlement and the setting of heritage assets.

16.7 Bushey has an important role to play in accommodating growth within Hertsmere. However, its role differs from Borehamwood and Potters Bar. Although Bushey has a strong service offer, a sizeable population and good access to nearby rail services, its fragmented spatial structure, heritage sensitivities, local-centre scale, landscape setting and important settlement gaps mean that growth must be carefully managed.

16.8 The Local Plan therefore identifies Bushey as a location for managed and character-led growth. Development will focus primarily on suitable previously developed land, sensitive infill, small-site intensification, local-centre enhancement and limited opportunities for mixed-use development where these can be accommodated without harming the character, heritage, amenity or landscape setting of the settlement.

16.9 The purpose of the Bushey policies is to guide careful evolution rather than major transformation. Growth should support local centres, improve public realm, provide a wider choice of homes, enhance walking, cycling and public transport connections, support local shops and services, and protect the distinctive qualities that make Bushey a valued place to live.

16.10 Figure 16.1: Bushey Area identifies the geographic extent of the Bushey area for the purposes of this chapter. Figure 16.2: Bushey Spatial Framework identifies the broad spatial priorities for managed growth, local-centre enhancement, sustainable movement, green infrastructure and protection of local character. These maps should be read alongside the Policies Map, site allocation policies, and the policies in this chapter.

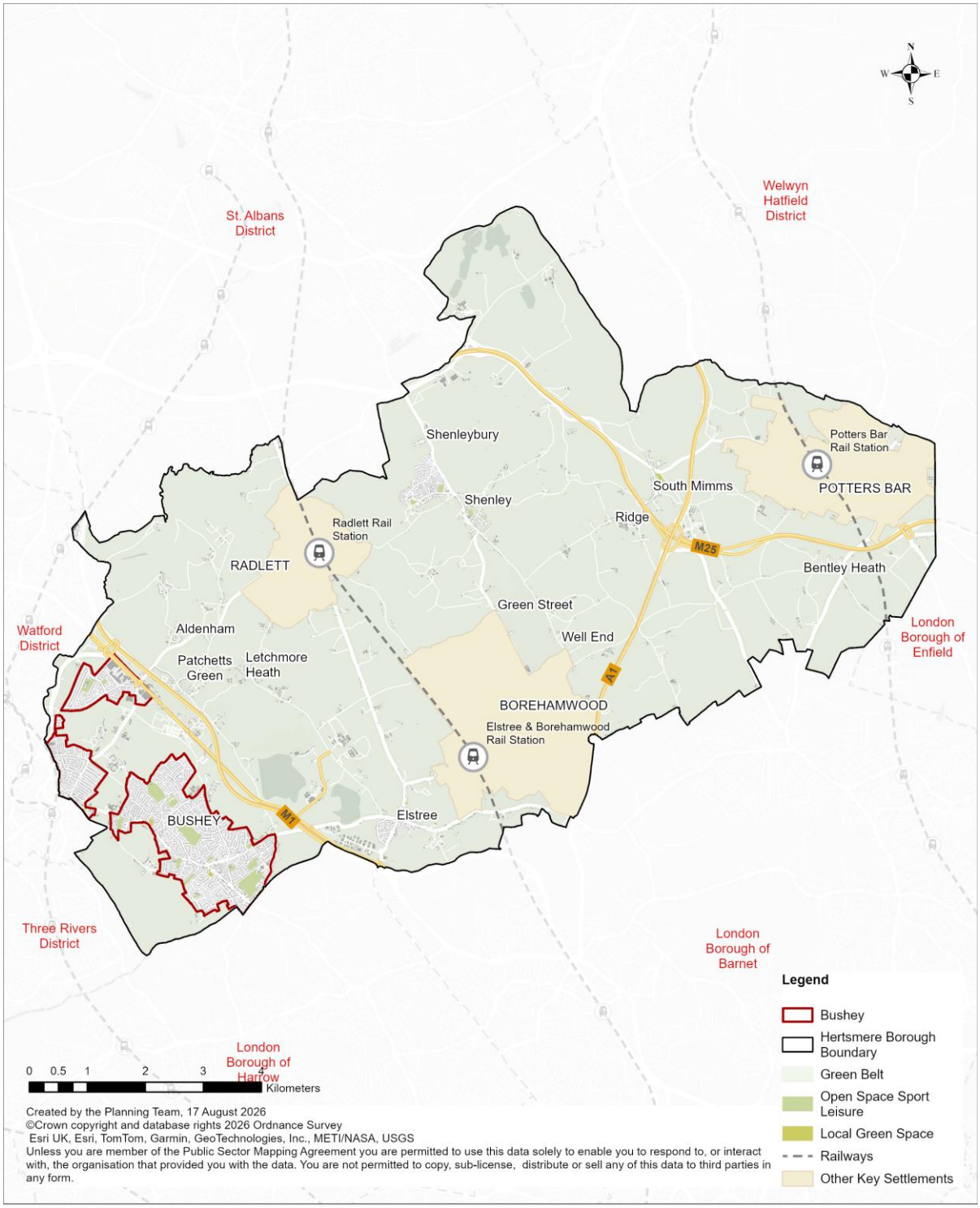


Figure 16.1: Bushey Area

Vision

16.11 Bushey will continue to evolve as a distinctive, connected and thriving settlement made up of Bushey Village, Bushey Heath, North Bushey and their surrounding neighbourhoods. Growth will be sensitive, pragmatic and character-led, supporting local housing needs, local centres, community life and access to nature while protecting the settlement's heritage, identity and green setting.

16.12 Bushey Village will be enhanced as the historic, cultural and social heart of the settlement. Its conservation area, Arts and Crafts character, independent businesses, community facilities and links to Bushey Museum, Bushey Manor Field and other heritage assets will be protected and strengthened through sensitive development, improved public realm, better shopfronts, wayfinding, traffic calming and pedestrian improvements.

16.13 Bushey Heath will be strengthened as an accessible local service and convenience centre. Improvements will focus on public realm, local shops and services, pedestrian safety, greening, accessibility, small-scale mixed-use development and better connections with surrounding residential areas.

16.14 Bushey's other local centres and parades will continue to provide important day-to-day services for residents. Their role will be supported through sensitive renewal, shopfront improvements, small-scale mixed-use development and better walking, cycling and public transport connections.

16.15 Bushey's local centres will remain compact, distinctive and community focused. Development will be expected to reinforce their vitality and viability without undermining their scale, character or local function. Sensitive mixed-use development, infill and redevelopment will be supported where it helps provide homes, local services, community facilities, workspace, public realm and improved accessibility.

16.16 Bushey will become easier and safer to move around. Development will help improve walking, cycling, wheeling and public transport links between Bushey Village, Bushey Heath, North Bushey, Bushey railway station, schools, parks, community facilities, open spaces and neighbouring centres including Watford, Stanmore, Harrow and South Oxhey.

16.17 Bushey's green and semi-rural character will be protected and enhanced. Growth will be planned to maintain the separate identities of its neighbourhoods, protect important gaps, strengthen green infrastructure, improve access to parks and countryside, and ensure that new development contributes positively to health, wellbeing, biodiversity and climate resilience.

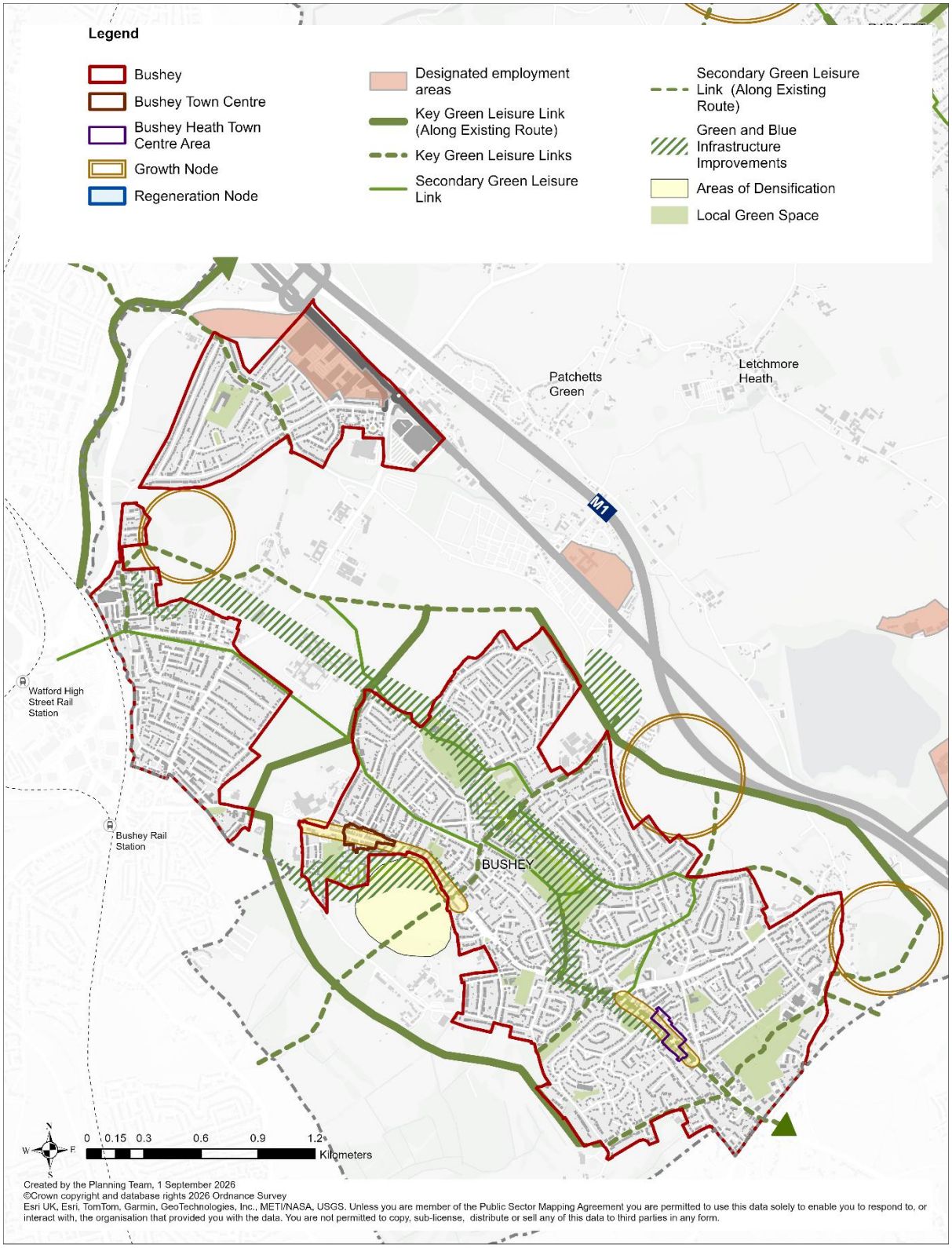


Figure 16.2: Bushey Spatial Strategy

Key Spatial Objectives

To achieve this vision, the key spatial objectives for Bushey are to:	
1	Support Bushey's role as one of Hertsmere's principal settlements while recognising that growth will be managed, character-led and more limited in scale than in the borough's main regeneration locations.
2	Direct growth to suitable previously developed land, infill sites, local-centre opportunities and other accessible locations where development can be accommodated without harming character, heritage, amenity, infrastructure capacity or landscape setting.
3	Strengthen Bushey Village and Bushey Heath as distinctive local centres serving day-to-day needs, local businesses, community life and social interaction.
4	Support the continued role of smaller local centres and parades, including at Bushey Mill Lane and Bushey Hall Road, where they provide local shops, services, employment and community functions.
5	Support sensitive mixed-use development in local centres where this provides homes, local services, workspace, community facilities, public realm improvements and active frontages.
6	Protect and enhance Bushey Village's historic, cultural and Arts and Crafts character, including its conservation area, heritage assets, shopfronts, public realm and links to Bushey Museum and Bushey Manor Field.
7	Improve the quality, accessibility and attractiveness of Bushey Heath as a local service centre, including through public realm, greening, crossings, shopfronts, signage and pedestrian improvements.
8	Provide a wider mix of homes, including affordable homes, smaller homes, family homes, homes for younger people, downsizer homes and accessible homes, in locations that are well related to services and public transport.
9	Improve walking, cycling, wheeling and public transport connections between Bushey Village, Bushey Heath, North Bushey, Bushey railway station, schools, parks, open spaces, community facilities and neighbouring centres.
10	Recognise and plan positively for Bushey's cross-boundary connections with Watford, Stanmore, Harrow, South Oxhey and nearby public transport hubs.
11	Reduce severance caused by main roads, difficult junctions and poor-quality pedestrian environments.
12	Protect the separate identities of Bushey Village, Bushey Heath and North Bushey, including important semi-rural gaps, landscape buffers, green edges and views.
13	Strengthen green infrastructure and sustainable travel networks, including a coherent green loop, links between parks and open spaces, improved access to the countryside and enhanced biodiversity corridors.

HBUSA1 Bushey Local Centres

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Bushey Village, Bushey Heath and other local centres and parades will be strengthened as attractive, accessible and distinctive places serving local communities.

B Development proposals within Bushey's local centres, as identified on Figure 16.3: Bushey's Local Centres, will be supported where they:

i. Maintain and enhance the vitality and viability of the centre;

ii. Provide an appropriate mix of local shops, services, cafés, food and drink uses, community facilities, workspace and residential uses;

iii. Support independent businesses and local services that meet day-to-day needs;

iv. Provide active ground floor frontages where appropriate;

v. Support sensitive mixed-use development, infill or redevelopment where this is compatible with local character, heritage, scale, amenity, access and infrastructure capacity;

vi. Provide new homes above, behind or alongside local centre uses where this would support centre vitality and provide an appropriate standard of residential amenity;

vii. Improve the appearance, quality and consistency of shopfronts, signage, lighting and building frontages;

viii. Improve public realm, including footways, seating, planting, lighting, wayfinding, crossings, cycle parking and accessibility;

ix. Protect and enhance heritage assets, conservation areas, locally important buildings, townscape features and local views;

x. Retain, modernise or re-provide community, cultural, health or social infrastructure where affected by development, unless it is demonstrated that the facility is no longer required;

xi. Support small-scale workspace and facilities for local businesses, micro-businesses and home-based workers where compatible with local character and amenity;

xii. Provide appropriate disabled parking, servicing and accessible access to shops, services and facilities; and

xiii. Contribute to infrastructure and public realm improvements identified in Figure 16.2: Bushey Spatial Framework, Figure 16.3: Bushey's Local Centres, the Infrastructure Delivery Plan and relevant site allocation policies.

C Within Bushey Village, development should reinforce its role as the historic, cultural and social heart of Bushey. Proposals should:

i. Preserve and enhance Bushey Village Conservation Area and the setting of listed and locally important buildings;

ii. Support heritage-led public realm improvements, including better links to Bushey Museum, Bushey Manor Field and other historic buildings and spaces;

iii. Support small-scale food and beverage, cultural, visitor, workspace and community uses where compatible with residential amenity;

iv. Improve pedestrian comfort, reduce traffic dominance and provide safe crossings where feasible;

v. Provide shopfronts, signage, materials, detailing, scale and frontage design that respond positively to Bushey's historic, vernacular and Arts and Crafts character; and

vi. Avoid development that would erode the historic grain, result in excessive building scale, harm heritage significance or undermine village character.

vii. Within Bushey Heath, development should support its role as a local service and convenience centre. Proposals should:

a. Improve the quality, consistency and accessibility of the public realm;

b. Support local shops, services, health, childcare, community and convenience uses;

c. Provide small-scale mixed-use development where this would strengthen local services and be compatible with character and amenity;

d. Improve walking, cycling, bus access and accessibility to surrounding neighbourhoods;

e. Provide pocket parks, greening, seating or small public spaces where opportunities arise; and

f. Improve wayfinding, lighting, crossings and accessibility for all users.

D Within other local centres and parades, including Bushey Mill Lane and Bushey Hall Road, development should:

i. Retain or re-provide local shops and services where these meet day-to-day needs;

ii. Support sensitive mixed-use redevelopment where this would improve the quality, accessibility and function of the centre;

iii. Provide active ground floor uses with residential or other appropriate uses above where feasible;

iv. Improve shopfronts, frontages, public realm, pedestrian safety and cycle parking; and

v. Respond positively to the scale, form, materials and character of the surrounding area.

E Residential development will be supported within Bushey's local centres where it forms part of a mixed-use approach that maintains or strengthens the role, function and vitality of the centre. Residential-only redevelopment of strategically important local centre sites will not be supported unless it is demonstrated that mixed-use development is not viable or is not necessary to support the role, function and vitality of the centre.

F Major development within or adjoining Bushey's local centres must be accompanied by a masterplan, design and access statement, or other proportionate material demonstrating how the proposal contributes to the managed evolution of Bushey and responds to the relevant maps in this chapter.

G Development that would result in inactive frontages, poor public realm, loss of important local services, excessive scale, harm to heritage significance, car-dominated layouts or isolated residential development that fails to contribute to local-centre vitality will not be supported.

Explanation

16.18 Policy HBUSA1 delivers Key Spatial Objectives 1 to 8 by supporting the careful enhancement of Bushey's local centres. Bushey Village and Bushey Heath have different but complementary roles. Bushey Village is the historic, cultural and social heart of the settlement, while Bushey Heath provides an important local service and convenience role for surrounding residential areas. Other local centres and parades, including Bushey Mill Lane and Bushey Hall Road, also provide important day-to-day services.

16.19 The policy supports sensitive mixed-use development, infill and redevelopment where this helps strengthen local centres, provide homes, support local businesses and improve public realm. This is not intended to promote large-scale regeneration or development that would undermine the scale and character of Bushey. Instead, growth should be used to support the managed evolution of local centres and to deliver practical improvements for existing and future residents.

16.20 Bushey Village's heritage and Arts and Crafts character are central to its identity. Development in and around the village centre must preserve and enhance heritage significance, improve shopfronts and frontages, support active uses and strengthen connections to Bushey Museum, Bushey Manor Field and nearby historic assets. Public realm, signage, street furniture and wayfinding should reinforce local distinctiveness.

16.21 Bushey Heath has opportunities to improve its role as a local service centre. Development should support day-to-day shops and services, improve accessibility, enhance public realm, introduce greening and provide small-scale mixed-use development where appropriate. The emphasis should be on local convenience, community infrastructure and public realm quality rather than major redevelopment.

16.22 Figure 16.2: Bushey Spatial Framework identifies the broad spatial priorities for local-centre enhancement and managed growth. Figure 16.3: Bushey's Local Centres identifies the local centres and parades to which Policy HBUSA1 applies. These maps should be read alongside the Policies Map, and site allocation policies.

16.23 Where development affects a strategically important local centre site, applicants should demonstrate that the proposal will support the role, function and vitality of the centre. Residential development will be supported where it contributes to mixed-use vitality, but residential-only schemes will not be appropriate where they would result in the loss of important local services or undermine local-centre function.

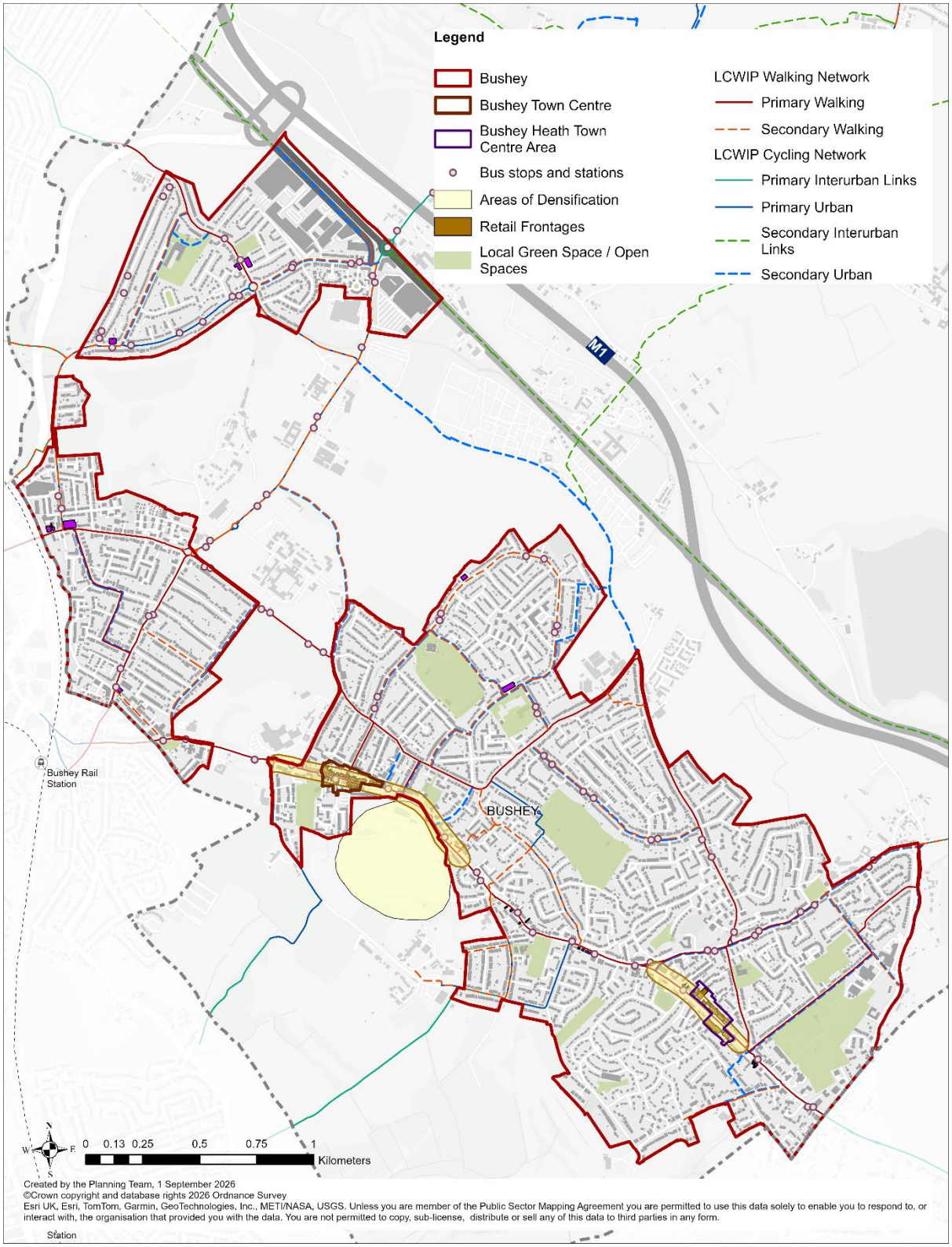


Figure 16.3: Bushey's Local Centres

HBUSA2 Movement and Connectivity in Bushey

Strategic Objectives

A Delivering a better future for Hertsmere
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Development in Bushey must contribute to safer, more accessible and more sustainable movement within the settlement and to neighbouring centres.

B Development proposals will be expected to:

i. Prioritise walking, cycling, wheeling and public transport in accordance with the transport user hierarchy;

ii. Improve connections between Bushey Village, Bushey Heath, North Bushey, local schools, parks, community facilities and open spaces;

iii. Improve walking, cycling and public transport connections to Bushey railway station and other nearby public transport hubs, including where these lie outside the borough boundary;

iv. Support safe, legible and accessible routes to Watford, Stanmore, Harrow, South Oxhey and other neighbouring communities where relevant;

v. Reduce severance caused by main roads and difficult junctions through improved crossings, continuous footways, traffic calming, junction improvements and inclusive design;

vi. Improve pedestrian and cycle access to local centres, schools, health facilities, recreation grounds, parks, countryside routes and Public Rights of Way;

vii. Support a coherent green active travel network, including routes that connect parks, open spaces, green corridors and neighbourhoods;

viii. Support improved links along and across London Road, High Road, Sparrows Herne, Little Bushey Lane and other key routes identified in Figure 16.2: Bushey Spatial Framework and Figure 16.4: Sustainable Travel Networks and Opportunities Across Bushey;

ix. Improve the quality, accessibility and safety of pedestrian routes, including through better surfacing, lighting, visibility, seating, wayfinding and maintenance;

x. Provide secure and accessible cycle parking in local centres, residential developments, community facilities and other key destinations;

xi. Support improved bus stops, real-time information, shelters, seating and service reliability where required to mitigate development impacts;

xii. Manage parking, servicing, deliveries and construction impacts so that they do not undermine pedestrian safety, public realm quality or local-centre vitality;

xiii. Provide appropriate disabled parking and accessible drop-off arrangements in local centres and close to key facilities;

xiv. Support shared mobility, car clubs, cycle hire and other low-carbon transport measures where appropriate;

xv. Contribute to transport infrastructure and mitigation measures identified through the Infrastructure Delivery Plan, Transport Assessment, Local Cycling and Walking Infrastructure Plan, site allocation policies and other relevant evidence; and

xvi. Demonstrate how movement, access, public realm and active travel measures respond, where relevant and proportionate, to the routes, links, crossing points and green movement priorities identified in Figure 16.2: Bushey Spatial Framework, Figure 16.4: Sustainable Travel Networks and Opportunities Across Bushey.

C Major development must demonstrate how its layout, access, street design and public realm will support reduced car dependency and increased use of walking, cycling, wheeling and public transport.

D Where movement improvements depend on land or infrastructure outside Hertsmere, proposals should demonstrate how they have had regard to cross-boundary connections shown indicatively on Figure 16.2 and Figure 16.4, and how any necessary coordination with neighbouring authorities or infrastructure providers will be addressed.

E Where development forms part of a wider group of related sites or a local centre opportunity area, proposals must demonstrate how access and movement arrangements have been coordinated with adjoining sites and with the Bushey Spatial Framework.

F Development proposals that would prejudice identified walking, cycling, public transport, accessibility, green-link or public realm improvements will not be supported.

Explanation

16.24 Policy HBUSA2 delivers Key Spatial Objectives 9 to 14 by supporting safer and more sustainable movement within Bushey and between Bushey and neighbouring centres. Bushey's movement challenges reflect its dispersed settlement structure, the separation between Bushey Village, Bushey Heath and North Bushey, the location of Bushey railway station to the west of the main settlement, and the influence of major roads and cross-boundary travel patterns.

16.25 The policy recognises that Bushey's accessibility is not limited to infrastructure within Hertsmere. Bushey residents rely on connections to Watford, Stanmore, Harrow, South Oxhey and other nearby places for rail, employment, education, services and leisure. Development should therefore have regard to cross-boundary connections and should support improvements where appropriate and deliverable.

16.26 The Bushey Spatial Framework identifies the need to overcome severance, improve active travel links and prioritise sustainable movement. This includes improving the quality of pedestrian routes, strengthening cycle links, improving access to Bushey railway station, supporting links to nearby public transport hubs, improving wayfinding and creating a green active travel network that connects open spaces and neighbourhoods.

16.27 Figure 16.4: Sustainable Travel Networks and Opportunities Across Bushey identifies existing and proposed sustainable travel routes and opportunities across Bushey, including connections to local centres, public transport hubs, open spaces, neighbouring settlements and cross-boundary destinations. The map should be read alongside Figure 16.2: Bushey Spatial Framework, the Policies Map, site allocation policies, the Infrastructure Delivery Plan, and transport evidence.

16.28 Movement improvements should not be limited to site access or highway capacity. Development should contribute to wider placemaking objectives by improving public realm, reducing traffic dominance, providing safer crossings, supporting local centres, connecting parks and community facilities, and creating routes that are accessible for all ages and abilities.

16.29 Proposals will be expected to coordinate with the Bushey Spatial Framework, site allocation policies, the Infrastructure Delivery Plan, the Local Cycling and Walking Infrastructure Plan and other relevant transport evidence. Where improvements depend on land or infrastructure outside Hertsmere, the Council will work with neighbouring authorities and infrastructure providers to support coordinated delivery.

16.30 The delivery of improved movement and connectivity will support Bushey's managed growth role by helping residents access shops, services, schools, parks, public transport and community facilities without relying solely on private cars.

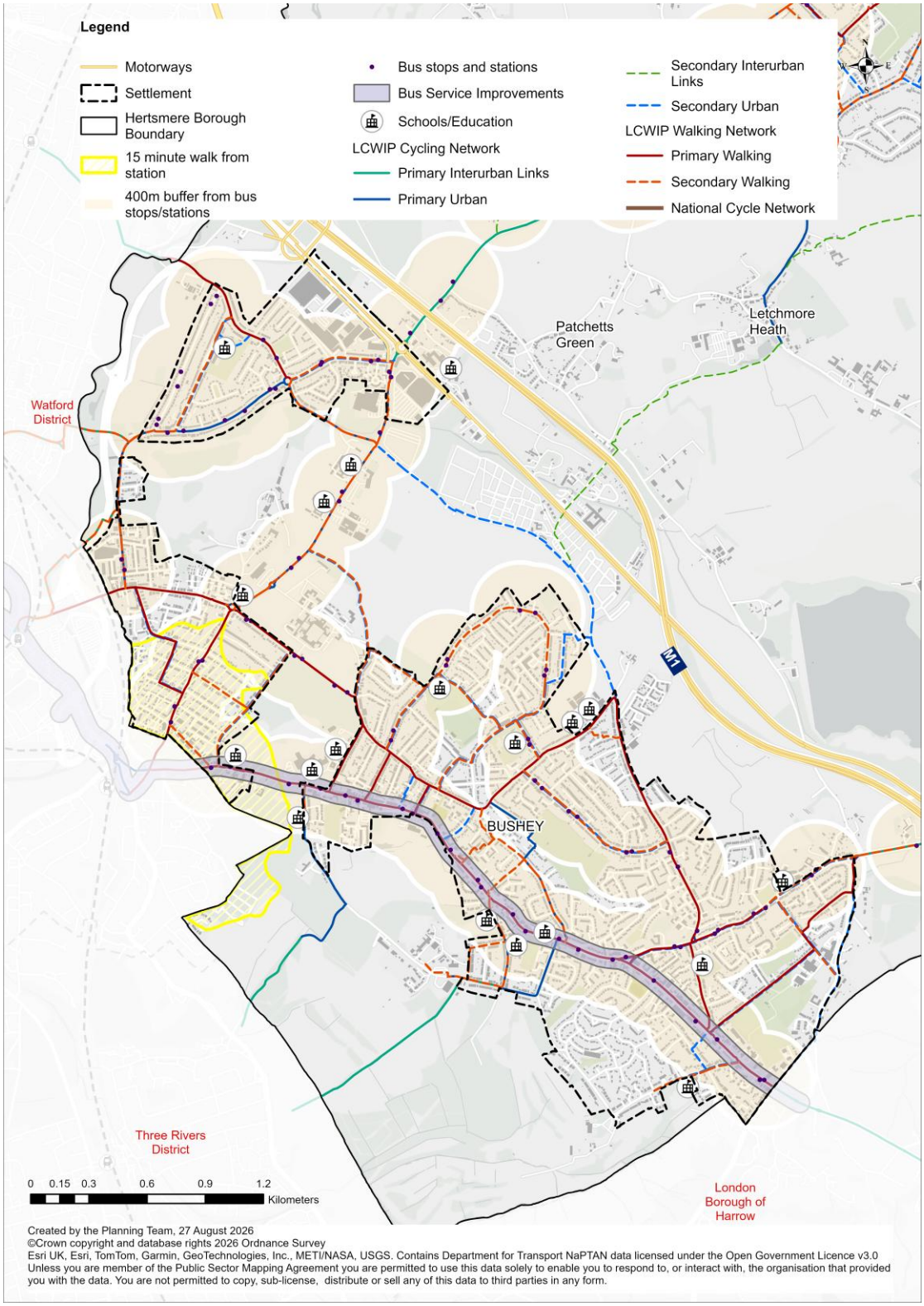
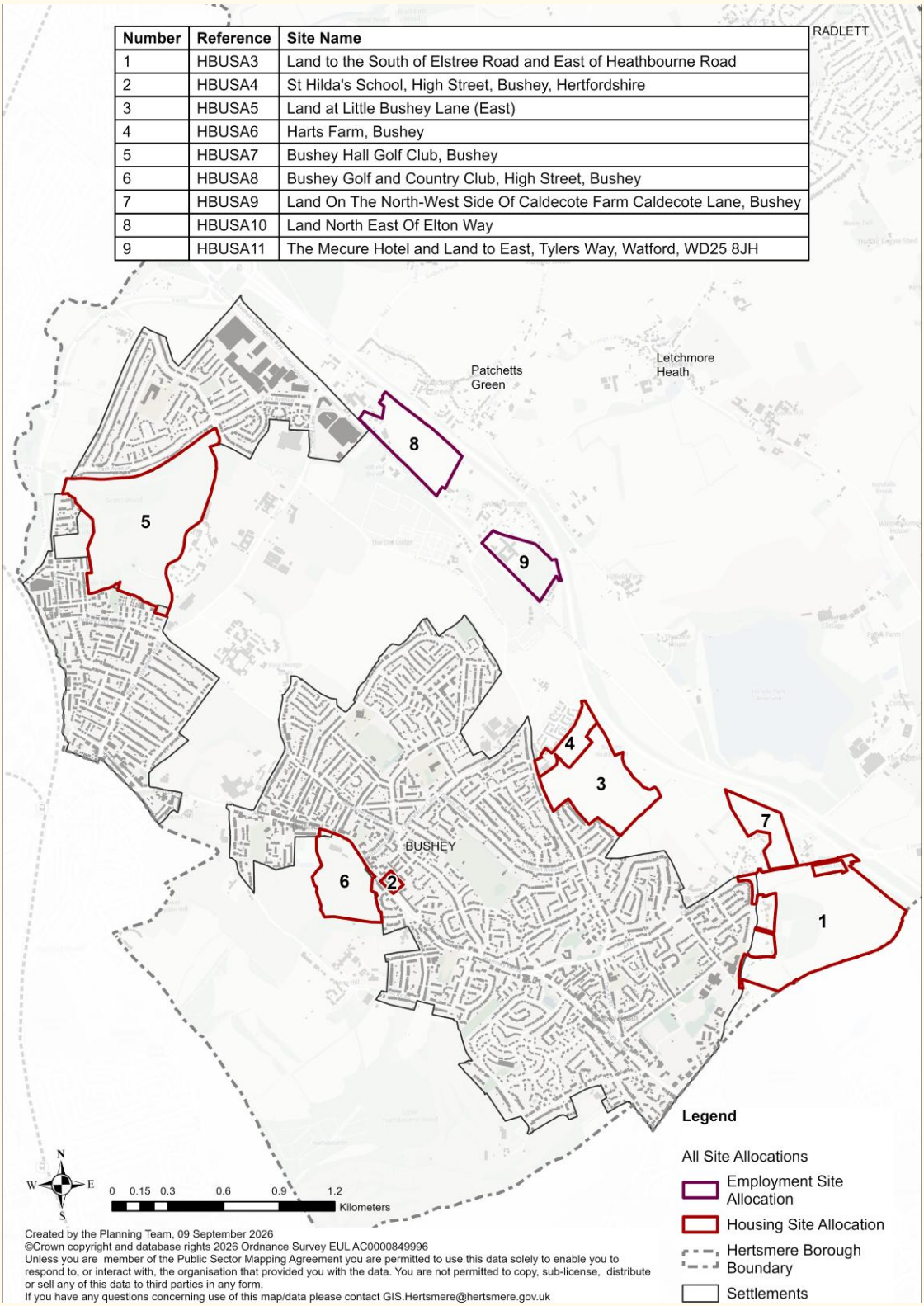


Figure 16.3: Sustainable Travel Networks and Opportunities

Number	Reference	Site Name
1	HBUSA3	Land to the South of Elstree Road and East of Heathbourne Road
2	HBUSA4	St Hilda's School, High Street, Bushey, Hertfordshire
3	HBUSA5	Land at Little Bushey Lane (East)
4	HBUSA6	Harts Farm, Bushey
5	HBUSA7	Bushey Hall Golf Club, Bushey
6	HBUSA8	Bushey Golf and Country Club, High Street, Bushey
7	HBUSA9	Land On The North-West Side Of Caldecote Farm Caldecote Lane, Bushey
8	HBUSA10	Land North East Of Elton Way
9	HBUSA11	The Mecure Hotel and Land to East, Tylers Way, Watford, WD25 8JH



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Chapter 16: Bushey Site Allocations

Section

HBUSA3 Land to the South of Elstree Road and East of Heathbourne Road

HBUSA4 St Hilda's School, High Street

HBUSA5 Land at Little Bushey Lane

HBUSA6 Harts Farm

HBUSA7 Bushey Hall Golf Club, Bushey Hall Drive

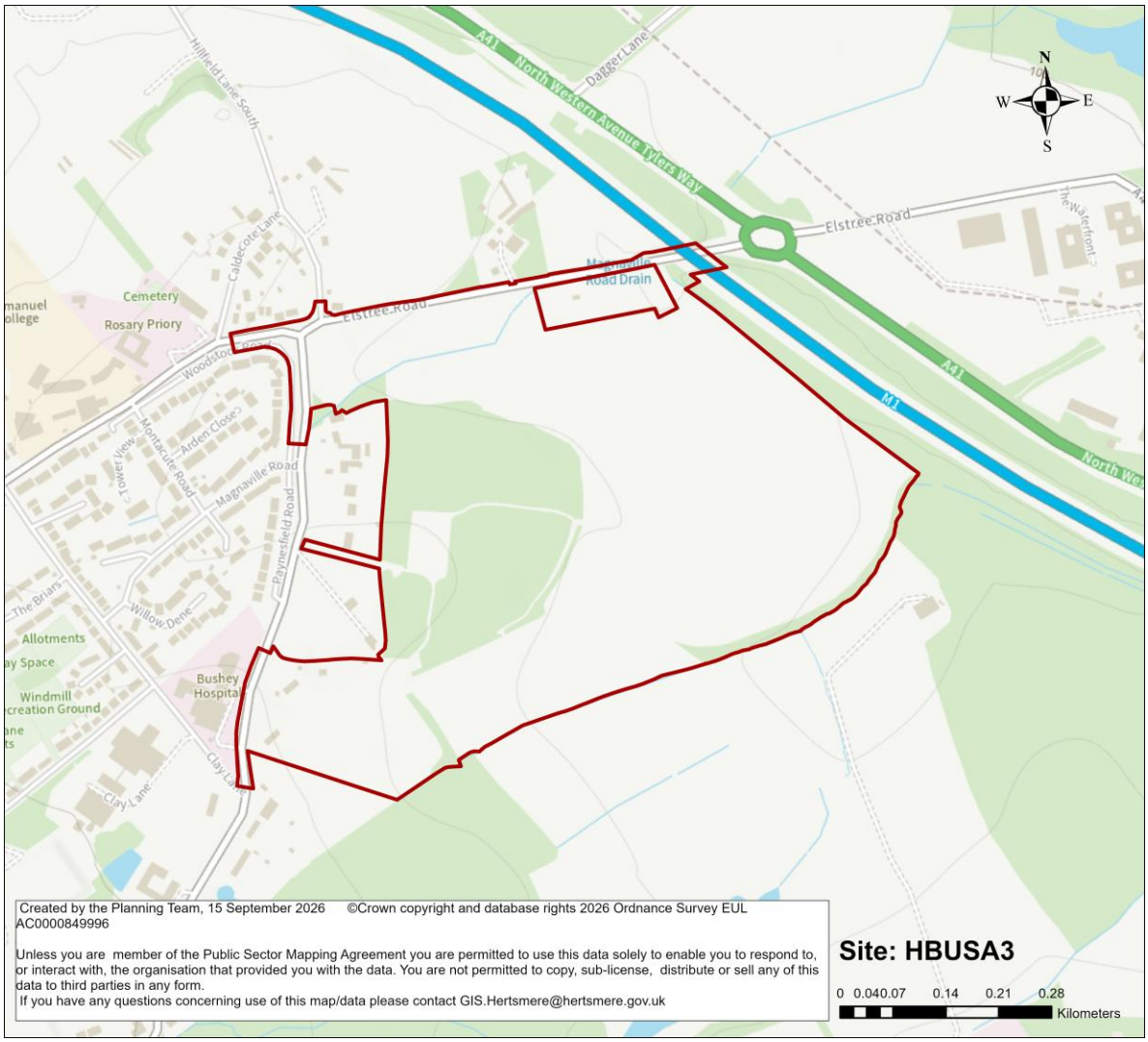
HBUSA8 Bushey Golf and Country Club, High Street

HBUSA9 Land adjoining Caldecote Farm

HBUSA10 Land North East Of Elton Way

HBUSA11 The Former Mercure Hotel

HBUSA3 Land to the South of Elstree Road and East of Heathbourne Road



Site Address	Land to the South of Elstree Road and East of Heathbourne Road, Bushey		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	37.5 ha	Strategic Urban Extension	Private
Current Uses	Agricultural land, with areas of previously developed land associated with historic landfill activity.		
How Site was Identified	Call for Sites (CFS-2025-017)		
Planning Designations and Site Considerations	Metropolitan Green Belt; Local Wildlife Site within the site; Local Nature Reserve affecting a small part; TPOs; Conservation Area affecting part of the site and listed buildings within 750m; small areas of Flood Zones 2 and 3; surface-water and reservoir flood risk; ditch/watercourse; sand and gravel safeguarding; Heathrow Airport safeguarding; proximity to the A411 Elstree Road, A409 Heathbourne Road, A41 and M1; public right of way; protected woodland; gas pipeline; main river.		

Planning Status	24/0692/OUTEI, live outline application for a mixed intergenerational community including C2 and C3 housing, care facilities, community, commercial and leisure uses, open spaces, sports facilities, community growing, transport hub, access and infrastructure.
Indicative Development Capacity	1500 dwellings

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-strategic policy

Site Allocation

16.30 Land to the South of Elstree Road and East of Heathbourne Road is allocated for a comprehensive mixed-use strategic urban extension of at least 1,500 homes. Delivery of the allocation will include housing and care provision for older people, together with community, health, leisure, commercial and other compatible uses, public open space, play and sports facilities, green and blue infrastructure and associated transport and utility infrastructure. It is anticipated that the site allocation be delivered during the later stages of the plan period.

16.31 The allocation is located within the Metropolitan Green Belt. The Borough-wide Green Belt Assessment Stage 2 further considers the site's contribution to the purposes of the Green Belt. It concludes that the site provides no contribution towards Purpose A and only a moderate contribution toward Purpose B and consequently is identified as being provisional grey belt. The comprehensive development of the strategic urban extension must secure a defensible Green Belt Boundary to the south and east to retain the visual separation between Bushey and Greater London (to the south).

Opportunities

16.32 The delivery of the strategic urban extension provides an opportunity to create a new successful and sustainable community located to the east of Bushey. It will be a

walkable place, with a diverse mix of homes, including genuinely affordable homes. It will deliver a distinctive intergenerational neighbourhood in which conventional housing, specialist and care accommodation, community facilities, recreation, landscape and local services are planned together.

16.33 The strategic urban extension will secure a mixed-use centre and transport hub that will provide a focus for community life and reduce the need for residents to travel for everyday needs. The former will include a range of complementary and compatible main town centre uses. The site's proximity to Elstree Road provides opportunities to improve public transport links towards Bushey, Stanmore, Borehamwood and other nearby centres.

16.34 Existing woodland, watercourses and ecological features provide an opportunity to establish a substantial connected green and blue infrastructure network incorporating parkland, habitat enhancement, SuDS, play, outdoor sport, food growing and walking and cycling routes.

16.35 Development also provides an opportunity to improve east-west movement across this part of Bushey, including walking and cycling provision along Elstree Road and Heathbourne Road.

Development Requirements

16.36 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the strategic urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation. The masterplan must identify development parcels, land uses, access, public transport, walking and cycling routes, green and blue infrastructure, community infrastructure, utilities and critical infrastructure triggers.

16.37 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. It is anticipated that higher intensity mixed-use development could be delivered as part of the new community's local centre and other appropriate locations across the site where higher density homes may be appropriate.

16.38 The masterplan must consider the site and its wider surroundings, including the adjoining motorway, surface water flood risk, the relationship to existing neighbourhoods located to the west, and the significance of nearby heritage assets especially the adjoining Conservation Area. These factors will inform the siting and massing of built form, open space and important views.

16.39 As a strategic urban extension, development proposal must be prepared in accordance with Policy HQD1(K) and must be supported by a site-wide Design Code prepared in alignment with the National Model Design Code, or successor guidance. The site-specific design code will be coordinated with the masterplan required by Policy DM3.

16.40 Developers should prepare a 30-year stewardship strategy to be submitted in advance of, or alongside, the planning application. This should provide for the long-term management and maintenance of strategic open space, green and blue infrastructure, SuDS, community assets, public realm and other shared infrastructure.

16.41 Development must be phased to ensure the timely provision of the infrastructure necessary to support the strategic urban extension. The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Bushey. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of future growth in Bushey.

16.42 Developers will engage with Hertfordshire County Council Highways (or successor highway authority) at an early stage in the master planning process to gain an understanding of the cumulative traffic impacts of growth and how it can be managed. This work should demonstrably set out a sustainable transport approach to the strategic urban extension, in respect of connectivity and mitigation of highway impacts. It is anticipated that mitigation will include necessary off-site works to rationalise the local highway, reduce severance and enhance sustainable connectivity to services and facilities. The development must be fully integrated with the surrounding highway, pedestrian and cycle networks. Development must contribute towards improvements to Elstree Road and Heathbourne Road where needed to provide safe crossings, continuous footways and cycle infrastructure.

16.43 Layout of development needs to respond to noise sensitivities of the site, with appropriate noise mitigation measures proposed, to include landscaping, ventilation and M1 acoustic barrier. Existing woodland and boundary planting to be retained.

16.44 Development must retain and protect the Local Wildlife Site, Local Nature Reserve, protected woodland, important trees and other priority habitats. These features must form part of a connected ecological network that delivers biodiversity net gain and responds to the Hertfordshire Local Nature Recovery Strategy. Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS.

16.45 Flood risk and the natural drainage network must structure the masterplan. Built development must avoid areas of greatest fluvial, surface-water and reservoir flood risk where practicable, maintain appropriate watercourse buffers and incorporate multifunctional SuDS. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

16.46 Developers will work collaboratively with the education authority (Hertfordshire County Council) to determine the requirements for school place provision arising from the delivery of the strategic urban extension. This includes any on-site

provision that arises from the strategic urban extension. The developers will work with the education authority to ensure that the education needs of the allocation are met and accommodated as the site is delivered.

16.47 Development must respond positively to nearby heritage assets and the Conservation Area. Development must be informed by proportionate heritage and archaeological assessment, with important views and landscape setting reflected in the layout. Proposals must address impacts on the significance of these heritage assets and their setting, including the impact on views from within the Conservation Area.

16.48 Development must establish a strong and enduring Green Belt boundary using existing landscape features and substantial structural planting. Appropriate compensatory Green Belt improvements must be secured.

Development Guidance

16.49 Development should comprise a series of distinct but connected walkable neighbourhoods focused on the mixed-use centre, public transport stops, community facilities and high-quality open spaces. Higher-density development should be achieved through an appropriate combination of building form, layout and scale. Buildings meeting the definition of a tall building in Policy HQD5 will not be supported within this allocation, as the site is not identified within a Tall Building Suitability Zone. Any localised increase in building height must remain below that threshold and must be justified through the site-wide masterplan, Design Code and relevant townscape, landscape, heritage and amenity evidence.

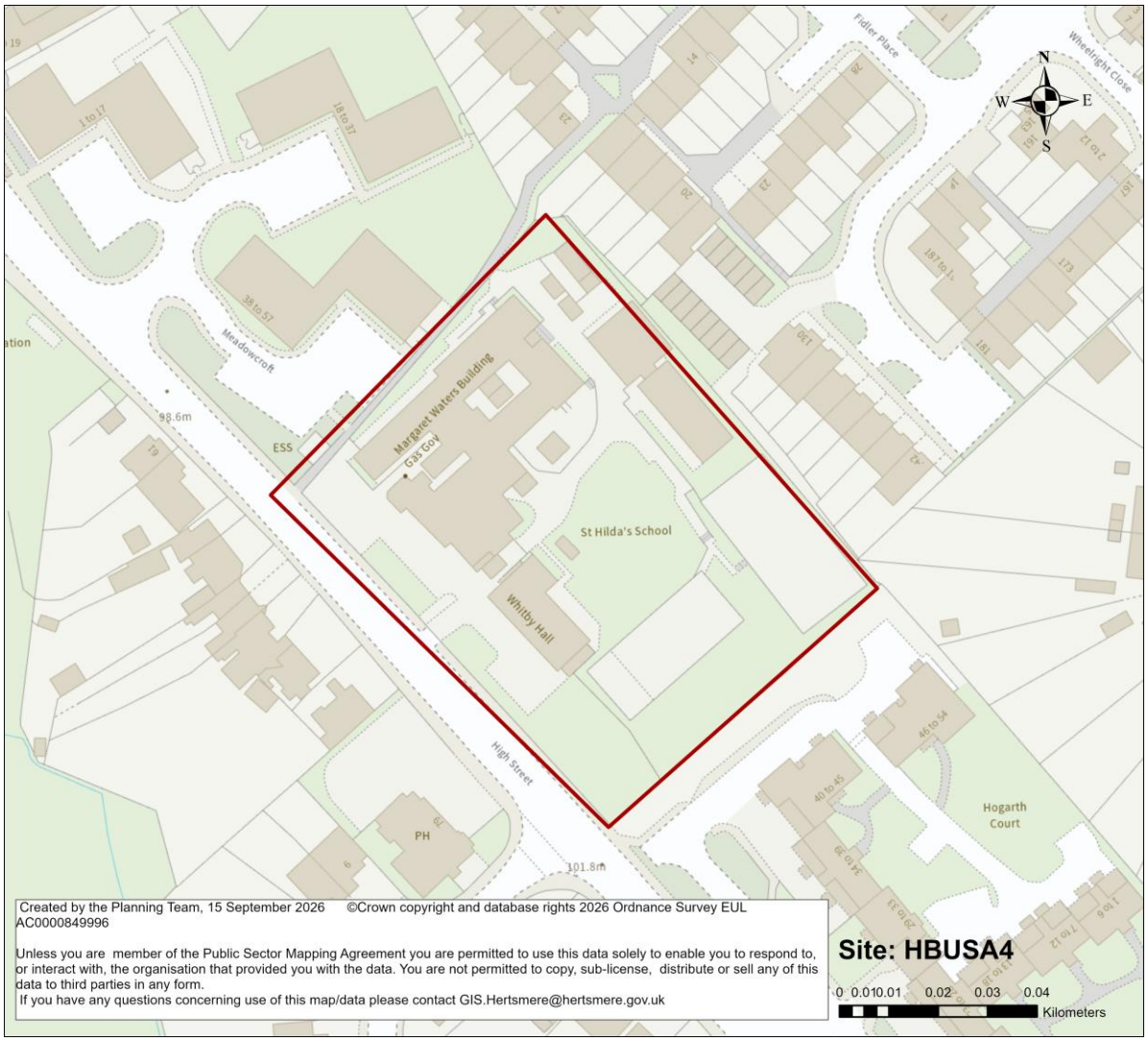
16.50 Development must deliver biodiversity net gain (BNG) and enhancement of the habitat network in line with the actions identified in the Hertfordshire Local Nature Recovery Strategy (LNRS). Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain incorporate the relevant actions in the LNRS. Retained hedgerows, woodland, watercourses and important trees should help define neighbourhoods and routes.

16.51 Applicants will undertake early engagement and work collaboratively with Hertfordshire County Council to explore, identify and agree the potential for the delivery of a new specialised residential provision. This may include the on-site delivery of new provision for children; older persons (to potentially include extra care accommodation); and adults with learning, autism and physical disabilities.

16.52 High-quality public spaces should be created within and around the development which are addressed by positive and/or active building frontages. These should incorporate residential amenity space and play provision that addresses local shortfalls and is accessible to all, and appropriate planting for biodiversity benefit and urban greening as set out in Chapter 10 Green and Blue Infrastructure.

16.53 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

HBUSA4 St Hilda's School, High Street



Site Address	St Hilda's School, High Street, Bushey, Hertfordshire		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	0.69 ha	Urban	Private
Current Uses	Former independent school site. The site comprises previously developed land within the established Bushey urban area.		
How Site was Identified	Call for Sites 2025, reference CFS-2025-051		
Planning Designations and Site Considerations	Previously developed urban land close to the High Street. TPOs affect the site. Listed buildings and a Conservation Area lie within 750m. The site is outside Flood Zones 2 and 3 but parts are subject to low/medium/high surface-water flood risk. Heathrow Airport safeguarding applies.		
Planning Status	No recent relevant history.		
Indicative Development Capacity	52 dwellings		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-strategic policy

Site Allocation

16.54 St Hilda's School is allocated for residential-led redevelopment comprising at least 52 homes, together with compatible community uses where appropriate. The site allocation will be delivered during Years 1 – 5 of the plan period.

16.55 Development should optimise the opportunities provided by this previously developed urban site while retaining important landscape features and responding sensitively to the High Street and surrounding residential neighbourhoods.

Opportunities

16.56 Redevelopment provides an opportunity to reuse an accessible sustainably located previously developed site that is located within the existing built-up area. The High Street location provides an opportunity to support local shops and services and improve the physical relationship between the site and surrounding walking and cycling routes. There are opportunities to retain mature landscape features, improve biodiversity and surface-water management and create a high-quality residential environment.

Development Requirements

16.57 Development must be planned and delivered comprehensively in accordance with a masterplan in line with Policy DM3 (Masterplans and comprehensive development). A site-wide masterplan must be prepared demonstrating how the urban redevelopment will deliver a mix of new homes in accordance with the site allocation.

16.58 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high intensity residential development that

provides positive frontages that address key routes and public spaces. The delivery of the site allocation will secure new and improved public realm and open space.

16.59 Any land within the allocation that remains identified as open space on the Policies Map must be retained and incorporated into the development's open-space and landscape framework. Where the Local Plan removes or alters an existing open-space designation to enable this allocation, any resulting loss of open space, playing-field or recreational function must be demonstrated to be acceptable in accordance with Policies GI7 and SCI3, with replacement, enhancement or other mitigation secured where required.

16.60 The site will deliver space for nature, including the provision of SuDS, Biodiversity Net Gain and urban greening in line with the relevant policies in Chapter 10 Green and Blue Infrastructure. Protected and other important trees must be retained and integrated into the layout wherever practicable, supported by proportionate arboriculture evidence.

16.61 Development must conserve the significance and setting of nearby heritage assets and respond positively to the character of the historic High Street context.

Development Guidance

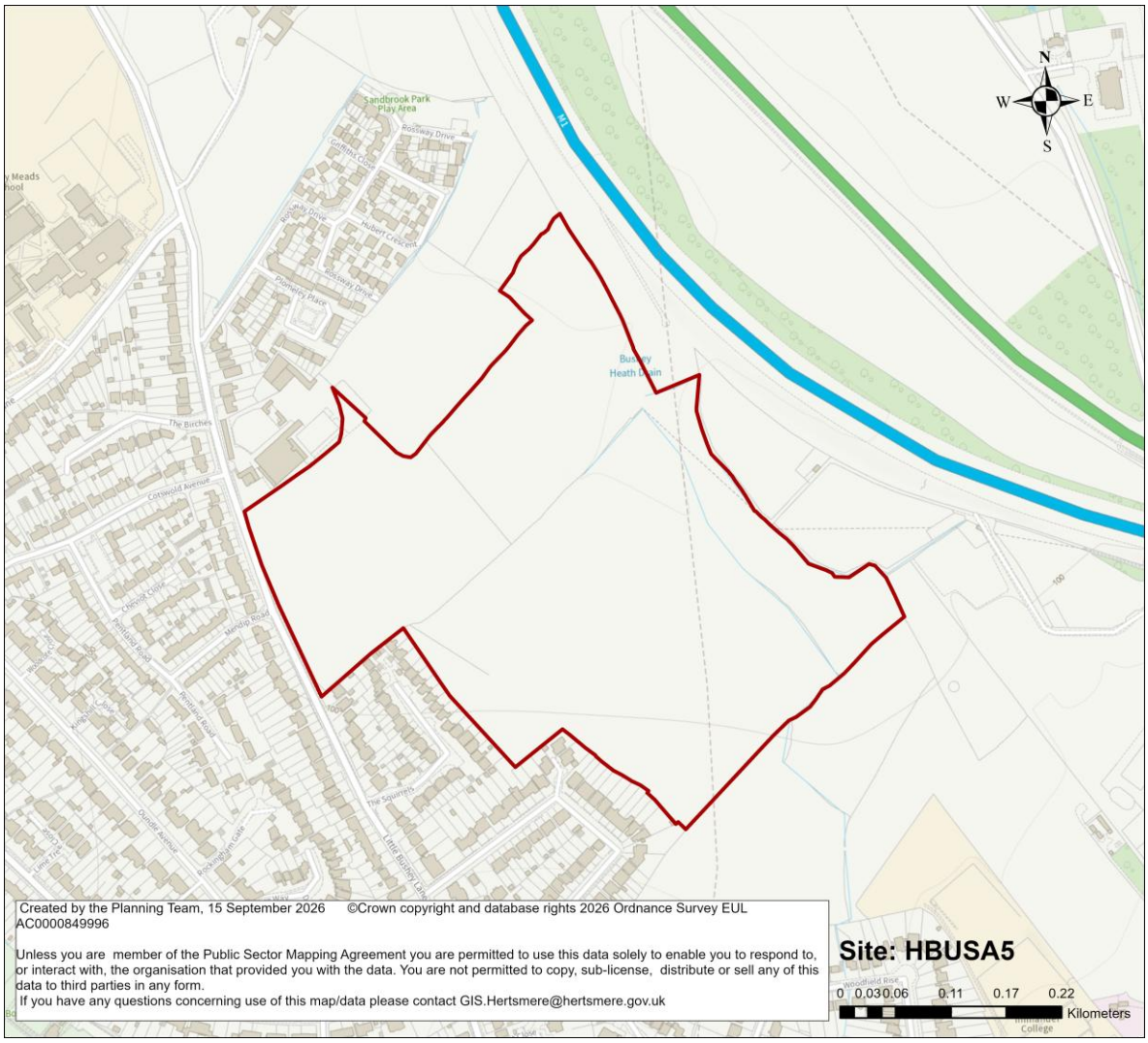
16.62 Development should comprise medium-density, low- to medium-rise housing. Buildings addressing High Street must respond positively to the established plot rhythm, building line, scale, eaves and ridge heights, architectural character and materials of the historic High Street and must conserve the significance and setting of nearby heritage assets. Building scale should reduce where necessary towards adjoining lower-density residential properties, retained trees and sensitive site boundaries.

16.63 Buildings should positively address the High Street and principal pedestrian routes. Blank or service-dominated frontages should be avoided.

16.64 Community uses, where provided, should be readily accessible from High Street and designed to avoid unacceptable impacts on residential amenity.

16.65 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. Access and pedestrian movement must provide a safe and attractive relationship with High Street and surrounding residential streets. The masterplan will include a forward-facing car parking strategy that secures maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

HBUSA5 Land at Little Bushey Lane



Site Address	Land at Little Bushey Lane, Hertsmere		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	14.72 ha	Urban Extension	Private
Current Uses	Predominantly pasture/agricultural land used for grazing horses.		
How Site was Identified	Call for Sites 2025 (CFS-2025-070)		
Planning Designations and Site Considerations	Green Belt; LNRS ACIB; listed building within 750m; public rights of way; M1 proximity; flood risk; good-quality agricultural land; cumulative highway effects.		
Planning Status	24/1522/OUT, up to 280 homes, mobility/community hub and open space; refused March 2026 and subject to appeal. Earlier 310-home scheme dismissed at appeal.		
Indicative Development Capacity	280 homes and a community/mobility hub.		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A **Delivering a better future for Hertsmere**
E **Meet the Borough's housing needs by delivering homes for everyone**
F **Delivering affordable homes**
G **Securing a greener Borough**
H **Responding to the climate emergency**
I **Celebrating our local identity**
J **Healthy and safe communities**
K **Securing the timely delivery of infrastructure**

Non-strategic policy

Site Allocation

16.67 Land at Little Bushey Lane is allocated for a comprehensively planned residential urban extension that will deliver at least 280 homes during Years 1 – 5 of the plan period. It will also comprise a community/mobility hub, public open space, play, green and blue infrastructure and associated transport and community infrastructure.

16.68 The Borough-wide Green Belt Assessment Stage 2 identifies the site as comprising provisionally grey belt land. The assessment concludes that the site makes a limited contribution to the purposes of the Green Belt. The delivery of the site allocation will secure a coherent and durable outer Green Belt boundary along the eastern and north-eastern edge of the combined development area (inclusive of the adjoining Harts Farm site allocation).

Opportunities

16.69 The site provides an opportunity to create a new residential neighbourhood adjoining the eastern edge of Bushey. The associated community/mobility hub will provide a focus for community activity and sustainable travel. Existing rights of way and the Little Bushey Lane LCWIP corridor provide opportunities to improve walking and cycling connections.

16.70 Development must be coordinated with the adjoining Harts Farm site allocation to ensure the delivery of a coherent movement network, settlement edge, drainage strategy and infrastructure solution.

Development Requirements

16.71 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

16.72 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. It must coordinate housing, access, movement, the mobility hub, community facilities, public open space, green and blue infrastructure, drainage, utilities and phasing. It will ensure that the mobility hub is accessible by walking, cycling and public transport. It must also demonstrate how the delivery of the site relates to the adjoining Harts Farm site allocation in terms of connecting and complementing the movement, landscape and infrastructure network.

16.73 As an urban extension, development proposal must be prepared in accordance with Policy HQD1(K) and must be supported by a site-wide Design Code prepared in alignment with the National Model Design Code, or successor guidance. The site-specific design code will be coordinated with the masterplan required by Policy DM3.

16.74 Development must be phased to ensure the timely provision of the infrastructure necessary to support the urban extension. The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Bushey. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of future growth across Bushey.

16.75 Delivery of the urban extension will secure a natural landscaped boundary that is informed by the development's master plan and landscape plan. Specifically, development will provide a defensible Green Belt Boundary to the site's eastern and north-eastern edge. It will make use of the M1 and existing permanent landscape features wherever practicable. Structural planting and green infrastructure must provide an appropriate transition between the new settlement edge and retained Green Belt.

16.76 The delivery of the urban extension must take account of the flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

16.77 Developers will engage with Hertfordshire County Council Highways (or successor highway authority) at an early stage in the master planning process to gain an understanding of the cumulative traffic impacts of growth and how it can be managed. This specifically applies to possible impacts to Little Bushey Lane, the A41 and M1 Junction 5.

16.78 Existing public rights of way must be retained and enhanced within a connected walking and cycling network.

16.79 Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS.

Development Guidance

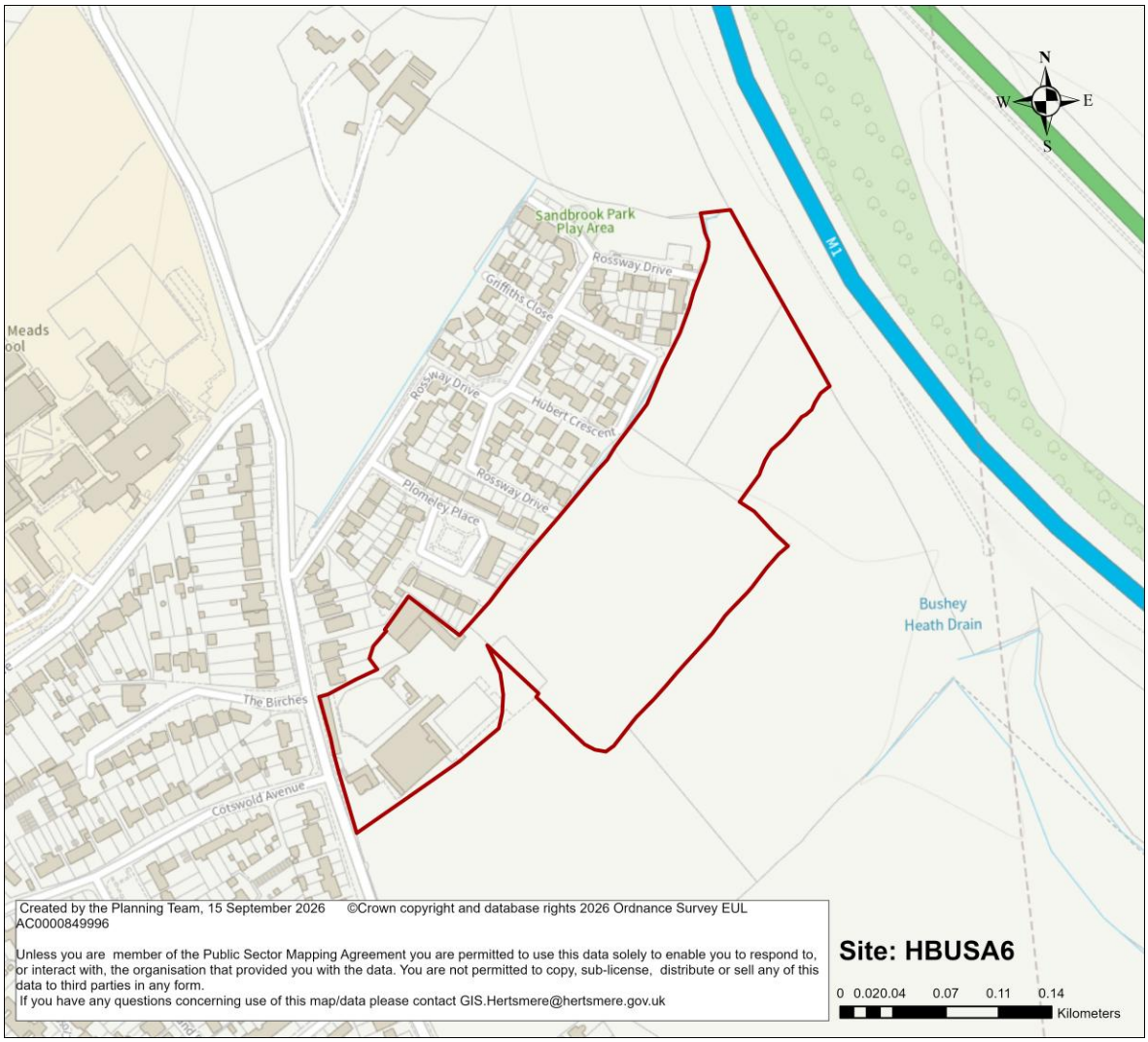
16.80 Residential development should generally be low to medium rise, with density focused on accessible parts of the site and reduced towards sensitive edges.

16.81 The community/mobility hub should occupy a prominent location on principal walking, cycling and public-transport routes.

16.82 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

16.83 Development adjoining the M25 Motorway should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with National Highways.

HBUSA6 Harts Farm



Site Address	Harts Farm, Bushey		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	4.64 ha	Urban extension	Private
Current Uses	Livery stables, grazing land, single dwelling, and areas of previously developed land		
How Site was Identified	HELAA (HEL-0336-22)		
Planning Designations and Site Considerations	Green Belt; partly previously developed land. Adjacent to the strategic highway network, M1 immediately north-east. Surface-water flood risk. Listed building within 750m. Heathrow airport safeguarding zone. Good-quality agricultural land.		
Planning Status	No recent relevant history.		
Indicative Development Capacity	57 dwellings		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-strategic policy

Site Allocation

16.84 Harts Farm is allocated for residential development that will deliver at least 57 homes, together with open space, landscape, SuDS and associated infrastructure during Years 1 – 5 of the plan period.

16.85 The Borough-wide Green Belt Assessment Stage 2 identifies the site as comprising provisionally grey belt land. The assessment concludes that the site makes a limited contribution to the purposes of the Green Belt. The delivery of the site allocation will secure a coherent and durable outer Green Belt boundary along the eastern and north-eastern edge of the combined development area (inclusive of the adjoining Land at Little Bushey Lane site allocation).

Opportunities

16.86 The site provides an opportunity to consolidate the built form on Little Bushey Lane and make effective use of previously developed land. Its relationship with the adjoining site allocation at Land at Little Bushey Lane provides an opportunity to create a coherent eastern edge to Bushey. The redevelopment of the site can improve landscape structure, surface-water management and connections to surrounding neighbourhoods.

16.87 Development must be coordinated with Land at Little Bushey Lane where necessary to ensure a coherent movement network, settlement edge, drainage strategy and infrastructure solution.

Development Requirements

16.88 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

16.89 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. It must also demonstrate how the delivery of the site relates to the adjoining Land at Little Bushey Lane site allocation in terms of connecting and complementing the movement, landscape and infrastructure network.

16.90 Delivery of the urban extension will secure a natural landscaped boundary that is informed by the development's master plan and landscape plan. Specifically, development will provide a defensible Green Belt Boundary to the site's eastern and north-eastern edge. It will make use of the M1 and existing permanent landscape features wherever practicable. Structural planting and green infrastructure must provide an appropriate transition between the new settlement edge and retained Green Belt.

16.91 Development must be phased to ensure the timely provision of the infrastructure necessary to support the urban extension. The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Bushey. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of future growth across Bushey.

16.92 The delivery of the urban extension must take account of the flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

16.93 Developers will engage with Hertfordshire County Council Highways (or successor highway authority) at an early stage in the master planning process to gain an understanding of the cumulative traffic impacts of growth and how it can be managed. This specifically applies to possible impacts to Little Bushey Lane, the A41 and M1 Junction 5.

16.94 Development must conserve the significance and setting of nearby listed buildings and have regard to airport safeguarding.

Development Guidance

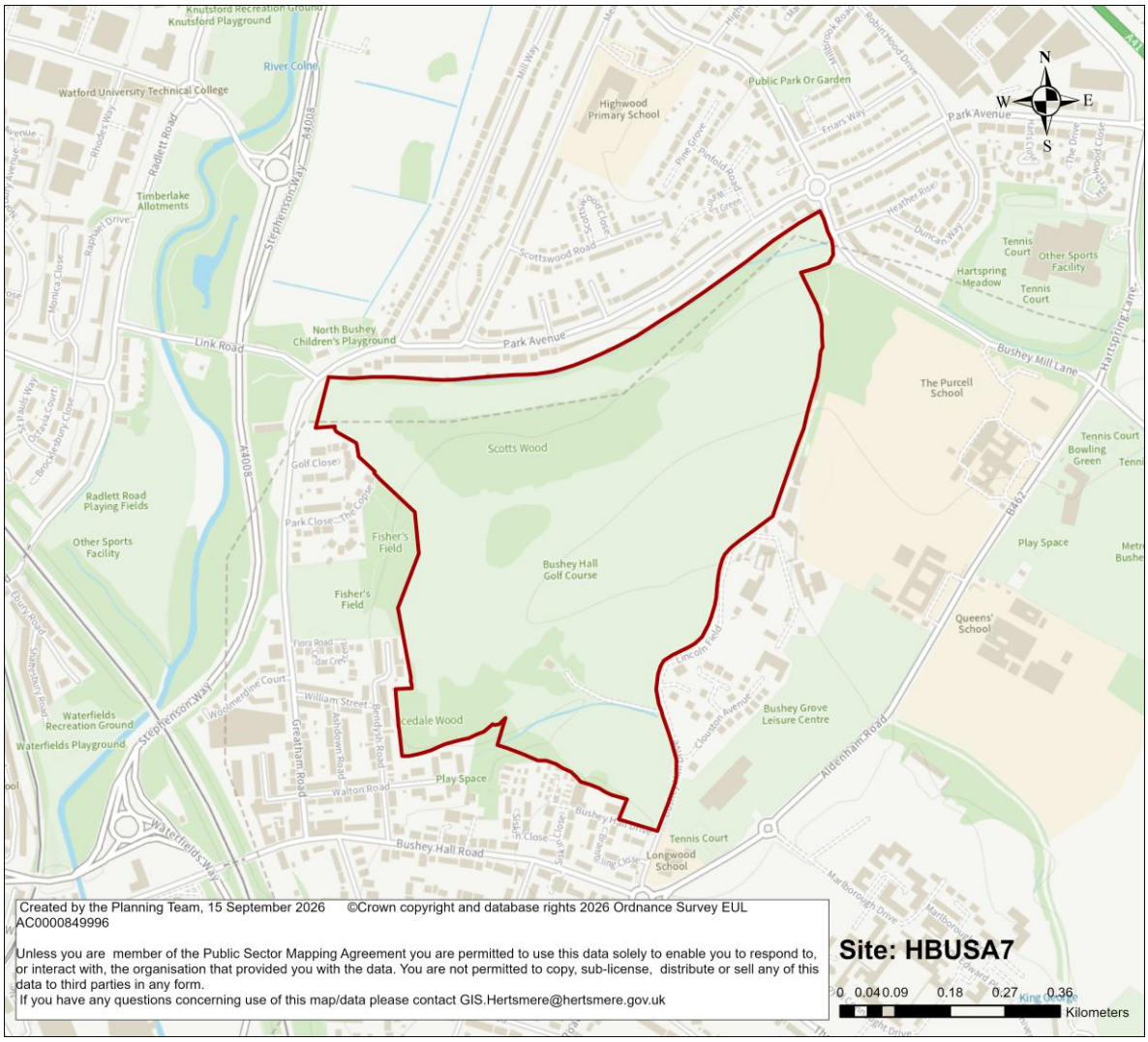
16.95 Development should generally be low to medium rise and respond to adjoining residential development. The site's previously developed components should be

optimally utilised, with lower-intensity development, and landscape treatments that reinforces and protect the retained Green Belt.

16.96 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The street and path network should be capable of connecting into the adjoining Little Bushey Lane allocation. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

16.97 Development adjoining the M25 Motorway should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with National Highways.

HBUSA7 Bushey Hall Golf Club, Bushey Hall Drive



Site Address	**Bushey Hall Golf Club, Bushey Hall Drive (Scotts Wood Park, Hertsmere)**		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	41.71 ha	Strategic Urban Extension	Private
Current Uses	Former golf course/private open space.		
How Site was Identified	Call for Sites 2025 (CFS-2025-143) and HELAA (HEL-0905-22)		
Planning Designations and Site Considerations	Metropolitan Green Belt. Scotts Wood Local Wildlife Site and Local Nature Reserve; LNRS APIB/ACIB areas; TPOs; Flood Zones 2/3, surface-water and reservoir flood risk; Main Rivers; sand/gravel safeguarding; public right of way; nearby listed buildings/Scheduled Monument; gas and National Grid infrastructure.		
Planning Status	24/1022/OUT – outline permission for up to 350 homes together with community, healthcare and wellbeing facilities, access, landscaping and associated works; granted 26 February 2026.		

Indicative Development Capacity	500 dwellings

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A Delivering a better future for Hertsmere
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Existing Planning Consent

16.98 The site benefits from the following extant consent:

- 24/1022/OUT – outline permission for up to 350 homes together with community, healthcare and wellbeing facilities, access, landscaping and associated works.

Site Allocation

16.99 Bushey Hall Golf Club is allocated for at least 500 homes together with community, healthcare and wellbeing facilities, extensive public open space, green and blue infrastructure and associated transport/community infrastructure. It is anticipated that the site allocation will be delivered during the plan period. The principle of redevelopment of the former golf course/private open space has been established through outline permission 24/1022/OUT.

16.100 The Borough-wide Green Belt Assessment Stage 2 further considers the site's contribution to the purposes of the Green Belt. It concludes that the site is defined as grey belt. The comprehensive development of the strategic urban extension must secure a defensible Green Belt Boundary that maintains effective landscape separation between Bushey Village and North Bushey.

Opportunities

16.101 The allocation provides an opportunity to deliver a substantial residential neighbourhood in a comparatively well-connected location between Bushey and

Watford whilst securing the retention of extensive landscape, ecological and flood-management areas. The delivery of the site allocation provides an opportunity to secure investment that significantly improves walking and cycling networks between existing neighbourhoods in Watford and Bushey and supports healthier and more sustainable lifestyles.

16.102 Development must retain and deliver the substantial publicly accessible open space, green and blue infrastructure and community, healthcare and wellbeing benefits forming part of the extant permission. Subsequent proposals that seek to materially alters these elements must demonstrate that the resulting open-space, recreation and community-infrastructure provision is equivalent or exceeds and complies with Policies GI7, SCI1 and SCI3 as applicable.

Development Requirements

16.103 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the strategic urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

16.104 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. It is anticipated that higher intensity mixed-use development could be delivered as part of the new community's local centre and other appropriate locations across the site where higher density homes may be appropriate.

16.105 Development must be phased to ensure the timely provision of the infrastructure necessary to support the strategic urban extension. The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Bushey. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of future growth across Bushey.

16.106 Delivery of the strategic urban extension will secure a natural landscaped boundary that is informed by the development's master plan and landscape plan. Specifically, development will provide a defensible Green Belt Boundary that maintains effective landscape separation between Bushey Village and North Bushey and establishes a durable boundary to retained Green Belt.

16.107 The delivery of the strategic urban extension must take account of the flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

16.108 Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the

LNRS. Scotts Wood Local Wildlife Site and Local Nature Reserve must be protected from built development and enhanced as part of the site-wide ecological and green-infrastructure network. Important existing trees and TPO groups must be retained and integrated into the landscape framework.

16.109 Development must safeguard National Grid and gas infrastructure, including operational access and appropriate easements, and must not prejudice safe operation, maintenance or future reinforcement. Developers are encouraged to engage with relevant utility infrastructure partners to meet their requirements at early stage in the delivery process.

16.110 Development must conserve the significance and setting of nearby heritage assets and address archaeological/mineral safeguarding requirements.

Development Guidance

16.111 Residential development should generally be low to medium rise and transition sensitively to adjoining low-density neighbourhoods and retained open landscape.

16.112 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. Proposals should consider network improvements towards Bushey, Watford and public transport, including links to the LCWIP route on Park Avenue. Existing rights of way must be retained and enhanced and opportunities should be taken to provide an additional east-west walking route south of Hilfield Brook and improve the surrounding footpath network. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

16.113 The long-term management and stewardship arrangements secured through permission 24/1022/OUT must be implemented for the lifetime of the development. Any subsequent or replacement permission must provide a 30-year stewardship strategy, consistent with Policy HQD1(K), covering public open space, ecological areas, SuDS, landscape, walking and cycling routes and shared community infrastructure.

HBUSA8 Bushey Golf and Country Club, High Street

Site Address	Bushey Golf and Country Club, High Street, Bushey		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	12.42 ha	Urban extension	Public
Current Uses	Former Bushey Golf and Country Club. Buildings and parts of the site have subsequently accommodated leisure, commercial, events and community-related uses		
How Site was Identified	Call for Sites (CFS-2025-149) and HELAA (HEL176)		
Planning Designations and Site Considerations	Metropolitan Green Belt and partly previously developed land. Adjacent/near Bushey High Street and Melbourne Road Conservation Areas, Bushey Rose Garden Registered Park and Garden and multiple listed buildings. Also archaeological potential, TPOs, LNRS ACIB, sand/gravel safeguarding, limited Flood Zones 2/3 and surface-water risk.		
Planning Status	No recent relevant planning history.		
Indicative Development Capacity	250 dwellings, commercial and community space		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Site Allocation

16.114 Bushey Golf and Country Club is allocated for comprehensive residential-led mixed-use regeneration comprising at least 250 homes during the plan period. The delivery of the site allocation will also secure new community and cultural facilities, compatible commercial uses and substantial publicly accessible open space and green infrastructure.

16.115 The Borough-wide Green Belt Assessment Stage 2 further considers the site's contribution to the purposes of the Green Belt. It concludes that the site is defined as grey belt. The comprehensive development of the urban extension must maintain effective strategic separation between Bushey and Oxhey and establish a durable long-term Green Belt boundary.

Opportunities

16.116 The site is in Council ownership and serves as one of Bushey's principal regeneration opportunities. It includes previously developed land that is highly accessible to a variety of sustainable travel networks. Its redevelopment provides an opportunity to accommodate a mix of new housing, community and main town centre uses while retaining a significant area of the wider site as publicly accessible green space. As a publicly owned site there is an opportunity to deliver a higher proportion of new dwellings on the site as genuinely affordable homes.

16.117 The Council-led regeneration of the site can create a community and cultural focus for Bushey. Regeneration can also secure public access through the former golf course, which was not previously open to the public, strengthen connections to the High Street and establish a permanent green edge towards Oxhey.

Development Requirements

16.118 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating

how the strategic urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

16.119 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. It must coordinate housing, community and commercial uses, public open space, landscape, heritage, movement, infrastructure and phasing across the allocation and its relationship with the wider Country Club estate.

16.120 A substantial proportion of the former Country Club estate must be retained and secured as permanent publicly accessible open space and green infrastructure, with built development focused on parts capable of accommodating development without unacceptable Green Belt, landscape or heritage harm. Retained public open space should have a clear long-term stewardship and management arrangement securing public access, landscape quality, biodiversity and recreation.

16.121 A strong and permanent Green Belt boundary must be established along the western and south-western edge of the developed area, using Merry Hill Road, retained woodland, mature vegetation and other permanent landscape features wherever possible. The landscape framework must maintain a clear transition to the retained Green Belt and preserve effective visual and physical separation between Bushey and Watford.

16.122 As a strategic allocation, development proposal must be prepared in accordance with Policy HQD1(K) and must be supported by a site-wide Design Code prepared in alignment with the National Model Design Code, or successor guidance. The site-specific design code will be coordinated with the masterplan required by Policy DM3.

16.123 Development must be phased to ensure the timely provision of the infrastructure necessary to support the strategic urban extension. The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Bushey. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of future growth across Bushey.

16.124 The delivery of the strategic urban extension must take account of the flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

16.125 Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS. Existing TPO trees, woodland and important landscape features must be retained wherever practicable and integrated with habitat creation, biodiversity net gain and the LNRS ACIB.

16.126 Applicants and developers are required to carry out necessary geophysical survey and archaeological evaluation to reveal the archaeological potential of the site.

16.127 Development proposals must consider and respond positively to the significance and setting of the Bushey High Street and Melbourne Road Conservation Areas, Bushey Rose Garden Registered Park and Garden and nearby listed buildings. Master plans prepare din support of proposals will be informed by the local heritage assets in terms of how they provide a positive response to scale, massing, landscape and architectural across the site allocation.

Development Guidance

16.128 Development should provide for complementary and distinctive character areas across the strategic urban extension that link in with and complement the masterplan across this site and existing neighbourhoods to the north. The design and layout of the development should reflect and reinforce the hierarchy of streets and open/green spaces, with a differentiation in design, density, scale and massing, including a range of plot sizes and building heights, with reference to Bushey's established character. Built development should be concentrated principally towards High Street and previously developed parts of the site, with scale and density reducing towards retained open landscape and sensitive Green Belt edges.

16.129 Residential development should generally be between two to four storeys. Localised increases in height may be used to mark important routes, spaces or community focal points where this is justified through the masterplan and heritage and townscape assessment. Buildings meeting the definition of a tall building in Policy HQD5 will not be supported, as the site is not within a Tall Building Suitability Zone.

16.130 The new main town centre uses must complement the vitality and viability of Bushey High Street. It should seek to support the community function of the new community forming on the site rather than create a competing out-of-centre destination.

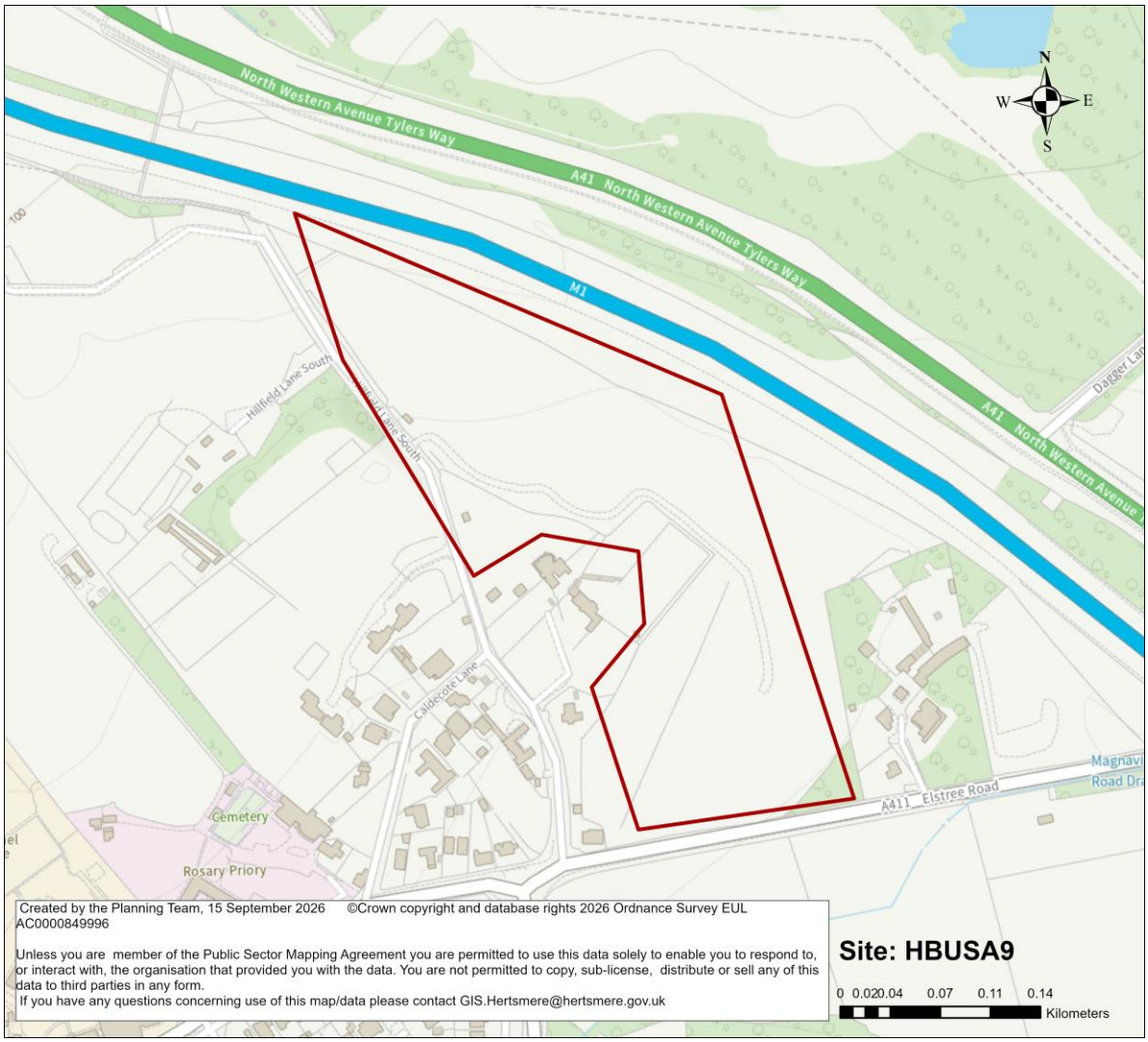
16.131 Development must provide a new community hub incorporating flexible community and cultural space and make appropriate provision for arts, education and uses associated with the Council-led regeneration.

16.132 Affordable housing must be provided in accordance with Local Plan policy, with the Council-owned site expected to maximise affordable delivery. Ideally developers should seek to achieve the current project ambition of 50% genuinely affordable homes.

16.133 Developers should ensure that the new community hub is well located in relation to the site's wider open space provision. This is to enable access to the open space and take advantage of the area around the pond to facilitate outdoor dining and events. Master plans prepared in support of proposals should identify other suitable locations for the community hub, but iin all instances it should be located close to principal walking routes.

16.134 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. Development must provide substantially improved walking/cycling permeability through the site, including connections to High Street, surrounding neighbourhoods, Bushey Station and routes towards Watford, and should investigate a new public route between High Street and Merry Hill Road. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

HBUSA9 Land adjoining Caldecote Farm



Site Address	Land on the northwest Side of Caldecote Farm Caldecote Lane, Bushey		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	6.7 ha	Urban Extension	Private
Current Uses	Land in agricultural, horticultural, and equine related uses.		
How Site was Identified	Call For Sites (CFS-2025-167)		
Planning Designations and Site Considerations	Metropolitan Green Belt; LNRS Area that Could Become of Particular Importance for Biodiversity; nearby listed buildings and Conservation Area; Heathrow Airport safeguarding; proximity to the A411 and M1; good-quality agricultural land; and areas of surface-water flood risk.		
Planning Status	No relevant recent planning history		
Indicative Development Capacity	154 dwellings		

Timeframe for delivery

Strategic Objectives

E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Site Allocation

16.135 The site allocation proposes an urban extension to Bushey that will deliver at least 154 homes during the plan period. The delivery of the allocation will also secure new public open space, green infrastructure, SuDS and associated transport and community infrastructure improvements.

16.136 The Borough-wide Green Belt Assessment Stage 2 concludes that the site makes a limited contribution to the purposes of the Green Belt. Consequently, the Assessment Stage 2 concludes that the site is defined as being provisionally grey belt. The delivery of the site allocation as an urban extension to Bushey will secure a durable new Green Belt boundary, making use of the M1, Hillfield Lane and retained mature vegetation as permanent and readily recognisable features.

Opportunities

16.137 The site provides an opportunity to deliver a new residential neighbourhood, comprised of genuinely affordable and market housing and a range of dwelling sizes and types, within a strong landscape setting.

16.138 The existing rural character, vegetation and the Hertfordshire Local Nature Recovery Strategy Area that Could Become of Particular Importance for Biodiversity provide opportunities to create a connected green infrastructure network, strengthen habitat connectivity and deliver biodiversity net gain.

Development Requirements

16.139 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

16.140 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. The master plan must consider and address how the Delivery of the urban extension provides an opportunity to positively develop the relationship with adjoining land around Caldecote Farm. Proposals must not prejudice the appropriate future development, landscape treatment or access arrangements of adjoining land.

16.141 The master plan must provide strong structural landscape framework that defines the northern and eastern edges of the development and establish a durable new Green Belt boundary, making use of the M1, Hillfield Lane and retained mature vegetation as permanent and readily recognisable features.

16.142 15.88 Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS.

16.143 The delivery of the urban extension must take account of the flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

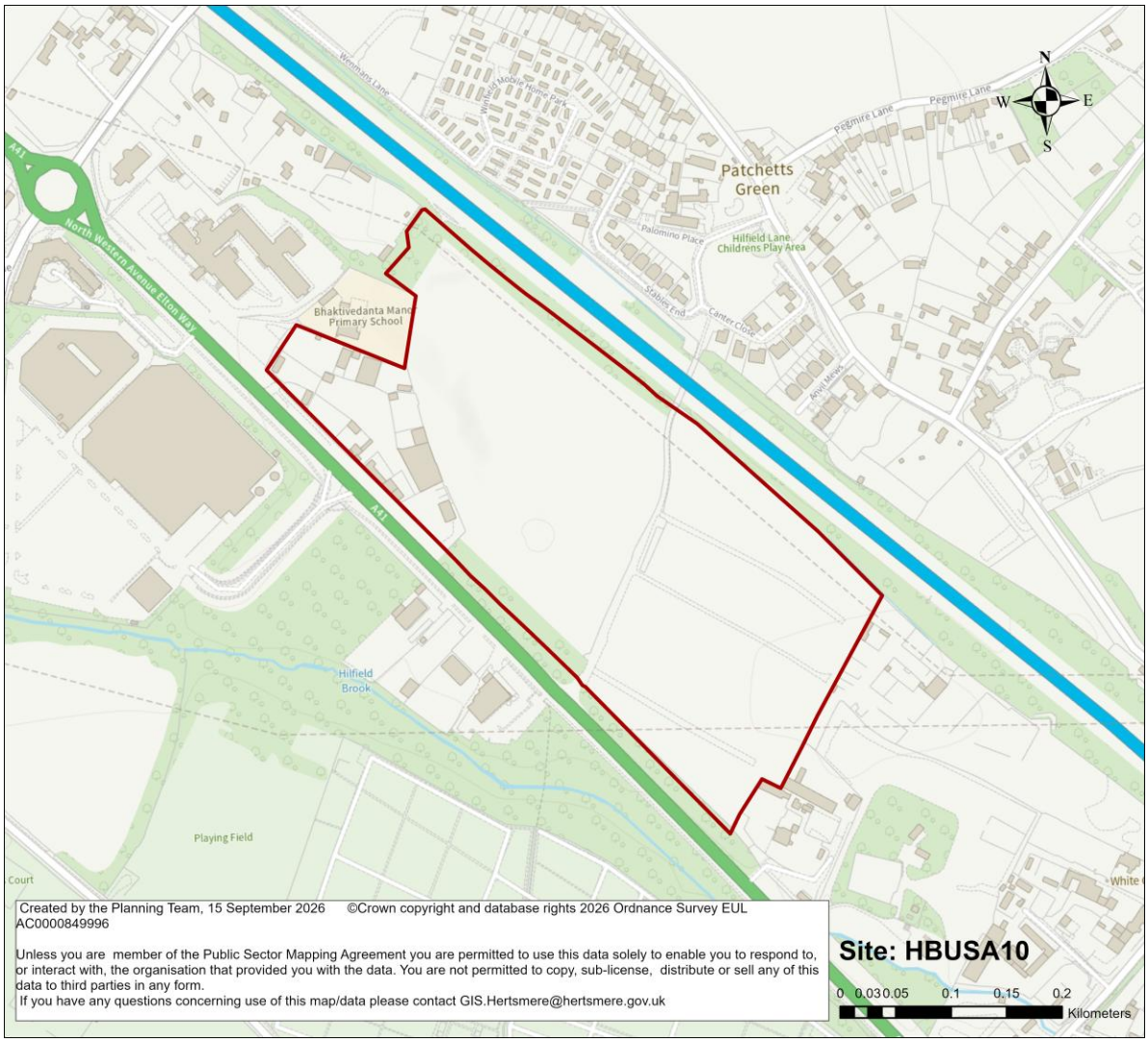
16.144 Development adjoining the M1 Motorway should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with National Highways.

Development Guidance

16.145 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. Specifically, proposals should consider and where possible secure improvements to walking and cycling connections along Elstree Road and Hilfield Lane and provide safe and convenient links between the site, surrounding neighbourhoods, local services and public transport. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

16.146 High-quality public spaces should be created within and around the development which are addressed by positive and/or active building frontages. These should incorporate residential amenity space and play provision that addresses local shortfalls and is accessible to all, and appropriate planting for biodiversity benefit and urban greening as set out in Chapter 10 Green and Blue Infrastructure.

HBUSA10 Land Northeast of Elton Way



Site Address	Land northeast of Elton Way		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	12.66 ha	Urban Extension (Employment)	Private
Current Uses	Existing employment land and open land		
How Site was Identified	Identified as a candidate site at Regulation 18 Preparation of the Local Plan		
Planning Designations and Site Considerations	Green Belt; adjacent to M1; strategic employment context; strategic-road access; landscape/visual impacts; noise and air quality; drainage/biodiversity; relationship with nearby residential uses.		
Planning Status	24/1283/OUTEI proposes demolition and redevelopment to comprise B8 use of up to 45,000 sqm gross external, including ancillary offices.		
Indicative Development Capacity	45,000 sqm employment floorspace.		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A **Delivering a better future for Hertsmere**
B A thriving local economy
D Support a well-educated and skilled population
G Securing a greener Borough
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Existing Planning Consents

16.147 Planning permission 24/1283/OUTEI proposes the demolition and redevelopment of the site to comprise up to 45,000 sqm gross external B8 industrial employment storage use, including ancillary offices.

Site Allocation

16.148 Land northeast of Elton Way is allocated as a strategic employment site for industrial, manufacturing, storage and distribution and compatible employment uses, including E(g)(iii), B2 and B8 uses and ancillary offices. The site allocation will deliver approximately 45,000 sqm of industrial employment floorspace during the plan period.

16.149 Development must maintain the site's primary strategic industrial employment function and provide modern, adaptable premises capable of responding to changing business and occupier requirements over the plan period.

16.150 The delivery of the allocation must be comprehensively planned so that individual development proposals do not prejudice the employment capacity, access, infrastructure, landscape or effective long-term operation of the wider site.

16.151 Development should be delivered broadly in accordance with the approved development parameters established by 24/1283/OUTEI. Materially different redevelopment or re-planning of the site must demonstrate an equivalent or improved employment, landscape, ecological, transport, infrastructure and sustainability outcome and, where appropriate, comply with Policy DM3.

16.152 The Borough-wide Green Belt Assessment Stage 2 concludes that the site makes a limited contribution to the purposes of the Green Belt. Consequently, the

Assessment Stage 2 concludes that the site is defined as being provisionally grey belt. The delivery of the site allocation as an employment site must establish a durable and readily recognisable boundary to retained Green Belt, using the M1 and A41/North Western Avenue corridors and associated permanent landscape features wherever practicable. Development must reinforce these boundaries through structural landscaping and avoid incremental outward expansion into the gap between Bushey and Radlett.

Opportunities

16.153 The site provides an opportunity to expand and consolidate employment provision within the wider Tylers Way employment area in a location with strong access to the M1, A41 and strategic road network.

16.154 Development can provide modern industrial, manufacturing and logistics floorspace capable of accommodating businesses requiring larger premises and strategic-road access and contribute towards meeting Hertsmere's identified employment land requirements.

16.155 The scale of the allocation provides an opportunity to create a coherent employment environment with a stronger landscape structure, improved environmental performance and modern infrastructure rather than a series of unrelated development compounds.

16.156 The redevelopment and intensification of the site provide opportunities for local employment, training and apprenticeships associated with construction and the subsequent operation of businesses.

Development Requirements

16.157 The site allocation is safeguarded for industrial employment uses. Residential development and unrelated uses that could compromise the industrial employment function, operational requirements or future intensification of the site will not be supported.

16.158 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how development will deliver strategic industrial employment uses that are in accordance with the site allocation.

16.159 The master plan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density industrial employment uses. The master plan will demonstrate how buildings, access, servicing, parking, utilities, drainage, landscape and green infrastructure will be coordinated across the site. Where development is phased, individual phases must not prejudice efficient development of the remainder of the allocation.

16.160 Development must provide safe and efficient access for commercial vehicles, HGVs, employees and emergency services and address individual and cumulative impacts on the A41, M1 and local highway network. HGV access, servicing and loading arrangements must be designed so that they do not result in unacceptable conflict with residential areas, walking and cycling routes or the safe operation of the local highway network.

16.161 Development proposals must demonstrate that sufficient power and digital infrastructure can be provided for each phase and for the campus. Necessary improvements to substations, network reinforcement and other power infrastructure must be incorporated into the design and landscape framework and delivered without prejudicing later development.

16.162 Development must demonstrate that adequate water supply, wastewater capacity, firefighting provision and drainage infrastructure can be provided in step with each phase. Developers must work with relevant infrastructure providers to ensure that these requirements can be met within the constraints of their network capacities.

16.163 Noise, air quality, lighting and other operational effects associated with industrial and logistics activity, including cumulative effects arising from multiple occupiers, must be appropriately assessed and mitigated.

16.164 Development must be informed by a site-specific Landscape and Visual Impact Assessment. The location, height, scale and massing of buildings, external plant, yards and associated infrastructure must respond to the site's high sensitivity to large-scale employment development and minimise effects on surrounding countryside and sensitive receptors.

16.165 The master plan must establish a durable and readily recognisable boundary to retained Green Belt, using the M1 and A41/North Western Avenue corridors and associated permanent landscape features wherever practicable. Development must reinforce these boundaries through structural landscaping and avoid incremental outward expansion into the gap between Bushey and Radlett.

16.166 Development must protect and enhance the site's ecological network, including its identification as an LNRS ACIB, and deliver biodiversity net gain. Existing vegetation should be integrated with new habitat and structural landscaping to provide connected ecological corridors. Biodiversity net gain and the long-term management of retained and created habitat must be integrated with the landscape, drainage and open-space strategy. Important existing vegetation should be retained where practicable and supplemented by substantial structural planting, particularly at visually sensitive boundaries and around larger buildings and service areas.

16.167 Surface-water drainage must be addressed comprehensively during the delivery of the site allocation. Multifunctional SuDS must be integrated with the landscape and biodiversity framework and should avoid inefficient or piecemeal drainage arrangements between individual development parcels. Developers should work in

partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

16.168 Development must make appropriate provision for local employment, skills, training and apprenticeship opportunities having regard to the scale and nature of the employment proposed.

Development Guidance

16.169 Building elevations and roofs should use materials, colours and finishes which reduce the visual prominence of large building forms. The height and mass of buildings should decrease towards the southern and western site boundaries. Loading areas, external storage, plant and service yards should be located and screened so that they do not dominate sensitive boundaries or principal views.

16.170 Buildings should be designed for long-term adaptability and efficient use of land. In the case that data-centre development is proposed, opportunities for low-carbon energy, heat recovery and efficient use of energy and water should be considered as part of the site-wide infrastructure strategy.

16.171 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

16.172 Development adjoining the M1 Motorway should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with National Highways.

HBUSA11 The Former Mercure Hotel

Site Address	Land at Bushey Mill Lane		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	7.43 ha	Urban Extension (Employment)	Private
Current Uses	Vacant former hotel including low-quality woodland/open land and former dwelling/clearing.		
How Site was Identified	Call for Sites (CFS-2025-087)		
Planning Designations and Site Considerations	Green Belt; M1/A41; Hilfield Brook; Flood Zones 2/3; surface-water risk; woodland/biodiversity; road noise and air quality; limited public transport; major electricity, water and digital infrastructure requirements.		
Planning Status	22/1117/OUT, permission for up to 30,000 sqm B8. 25/1781/FUL, live data-centre application proposing 137,410 sqm submitted for determination.		
Indicative Development Capacity	c.30,000 sqm B8 or up to 138,000 sqm of datacentre use		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
D Support a well-educated and skilled population
G Securing a greener Borough
H Responding to the climate emergency
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Existing Planning Consents

16.173 Planning permission 22/1117/OUT provides for 30,000 sqm of B8 industrial storage provision.

16.174 Planning application 25/1781/FUL seeks the comprehensive redevelopment of the for an industrial employment data centre use over 137,410 sqm floorspace. At the point of the Local Plan's Publication, the proposal is still to be determined.

Site Allocation

16.175 The former Mercure Hotel and land contained within its boundary to the immediate east is allocated as a strategic employment site. The site allocation will deliver strategic industrial employment that could comprise data centre development, storage and distribution, industrial and other compatible employment uses. The delivery of the site allocation will also secure necessary energy, digital, water, transport and other infrastructure required to support its operation.

16.176 Following delivery, the uses provided across the site will contribute and form part of the wider Tylers Way employment area. Proposals for the site allocation must retain and align with the primary strategic employment function of the wider employment area.

16.177 The Borough-wide Green Belt Assessment Stage 2 concludes that the site makes a limited contribution to the purposes of the Green Belt. Consequently, the Assessment Stage 2 concludes that the site is defined as being provisionally grey belt. The delivery of the site allocation as an employment site must establish a robust and readily recognisable long-term boundary, making use of the A41/North Western Avenue, Hilfield Brook and Sandy Lane as permanent physical features where they coincide with the released area. Where the release boundary adjoins retained Green Belt to the south-east, it must be reinforced through substantial

structural landscaping and existing permanent landscape or development boundaries.

Opportunities

16.178 The site occupies a strategically accessible location close to the M1 and A41 and provides an opportunity to meet specialist employment and digital-infrastructure requirements that require large sites, high-capacity utilities and strategic connectivity.

16.179 Redevelopment of the vacant former hotel and other previously developed parts of the site provides an opportunity to replace underused development with modern strategic employment infrastructure.

16.180 The scale and location of the site provide an opportunity to consolidate the Tylers Way employment area and secure investment in electricity, digital and other infrastructure supporting the wider employment function of the area.

16.181 Hilfield Brook, existing woodland and undeveloped parts of the site provide opportunities to establish a substantial green and blue infrastructure framework incorporating habitat enhancement, biodiversity net gain, sustainable drainage and structural landscape planting.

16.182 Development provides opportunities for local employment, skills and training associated with construction, engineering, digital infrastructure and the ongoing operation and maintenance of the site.

16.183 The scale and energy profile of data-centre development also provide an opportunity to investigate the beneficial use of waste heat and other measures which improve energy and resource efficiency.

Development Requirements

16.184 Development must be delivered as a comprehensively planned and phased data-centre campus. Individual phases must accord with the approved site-wide development parameters and must not prejudice the delivery of access, utilities, drainage, landscape, ecological mitigation or other infrastructure necessary to support later phases.

16.185 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how development will deliver strategic industrial employment uses that are in accordance with the site allocation.

16.186 The master plan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density industrial employment uses. The master plan will demonstrate how buildings, access, servicing, parking, utilities, drainage, landscape and green infrastructure will be

coordinated across the site. Where development is phased, individual phases must not prejudice efficient development of the remainder of the allocation.

16.187 The master plan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density industrial employment uses. The master plan will demonstrate how access, internal roads, servicing, construction traffic and emergency access will be coordinated across the site. The development must deliver the highway works and sustainable-transport measures required through the outline permission and subsequent approvals, including safe pedestrian and cycle routes and improvements to the public-rights-of-way network.

16.188 Development proposals must demonstrate that sufficient power and digital infrastructure can be provided for each phase and for the campus. Necessary improvements to substations, network reinforcement and other power infrastructure must be incorporated into the design and landscape framework and delivered without prejudicing later development.

16.189 Development must demonstrate that adequate water supply, wastewater capacity, firefighting provision and drainage infrastructure can be provided in step with each phase. Developers must work with relevant infrastructure providers to ensure that these requirements can be met within the constraints of their network capacities.

16.190 Development must be informed by a site-specific Landscape and Visual Impact Assessment. The location, height, scale and massing of buildings, external plant, yards and associated infrastructure must respond to the site's high sensitivity to large-scale employment development and minimise effects on surrounding countryside and sensitive receptors. Hilfield Brook, woodland, flood-risk land and other important environmental features should structure the green framework and provide separation between intensive development and sensitive boundaries.

16.191 The master plan must establish a durable and readily recognisable boundary to retained Green Belt, making use of the A41/North Western Avenue, Hilfield Brook and Sandy Lane as permanent physical features where they coincide with the released area. Where the release boundary adjoins retained Green Belt to the south-east, it must be reinforced through substantial structural landscaping and existing permanent landscape or development boundaries.

16.192 Development must protect and enhance the site's ecological network, including its identification as an LNRS ACIB, and deliver biodiversity net gain. Existing woodland and other important habitats must be retained and enhanced wherever practicable. Biodiversity net gain and the long-term management of retained and created habitat must be integrated with the landscape, drainage and open-space strategy.

16.193 Development must provide appropriate local employment, skills, training and apprenticeship opportunities having regard to both the construction and operational phases of the development.

Development Guidance

16.194 Building elevations and roofs should use materials, colours and finishes which reduce the visual prominence of large building forms. Intensive built development should be concentrated on previously developed and less environmentally sensitive parts of the site. Loading areas, external storage, plant and service yards should be located and screened so that they do not dominate sensitive boundaries or principal views.

16.195 Buildings should be designed for long-term adaptability and efficient use of land. In the case that data-centre development is proposed, opportunities for low-carbon energy, heat recovery and efficient use of energy and water should be considered as part of the site-wide infrastructure strategy.

16.196 The layout and infrastructure strategy should allow for technological change, adaptation and replacement of plant over the lifetime of the development without requiring significant expansion into retained landscape, ecological or flood-management areas.

16.197 External lighting should be designed as part of the overall landscape and ecological strategy for the wider site. This should seek to minimise unnecessary light spill towards surrounding countryside, habitats and nearby sensitive uses. Security requirements must be integrated sensitively into the landscape and design. Fencing, gates, lighting and other security infrastructure should avoid an unnecessarily hostile or visually intrusive edge to the site.

16.198 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

16.199 Development adjoining the M1 Motorway should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with National Highways.

Radlett Area

Chapter 17: Radlett Area

Section

Context and Character

Vision

Key Spatial Objectives

HRA1 Radlett Centre

Context and Character

17.1 In terms of the geographic area that it covers Radlett is one of Hertsmere's larger settlements. However, in planning terms, it is a Category III Settlement, which equates to it being a small town or settlement. This is due to the predominance of residential uses and the absence of a full range of services, facilities, amenities and employment opportunities. Nevertheless, Radlett's residents value the sense of community and strong local identity that they derive from living in in the town.

17.2 Radlett is in the western half of Hertsmere along the historic Watling Street corridor. The settlement has developed around this historic route and the railway line, both of which continue to shape its structure, movement patterns and character. Radlett is surrounded by open countryside and retains a distinct relationship with its rural and wooded setting, which contributes significantly to its identity and separation from neighbouring settlements.

17.3 The town benefits from strong transport connectivity, most notably through Radlett railway station, which provides direct Thameslink services to London and other destinations. The settlement also benefits from road connections via Watling Street and nearby access to the M1 and M25. Despite this connectivity, Radlett experiences traffic pressures associated with through-traffic along Watling Street and surrounding routes, which affects movement, public realm quality and pedestrian comfort within the centre.

17.4 Radlett's built form is largely characterised by low-density residential neighbourhoods, generous plots, mature trees, planted boundaries and leafy streets. These areas contribute to its distinctive character. The settlement also contains heritage assets and conservation areas that reflect its historic development and reinforce the character of the centre and surrounding neighbourhoods.

17.5 The town's centre is aligned along Watling Street and functions as the focus for retail, services, culture and community life. It contains a mix of independent shops, cafés, restaurants, community facilities and cultural uses, including the Radlett Centre and Radlett Library. These facilities contribute to the strong sense of community identity associated with Radlett and support a range of cultural and social activities.

17.6 The town's Centre has an attractive but varied townscape, including historic buildings, shopping parades, small-footprint commercial premises and more recent development. Its eclectic character, fine grain, independent businesses and café and restaurant offer are important strengths. However, parts of the centre would benefit from enhancement, particularly in relation to shopfront quality, public realm, pedestrian movement, traffic dominance, street greening, cycle parking and the relationship between the east and west sides of the railway line.

17.7 The town benefits from green spaces, trees, watercourses and surrounding countryside, which form an important component of the settlement's environmental

setting. Tykes Water, local parks, recreation spaces, wooded slopes, planted boundaries and surrounding countryside contribute to local character, biodiversity, recreation and wellbeing. Opportunities exist to strengthen green and blue infrastructure, improve biodiversity and enhance access to nature.

17.8 Radlett maintains close functional relationships with surrounding settlements, including Shenley, Aldenham and Borehamwood. Residents also access employment, services and transport connections in nearby centres. These relationships reinforce Radlett's role as a smaller but well-connected town within the Borough's settlement hierarchy.

17.9 In accordance with the Local Plan's spatial strategy, Radlett will accommodate modest and incremental growth than the Borough's larger settlements. Opportunities for development are expected to arise primarily through the sensitive redevelopment of previously developed land, infill development, small-site opportunities, town centre enhancement and the efficient use of under-utilised land within the existing urban area.

17.10 The purpose of the Radlett policies is to guide careful evolution rather than major transformation. Growth should support the centre, provide a wider choice of homes, improve public realm and sustainable movement, support local businesses and community facilities, and protect the distinctive qualities that make Radlett a valued place to live.

17.11 Figure 17.1: Radlett Area identifies the geographic extent for the purposes of this chapter. Subsequently, Figure 17.2: Radlett Spatial Strategy identifies the broad spatial priorities for Radlett, including Radlett Centre, Watling Street, movement and public realm priorities, green and blue infrastructure, managed growth, local character and landscape setting. These maps should be read alongside the Policies Map, and site allocation.

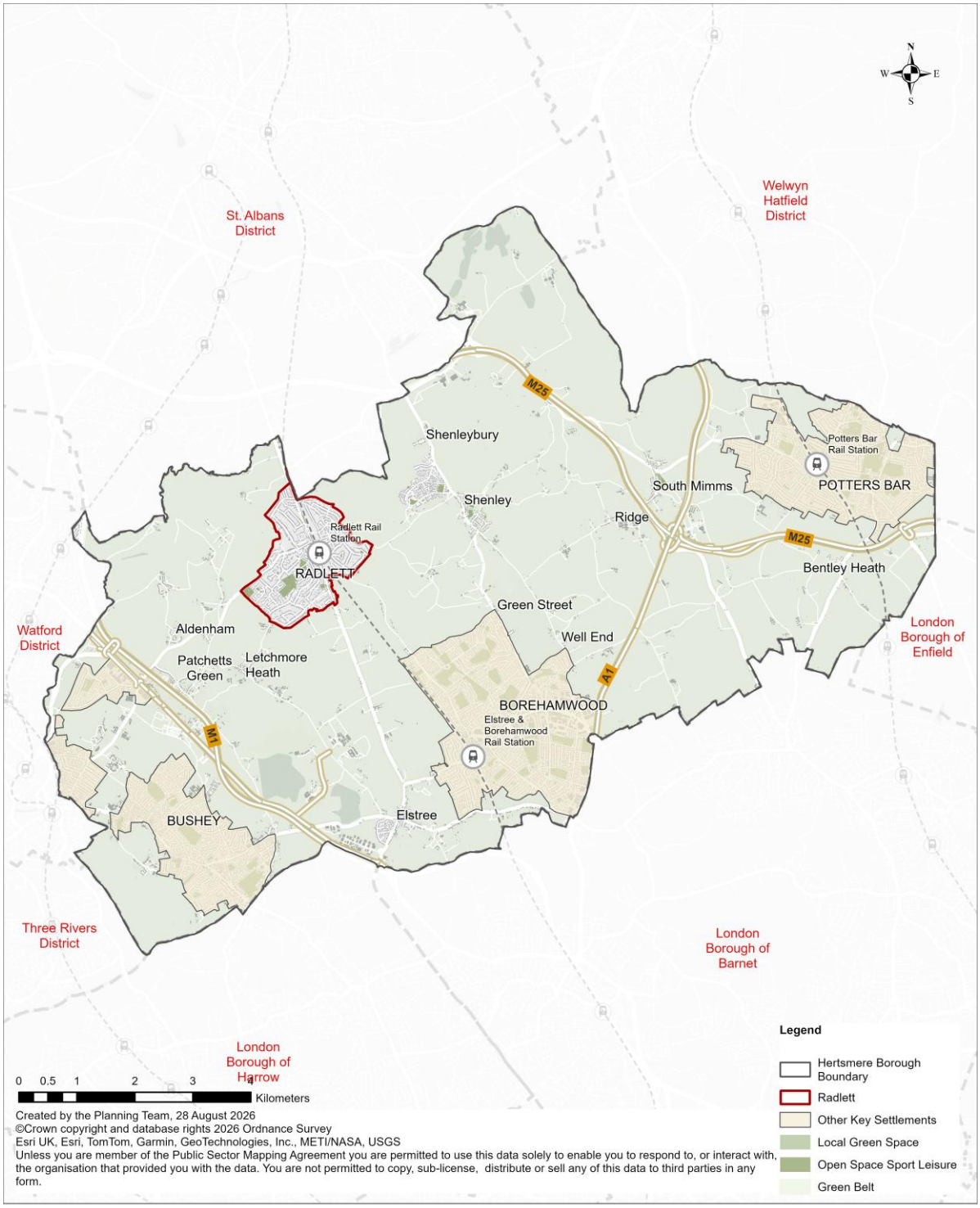


Figure 17.1: Radlett Area

Vision

17.12 Radlett will continue to evolve as a prosperous, distinctive and well-connected town shaped by its historic Watling Street corridor, railway connections, identity, heritage assets and green setting. Growth will be carefully managed and incremental, supporting local housing needs, community life, local businesses and access to nature while protecting the qualities that make Radlett distinctive.

17.13 Over the plan period Radlett Centre will remain the focal point for community, cultural, retail and social life. Its role will be strengthened through sensitive enhancement of Watling Street, support for independent businesses, improved shopfronts, better pedestrian environments, coordinated public realm, traffic calming, greening and stronger links between the centre, railway station, the Centre, the Library and surrounding neighbourhoods.

17.14 Development within and around Radlett Centre will support consolidation and enhancement of the existing high-quality offer rather than significant structural change. Sensitive mixed-use development, infill, refurbishment, upper-floor residential uses, small-scale workspace, cultural uses and local services will be supported where they reinforce the centre's role and respond positively to character, heritage, amenity and infrastructure capacity.

17.15 Radlett will become easier, safer and more attractive to move around. Development will help improve walking, cycling, wheeling and public transport connections between residential neighbourhoods, the Centre, railway station, schools, parks, community facilities and surrounding countryside routes. Opportunities to reduce traffic dominance and improve pedestrian comfort along Watling Street will be supported.

17.16 Radlett's green and wooded setting will remain a defining feature. Growth will be planned to protect important views, mature trees, planted boundaries, open spaces, heritage settings, Tykes Water and the wider landscape context. New development will be expected to contribute positively to biodiversity, climate resilience, sustainable drainage, public realm and access to open space.

Figure 17.2: Radlett Spatial Strategy

Key Spatial Objectives

To achieve this vision, the key spatial objectives for Radlett are to:	
1	Support Radlett's role as a well-connected Category III settlement while recognising that growth will be modest, incremental and character-led.
2	Direct growth to suitable previously developed land, infill sites, town centre opportunities and other accessible locations where development can be accommodated without harming character, heritage, amenity, infrastructure capacity or landscape setting.
3	Enhance Radlett Centre as the focal point for retail, cultural, community and social life.
4	Strengthen Watling Street as Radlett's principal high street and movement corridor, with improved public realm, shopfronts, pedestrian comfort, greening, wayfinding, cycle parking and crossing opportunities.
5	Support independent businesses, cafés, restaurants, cultural uses, community facilities, local services and small-scale workspace that contribute to Radlett's vitality and distinctive local offer.
6	Support sensitive mixed-use development within Radlett Centre where this provides homes, local services, workspace, community uses, active frontages and public realm improvements.
7	Provide a wider mix of homes, including affordable homes, smaller homes, homes for younger people, downsizer homes and accessible homes, in locations well related to services and public transport.
8	Protect and enhance Radlett's historic character, heritage assets, conservation areas, shopfronts, fine-grain townscape and local architectural identity.
9	Improve walking, cycling, wheeling and public transport connections between Radlett Centre, Radlett railway station, residential neighbourhoods, schools, parks, community facilities and surrounding countryside.
10	Reduce traffic dominance and severance along Watling Street and improve pedestrian safety, accessibility and comfort.
11	Protect and enhance Radlett's green and blue infrastructure, including Tykes Water, mature trees, wooded slopes, parks, planted boundaries, open spaces, sustainable drainage, biodiversity corridors and access to the countryside.

HRA1 Radlett Centre

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
C The regeneration of Borehamwood and Potters Bar
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Strategic Policy

A Radlett Centre will be strengthened as the principal focus for retail, cultural, community, service, social and local economic activity in Radlett.

B Development proposals within Radlett Centre, as identified on Figure 17.2: Radlett Spatial Strategy, will be supported where they:

i. Maintain and enhance the vitality and viability of Radlett Centre;

ii. Support a diverse mix of shops, services, cafés, restaurants, cultural uses, community facilities, workspace and residential uses;

iii. Support independent businesses and local services that meet day-to-day needs and reinforce Radlett's distinctive local offer;

iv. Provide active ground floor frontages where appropriate, particularly along Watling Street and other key pedestrian routes;

v. Support sensitive mixed-use development, infill, refurbishment, retrofitting or redevelopment where this is compatible with local character, heritage, scale, amenity, access and infrastructure capacity;

vi. Provide new homes above, behind or alongside centre uses where this would support centre vitality and provide an appropriate standard of residential amenity;

vii. Support opportunities for small-scale workspace, maker space, creative uses, cottage industries and other local employment uses where these are compatible with the role and character of the centre;

viii. Support opportunities to improve food shopping, convenience retail and local services where this would meet local needs and be compatible with centre character, movement and parking requirements;

ix. Retain, modernise or re-provide community, cultural, health, civic or social infrastructure where affected by development, unless it is demonstrated that the facility is no longer required;

x. Protect and enhance heritage assets, conservation areas, locally important buildings, townscape features, shopfronts and local views;

xi. Improve the appearance, quality and consistency of shopfronts, signage, lighting and building frontages;

xii. Improve public realm, including footways, seating, planting, street trees, lighting, wayfinding, crossings, cycle parking and accessibility;

xiii. Reduce traffic dominance and improve pedestrian comfort along Watling Street where feasible;

xiv. Improve walking, cycling, wheeling and public transport connections between Radlett Centre, Radlett railway station, surrounding neighbourhoods, community facilities, parks and open spaces;

xv. Support improvements to the area around the war memorial, Watling Street and other focal points where these would create more attractive and inclusive public spaces;

xvi. Manage parking, servicing, deliveries and waste so that they do not dominate streets, public spaces or pedestrian environments;

xvii. Provide appropriate disabled parking, servicing and accessible access to shops, services and facilities; and

xviii. Protect and enhance green and blue infrastructure, including opportunities to improve the setting of Tykes Water, street greening, biodiversity, sustainable drainage and links to open spaces.

C Development within Radlett Centre must respond positively to the historic and townscape character of Watling Street. Development should preserve and enhance the significance of designated and non-designated heritage assets and should contribute to a coherent, attractive and pedestrian-friendly centre.

D New development must be of a scale, height, form and massing that responds positively to Radlett's character, heritage, topography and landscape setting. Taller buildings will only be supported where they are justified by context, and would not harm the character, appearance or setting of Radlett Centre.

E Residential development will be supported within Radlett Centre where it forms part of a mixed-use approach that maintains or strengthens the role, function and vitality of the centre. Residential-only redevelopment of strategically important centre sites will not be supported unless it is demonstrated that mixed-use development is not viable or is not necessary to support the role, function and vitality of the centre.

F Major development within or adjoining Radlett Centre must be accompanied by a masterplan, design and access statement, or other proportionate material demonstrating how the proposal contributes to the managed evolution of Radlett, responds to Figure 17.2: Radlett Spatial Strategy.

G Development that would result in inactive frontages, poor public realm, loss of important local services, excessive scale, harm to heritage significance, car-dominated layouts or isolated residential development that fails to contribute to centre vitality will not be supported.

Explanation

17.17 Policy HRA1 delivers the key spatial objectives by supporting the careful enhancement of Radlett Centre. Radlett Centre performs an important retail, service, cultural and community role and is central to Radlett's identity. Its independent shops, cafés, restaurants, community facilities, Radlett Centre, Radlett Library and railway station all contribute to its vitality and local distinctiveness.

17.18 The policy supports sensitive mixed-use development, infill, refurbishment and redevelopment where this helps strengthen Radlett Centre, provide homes, support local businesses and improve public realm. This is not intended to promote large-scale regeneration or development that would undermine Radlett's scale and character. Instead, growth should be used to support the managed evolution of the centre and to deliver practical improvements for existing and future residents.

17.19 Watling Street is the historic spine of Radlett and remains the focus for retail, services, movement and community life. Development should support its role through active frontages, improved shopfronts, better public realm, enhanced pedestrian and cycle movement, traffic-calming measures where feasible, street greening and improved accessibility.

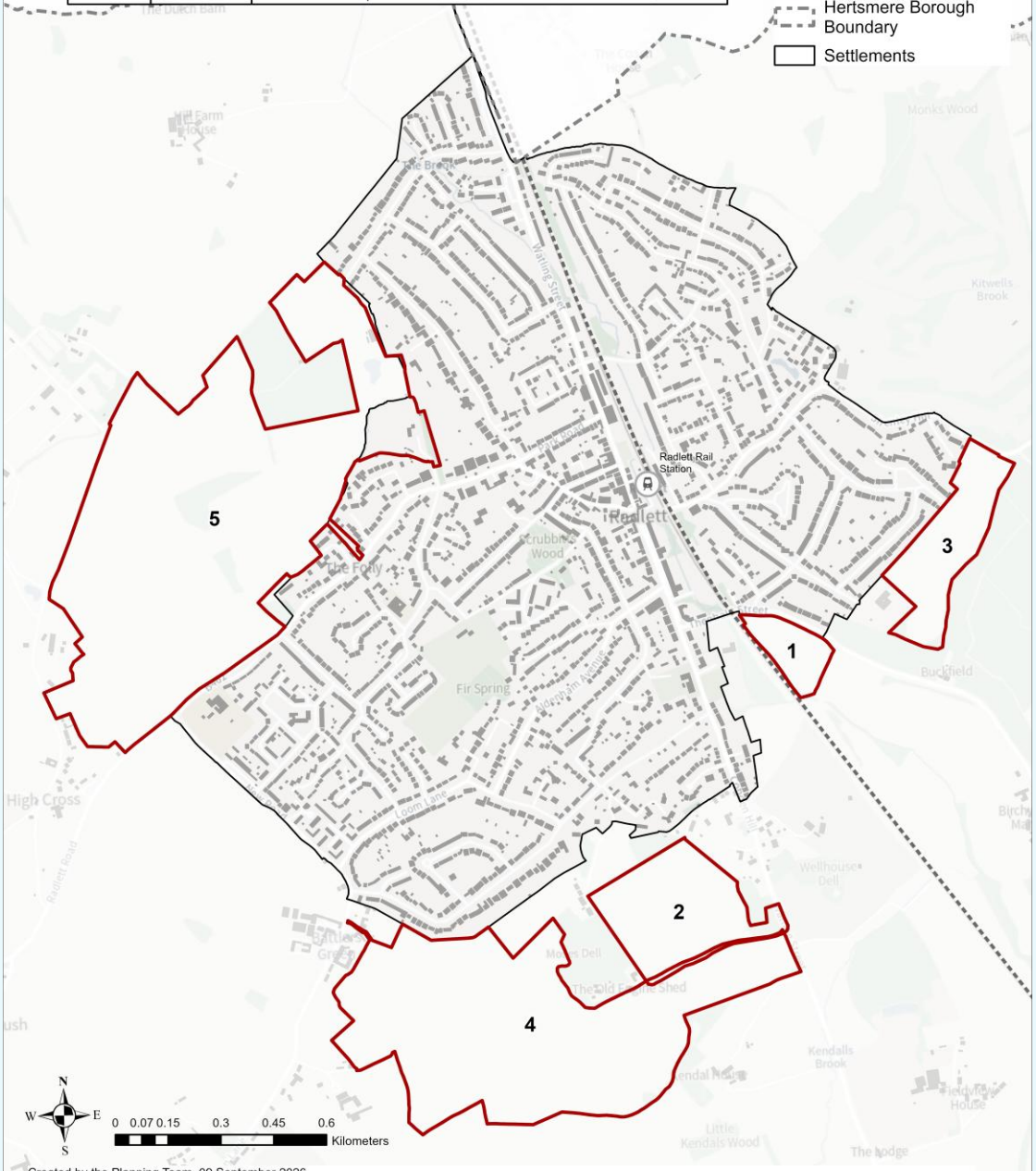
17.20 Radlett's town centre strategy is based on consolidation and enhancement of its existing high-quality offer rather than significant structural change. Development should support independent businesses, cafés, restaurants, cultural uses, community facilities and local services. Opportunities for small-scale workspace, maker space, creative uses and other local employment uses may help diversify the centre and support daytime activity where compatible with local character and amenity.

17.21 The centre contains few substantial development opportunities, and some sites are constrained by heritage, access, parking, topography and townscape considerations. Where opportunities do arise, including through refurbishment, upper-floor residential use, infill, redevelopment of under-used sites or improvements to parking areas, proposals should make efficient use of land while respecting Radlett's character, setting and infrastructure capacity.

17.22 Figure 17.2: Radlett Spatial Strategy identifies the broad spatial priorities relevant to Radlett Centre, including Watling Street, Radlett railway station, town centre public realm, movement links, green and blue infrastructure, and the relationship between the centre and surrounding neighbourhoods. It should be read alongside Figure 17.1: Radlett Area, the Policies Map, relevant site allocation policies, and the Infrastructure Delivery Plan.

17.23 The careful enhancement of Radlett Centre will help maintain its role as a vibrant, attractive and inclusive focus for community life. Development should protect the qualities that make Radlett distinctive while enabling modest, well-designed change that supports local needs, local businesses, sustainable movement and environmental resilience.

Number	Reference	Site Name
1	HRA2	Land south of Theobald street
2	HRA3	Land West of Watling Street, Radlett, Hertfordshire
3	HRA4	Land South Of Shenley Hill Radlett Hertfordshire
4	HRA5	Home Farm, Radlett
5	HRA6	Cluster - Kemprow Farm and land off Watford Road, Radlett



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Chapter 17: Radlett Site Allocations

Section

HRA2 Land South of Theobald Street

HRA3 Land West of Watling Street

HRA4 Land South of Shenley Hill

HRA5 Home Farm Strategic Urban Extension

HRA6 Northwest Radlett Strategic Urban Extension

HRA2 Land South of Theobald Street

Site Address	Land South of Theobald Street		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	3.16 ha	Urban Extension	Private
Current Uses	The site is open agricultural land.		
How Site was Identified	Call for Sites process		
Planning Designations and Site Considerations	Measurable flood risk at southwestern corner of site, unlikely to affect developable area. The site includes several trees that are subject to Tree Preservation Orders (TPO); forms part of a sand and gravel safeguarded area; within a drinking water safeguarded area. The site is located within 750m of a Listed Building and a Conservation Area.		
Planning Status	Pre-application enquiry: 26/0216/PA1 'Land Opposite 2 - 12 Theobald Street'		
Indicative Development Capacity	95 dwellings		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-strategic policy

Site Allocation

17.24 The site allocation proposes development for at least 95 homes that will provide an urban extension to Radlett. The anticipated that it will deliver medium-density, low-rise residential dwellings, including new genuinely affordable homes. The development of the site provides an opportunity to deliver on-site improvements for active travel, and that benefit biodiversity.

17.25 The Borough-wide Green Belt Assessment1 Stage 2 confirms the site's grey belt status. It concludes that the site forms only a small part of the gap between Radlett and Borehamwood and could be developed without the loss of visual separation between the two towns.

Opportunities

17.26 This accessible location lies within walking distance of Radlett's district centre provides an opportunity to contribute to meeting Radlett's housing needs, including genuinely affordable homes, during the early years of the plan period. The development of the site also provides an opportunity to deliver on-site biodiversity enhancements and active travel improvements to the Public Rights of Way network.

17.27 The delivery of the site provides an opportunity to enhance the walking and cycling provision along Theobald Street, in line with the LCWIP. The site should provide funding or on-the-ground improvements to a section of the proposed shared-use path on Theobald Street which would link the site with Watling Street.

Development Requirements

17.28 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

17.29 The design and layout of the development must address the existing housing typologies on the edge of Radlett, specifically the Newberries Estate. This is expressed in

[1] Hertsmere Green Belt Assessment Stage 2, September 2026

the Radlett Neighbourhood Plan (and any successor document). It must create a defensible Green Belt boundary to the southeast of the town.

17.30 The urban extension will be integrated into Radlett's existing transport infrastructure networks. Improvements will maximise access and permeability for active travel modes, pedestrian, cycle and vehicular access from Theobald Street, improved walking and cycling provision along Theobald Street. These will be in accordance with the proposals in the Local Cycling and Walking Infrastructure Plan (LCWIP). The improvements will provide a connection with Footpath Aldenham 54 to the south.

17.31 Development must be phased to ensure the timely provision of the infrastructure necessary to support the urban extension that contributes to Radlett becoming self-sustaining place. This must include the timely investment in community infrastructure to meet demand arising from the development.

17.32 The delivery of the urban extension will provide new and improved public realm and suitable open space in accordance with a site-wide public realm strategy. This must incorporate, retain and enhance the row of mature field-edge trees located on the site's southeastern boundary to form a defensible Green Belt boundary in the long term. The public realm strategy will also secure the retention of existing tree and hedge cover along Theobald Street. This will benefit of biodiversity by providing a link to other areas of enhanced habitat within and adjoining the site.

Development Guidelines

17.33 The delivery of the urban extension must take account of the flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

17.34 Development must deliver biodiversity net gain (BNG) and enhancement of the habitat network in line with the actions identified in the Hertfordshire Local Nature Recovery Strategy (LNRS). Applicants are expected to work with Hertfordshire Ecology (or any successor body following Local Government Reorganisation) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain incorporate the relevant actions in the LNRS.

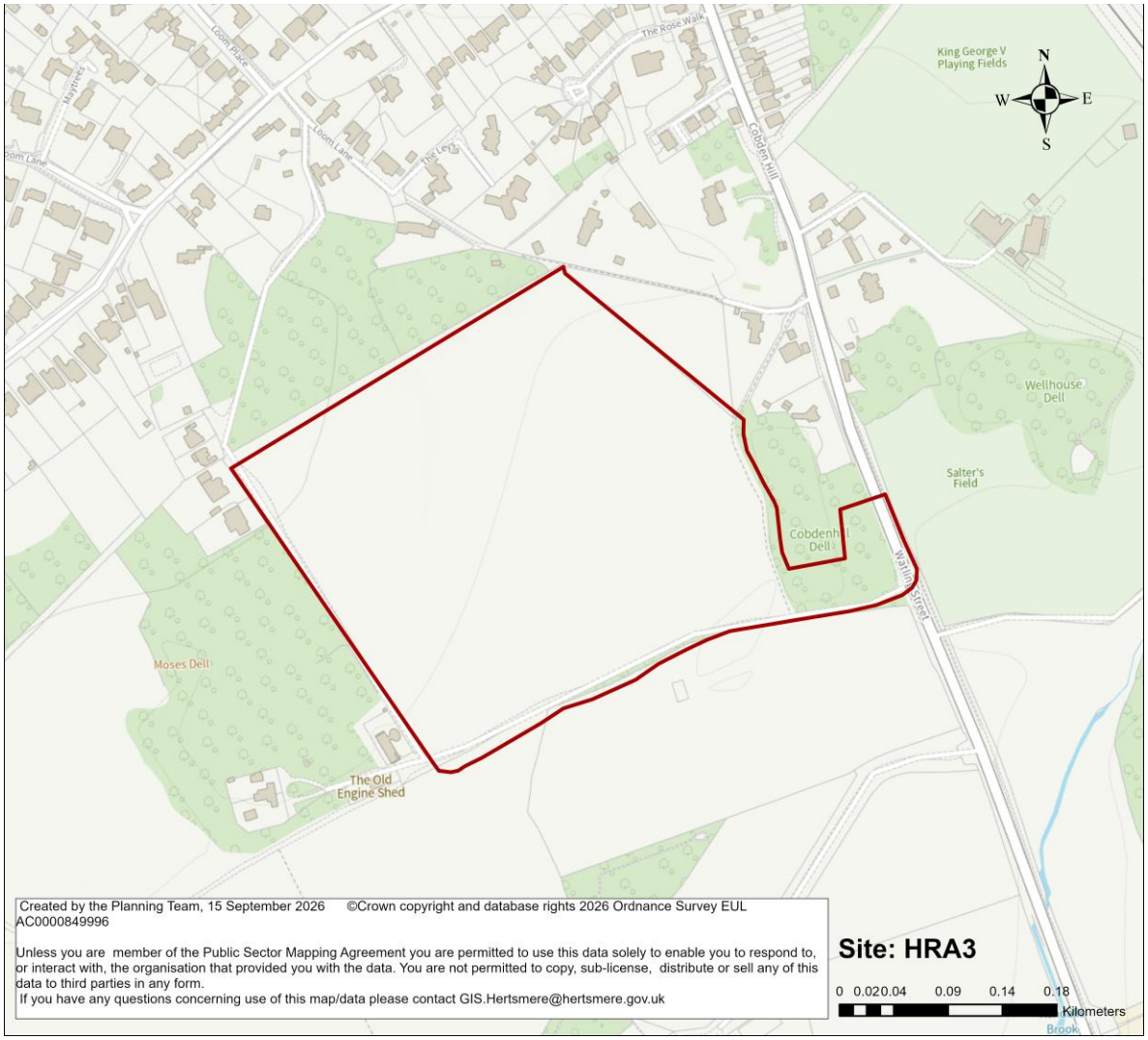
17.35 Development adjoining the railway line should consider the use of land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects. Necessary acoustic measures and mitigations will be justified and identified by appropriate and proportionate technical evidence submitted to the decision-taking process. Developers should demonstrate that they have undertaken engagement with Network Rail.

17.36 Applicants should engage with Thames Water early in the design process, and work in partnership with them to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied.

17.37 Development must respond positively to heritage assets including nearby listed buildings at Christchurch, Watling Street and the Cat and Fiddle (former public house), Watling Street and the Radlett South Conservation Area (which covers Watling Street at the junction of Theobald Street). Proposals must address impacts on the significance of these heritage assets and their setting, including the impact on views from within the Conservation Area.

17.38 Development should be designed to improve connectivity with, and maximise the value of, nearby open space King George V Recreation Ground, including Wellhouse Dell, and celebrate the site's location on the edge of Hertsmere's beautiful countryside. The site will deliver a link with Footpath Aldenham 54, which connects with King George V Recreation Ground and on to Watling Street and other Public Right of Way (PROW) links into the countryside on the southern edge of Radlett, providing residents with opportunities for improving their health and well-being.

HRA3 Land West of Watling Street



Site Address	**Land West of Watling Street, Radlett, Hertfordshire**		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	11.85 ha	Urban extension	Private
Current Uses	The site is arable farmland.		
How Site was Identified	Call for Sites process		
Planning Designations and Site Considerations	The site includes trees that are subject to TPOs. It is also in proximity to a Local Wildlife Site (Cobdenhill Dell). There is a level of measurable surface water flood risk on the site. The site is located within 750m of a Listed Building and a Conservation Area.		
Planning Status	No recent relevant planning history.		
Indicative Development Capacity	122 dwellings		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-strategic policy

Site Allocation

17.39 The site allocation proposes development for at least 122 homes that will provide an urban extension to Radlett. The anticipated extension will deliver medium-density, low-rise residential dwellings, including new genuinely affordable homes. The development of the site provides an opportunity to deliver on-site improvements for active travel, and that benefit biodiversity.

17.40 The Borough-wide Green Belt Assessment Stage 2 confirms the site's grey belt status. It concludes that the site forms only a small part of the gap between Radlett and Borehamwood and could be developed without the loss of visual separation between the two towns.

Opportunities

17.41 This accessible location lies within walking distance of Radlett's district centre provides an opportunity to contribute to meeting Radlett's housing needs, including genuinely affordable homes, during the early years of the plan period. The development of the site also provides an opportunity to deliver on-site biodiversity enhancements and active travel improvements to the Public Rights of Way network.

Development Requirements

17.42 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

17.43 The delivery of the urban extension, specifically its design and layout, should be co-ordinated with the development of the neighbouring site, Home Farm Meadows. This will ensure that active travel connections and public realm improvements are legible across both sites, specifically in relation to the vehicular access from Watling Street/Cobden Hill.

17.44 It is anticipated that the urban extension will be delivered as a component of a wider master planned proposal that includes Home Farm Meadows, which is located to the south and east. On that basis, the Council concludes that site, once developed, will

no longer have boundary with the Green Belt. However, should the site be brought forward in isolation, the site masterplan will identify and provide a defensible Green Belt boundary for the long term. This will comprise a natural landscaped boundary to the access from Cobden Hill to the south of the site; currently Bridleway Aldenham 71.

17.45 Development must be phased to ensure the timely provision of the infrastructure necessary to support the urban extension that contributes to Radlett becoming self-sustaining place. This must include the timely investment in community infrastructure to meet demand arising from the development.

17.46 The delivery of the urban extension will provide new and improved public realm and suitable open space in accordance with a site-wide public realm strategy. This should consider and reflect the opportunities identified in the Local Nature Recovery Strategy (LNRS) and meet necessary requirements for on-site sustainable drainage.

Development Guidelines

17.47 Development should provide for complementary and distinctive character areas across the urban extension that link in with and complement the masterplan across this site and the neighbouring larger site at Home Farm, to the south and east. The design and layout of the development should reflect and reinforce the hierarchy of streets and open/green spaces, with a differentiation in design, density, scale and massing, including a range of plot sizes and building heights, with reference to Radlett's character.

17.48 Development must support built environment conservation objectives by preserving and enhancing heritage assets and their setting. This should include the consideration of the site's history and heritage to inform the masterplan; incorporation of heritage assets into the layout of the site in a positive way; and celebration of their significance through increased public access and opportunities for interpretation. This Guidelines specifically relates to the setting of Radlett South Conservation Area, and several listed buildings on Loom Lane and Cobden Hill, which are within 750m of the allocation.

17.49 The delivery of the urban extension should secure a genuinely accessible and useable walking and cycling route towards Radlett District Centre and Railway Station. This route should prioritise sustainable travel over car use. It could make use of the existing bridleway that runs north towards The Leys and Loom Lane, with improved surfacing, and contribute towards provide for footway improvements around Letchmore Road/ Aldenham Avenue as proposed in the LCWIP.

17.50 Development should be designed to improve connectivity with and maximise the value of nearby open space King George V Recreation Ground, including Wellhouse Dell. The site will, in conjunction with Home Farm to the west, contribute to the delivery of genuinely accessible walking and cycling routes into the open countryside to the south. This includes a link with the public rights of way that surround the site, particularly those that provide connection to the wider countryside. These include Footpath Aldenham 18, which links up with the northernmost edge of Borehamwood, providing residents with opportunities for improving their health and well-being.

17.51 The Hertsmere Open Space Study2 identifies other forms of open space provision that might serve to fill identified gaps in public park catchments, such as amenity greenspace and natural and semi natural greenspace. Developer contributions could be utilised to deliver new open space within the adjoining and connected Home Farm site, to be largely provided by that larger site, or towards improvements to King George V Playing Fields/Wellhouse Dell on the opposite side of Watling Street.

17.52 Applicants should engage with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain incorporate the relevant actions in the LNRS. These could include enhancement of existing grassland and heathland to the west of the site; expanding and linking up existing ponds to other ponds or ecologically rich habitats in the south-east of the site; managing existing grassland and heathland to maintain the biodiversity of existing good quality habitats and enhance poor quality sites; creating more good quality neutral grassland around the edges of the site; and creating new broadleaved woodland and expanding existing sites around the edges of Moses Dell.

17.53 Applicants should work in partnership with the local transport authority to ensure that development proposals fully integrate with and provide improvements to transport networks, including bus services. Connections to sustainable travel and active networks should be prioritised and maximised.

17.54 Proposals should investigate and maximise opportunities for Decentralised Energy, including connections to local networks, in conjunction with the neighbouring Home Farm site.

[2] Hertsmere Open Space Assessment (KK&P/ AECOM August 2026)

HRA4 Land South of Shenley Hill

Site Address	Land South of Shenley Hill, Radlett		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	8.7 ha	Urban Extension	Private
Current Uses	The site is arable farmland		
How Site was Identified	Call for Sites process		
Planning Designations and Site Considerations	The wooded area bordering Theobald Street is designated as a Local Wildlife Site and is as Area of Particular Importance for Biodiversity (APIB) in the LNRS. Part of the northwestern boundary of the site is identified as an Area that Could become of Particular Importance for Biodiversity (ACIB) in the LNRS. There are listed Buildings and a Conservation Area within 750m of the site boundary.		
Planning Status	Appeal allowed; Outline permission (with all matters reserved except for means of access) granted for the erection of up to 195 new homes (50% affordable), safeguarded land for the expansion of Newberries Primary School and provision of a new medical centre, along with associated access, landscaping and parking.		

Indicative Development Capacity	195 dwellings

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-strategic policy

Existing planning consent

17.55 24/1211/OUT outline application refused and allowed on appeal (25/0029/APP) in March 2026.

17.56 The site benefits from an outline permission, with all matters reserved except for means of access, for the erection of up to 195 new homes. The consented development is comprised of 50% affordable housing; safeguarded land for the expansion of Newberries Primary School; provision of a new medical centre; and associated access, landscaping and parking.

Site Allocation

17.57 The site allocation proposes development for at least 195 homes that will provide an urban extension to Radlett comprised of compatible residential, main town centre uses, and community uses. The anticipated extension will deliver medium-density, low-rise residential dwellings, including new genuinely affordable homes.

Opportunities

17.58 The development of this accessible location close presents an opportunity to contribute to the character-led growth of Radlett during the early years of the plan period, while enhancing the biodiversity benefit of the site.

Development Requirements

17.59 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

17.60 The urban extension will be integrated into Radlett's existing transport infrastructure networks. Developers must work collaboratively with the transport authority to deliver a sustainable transport approach for the site, in terms of connectivity and mitigation of highway impacts. It is anticipated that this could include necessary off-site works

to rationalise the local highway, reduce severance and enhance sustainable connectivity to services and facilities. Improvements to the network will ensure that the extension is fully re-integrated with the surrounding street network; providing improved access and permeability Radlett Town Centre, and enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods.

17.61 The delivery of the urban extension will provide new and improved public realm and suitable open space in accordance with a site-wide public realm strategy. This will incorporate biodiversity net gain (BNG), the opportunities identified in the Local Nature Recovery Strategy (LNRS), and sustainable drainage requirements.

Development Guidelines

17.62 Development should provide for complementary and distinctive character areas across the urban extension that link in with and complement the neighbouring residential areas. These will create a new high-quality, mixed-use neighbourhood that is well-integrated with its surrounding neighbourhoods and communities.

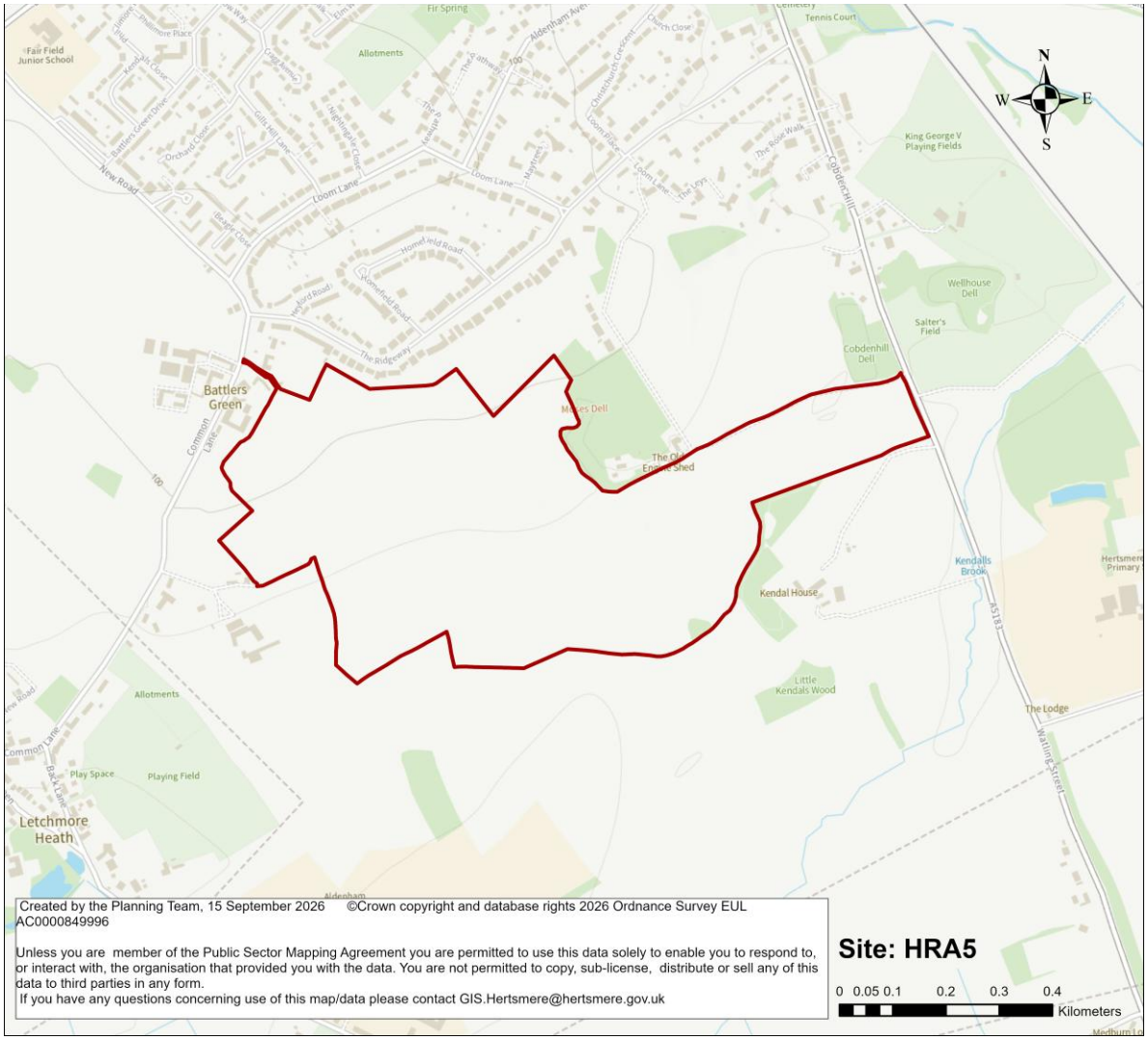
17.63 The delivery of the urban extension should secure a genuinely accessible and useable walking and cycling route towards Radlett District Centre and Railway Station. This route should prioritise sustainable travel over car use.

17.64 Applicants should engage with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain incorporate the relevant actions in the LNRS. These could include enhancement to habitats and species present on or adjacent to the site.

17.65 The design of the scheme is expected to incorporate necessary SuDS and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

17.66 Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied.

HRA5 Home Farm Strategic Urban Extension



Site Address	**Home Farm Meadows, west of Watling Street, Radlett**		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	45.2 ha	Strategic Urban Extension	Private
Current Uses	The site is in agricultural use		
How Site was Identified	Call for Sites process		
Planning Designations and Site Considerations	The site includes trees that are subject to TPOs. The site includes safeguarded as a sand and gravel belt. The site falls within the Heathrow Safeguarding Area. The site includes areas identified in the LNRS as APIB and ACIB. There are Listed Buildings and Conservation Area within 750m of the site.		
Planning Status	25/1456/EI2 (response given in 2025) Request for a scoping opinion (Environmental Impact Assessment). 26/0962/EI2 Request for a scoping opinion (Environmental Impact Assessment). (Pending consideration)		
Indicative Development Capacity	The strategic urban extension will deliver at least 650 dwellings		

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

B A Thriving local economy
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-strategic policy

Site Allocation

17.67 The site allocation proposes a strategic urban extension to Radlett that will deliver at least 650 homes during the plan-period. It will be comprised of comprehensive mixed-use developments with compatible residential, commercial, community and main town centre uses. It will deliver new walkable neighbourhoods with an integrated network of walking and cycling routes, including improved active travel networks that access Radlett District Centre and the railway station, and have the potential to extend beyond to adjoining settlements. The delivery of the strategic urban extension will also secure other social and community infrastructure improvements, including proportionate investment in local public transport; public realm and environmental enhancements. The latter is anticipated to include new public open space and improvements for nature in line with the aims of the LNRS.

17.68 The Borough-wide Green Belt Assessment Stage 2 further considers the site's contribution to the purposes of the Green Belt. It concludes that it makes a moderate contribution towards Purpose B and as such is provisionally defined as grey belt. The delivery of the strategic urban extension will provide a new defensible boundary between Radlett's south-western built-up area and the Green Belt/ open countryside. This will be secured in perpetuity.

Opportunities

17.69 The delivery of the strategic urban extension provides an opportunity to create a new successful and sustainable community located to the south of Radlett. It will be a walkable place, with a diverse mix of homes, including genuinely affordable homes that are supported by compatible education, health, community, leisure and recreation facilities. The new neighbourhood will respond positively to the challenges of balancing growth and securing a thriving economy with minimising the impacts of the climate emergency. These new uses will be linked by a comprehensive high-quality green and blue infrastructure network.

Development Requirements

17.70 Development must be planned and delivered comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan be prepared demonstrating how the strategic urban extension will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

17.71 The master plan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. It is anticipated that high intensity mixed-use could be delivered as part of the new community's local centre and other appropriate locations across the site where higher density homes may be appropriate.

17.72 The delivery of the strategic urban extension, specifically its design and layout, should be co-ordinated with the development of the neighbouring site at Land West of Watling Street, particularly in relation to securing vehicular access from Watling Street/Cobden Hill. Delivery will secure a natural landscaped boundary that is informed by the development's master plan and landscape plan.

17.73 As a strategic urban extension, development proposal must be prepared in accordance with Policy HQD1(K) and must be supported by a site-wide Design Code prepared in alignment with the National Model Design Code, or successor guidance. The site-specific design code will be coordinated with the masterplan required by Policy DM3.

17.74 Development must be phased to ensure the timely provision of the infrastructure necessary to support the urban extension that contributes to Radlett becoming a self-sustaining place. This must include the timely investment in community infrastructure to meet demand arising from the development.

17.75 The delivery of the urban extension will provide new and improved public realm and suitable open space in accordance with a site-wide public realm strategy. Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS. These include enhancement of existing grassland and heathland to the west of the site; expanding and linking up existing ponds to other ponds or ecologically rich habitats in the south-east of the site; managing existing grassland and heathland to maintain the biodiversity of existing good quality habitats and enhance poor quality sites; creating more good quality neutral grassland around the edges of the site; and creating new broadleaved woodland and expanding existing sites around the edges of Moses Dell.

Development Guidelines

17.76 Development should provide for complementary and distinctive character areas across the strategic urban extension that link in with and complement the masterplan across this site and existing neighbourhoods to the north. The design and layout of the development should reflect and reinforce the hierarchy of streets and open/green

spaces, with a differentiation in design, density, scale and massing, including a range of plot sizes and building heights, with reference to Radlett's character.

17.77 Development must support built environment conservation objectives by preserving and enhancing heritage assets and their setting. This should include the consideration of the site's history and heritage to inform the masterplan; incorporation of heritage assets into the layout of the site in a positive way; and celebration of their significance through increased public access and opportunities for interpretation. Development must conserve and, where appropriate, enhance heritage assets and their settings, including listed buildings at Battlers Green Farm (that include a grade II* building) and Kendal House Farm, and Radlett South Conservation Area to the east.

17.78 Developers will engage with Hertfordshire County Council Highways (or successor highway authority) at an early stage in the master planning process to gain an understanding of the cumulative traffic impacts of growth and how it can be managed. This work should demonstrably set out a sustainable transport approach to the strategic urban extension, in respect of connectivity and mitigation of highway impacts. It is anticipated that mitigation will include necessary off-site works to rationalise the local highway, reduce severance and enhance sustainable connectivity to services and facilities. The site must be fully re-integrated with its surroundings to improve access and permeability through onto the District Centre, with enhanced walking and cycle connections between public spaces, the surrounding neighbourhoods and the Public Right of Way network that connects with the surrounding countryside and should deliver the proposals in the LCWIP where these relate to the site.

17.79 Developers will work collaboratively with the education authority (Hertfordshire County Council) to determine the requirements for school place provision arising from the delivery of the strategic urban extension. This includes any on-site provision that arises from the strategic urban extension. The developers will work with the education authority to ensure that any agreed on-site provision is delivered in a timely manner to ensure that Radlett remains a sustainable and walkable town.

17.80 Applicants will undertake early engagement and work collaboratively with Hertfordshire County Council's Children's Services to explore, identify and agree the potential for the delivery of a new specialised residential provision that provides accommodation for children in care.

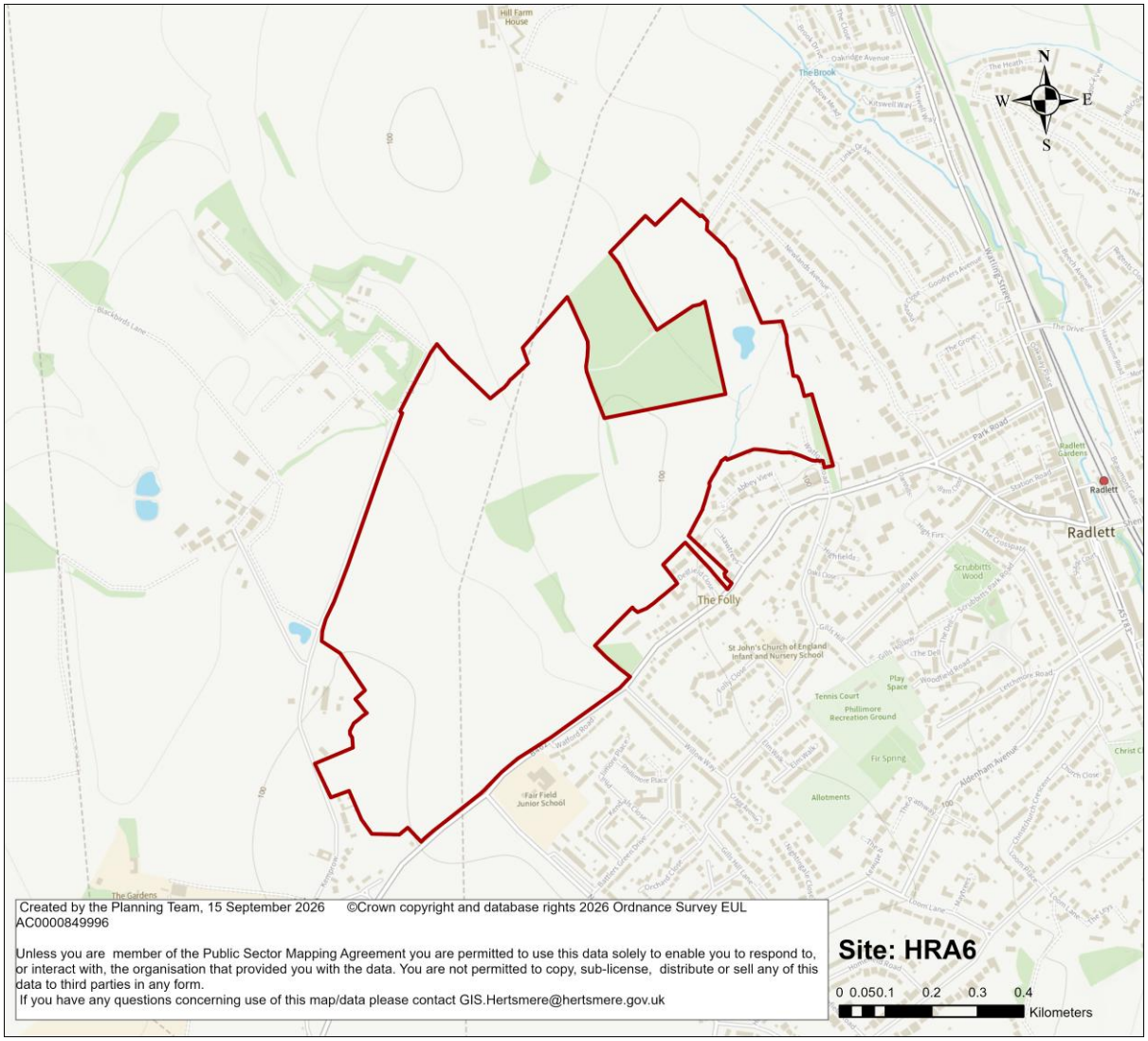
17.81 The delivery of the strategic urban extension must take account of the flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

17.82 Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied.

17.83 Applicants and developers are required to carry out necessary geophysical survey and archaeological evaluation to reveal the archaeological potential of the site.

17.84 Proposals should investigate and maximise opportunities for decentralised energy generation, including connections to local networks.

HRA6 Northwest Radlett Strategic Urban Extension



Site Address	**Comprised of Kemprow Farm, Watford Road; land off Watford Road; land to the south of Hill Farm; land off Oakridge Avenue; and land at Starveacres**		
Site Characteristics	**Site Size ha**	**Setting**	**Ownership**
	68.81 ha	Strategic Urban Extension	Private
Current Uses	The site is comprised of agricultural land and woodland.		
How Site was Identified	Site in part promoted through the Call for Sites process, and in part identified by the Council.		
Planning Designations and Site Considerations	The site includes trees that are subject to TPOs. The site includes safeguarded as a sand and gravel belt. The site falls within the Heathrow Safeguarding Area. The site includes areas identified in the LNRS as APIB and ACIB. There are Listed Buildings and Conservation Area within 750m of the site.		

	The site has been assessed as having medium/high landscape sensitivity to most development types. The northern part of site may be affected by Blackbirds Farm sewage treatment works, as it lies within the 400m buffer around Water Centres. here is a Local Wildlife Site within the site boundary.
Planning Status	No recent relevant planning history.
Indicative Development Capacity	The strategic urban extension will deliver at least 1,573 dwellings.

Timeframe for delivery

Year 1-5 | Year 6-10 | Year 11-17 | Beyond Year 17

Strategic Objectives

B A Thriving local economy
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-strategic policy

Site Allocation

17.85 The site allocation proposes a strategic urban extension to Radlett that will deliver at least 1,573 homes during the plan-period. It will be comprised of comprehensive mixed-use developments with compatible residential, commercial, community and main town centre uses. It will deliver new walkable neighbourhoods with an integrated network of walking and cycling routes, including improved active travel networks that access Radlett District Centre and the railway station, and have the potential to extend beyond to adjoining settlements. The delivery of the strategic urban extension will also secure other social and community infrastructure improvements, including proportionate investment in local public transport; public realm and environmental enhancements. The latter is anticipated to include new public open space and improvements for nature in line with the aims of the LNRS.

17.86 The Borough-wide Green Belt Assessment Stage 2 further considers the site's contribution to the purposes of the Green Belt. It concludes that parts of the site are defined as being grey belt and the rest as provisionally grey belt. The comprehensive development of the strategic urban extension must secure a defensible Green Belt Boundary to site's northern and western edges to retain the visual separation between Radlett and Watford. In particular, the existing hedgerows that demarcate the northern edge of the site must be reinforced to ensure the boundary is strong and defensible in perpetuity in the absence of any roads or other built or natural landscape features such as roads or changes in topography.

Opportunities

17.87 The delivery of the strategic urban extension provides an opportunity to create a new successful and sustainable community located to the south of Radlett. It will be a walkable place, with a diverse mix of homes, including genuinely affordable homes that are supported by compatible education, health, community, leisure and recreation facilities. The new neighbourhood will respond positively to the challenges of balancing growth and securing a thriving economy with minimising the impacts of the climate emergency. These new uses will be linked by a comprehensive high-quality green and blue infrastructure network.

Development Requirements

17.88 Landowners must work in partnership and accordance with a masterplan, to ensure the appropriate co-ordination, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). It is the responsibility of the lead landowner/ developer (who is bringing forward the site-wide masterplan) to demonstrate that they have made all reasonable efforts to undertake positive and meaningful engagement with other relevant neighbour land interests.

17.89 The master plan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. It is anticipated that high intensity mixed-use could be delivered as part of the new community's local centre and other appropriate locations across the site where higher density homes may be appropriate.

17.90 The master plan must consider the site, and its surrounding areas heritage significance and archaeological potential must inform the masterplan. This should inform the master plan's consideration of the siting and location of development, open space, landscape and important views.

17.91 Development must be phased to ensure the timely provision of the infrastructure necessary to support the urban extension that contributes to Radlett becoming a self-sustaining place. This must include the timely investment in community infrastructure to meet demand arising from the development.

17.92 The delivery of the urban extension will provide new and improved public realm and suitable open space in accordance with a site-wide public realm strategy. This will establish a connected, multi-functional green and blue infrastructure network incorporating strategic open space, parks, sport and play provision, ecological corridors, woodland, hedgerows, ponds, sustainable drainage and public rights of way. The delivery of the strategic urban extension must protect and seek to enhance green infrastructure, including the existing Local Wildlife Site, and deliver Biodiversity Net Gain in accordance with the relevant Local Plan policies and legislation. This includes delivery of new strategic open space provision that addresses local shortfalls in natural and semi-natural greenspace and in smaller, more local children's play provision (LAPs and LEAPs), and a space for allotments to serve the new population. New green infrastructure is expected to take account of the actions in the LNRS and create and enhance the site-specific habitats identified within that strategy.

17.93 Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space

provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS. This will include the retention and integration of existing on-site TPOs and Local Wildlife Site.

Development Guidelines

17.94 Development should provide for complementary and distinctive character areas across the strategic urban extension that link in with and complement the masterplan across this site and existing neighbourhoods to the north. The design and layout of the development should reflect and reinforce the hierarchy of streets and open/green spaces, with a differentiation in design, density, scale and massing, including a range of plot sizes and building heights, with reference to Radlett's character.

17.95 Developers will engage with Hertfordshire County Council Highways (or successor highway authority) at an early stage in the master planning process to gain an understanding of the cumulative traffic impacts of growth and how it can be managed. This work should demonstrably set out a sustainable transport approach to the strategic urban extension, in respect of connectivity and mitigation of highway impacts. It is anticipated that mitigation will include necessary off-site works to rationalise the local highway, reduce severance and enhance sustainable connectivity to services and facilities. The development must be fully integrated with the surrounding street network to improve access and permeability through onto Radlett District Centre, with enhanced walking and cycle connections between public spaces and surrounding neighbourhoods. The master plan will include a forward-facing car parking strategy that introduces maximum standards3 that will secure a shift towards a car-lite/ car-free future.

17.96 Delivery of the strategic urban extension will secure a natural landscaped boundary that is informed by the development's master plan and landscape plan. Specifically, development will provide a defensible Green Belt Boundary to the site's northern and western edges to retain the visual separation between Radlett and Watford. In particular, the existing hedgerows that demarcate the northern edge of the site must be reinforced to ensure the boundary is strong and defensible in perpetuity.

17.97 Developers will work collaboratively with the education authority (Hertfordshire County Council) to determine the requirements for school place provision arising from the delivery of the strategic urban extension. This includes any on-site provision that arises from the strategic urban extension. The developers will work with the education authority to ensure that any agreed on-site provision is delivered in a timely manner to ensure that Radlett remains a sustainable and walkable town.

17.98 Applicants will undertake early engagement and work collaboratively with Hertfordshire County Council to explore, identify and agree the potential for the delivery of a new specialised residential provision. This may include the on-site delivery of new provision for children; older persons (to potentially include extra care accommodation); and adults with learning, autism and physical disabilities.

[3] In accordance with Hertsmere Local Plan Policy TR3 Parking.

17.99 The delivery of the strategic urban extension must take account of the flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

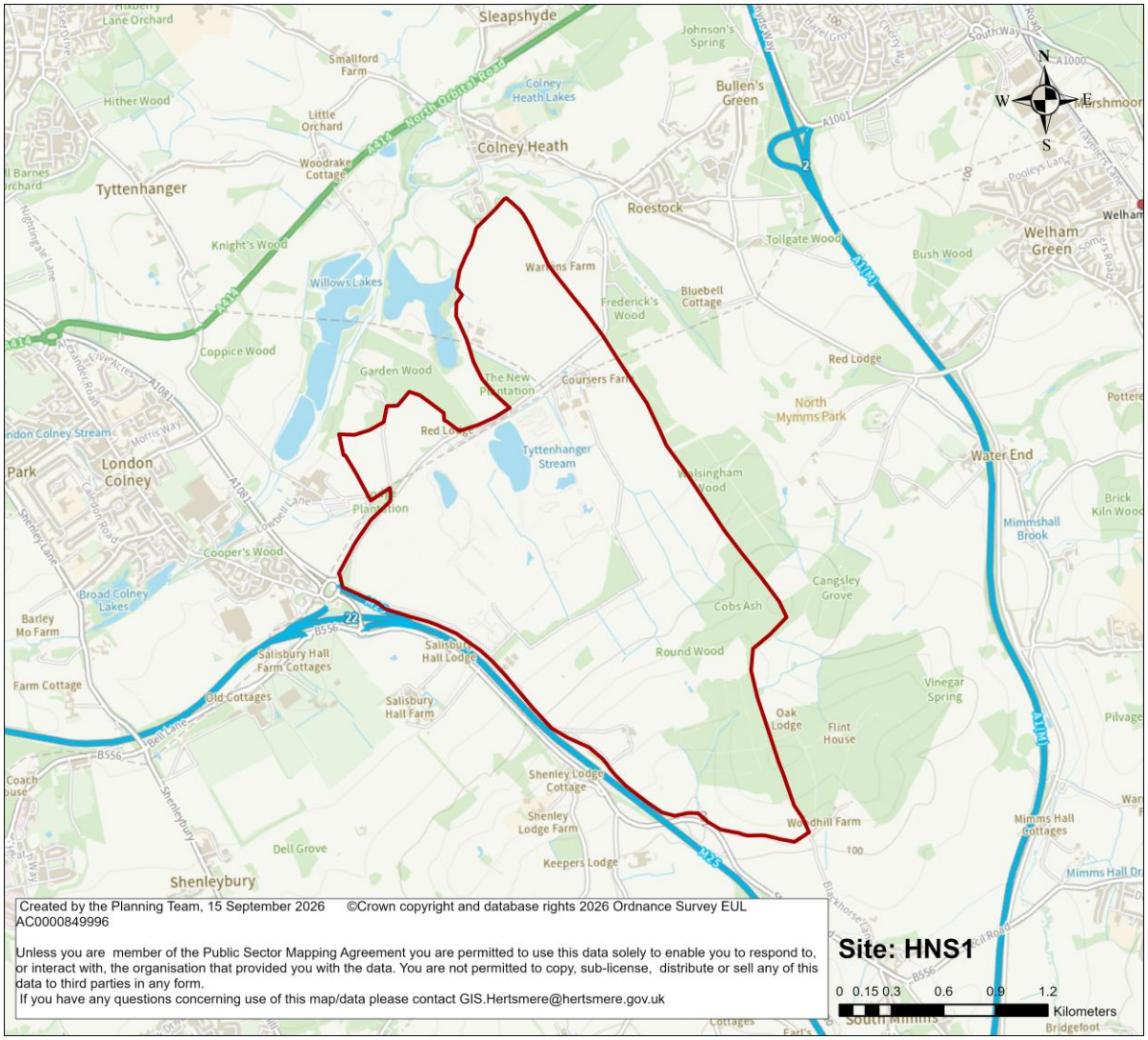
17.100 Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied. Developers must work positively with the Council and Thames Water to identify any appropriate design-focussed avoidance or mitigation measures relating to the neighbouring Blackbirds Farm Seage Works.

17.101 Applicants and developers are required to carry out necessary geophysical survey and archaeological evaluation to reveal the archaeological potential of the site.

New Settlement

BOWMANS CROSS

HNS1 Bowmans Cross New Settlement



Site Address	Land at Bowmans Cross. Located to the east of London Colney between Coursers Road (C175) and the St Albans Road/Blackhorse Lane (B556), Colney Heath, Hertfordshire		
	Site Size ha	**Setting**	**Ownership**
	420 ha	New Settlement	Private
Current Uses	Agricultural land; active and restored mineral workings associated with Tyttenhanger Quarry, woodland, hedgerows, ponds and grassland, two farms, a building supplier, the South Mimms composting facility, the North London anaerobic digestion facility; roads, public rights of way and utility infrastructure.		
How Site was Identified	Call for Sites process.		
Planning Designations and Site Considerations	The site is currently within the Metropolitan Green Belt. Key considerations include Tyttenhanger Quarry and its restoration; safeguarded waste infrastructure; the Peters Green / South Mimms high-pressure gas pipeline; M25 Junctions 22 and 23; Redwell Wood SSSI and nearby Colney Heath Local Nature Reserve; woodland, hedgerows, ponds and protected species; Tyttenhanger Stream and areas of Flood Zones 2 and 3; groundwater Source		

	Protection Zones; designated and non-designated heritage assets; archaeological potential; public rights of way; and areas of Best and Most Versatile agricultural land.
Planning Status	Environmental Impact Assessment Scoping Opinion reference 25/1630/EI2 and subsequent Addendum Scoping Opinion. The scoping material describes a forthcoming outline application for the site.
Indicative Development Capacity	The new settlement will deliver at least 5,000 dwellings across its lifespan. Of these at least 2,500 dwellings will be delivered during the plan-period, with the development of the new settlement continuing into the next plan-period. The new settlement will include housing for older people; employment floorspace; a principal mixed-use hub and neighbourhood facilities; retail, commercial, leisure, health, community and sports use; nurseries, primary schools and a secondary school; necessary public transport infrastructure, formal and informal open space, ecological areas, woodland and landscaping; and associated infrastructure.

Timeframe for delivery

Year 1-5	Year 6-10	Year 11-17	Beyond Year 17

Strategic Objectives

A Delivering a better future for Hertsmere
B A thriving local economy
E Meet the Borough's housing needs by delivering homes for everyone
F Delivering affordable homes
G Securing a greener Borough
H Responding to the climate emergency
I Celebrating our local identity
J Healthy and safe communities
K Securing the timely delivery of infrastructure

Non-Strategic Policy

Existing Planning Consents

18.1 An environmental impact assessment scoping opinion, reference 25/1630/EI2 and subsequent addendum scoping opinion have been submitted to the Borough Council, as the local planning authority, for decision. The scoping material describes and anticipates a forthcoming outline application proposing the comprehensive development of the site.

Site Allocation

18.2 Land located at Bowman's Cross is allocated as a new strategic mixed-use settlement that will deliver at least 5,000 homes. It is anticipated that at least 2,500 homes will be delivered during the plan-period. The new settlement will comprise a comprehensive mixed-use development incorporating residential neighbourhoods together with complementary and compatible employment, retail, service, leisure,

cultural, community, health, education, civic and open space uses. Collectively, the mix of uses will deliver a new settlement that is a successful, walkable and sustainable place.

18.3 The new settlement will be served by new and improved sustainable transport infrastructure networks. These will deliver a new road layout across the site, public transport networks to adjoining settlements, and an integrated network of walking, cycling and equestrian routes. These sustainable infrastructure networks will connect and access the new settlements public realm and environmental enhancements, including new public open spaces.

18.4 The Borough-wide Green Belt Assessment Stage 2 states that the land for the new settlement allocation makes no contribution towards Green Belt Purpose A, and only a moderate contribution towards Purpose B. Consequently, the Assessment concludes that the land for the new settlement can be classified as being provisionally grey belt. Going forward, the delivery of the new settlement, specifically through its planting, layout and landscaping must provide sensitive transitions to the surrounding countryside and establish a robust and enduring Green Belt boundary.

Opportunities

18.5 The delivery of the new settlement provides the opportunity to create a walkable, well-connected and infrastructure-led place with a diverse range of new homes that are supported by compatible employment, education, health, community, leisure and recreation facilities. These new uses will be linked by a comprehensive green and blue infrastructure and high-quality sustainable transport networks.

18.6 The delivery of the new settlement should be planned and delivered as a coherent whole rather than as a series of disconnected development parcels. Proposals for the new settlement must be supported by a site-wide masterplan, which may be submitted as part of an outline planning application. This will establish the overall spatial framework, neighbourhood structure, movement hierarchy, landscape and green infrastructure, infrastructure requirements, delivery sequencing and design principles. It will also demonstrate how each phase contributes to the successful delivery of the whole allocation and how critical infrastructure will be provided when needed.

18.7 The site has several significant environmental and infrastructure constraints that must shape the masterplan from the outset. These include the proximity of the M25 and its junctions, active and restored mineral workings, safeguarded waste facilities, a major accident hazard gas pipeline, ecologically sensitive woodland and designated sites, flood risk and groundwater protection, heritage assets and archaeological potential. These constraints are also opportunities to establish a strong landscape framework, secure new habitat and recreational networks, integrate restored land, and create a distinctive long-term edge to the new community.

18.8 The site lies within the Metropolitan Green Belt, with much of the land assessed and classified as being provisionally grey belt. Its allocation reflects its contribution

to meeting development needs in full in accordance with the spatial strategy, while enabling the creation of a robust and enduring Green Belt boundary.

Development Requirements

18.9 Development must be planned comprehensively in accordance with Policy DM3. This requires that a site-wide masterplan is prepared demonstrating how the new settlement will deliver a mix of new homes and other compatible uses in accordance with the site allocation.

18.10 The masterplan must use the design-led approach to consider how the capacity of the site can be optimised to deliver high-quality and higher density homes. It is anticipated that higher intensity mixed-use development could be delivered as part of the new community's local centre and other appropriate locations across the site where higher density homes may be appropriate.

18.11 Developers will engage with Hertfordshire County Council Highways (or successor highway authority) at an early stage in the master planning process to gain an understanding of the cumulative traffic impacts of growth and how it can be managed. The delivery of the new settlement must secure the full integration with the surrounding highway and transport network to improve access and permeability across the area, with enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods. Development must also enable new public transport services and active travel infrastructure within and through the site. This will require a hierarchy along clearly articulated north to south corridors, including services and routes serving Potters Bar Railway Station. These improvements will be identified improvements identified through the Transport Assessment and agreed with the relevant highway authorities.

18.12 Development must be phased with the timely provision of the infrastructure necessary to support the new settlement as self-sustaining place. This must include the timely delivery of new community infrastructure to meet demand arising from the development, including new schools and health facilities.

18.13 Development must deliver new and improved public realm and open space in accordance with a site-wide public realm strategy, to be secured by planning condition following the determination of outline planning permission. This will establish a connected, multi-functional green and blue infrastructure network incorporating strategic open space, parks, sport and play provision, ecological corridors, woodland, hedgerows, ponds, sustainable drainage and public rights of way. Development must protect and, where appropriate, enhance Redwell Wood SSSI, Colney Heath Local Nature Reserve, important woodland, trees, hedgerows, ponds, habitats and protected species, and deliver biodiversity net gain in accordance with the relevant Local Plan policies and legislation.

18.14 The design of the new settlement must ensure the significance of the wider landscape; the historic environment and heritage assets is fully understood.

18.15 Development must create a high-quality, landscape-led new settlement comprising distinctive but connected neighbourhoods, structured around the principal mixed-

use hub, neighbourhood facilities, a clear movement hierarchy and an integrated green and blue infrastructure network. Density, scale and massing should respond to accessibility and the site's landscape and heritage context, with higher densities focused at the most accessible locations. Development must provide sensitive transitions to the surrounding countryside and establish a robust and enduring Green Belt boundary.

18.16 Developers will work collaboratively with the education authority (Hertfordshire County Council) to determine the requirements for school place provision arising from the delivery of the new settlement. This includes any on-site provision that arises during the delivery of the new settlement. The developers will work with the education authority to ensure that any agreed on-site provision is delivered in a timely manner to ensure that the new settlement is walkable, successful and sustainable place.

18.17 The delivery of the new settlement must take account of the flood risk that affects the site and incorporate Sustainable Drainage (SuDS) and flood risk attenuation measures into the earliest stages of the layout. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.

18.18 Applicants should engage with Thames Water early in the design process, and work in partnership with them to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied.

18.19 Applicants are expected to work with Hertfordshire Ecology (or any successor body following LGR) and Herts and Middlesex Wildlife Trust to ensure that open space provision and Biodiversity Net Gain measures incorporate the relevant actions in the LNRS.

Development Guidance

18.20 Development should support the creation of a new settlement comprised of high-quality, mixed-use neighbourhoods that are well-integrated with their surrounding places and communities.

18.21 Over the lifespan of the new settlement, the capacity of the site and the rate of delivery may increase because of changes in circumstances, including:

a) the removal, relocation or reconfiguration of existing uses within or adjoining the allocation, including the decommissioning or relocation of the anaerobic digestion facility when it becomes obsolete;

b) updated evidence on education and community infrastructure requirements, including changes to land take associated with updated child yield assumptions; and

c) changes in delivery models, viability or market conditions, which support a wider range of tenures and unit types.

18.22 The long-term delivery of the new settlement should be supported by the establishment, of a stewardship body or equivalent mechanism that informs the design and management of community assets and provides continuity as individual phases are completed. The form and function of the body will be agreed with the Council as part of the determination of the outline planning permission.

18.23 Development should deliver transport infrastructure improvements necessary to mitigate development impacts, as identified through the Transport Assessment and agreed with the relevant highway authorities. The timing of these improvements, and any related phasing of development, will be determined through the site-specific Transport Assessment and secured by planning condition or planning obligation as appropriate.

18.24 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/ car-free future.

18.25 Development must conserve and, where appropriate, enhance designated and non-designated heritage assets and their settings, including the Grade II listed Coursers Farm Barn and the setting of Grade I listed Tyttenhanger House. Heritage significance and archaeological potential must inform the masterplan, including the disposition of development, open space, landscape and important views.

18.26 Development adjoining the M25 should use land-use disposition, built form, landscaping and good acoustic design to address noise and other environmental effects.

18.27 Developer contributions secured from the new settlement will be used the Council and its infrastructure partners to solely deliver infrastructure improvements for Bowman’s Cross. Developers must work positively with the infrastructure plan-making process, in the preparation of the Hertsmere Infrastructure Delivery Plan, to ensure that improvements are appropriately identified and prioritised.

18.28 Developers must engage positively with the neighbouring local planning authorities to reach agreement on how the new settlement will function and interact with the neighbouring settlements of St Albans, Hatfield, London Colney and Colney Heath.

18.29 The Council, the relevant waste authority and developers will work together to resolve any outstanding matters relating to on-site waste facilities. Developers must work positively with the Council and waste authority to identify appropriate provision that meets the needs of the new settlement.

PART 4
Delivery and Monitoring

Chapter 19: Delivery and Monitoring

Section

DM1 Working with stakeholders to deliver the Local Plan

DM2 Infrastructure funding and planning obligations

DM3 Masterplans and comprehensive development

DM4 Land assembly

DM5 Meanwhile Uses

DM6 Health impact assessments

DM7 Monitoring and review

DM1 Working with stakeholders to deliver the Local Plan

Strategic objectives

K Securing the timely delivery of infrastructure

Strategic Policy

A The Council will take a proactive and positive approach to working with and alongside stakeholders, including local communities and community groups, landowners, development industry partners, public sector bodies and the wider public to deliver the Local Plan.

B Progress towards the delivery of the Local Plan will be regularly monitored and assessed, in line with Policy DM7 (Monitoring and review). Where revisions to planning policies are necessary to ensure the successful implementation of the spatial strategy for the Borough, along with beneficial social, economic and environmental outcomes, these will be undertaken through the Local Plan review process.

C The Council will use powers available to it where this is necessary to support the delivery of the Local Plan, including planning enforcement.

Explanation

20.1 The Local Plan sets out an ambitious strategy to secure new investment in the Borough and coordinate this to support sustainable and successful place making. An Infrastructure Delivery Plan (IDP) has informed its preparation. This provides a detailed assessment of the infrastructure required to support Hertsmere's neighbourhoods and communities now and, in the future, considering the levels of growth planned over the long-term. The Local Plan and the accompanying IDP will be used by both the Council and its partners to support the delivery of growth. These documents have been prepared through extensive public consultation and engagement. The Local Plan will ensure that infrastructure providers, including public sector bodies, understand Hertsmere's future needs so that they can appropriately plan for and allocate funding towards the continued improvement of these networks.

20.2 National planning policy requires that the Local Plan be subject to review every five-years to ensure it is up to date. Annually published Authority Monitoring Reports help to assess progress on the delivery of the Local Plan. The IDP is a live document. As such, it will be subject to regular review and updating over the Plan period. This will ensure it takes account of implemented infrastructure improvements, new infrastructure programmes and service priorities. The Council will continue to liaise with infrastructure providers to inform updates to the IDP. We consider the IDP to

be an important supporting policy document that will over contribute towards the delivery of the successful and sustainable places.

20.3 We will continue to work positively and proactively with key stakeholders including local communities and community groups, businesses, landowners, developers, public sector bodies and the wider public to ensure the successful delivery of the Local Plan. The Statement of Community Involvement (SCI) sets out the Council's procedures for consulting the public on planning decisions. This includes the preparation of the Local Plan and guidance documents as well as the determination of planning applications. The SCI supports our wider corporate aims to increase public involvement in Council decisions, enhance transparency and openness in local democracy, and promote effective decision taking.

20.4 The Council will use the IDP as part of the negotiation process with development partners, to ensure the timely delivery of necessary infrastructure investment. We will work with relevant partners to monitor infrastructure demand and supply, as it evolves over the plan period. Evidence relating to infrastructure and the delivery of growth will be utilised by the Council to evidence on-going viability assessment and sustainability appraisal process over the plan period – supporting the wider approaches towards delivery and monitoring.

DM2 Infrastructure funding and planning obligations

Strategic objectives

K Securing the timely delivery of infrastructure

Strategic Policy

Community infrastructure levy

A The Council sets a Community Infrastructure Levy which is payable on all qualifying development that is being delivered across Hertsmere. Community Infrastructure Levy funding will be used to secure the delivery of inclusive, healthy and liveable neighbourhoods across the Borough that are well supported by infrastructure. A Community Infrastructure Levy Charging Schedule is published by the Council, and this will be subject to periodic review over the Plan period.

B A portion of Hertsmere CIL collected will be allocated towards neighbourhood priorities to help ensure that local areas are appropriately supported with infrastructure and benefit from investment generated by new development. The Council will work proactively with local communities to set priorities for the spending of neighbourhood CIL across Hertsmere.

C Neighbourhood forums are strongly encouraged to identify priorities for the use of neighbourhood CIL in neighbourhood plans. Planning obligations

D The Council will seek planning obligations on a case-by-case basis having regard to the relevant policy requirements of the statutory Development Plan, development specific impacts, appropriate mitigation (including additional facilities or requirements made necessary by the development), viability and the statutory tests for the use of planning obligations. Where financial contributions are required, these will be index linked, on an upward basis only, to maintain the value of the planning obligation.

E The following is a list of areas where planning obligations may be sought, recognising that other types of obligations may be necessary depending on the nature of a proposal and individual site circumstances:

i. Affordable housing
ii. Transport and highways infrastructure and works
iii. Sustainable transport and Healthy Streets
iv. Public transport improvements
v. Parking controls and restrictions
vi. Community and social infrastructure (including health infrastructure)
vii. Employment and skills training

viii. Affordable workspace
ix. Public realm
x. Public art
xi. Community safety measures
xii. Amenity space
xiii. Play space and recreational facilities
xiv. Open space
xv. Green and blue infrastructure
xvi. Biodiversity and wildlife habitats
xvii. Communications infrastructure
xviii. Management and maintenance arrangements
xix. Low carbon and renewable energy
xx. Flood risk management
xxi. Utilities

Explanation

20.5 The Council acknowledges that a wide range of strategic infrastructure projects will be required to support the levels of planned growth within Hertsmere over the long-term. Furthermore, site-specific measures will ensure that additional needs for infrastructure generated by new development are positively managed and that any impacts arising are appropriately mitigated. The following section describes the main funding tools that are available to the Council to support the successful delivery of the Local Plan.

Community Infrastructure Levy

20.6 The Council is the Community Infrastructure Levy (the Levy/ CIL) charging and collecting authority. This is a charge levied on certain types of new development and is non-negotiable. It is a key source of funding that contributes towards the delivery of strategic infrastructure essential to support growth across Hertsmere, particularly transport infrastructure. The Levy is also vital to helping the Council secure infrastructure required for inclusive, healthy and liveable neighbourhoods across the Borough.

20.7 Most new development that creates net additional floorspace of 100 square metres or more, or creates a new dwelling, is potentially liable for the Levy. Some developments may be eligible for relief or exemption (subject to application). This includes social housing, residential annexes and extensions, and new homes built by 'self-builders' (see Policy H8). There are strict criteria and procedures for obtaining relief or exemption. Those applying for relief or exemption should meet these in full. The Council advises applicants to refer to the Government's Planning Practice Guidance for general information on the setting, collection and use of the Levy.

20.8 Under normal circumstances all liable development will be begin payment of the Levy upon deemed commencement. The Council considers this a reasonable

approach to ensure that growth is delivered in a timely manner following their consent. Consequently, the Council will not normally agree to proposals that seek to delay payment of CIL upon commencement, under the application of a Phase 0. Possible exceptions could be considered where the developer presents robust evidence of the certainty that the delayed proposal will deliver and make payment of CIL within six months of Phase 0. In the context of housing crisis and poor housing delivery performance the Council considers this a reasonable approach.

20.9 The Council adopted a CIL Charging Schedule in February 2014, which sets out the Levy rates across the Borough. This will be subject to periodic review and potential updating over the Plan period. Changes to the CIL Charging Schedule may be necessary to respond to significant changes in the level of infrastructure provision required to support the planned levels of growth, or to consider new evidence on development viability. Further information is available on the Council's planning website.

20.10 A portion of Hertsmere's CIL is committed to neighbourhood priorities. The Council has formally agreed governance arrangements for the use of this neighbourhood Community Infrastructure Levy (NCIL). There are NCIL funds available to each ward within the Borough. Local residents and community groups are encouraged to assist in setting priorities for the use of these funds within their local areas. Neighbourhood forums are strongly encouraged to set out priorities for the use of NCIL within neighbourhood plans. This will allow for an additional level of public engagement in the process of priority setting and help to ensure there are clear priorities in place to address neighbourhood plan objectives. Further information on the governance arrangements for NCIL, and opportunities to assist in priority setting, is available on the Council's planning webpage.

Planning Obligations

20.11 As part of the process of determining planning applications, the Council may seek to enter into legal agreements with landowners and developers, and/or secure planning contributions towards infrastructure improvements. This is particularly where infrastructure is required to address the additional demand generated by new development proposals. The purpose of planning obligations is to make development acceptable in planning terms. The Council will seek to secure planning obligations to mitigate the impact of a development, which without that mitigation, would render the development unacceptable in planning terms. The Council will negotiate legal agreements and/or contributions on a case-by-case basis, considering the individual site circumstances and the mitigation measures required for the development proposed. The Council will seek to refuse planning applications where appropriate mitigation measures are not provided or cannot otherwise be secured.

20.12 The Council has published a Developer Contributions Framework, which is available on the Council's webpages. This sets out the basis for securing financial contributions that the Council will seek in association with new development. Reduced contributions, where necessary (for example due to the exceptional costs of redeveloping a particular site) will be considered before becoming the subject of

negotiation through an ‘open book’ basis based on the financial viability of the scheme.

20.13 Financial obligations will be index linked (on an upwards basis only) to maintain the value of the obligation, from the date of the resolution to grant planning permission until the date that the full payment is received. In most cases, the Council will apply the Retail Price Index (RPI) for non-capital financial contributions (e.g. workplace training contributions). The Council will use the Building Cost Information Service (BCIS) index or equivalent for financial contributions towards a specific building or facility as it relates more closely to the cost of delivering a scheme.

DM3 Masterplans and comprehensive development

Strategic objectives

K Securing the timely delivery of infrastructure

Strategic Policy

A Proposals for development must be accompanied by a site masterplan where they form all or part of a site allocation, or in other circumstances specified by the Local Plan. A site masterplan will be expected to set out how development will contribute to delivery of the spatial strategy for the Borough. It must also suitably demonstrate that the proposal will not prejudice the future development of other parts of the site and adjoining land or otherwise compromise the delivery of the site allocation and outcomes sought for the wider area.

B Where it is specified, a masterplan must be submitted as a component of either an outline, hybrid, or full planning application. Where an outline application is submitted, the first phase of development should be submitted in full detail. The scope and scale of future masterplans should reflect and be proportionate to the site or area under consideration and where appropriate comprise of:

i. An assessment of the site and its context to inform the overall development strategy;

ii. A detailed site-wide masterplan that responds positively to the spatial strategy for the Borough, site specific development principles and guidelines, and other relevant planning policies; and

iii. A delivery strategy that identifies how the development will be implemented and managed over its lifetime. This strategy must address any relevant matters to be resolved such as land assembly and preparation, infrastructure requirements, development phasing and likely need for planning obligations and/ or planning conditions, where these are necessary and appropriate.

C Proposals must address how the development site relates to neighbouring properties, the surrounding area and where necessary other relevant land ownerships, particularly in contributing to the delivery of the spatial strategy for the Borough. Where appropriate, applications will be required to be supported by a masterplan covering multiple plots within a site allocation to demonstrate the acceptability and deliverability of the scheme both in terms of its immediate and wider context. This is additional to the site masterplan required by (A) and (B) above.

D Applicants must demonstrate that they have appropriately consulted the public and relevant stakeholders through the masterplan process in accordance with the latest version of the Council's Statement of Community Involvement.

Explanation

20.14 To achieve the Local Plan's vision and strategic objectives it will be important that all development proposals positively engage with and seek to deliver the spatial strategy for the Borough. This is particularly vital for the strategic site allocations that have the potential to deliver new and improved housing, business space, public realm, facilities and other infrastructure to support the Borough's residents and communities. Hertsmere's diverse supply of strategic sites, which includes previously developed urban land in addition to large greenfield sites, have their own specific complexities in terms of their redevelopment. This may include a situation of multiple land ownership across the site, fragmentation of existing uses and space, land remediation and need for new or upgraded infrastructure. The Council considers that these constraints are more likely resolved, and the optimal use of sites realised, where development is comprehensive and in line with a site-wide masterplan.

20.15 To help ensure certainty of outcomes, the Council will seek the submission of masterplans as a key component of the outline, hybrid, or full planning application process. Submitted masterplans should be informed by a baseline assessment of the site and its surrounds, drawing on the latest available evidence. This may include demographic data, economic and social indicators and/or information on the historical, natural and built environment. The site-wide masterplan itself should establish the overall approach to the function and form of development. The level of detail included in the masterplan should be commensurate with nature and scale of development proposed, along with site-specific requirements. Depending on individual circumstances, matters to be addressed may include historical and cultural context; land uses, quantum and distribution of development; layout and design; access, circulation and parking; open space and landscaping; and infrastructure (including transport, community and green infrastructure).

20.16 The submitted masterplan's delivery strategy is important. It will seek to ensure certainty on outcomes sought from both the individual scheme, and the site allocation. One of the key aims of the masterplan process is to ensure that landowners and/ or developers are liaising with each other and made aware of the planning objectives for the site and wider area. In most cases, it will be mutually beneficial for the landowners present across an allocation to work positively together in delivering the site allocation. The Council encourages the development of such positive relationships. Coordination between landowners and other stakeholders, including infrastructure providers, will help to ensure that proposals do not prejudice each other, or the wider development aspirations for the Borough. Sites that are designed and brought forward comprehensively through the masterplan process will help to alleviate issues that may arise through piecemeal development and are more likely to maximise wider public benefits. Nevertheless, the Council acknowledges that there may be circumstances under which landowners are legitimately unable to work together. Where this arises, it will be the responsibility of the lead landowner/ developer (who is bringing forward the site-wide masterplan) to demonstrate that they have made all reasonable efforts to undertake positive and meaningful engagement with relevant neighbour land interests. The Council requires that this

process should be evidenced and documented as part of the planning application submission. Those developers seeking to bring forward proposals on their land that are contrary to emerging or agreed site-allocation wide masterplans will be required to demonstrate, through appropriate and proportionate technical evidence, that their scheme is genuinely deliverable and will not prejudice planned-for delivery across the remainder of the site. Under such circumstances, proposals must also demonstrate that they accord with the relevant site allocation policy. This is in accordance with national planning policy. Proposals that prejudice delivery across the wider site allocation, including impacts upon the scale of development and timing of housing delivery will be considered correspondingly.

DM4 Land assembly

Strategic objectives

K Securing the timely delivery of infrastructure

Non-strategic Policy

A To enable the delivery of the Local Plan and the spatial strategy for the Borough, and where it is appropriate and necessary, the Council will support land assembly to achieve comprehensive development. The Council will consider the use of its compulsory purchase powers to assemble land for development within the Borough where there is a compelling case in the public interest do so and where:

i. Landowners and/or developers, as appropriate, can demonstrate that there is a deliverable development proposal that will contribute to the achievement of the economic, social, or environmental well-being of the area; or

ii. A comprehensive approach to development of the site will deliver a strategic site allocation contained in the Local Plan (including the requirements of a masterplan where required); in a timely manner that delivers public benefit; or

iii. The development proposal for the assembled site will contribute to the delivery of the spatial strategy for the Borough, having regard to the Vision and settlement policies for the area within which the development is located; or

iv. Where demonstrably reasonable efforts have been made to engage with the landowners and occupiers of the relevant land but have been unsuccessful in securing timely delivery.

B In appropriate cases, the Council will consider the use of its other statutory powers, including Section 203 of the Housing and Planning Act 2016, to facilitate development where it is in the public interest.

Explanation

20.17 A comprehensive approach to the development of sites will often be in the public interest, particularly to secure the successful delivery of the spatial strategy for the Borough. The Council acknowledges that there may be circumstances when it may be easier for developers to deliver proposals through the piecemeal development or incremental building out. However, the constraints posed by site boundaries, neighbouring developments or land uses, along with infrastructure and utilities (whether at or below the surface), all have potentially limiting consequences for the

design, scale, land use mix and viability of schemes. Across Hertsmere and particularly in key strategic locations, such consequences could depress the optimal use of land or impose limitations on coordinated planning and development of a site or an area. The Council considers that this will have a particularly harmful impact on the extent and permanence of the Green Belt, and as such is contrary to the spatial strategy for the Borough. Consequently, the Council advocates a comprehensive approach to development to ensure the achievement of wider regeneration and strategic growth objectives.

20.18 The necessity for the Council to consider the use of compulsory purchase powers is more likely on complicated strategic sites, particularly where there are multiple landowners and leaseholders. The Council will always assess the most appropriate options for securing the successful delivery of the Local Plan. It will carefully consider the use of powers available to it to ensure that it can bring forward new development in a coordinated way and delivered in the wider public interest.

DM5 Meanwhile Uses

Strategic objectives

B A Thriving Local Economy

Non-strategic Policy

A Proposals for development for the meanwhile (temporary) use of vacant land or buildings will only be supported where the site or unit:

i. Is being actively marketed; or

ii. Falls within the boundary of a site allocation that is not expected to come forward for comprehensive redevelopment in the short term; or

iii. Is located on land within a consented major development scheme, which is being delivered in phases; and

iv. The meanwhile use sought:

v. Is appropriate to its location, with priority given to suitable employment generating, community or cultural uses;

vi. Will not adversely impact on the amenity of adjoining and neighbouring occupiers, in line with the Agent of Change principle;

vii. Does not preclude the permanent use of the site for appropriate commercial or main town centre uses, or prohibit delivery of the site allocation; and

viii. Will be temporary in nature.

B Development proposals for the meanwhile (temporary) use of vacant land and buildings within town centres and designated employment areas must not adversely impact on the viability of the town centre or function of the employment area in supporting commercial uses and activities.

Explanation

20.19 Vacant buildings and sites can have a detrimental impact on the vitality and viability of commercial and other areas. This is especially in town centre locations where vacant units can visually detract from local character and result in lower levels of footfall. The Local Plan seeks to secure the optimal use of land is made, inclusive of ensuring that land and buildings do not go unnecessarily unused. The Council will support proposals that seek the meanwhile (temporary) use of vacant buildings (including building units) or sites, where they demonstrably provide for beneficial

uses. This includes uses that support business development, community and cultural activities (particularly in centres) and those that help to address acute local housing needs.

20.20 Where meanwhile uses are proposed, applicants must submit evidence to demonstrate that the vacant unit or site is being actively marketed for its lawful use, including during the period of meanwhile activity, at market rates that are reasonable to the local economic area. The intention of this approach is to ensure that sites or units are taken up for their intended use whilst recognising some flexibility is needed to respond to fluctuations in the market or other factors. The Council will not support proposals that involve a site or unit that has been made deliberately vacant to secure a temporary consent.

20.21 The Local Plan includes several strategic site allocations that it anticipates will come forward over the medium to long-term. Our priority is to ensure that the development of these sites is delivered as quickly as possible. However, there are circumstances where strategic site allocations may take longer to be realised, such as when development is phased or time is needed to allow for coordination between different landowners. In the interim period, we are keen to ensure that active uses are maintained on-site wherever appropriate.

20.22 Development proposals for meanwhile uses must not preclude the future permanent occupation of the site or unit for an appropriate main town centre, commercial or other use, taking into account relevant site allocation policies. Meanwhile uses must not have an adverse impact on the amenity of neighbouring properties or the local area. Where located in town centres or employment areas, meanwhile uses must not compromise the employment generating function of nearby sites in line with the Agent of Change principle, or otherwise harm the viability of the town centre.

20.23 The Council may consider the future use of Local Development Orders (LDO) allowing temporary uses in specific locations subject to certain conditions being satisfied.

20.24 Where meanwhile uses are approved, they will be considered for monitoring purposes. This includes meanwhile residential uses, where conventional units and non-conventional bedrooms will be counted towards Hertsmere's housing requirement.

DM6 Health impact assessments

Strategic objectives

J Healthy and safe communities

Non-strategic Policy

A A desktop Health Impact Assessment (HIA) must be submitted with the following types of development proposals:

i. Major developments;

ii. Developments located within an Air Quality Focus Area; and

iii. Developments including the following uses:

a. Hot-food takeaways;
b. Betting shops;
c. Education facilities;
d. Health and social care facilities;
e. Leisure and community facilities; and
f. Publicly accessible open space.

Explanation

20.25 This policy supports the objective for a healthier Hertsmere by improving residents' health and reducing health inequalities. Health Impact Assessments will be required for development proposals, which are most likely to impact on public health outcomes whether by virtue of their large scale, nature of uses or location in an area of poor air quality.

20.26 The Council advocates the use of a checklist approach to the completion of Health Impact Assessments. This can normally be completed as a desktop study. The Health Impact Assessment should be undertaken as early as possible in the planning and design process in order to identify opportunities for maximising public health benefits, minimising harm and addressing health inequalities. Development proposals must demonstrate how the Health Impact Assessment has been used to inform the design of the proposal. The Council advises that the Health Impact Assessment can be completed either as a standalone assessment or form part of an Integrated Impact Assessment, where appropriate. The scope of the Health Impact Assessment will depend on the nature, scale and location of development along with the potential impacts on public health and wellbeing.

DM7 Monitoring and review

Strategic objectives

N/A

Non-strategic Policy

A The implementation of the Hertsmere Local Plan policies will be kept under review throughout the Plan period, considering the Local Performance Indicators set out in Table 18.1. Progress and performance outcomes towards the delivery of a Better Future for Hertsmere and the spatial strategy will be measured annually throughout the Plan period and will be published annually in the statutory Authority Monitoring Report (AMR).

B Development viability across Hertsmere will be regularly reviewed over the Plan period. Where evidence suggests that changes in land values are likely to significantly impact on the viability of different types of development, whether areas across the Borough, the Council will consider the need for a review of strategic approaches or policies.

Explanation

20.27 Monitoring is necessary to assess progress towards the implementation of the Local Plan over the Plan period. The section sets out the monitoring framework against which the successful delivery of the Local Plan will be measured. The monitors will help to assess yearly performance. However, it is recognised that the spatial strategy is underpinned by the need for sensitively managed change and transformational investment (for example, in sustainable travel infrastructure), which in some local areas or specific circumstances may take several years to begin to materialise.

20.28 Performance against Hertsmere Local Plan's Local Performance Indicators (LPIs) will be published in the statutory Authority Monitoring Report (AMR). Performance metrics and figures will be accompanied by commentary to make reports more legible and user-friendly and may be supported by additional monitoring information.

20.29 Table 18.1 identifies 28 LPIs to measure progress against various aspects of the Local Plan. It sets out a range of specific targets, to reflect the requirements identified in individual policies, as well as differing types of targets that apply to more than one policy and seek. These targets will be measured on an annual basis, and on a rolling basis, to identify trends over time and/or throughout the Plan period:

- To deliver specific types of development in places that are, or are planned to be, well-connected by public transport.

- No net loss of specific types of development, other than those that meet policy criteria.
- Net gain of specific types of development, by a specific date and/or over the Plan period.
- To deliver a range of planned infrastructure projects, as identified in the Infrastructure Delivery Plan.

20.30 The Council considers the LPIs important for assessing policy performance and overall implementation of the Local Plan. It is anticipated that the AMR will include a more comprehensive and detailed set of data, which will help to complement and put into context the LPIs. This may include other data that is not made available on an annual basis, such as the Indices of Multiple Deprivation and Census data; information within research reports; other technical evidence; and Council strategies. Consequently, the scope of the AMR will evolve over time. However, the Council will seek to ensure continuity through a focus on the LPIs.

20.31 Where monitoring clearly indicates that a strategic objective, elements of the Local Plan spatial strategy or specific plan targets are not being delivered in a timely manner, we will assess the reasons for this and may consider, as appropriate, contingency measures or other actions. This may include single-issue reviews and corresponding updates to the Local Plan.

20.32 We will regularly monitor development viability as part of the Local Plan's implementation and performance monitoring. Where evidence suggests that changes in land values are likely to significantly impact the viability of different types of development, whether in specific areas or across the whole Borough, the Council will consider the need for a review of strategic approaches or policies. This is particularly in respect of requirements for affordable housing.

20.33 The preparation and publication of the Hertsmere Local Plan has involved the Council making a significant commitment towards the use of digital solutions. The Council will continue to explore the opportunities offered by increase digitisation of the planning process through the performance monitoring of the Plan's implementation. It is anticipated that this may enable a more dynamic approach to assessing and responding to the timely delivery of growth – particularly in respect of maintaining a rolling supply of land that responds to the Borough's needs.

Table 20.1: Monitoring Framework

Ref	Measure	Indicator	Policy Target
High-Quality Design and Heritage			
LPI 1	Density of housing	Densities of major developments being delivered	Policy HQD4 A and B: Delivery of higher density developments in places that are, or are planned to be, well-connected by public transport

LPI 2	Tall buildings	Number of tall buildings being delivered by number of storeys	Policy HQD5
LPI 3	Designated heritage assets	Net change in designated heritage assets including Conservations Areas, Listed Buildings, Scheduled Ancient Monuments, and Registered Parks and Gardens	Policy HE2 No net loss of designated heritage assets, other than those that meet policy HE2 criteria
Housing			
LPI 4	Housing delivery	Number of Homes being delivered	Policy H1 A Net gain in number of homes in accordance with housing need
LPI 5	Small housing sites	Number of net homes being delivered on small sites Proportion of net homes on small sites as part of the overall housing supply	Policy H2 Net gain in small site housing supply
LPI 6	Affordable housing	Number of net affordable homes being delivered on qualifying sites with 10 units or more Proportion of net affordable homes as part of overall housing supply	Policies H1 and H3
LPI 7	Genuinely affordable housing delivery	Number of net genuinely affordable homes being delivered on qualifying sites with 10 units or more Proportion of net genuinely and intermediate affordable homes	Policy H3 Tenure split in accordance with policy
LPI 8	Housing size mix	Number of net homes being delivered by dwelling size mix (e.g. bedrooms)	Policy HO1 Dwelling size mix for affordable housing, as set out in policy
LPI 9	Non-conventional housing	Number and type of net non-conventional homes being delivered, including older people's, supported and specialised accommodation Proportion of pro-rata non-conventional homes as part of the overall housing supply	Policies H4 and H5
LPI 10	Houses in Multiple Occupation (HMOs)	For HMOs requiring planning permission, number of net HMOs being delivered Proportion of pro-rata HMOs as part of the overall housing supply	Policy H6 No net loss of existing family housing (3 bedrooms or more) for use as HMOs, other than those that meet policy HO8 criteria.
LPI 11	Gypsy and traveller accommodation	Delivery of additional permanent gypsy and traveller pitches	Policy H8 Meeting new demand for gypsy and traveller pitches
Economy and Culture			

LPI 12	New workspace	Net change in employment floorspace delivered	Policy EC2 Net gain of employment floorspace by 2043
LPI 13	Affordable workspace	Number of on-site affordable workspace units being delivered Number of off-site contributions secured towards affordable workspace through planning obligations	Policy EC4
LPI 14	Main town centre uses floorspace	Net change in main town centre uses floorspace being delivered Proportion of main town centre uses floorspace located within the town centre network including major, district and local centres	Policy EC11 Neet gain in main town centre use floorspace
LPI 15	Cultural infrastructure	Net change in cultural venues and facilities being delivered, including public houses	Policies EC18, EC19 and SCI1 No net loss of cultural venues
Community Instructure			
LPI 16	Community infrastructure	Net change in community infrastructure being delivered	Policy SCI2 Delivery of planned infrastructure projects, against those identified in Appendix A of the Infrastructure Delivery Plan
Green Infrastructure			
LPI 17	Designated open space	Net change in designated open space including Local Green Space, Strategic Open Space and Neighbourhood Open Space	Policy GI3 No net loss of designated open spaces
LPI 18	Biodiversity	Net change in designated biodiversity sites including Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNR)	Policy GI 4 No net loss of designated biodiversity sites
LPI 19	Biodiversity Net Gain	Number of major developments providing biodiversity net gain	Policy GI4 A minimum 10% increase in habitat value for wildlife compared with the predevelopment baseline.
LPI 20	Urban Greening	Number of qualifying major developments meeting the target Urban Greening Factor on site	Policy GR5 C Score of 0.4 for predominantly residential development and 0.3 for predominantly commercial development.
LPI 21	Recreational and open space	Net change in new and/or enhanced accessible sports and recreational facilities and green infrastructure	Policies SCI3 and GR2 Delivery of planned infrastructure projects, against those identified in Appendix A of the Infrastructure Delivery Plan.

Sustainable Design and Infrastructure			
LPI 22	Carbon emissions on new development	Number of qualifying major developments meeting carbon emission reductions on-site	Policy SDI4 B 35% reduction of carbon emissions, compared to Building Regulations 2013.
LPI 23	Carbon offsetting	Number of major developments with net zero carbon on-site Amount of cash-in-lieu carbon offset contributions secured through planning obligations	Policy SDI4 C Increase in all major developments being net zero carbon on-site. Increase in carbon offset payments.
LPI 24	Air quality - major development	Number of major developments meeting air quality neutral standards	Policy SDI5 B • Increase in major developments improving air quality or being at least air quality neutral.
Transport and Connectivity			
LPI 25	Strategic infrastructure	Progress in the delivery of strategic transport infrastructure.	Policy TR1 C Delivery of planned strategic transport schemes, against those identified in Table 11.1 of the Local Plan and Appendix X of the Infrastructure Delivery Plan
LPI 26	Car free/ car-lite developments	Number and location of car free or car-lite schemes being delivered on major developments	Policy TR3 B Delivery of car free developments in places that are, or are planned to be, well-connected by public transport
LPI 27	Planning obligations	Number and type of planning obligations secured from Section 106 liable developments – to secure the timely delivery of infrastructure	Policy DM2 E Increase in planning obligations
Hertsmere's Towns and Places			
LPI 28	Allocated sites	Number of allocated sites being delivered in the four main towns. Proportion of allocated sites being delivered in the four main towns.	Appendix 6 Housing Trajectory Net gain of at least 17,460 new homes over the Plan period with: Borehamwood = Potters Bar = Bushey = Radlett = Bowman's Cross New Settlement =

APPENDICES

Appendices

Section

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Appendix 1: Abbreviations

Table 22.1: Table of Abbreviation Use

AMR	Authority Monitoring Report
AQA	Air Quality Assessment
AQMA	Air Quality Management Area
AV	Audio Visual
BNG	Biodiversity Net Gain
BRE	Building Research Establishment
BREEAM	Building Research Establishment Assessment Method
CAA	Civil Aviation Authority
CABE	Chartered Association of Building Engineers
CCTV	Closed Circuit Television
CHP	Combined Heat and Power
CIBSE	Chartered Institute of Building Service Engineers
CIL	Community Infrastructure Levy
CO2	Carbon Dioxide
CPZ	Controlled Parking Zones
DRP	Design Review Panel
DWMP	Drainage and Wastewater Management Plans
EA	Environment Agency
ESP	Employment and Skills Plan
EUI	Energy Use Intensity
EUV	Existing Use Value
EVCP	Electric Vehicle Charging Points
FEMA	Functional Economic Market Area
FRA	Flood Risk Assessment
GP	General Practitioner (Doctor)
GRP	Glass Reinforced Plastic
HBAPMN	Hertfordshire and Bedfordshire Air Pollution Monitoring Network
HELAA	Housing and Employment Land Availability Assessment
HIA	Health Impact Assessment
HMO	House in Multiple Occupation
HSE	Health and Safety Executive
ICT	Information Communication Technology
IDP	Infrastructure Delivery Plan
INNS	Invasive Non-Native Species
kWh	Kilowatt hours
LAEP	Local Area Energy Plan
LETI	London Energy Transformation Initiative
LGR	Local Government Reorganisation
LHNA	Local Housing Needs Assessment
LNRS	Local Nature Recovery Strategy
LURA	Levelling-Up and Regeneration Act 2023
MCA	Mineral Consultation Area
MCASPD	Mineral Consultation Areas Supplementary Planning Document
MUGA	Multi Use Games Area
NFM	Natural Flood Management
NPPF	National Planning Policy Framework
NOx	Nitrogen Oxide

PDMP	Parking Design and Management Plan
PPTS	Planning Policy for Traveller Sites
PSA	Primary Shopping Areas
RAF	Royal Air Force
RIA	Retail Impact Assessment
RICS	Royal Institution of Chartered Surveyors
RIGS	Regionally Important Geological Site
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SFRA	Strategic Flood Risk Assessment
SIL	Strategic Industrial Location
SME	Small and Medium-sized Enterprise
SPZ	Source Protection Zones
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Urban Drainage Systems
TRBMP	Thames River Basin Management Plan
UGF	Urban Greening Factor
WFD	Water Framework Directive

Appendix 2: Glossary

A

Agent of Change - A principle that places the responsibility of mitigating the impact of nuisances from existing nuisance generating uses on the proposed new development.

Allotments and Community Gardens - Opportunities for people who wish to grow their own produce as part of the long-term promotion of sustainability, health, and social inclusion.

Amenity - Element of a location or neighbourhood that helps to make it attractive or enjoyable for residents and visitors.

Amenity Space - The outside space of a building normally associated with housing. It may be private or shared, depending on the building it serves.

Ancient or Veteran Tree - A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

Ancient Woodland - An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).

Archaeological Interest - There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

Article 4 Direction - A tool used by local planning authorities to remove some or all permitted development rights that apply to a particular site or area.

B

Backland Site - Landlocked site to the rear of street frontages not historically in garden use such as builders' yards, small workshops and warehouses, and garages.

Biodiversity - This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value and has social and economic value for human society.

Brownfield Land – This refers to previously developed land.

C

Car Club - A short-term vehicle rental service that allows members access to cars parked locally.

Car Free Development – Development proposals that deliver car free development have no general parking but should still provide disabled persons parking.

Car Lite - Securing places and lifestyles that rely less on cars, and more upon walking, cycling and public transport for mobility; or even teleworking where possible, while not eliminating car transport entirely.

Circular Economy - An economic model in which resources are kept in use at the highest level possible for as long as possible to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.

Combined Heat and Power (CHP) - The combined production of electricity and usable heat is known as Combined Heat and Power. Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process heating.

Commercial Unit - This is defined as floorspace, either in built form or open, that is solely for the purpose of generating profit through business enterprises.

Commercial waste - Waste arising from premises which are used wholly or mainly for trade, business, sport, recreation or entertainment as defined in Schedule 4 of the Controlled Waste Regulations 1992.

Community infrastructure - See Social infrastructure.

Community Infrastructure Levy (CIL) - A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area to pay for infrastructure projects. These improvements are typically identified in the area's Infrastructure Delivery (IDP) and are necessary to support the delivery of planned-for growth.

Conservation (heritage) - The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Conservation Area - Areas of special architectural or historic interest designated by local authorities under the Planning (Listed Building and Conservation Areas) Act 1990.

Creative industries -Those industries which have their origin in individual creativity, skill and talent which have a potential for wealth and job creation through the generation and exploitation of intellectual property. Within Hertsmere these industries frequently provide support to resident film and television production.

D

Decentralised energy - Local renewable and local low-carbon energy sources.

Design and Access statement - A statement that accompanies a planning application to explain the design principles and concepts that have informed the development and how access issues have been dealt with.

Designated heritage asset – Within Hertsmere this can include Scheduled Monument, Listed Building, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Development Plan - For Hertsmere this comprises the Hertsmere Local Plan and Neighbourhood Plans; and the Hertfordshire Minerals and Waste Plan.

Digital infrastructure - Infrastructure, such as small cell antenna and ducts for cables, that supports fixed and mobile connectivity and therefore underpins smart technologies.

District heating network - A network of pipes carrying hot water or steam, usually underground that connects heat production equipment with heat customers. They can range from several metres to several kilometres in length.

Dual aspect dwelling - A dual aspect dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building. The provision of a bay window does not constitute dual aspect.

Dwelling - A self-contained unit of residential accommodation; also referred to as a 'residential unit'.

E

Embodied carbon / energy / emissions - The total life cycle carbon, energy, greenhouse gases used in the collection, manufacture, transportation, assembly, recycling and disposal of a given material or product.

Energy efficiency Making the best or most efficient use of energy to achieve a given output of goods or services, and of comfort and convenience.

Energy Hierarchy - Tiered approach to reducing carbon dioxide emissions in the built environment.

F

Family housing - A dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three or more bedrooms. Also referred to as family-sized housing or homes.

Flood Risk Assessment (FRA) - An assessment of the likelihood of flooding in a particular area (usually a specific site) so that development needs and mitigation measures can be carefully considered.

G

Garden land – Normally this relates to residential garden land within the curtilage of a dwellinghouse. The exact extent of a garden can often a matter of fact and degree based on the site's use, layout, and relationship to the house.

Genuinely affordable housing - In Hertsmere, genuinely affordable housing is housing at social rent levels.

Geodiversity - The range of rocks, minerals, fossils, soils and landforms.

Green Belt - A designated area of open land around London (or other urban areas). This is known as the Metropolitan Green Belt. The purposes of the Green Belt are set out in national planning policy. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Green corridor - Continuous areas of open space leading through the built environment, which may be linked and may not be publicly accessible to each other and to the Green Belt/ wider countryside that surrounds Hertsmere's towns and settlements. They often consist of rivers, railway embankments and cuttings, roadside verges, canals, parks, playing fields, and extensive areas of private gardens. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

Green cover - The total area covered by vegetation and water across the Borough's towns and settlements. It not only includes publicly accessible and publicly managed vegetated land (i.e. green space) and waterways, but also non-accessible green and blue spaces, as well as privately owned vegetated land including private gardens and agricultural land, and the area of vegetated cover on buildings and in the wider built environment such as green roofs, street trees and rain gardens.

Green infrastructure - A network of multi-functional green space, urban and rural, which can deliver a wide range of environmental and quality of life benefits for local communities.

Green roofs and walls - Planting on roofs or walls to provide climate change, amenity, food growing and recreational benefits.

Green space - All vegetated open space of public value (whether publicly or privately owned), including parks, woodlands, nature reserves, gardens and sports fields, which offer opportunities for sport and recreation, wildlife conservation and other benefits such as storing flood water, and can provide an important visual amenity in the urban landscape.

Greenfield runoff rate - The runoff rate from a site in its natural state, prior to any development.

Greenhouse gas - Any gas that induces the greenhouse effect, trapping heat within the atmosphere that would normally be lost to space, resulting in an increase in average atmospheric temperatures, contributing to climate change. Examples include carbon dioxide, methane and nitrous oxides.

Greening - The improvement of the appearance, function and wildlife value of the urban environment through soft landscaping use of vegetation or water.

Gypsy and Traveller - Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

H

Habitable room - A habitable room is any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, corridors, hallways, utility rooms or similar should not be considered habitable rooms.

Health Impact Assessment (HIA) - Used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population and highlight any health inequalities that may arise.

Heritage asset - A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic environment - All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Historic Environment - Record Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

House in Multiple Occupation (HMO) - Dwellings which are shared by three or more tenants who form two or more households and share a kitchen, bathroom or toilet. HMOs for between three and six people are classed as C4 (except for areas affected by an Article 4 Direction) whereas HMOs for more than six people are Sui Generis.

Household waste - Household waste includes waste from collection rounds of domestic properties (including separate rounds for the collection of recyclables), street cleansing and litter collection, beach cleansing, bulky household waste collections, hazardous household waste collections, household clinical waste collections, garden waste collections, and any other household waste collected by the waste authorities.

Housing and Employment Land Availability Assessment (HELAA)/ Strategic Housing Land Availability Assessment (SHLAA) - An assessment of land availability for housing which informs the plan-making process.

Housing Need - The outcome of the national standard method calculation of *housing need*, which is a standardised, unconstrained assessment of the minimum number of homes needed in an area. Under national planning policy and guidance this should provide the minimum starting point for the consideration of housing requirement.

Housing Requirement – this is the Borough's housing target as set by the plan-making authority. This is the number of homes that the Local Plan seeks to provide during the plan period, using the standard method housing need as a starting point, and then considering various local constraints, policies, strategies, and other relevant factors.

I

Inclusive design - Inclusive design results in an environment which everyone can use, to access and benefit from the full range of opportunities available; confidently, independently, with choice and dignity, which avoids separation or segregation and is made up of places and spaces that acknowledge diversity and difference, meeting the needs of everyone in society.

Industrial Land - This is defined as land used for the production, processing, repair, maintenance or storage of goods or materials.

Infill development - Development that takes place on vacant or undeveloped sites between other developments and/or built form. Informal Amenity Greenspace Informal recreation spaces and green spaces in and around residential blocks but not exclusively relating to estate amenity space.

Informal recreation space - Social space that allows people – often but not exclusively young people aged 12+ - to congregate together, socialise and participate in informal recreation or physical activity. It is less explicitly defined than formal open space but closely linked to the definition of amenity green space. However, it differs in that it can provide an additional offering of sociable seating and youth shelters and does not necessarily have to include grassland and other forms of planting.

Infrastructure - Term used to describe the facilities and services for local people to live their everyday lives. Infrastructure can take many forms; it can be defined in physical, green and social terms, and can range from strategic provision, such as a new road or school, to the creation of a local play space.

L

Legibility - The extent to which a place can be easily understood and traversed.

Listed Building - Buildings of special architectural or historic interest designated by the Department of Culture, Media and Sport under the Planning (Listed Building and Conservation Areas) Act 1990.

Locally listed buildings - These are buildings of historic or architectural interest at the local level. Although they are not legally protected, in general, close scrutiny will be given to any development affecting them.

M

Main Town Centre Uses - Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and

tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). See also National Planning Policy Framework.

Major Development - For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floor space of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Masterplan - A document which sets out land use principles and/ or proposals for the layout and design of buildings, spaces, transport and movement of people and vehicles, and supporting infrastructure along with a delivery strategy. A masterplan can cover an individual site, multiple sites and/or a wider strategic area, such as a town centre.

Mixed-use development - Development for a variety of activities on single sites or across wider areas such as town centres.

N

Natural and Semi-natural Greenspace - Access to nature, wildlife conservation, biodiversity and environmental education awareness.

Natural surveillance - When buildings around a space are designed with features that are likely to lead to people overlooking the space. These may be windows, balconies, front gardens or entrances.

Nature conservation - Protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and recreation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.

Neighbourhood Open Space - Open spaces that are not designated on the Policies Map but make an important contribution to liveability of neighbourhoods. These can include but are not limited to green spaces. Their primary function consists of the following: ‘provision for children and young people’, ‘informal amenity green space’ and ‘market squares and hard-surfaced areas designed for pedestrians’.

Neighbourhood Plan - A statutory plan prepared by a designated neighbourhood forum that contains non-strategic planning policies for a designated neighbourhood area.

Noise and vibration assessment - An assessment of noise and vibration that is either; existing and may impact upon future development, or that would be caused by new development and could impact upon the existing environment.

North facing - North facing windows are generally defined as any windows within 45 degrees of due north.

O

Older people - People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

Open space - Land that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space found across Hertsmere, both designated and non-designated, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

Original Building - A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.

Outdoor Sports Facility - Participation in outdoor sports, such as pitch sports, tennis, bowls, athletics or countryside and water sports.

P

Parks and gardens - Urban parks, country parks and formal gardens. Accessible, high-quality opportunities for informal recreation and community events. More multi-functional than other open space, offering space for quiet relaxation as well as a range of amenities and activities for visitors. Parks often include children’s playspace, youth space and/or outdoor sports facilities.

People with disabilities - People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their

ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

Permeability - The extent to which an area has a variety of pleasant, convenient and safe routes through it by walking and cycling.

Permitted Development Rights - A general planning permission granted not by the local authority but by Parliament. Legislation (currently the Town and Country Planning (General Permitted Development (England) Order 2015) sets out classes of development for which a grant of planning permission is automatically given, provided that no restrictive condition is attached or that the development is exempt from the permitted development rights.

Planning condition - A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning obligation - A legal agreement entered under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. See also Section 106 agreements.

Playing field - The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Policies Map - A part of the Local Plan illustrating the policies and showing the location of proposals on an Ordnance Survey base map.

Positive frontage - Design principle in which the front of the building is designed to create or enhance visual interest, provide a clear and legible articulation of buildings and their facades, and add vitality to the street or public realm. A positive frontage may incorporate an active frontage at the ground floor or street level. See also Active frontage.

Previously Developed Land - Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for

restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Primary Shopping Area (PSA) - Defined area where retail development is concentrated.

Priority habitats - Habitats of principal importance identified under section 41 of the Natural Environment and Rural Communities Act 2006. Most areas of priority habitat are protected within Sites of importance for Nature Conservation.

Priority species - Species that are a conservation priority because they are under threat, or they are characteristic of a particular region.

Private rented sector - All non-owner-occupied self-contained dwellings that are being rented out as housing (not including forms of affordable housing). Protected species Certain plant and animal species protected to various degrees in law, particularly the Wildlife and Countryside Act, 1981 (as amended).

Provision for Children and Young People - Areas designed primarily for play and social interaction involving children and young people, such as equipped play areas, ball courts, skateboard areas, and teenage shelters.

Public realm - The publicly accessible space between and around buildings, including streets, squares, forecourts, parks, and open spaces.

Q

Quiet Areas - The Environmental Noise (England) Regulations 2006 (as amended) require that Noise Action Plans for agglomerations include provisions that aim to protect any formally identified ‘Quiet Areas’ from an increase in road, railway, aircraft, and industrial noise.

R

Recycling - Involves the reprocessing of waste, either into the same product or a different one. Many non-hazardous wastes such as paper, glass, cardboard, plastics and metals can be recycled. Hazardous wastes such as solvents can also be recycled by specialist companies, or by in-house equipment.

Renewable Energy - Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy is included.

Retrofitting - The addition of modern technology or features to existing buildings in order to make them more efficient and to reduce their environmental impacts.

S

Secondary heat - To recover useful energy, in the form of heat, from sources where processes or activities produce heat which is normally wasted (for example recovering heat from the Underground network) or from heat that exists naturally within the environment (air, ground and water).

Section 106 agreements - These agreements confer planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990. See also Planning obligation.

Self-build and custom-build housing - Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Sequential approach - As defined in the National Planning Policy Framework, in relation to planning applications for town centre uses and in relation to flood risk.

Setting of a heritage asset - The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Shell and core - A commercial development where all internal finishes and services are left out, for provision by the tenant.

Significance of a heritage asset - The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Single family house - Self-contained house occupied by a single family. Also referred to as single family home.

Site allocation - A type of Local Plan policy which establishes land-use principles and requirements for new development within a specific location.

Site of Importance for Nature Conservation (SINC) - Areas of land chosen to represent the best wildlife habitats and areas of land where people can experience nature close to where they live and work. Sites are classified into Sites of Metropolitan, Borough and Local Importance depending on their relative value. Unlike SSSIs, SINCs are not legally protected, but their value must be considered in any land use planning decision.

Social infrastructure - Covers facilities such as health provision, early years provision, schools, colleges and universities, community, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive, and other facilities can be included as social infrastructure. Also referred to as Community infrastructure.

Special Areas of Conservation - Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation-sites.

Statement of Community Involvement (SCI) - The Statement of Community Involvement sets out the local planning authority's policy for involving the community in the preparation and revision of Local Development Documents and planning applications.

Strategic Development – These are development proposals that are defined as being comprised of 100 or more dwellings; related to major development (as defined by the NPPF) in the Green Belt; involve sites where there are potentially complex or sensitive issues such as listed buildings, conservation areas or heritage impacts; impact upon sites of archaeological interest; and/ or involve sites in multiple land ownership, where coordination between parties will be required to ensure the delivery of a high quality, coherent development. These can also include development proposals for mixed-use developments

where consideration needs to be given to their integration into the surrounding area; proposals for tall buildings; Gateway sites, as identified within the Hertsmere settlement Visions; involve major cultural / civic / community buildings; involve large office and other commercial development with the potential to impact on the wider area; relate to schemes that deviate from policy significantly; propose novel, innovative or unconventional design; and/ or involve sites which are politically sensitive or where there is a strong community interest.

Strategic Flood Risk Assessment (SFRA) - An assessment usually undertaken by a Local Authority at a borough–wide level that considers flood risk, both fluvial and tidal and examines the risks involved for developing certain areas within the borough in accordance with national planning policy.

Strategic Housing Market Assessment (SHMA) - An assessment of housing need and demand which informs plan-making process.

Strategic Open Space - Open spaces that are significant to the Borough's open space and green infrastructure network. Strategic open spaces are designated on the Policies Map. Their function includes the following typologies: 'parks and gardens', 'natural and semi natural greenspace', 'allotments and community gardens', 'outdoor sports facilities and playing fields', 'formal amenity green space' and 'cemeteries, churches and disused churchyards'.

Streetscape - The appearance of the street as a whole incorporating the road, kerb and gutter, verges, fences, trees and building frontages.

Supplementary Planning Document (SPD) - Document which adds further detail to the policies in the development plan. SPDs are capable of being a material consideration in planning decisions but are not part of the development plan.

Sustainable development - Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. See also National Planning Policy Framework.

Sustainable Drainage - This is an infrastructure approach that seeks to manage surface water run-off from buildings and hard standings in a way that reduces its total volume, flow and rate that runs directly into drains and sewers.

Sustainable Drainage Systems (SuDS) - Using sustainable drainage techniques and managing surface water run-off from buildings and hard standings in a way that reduces the total volume, flow and rate of surface water that runs directly into drains and sewers.

Sustainable transport modes - Any efficient, safe and accessible means of transport with overall minimal impact on the environment, including walking, cycling, and public transport.

T

Town Centre Area defined on the local authority's policies map, including the primary shopping area and areas occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

Transport Assessment - A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed deal with the anticipated transport impacts of the development.

Transport for London - One of the Greater London Authority group of organisations, accountable to the Mayor, with responsibility for delivering an integrated and sustainable transport strategy for London and the Capital's hinterland (including Hertsmere).

Transport statement - A simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.

Travel plan - A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.

Tree Preservation Order (TPO) - May be made to protect individual trees or groups of trees. The Order gives protection against unauthorised felling, lopping, or other tree works.

Trees of value - Trees that have the capacity to deliver eco system benefits in the form of absorbing carbon dioxide and producing oxygen and to filter, absorb and reduce other pollutant gasses including sulphur dioxide, carbon monoxide, nitrogen dioxide, and ozone. To achieve improved air quality, trees of value will have large deciduous canopies or have the potential to develop such in the future.

U

Urban greening - The process of adding green infrastructure elements, such as street trees and green roofs, in urban areas.

Urban Greening Factor (UGF) - A land-use planning tool to help determine the amount of greening required in new developments.

V

Viability assessment - An assessment of the financial viability of a development to determine the maximum level of affordable housing and other policy requirements where relevant.

Viability review mechanism - A review of development viability defined with a Section 106 agreement enabling the reassessment of development viability after permission has been granted, at an early or late stage in the development process. These mechanisms address uncertainties in the application stage assessment of viability to enable the maximum level of affordable housing provision over the lifetime of a proposal.

Visitor accommodation - Leisure and business accommodation that provides temporary overnight accommodation on a commercial basis, including serviced accommodation such as hotels, bed and breakfast, guesthouses, hostels and campus accommodation, and non-serviced accommodation such as self-catering apart-hotels, caravans, and camping.

W

Water spaces - Areas covered by water including rivers, canals, reservoirs, lakes, and ponds.

Windfall development (sites) Sites not specifically allocated in the development plan.

Z

Zero-carbon - Zero-carbon Activity that causes no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere.

Appendix 3: Strategic and Non-strategic Policies

The NPPF sets out that local plans should identify and distinguish strategic policies from other non-strategic policies. The table below identifies whether the policies and site allocations contained in the Hertsmere Local Plan are strategic or non-strategic.

SECTION/ POLICY AND/OR PARAGRAPH	NEW LOCAL PLAN POLICY	STRATEGIC OR NON-STRATEGIC POLICY
HBF 1	Delivering a Better Future for Hertsmere (spatial strategy)	
Chapter 5: High-Quality Design		
HQD1	Delivering High-Quality Design in Hertsmere	Strategic
HQD2	Inclusive and Welcoming Design	Non-strategic
HQD3	Public Realm and Connecting Places	Non-strategic
HQD4	Optimising Site Capacity	Non-strategic
HQD5	Building Heights	Strategic
HQD6	High-Quality Housing Design	Non-strategic
HQD7	Building Alterations and Extensions	Non-strategic
HQD8	Infill and Backland Sites, Garden Land and Amenity Areas	Non-strategic
HQD9	Shopfront Design	Non-strategic
HQD10	Outdoor Advertisement	Non-strategic
Chapter 6: Heritage		
HE1	Hertsmere's Historic Environment	Strategic
HE2	Designated Heritage Assets	Non-strategic
HE3	Non-Designated Heritage Assets	Non-strategic
Chapter 7: Housing		
H1	Meeting Hertsmere's Housing Need	Strategic
H2	Optimising Delivery from Small Urban Sites	Strategic
H3	Genuinely affordable housing	Strategic
H4	Accommodation for older people	Non-strategic
H5	Supported and specialised accommodation	Non-strategic
H6	Housing with Shared Facilities/Homes in Multiple Occupation	Non-strategic
H7	Self and custom-build housing	Non-strategic
H8	Gypsy and traveller accommodation	Non-strategic
H9	New Homes in the Countryside / Green Belt	Non-strategic
Chapter 8: Economy and Culture		
EC1	Meeting Hertsmere's Economic Needs	Strategic
EC2	Protecting employment land and delivering new workspace	Strategic
EC3	Delivering High-Quality Employment Sites and Workspaces	Non-strategic
EC4	Affordable Workspace	Strategic

EC5	Strategic Level Employment Designations	Non-strategic
EC6	Local Level Employment Designations	Non-strategic
EC7	Rural Employment Areas	Non-strategic
EC8	Hertsmere's Non-Designated Employment Sites	Non-strategic
EC9	Workplace Training and Job Opportunities	Non-strategic
EC10	The Rural Economy	Strategic
EC11	Town Centres at the Heart of Hertsmere's Communities	Strategic
EC12	Hertsmere's Town Centre Network and Hierarchy	Strategic
EC13	Optimising the Use of Town Centre Land and Floorspace	Strategic
EC14	Hertsmere's Main Town Centre and Local Town Centre	Strategic
EC15	Hertsmere's District Centres	Non-strategic
EC16	Hertsmere's Smaller Centres and Individual Shops	Non-strategic
EC17	Concentration of Harmful Uses	Non-strategic
EC18	Public Houses	Strategic
EC19	Markets	Non-strategic
EC20	Visitor accommodation	Non-strategic
Chapter 9: Social and Community Infrastructure		
SCI1	Safeguarding and Securing Social and Community Infrastructure	Strategic
SCI2	Delivering High Quality Social and Community Infrastructure	Non-strategic
SCI3	Delivering Sports, Recreation and Play Spaces	Non-Strategic
SCI4	Nurseries and Childcare Facilities	Non-Strategic
SCI5	Burial Spaces	Non-Strategic
Chapter 10: Green and Blue Infrastructure		
GI1	Hertsmere's Green and Blue Infrastructure Network	Strategic
GI2	Hertsmere's Watercourses and Blue Infrastructure	Strategic
GI3	Local Nature Recovery Strategy	Strategic
GI4	Protecting and Enhancing Biodiversity, Habitats and Ecological Networks	Strategic
GI5	Protection from Environmental Pollution	Strategic
GI6	Urban Greening, Trees and Landscaping	Non-strategic
GI7	Open Space	Strategic
GI8	Communal Gardens and Food Growing	Non-strategic
GI9	Geodiversity	Non-strategic
Chapter 11: Sustainable Design		
SD1	Responding to the Climate Emergency	Strategic
SD2	Sustainable Design and Retrofitting	Strategic
SD3	Managing Heat Risk	Strategic
SD4	Minimising Green House Gas Emissions	Strategic
SD5	Improving Air Quality	Strategic
SD6	Energy Infrastructure	Strategic
SD7	Minimising and Managing Flood Risk	Strategic
SD8	Water Supply and Wastewater	Strategic
SD9	Ground Conditions	Strategic
SD10	Reducing and Sustainably Managing Waste	Strategic

SD11	Securing a Circular Economy	Strategic
SD12	Minerals Consultation Area	Non-strategic
Chapter 12: Transport and Connectivity		
TR1	Sustainable Transport and Movement	Strategic
TR2	Transport Requirements for New Developments	Strategic
TR3	Parking	Non-strategic
TR4	Deliveries, Services and Construction	Non-strategic
TR5	Taxis and Private Hire Vehicles	Non-strategic
TR6	Digital Connectivity	Strategic
TR7	Airspace Safeguarding	Strategic
Chapter 14: Borehamwood Area		
HBA1	Borehamwood Principal Location for Growth	Strategic
HBA2	Borehamwood Town Centre Regeneration	Strategic
HBA3	Elstree Way Employment Corridor	Strategic
HBA4	Sustainable Movement and Connectivity in Borehamwood	Strategic
HBA5	Green Infrastructure and Landscape Setting	Strategic
HBA6	Retail Park, Borehamwood	Non-strategic
HBA7	The Point, Shenley Road, Borehamwood	Non-strategic
HBA8	Regent House & Car Park, Theobald Street, Borehamwood	Non-strategic
HBA9	Hertsmere Civic Offices Cluster, Elstree Way, Borehamwood	Non-strategic
HBA10	Borehamwood Fire Station and Job Centre Cluster, Elstree Way, Borehamwood	Non-strategic
HBA11	Elstree Way Cluster, Borehamwood	Non-strategic
HBA12	Imperial Place, Elstree Way, Borehamwood	Non-strategic
HBA13	Old Haberdasher's Sports Ground, Croxdale Road, Borehamwood	Non-strategic
HBA14	Aycliffe Road and Leeming Road Local Centre	Non-strategic
HBA15	North of Allum Lane, Elstree, Borehamwood	Non-strategic
HBA16	Land South of Allum Lane, Elstree, Borehamwood	Non-strategic
HBA17	Land North of Barnet Lane (West), Elstree, Borehamwood	Non-strategic
HBA18	Land West of Vale Avenue, Borehamwood	Non-strategic
HBA19	Land north of Barnet Lane, Borehamwood	Non-strategic
HBA20	Organ Hall Farm, Theobald Street, Borehamwood	Non-strategic
HBA21	Borehamwood Industrial Area Extension	Non-strategic
HBA22	Lismirrane Industrial Park Extension	Non-strategic
Chapter 15: Potters Bar Area		
HPBA1	Potters Bar Town Centres	Strategic
HPBA2	Movement and Connectivity in Potters Bar	Strategic
HPBA3	Character, Green Infrastructure and Setting	Strategic
HPBA4	Metropolitan House, 3 Darkes Lane	Non-strategic
HPBA5	Canada Life Place	Non-strategic
HPBA6	Tesco, Potters Bar	Non-strategic
HPBA7	Bus Garage, High Street	Non-strategic

HPBA8	Potters Bar Station Car Park	Non-strategic
HPBA9	Barnet Road Strategic Urban Extension	Non-strategic
HPBA10	Land rear of Park Avenue	Non-strategic
HPBA11	Former Potters Bar Golf Course	Non-strategic
HPBA12	Dove Lane	Non-strategic
HPBA13	Land Southeast of Junction 24 Strategic Industrial Employment Site	Non-strategic
HPBA14	St Albans Road Strategic Industrial Employment Site	Non-strategic
Chapter 16: Bushey Area		
HBUSA1	Bushey Local Centres	Strategic
HBUSA2	Movement and Connectivity in Bushey	Strategic
HBUSA3	Land to the South of Elstree Road and East of Heathbourne Road	Non-strategic
HBUSA4	St Hilda's School, High Street	Non-strategic
HBUSA5	Land at Little Bushey Lane	Non-strategic
HBUSA6	Harts Farm	Non-strategic
HBUSA7	Bushey Hall Golf Club, Bushey Hall Drive	Non-strategic
HBUSA8	Bushey Golf and Country Club, High Street	Non-strategic
HBUSA9	Land adjoining Caldecote Farm	Non-strategic
HBUSA10	Land North East Of Elton Way	Non-strategic
HBUSA11	The Former Mecure Hotel	Non-strategic
Chapter 17: Radlett Area		
HRA1	Radlett Centre	Strategic
HRA2	Land South of Theobald Street	Non-strategic
HRA3	Land West of Watling Street	Non-strategic
HRA4	Land South of Shenley Hill	Non-strategic
HRA5	Home Farm Strategic Urban Extension	Non-strategic
HRA6	North West Radlett Strategic Urban Extension	Non-strategic
Chapter 18: New Settlement		
HSN1	Bowmans Cross New Settlement	Non-strategic
Chapter 19: Delivery and Monitoring		
DM1	Working with stakeholders to deliver the Local Plan	Strategic
DM2	Infrastructure funding and planning obligations	Strategic
DM3	Masterplans and comprehensive development	Strategic
DM4	Land assembly	Non-strategic
DM5	Meanwhile Uses	Non-strategic
DM6	Health impact assessments	Non-strategic
DM7	Monitoring and review	Non-strategic

Appendix 4: Replacement, Deleted and New Policies

The table below shows whether the adopted policies from the above documents have been deleted or replaced. It also identifies policies that have been newly introduced in the Hertsmere Local Plan.

ADOPTED POLICY	POLICY DELETED, REPLACED OR NEWLY ADDED	NEW LOCAL PLAN POLICY
Core Strategy		
Policy SP1 Creating sustainable development	Replaced by	HBF 1 Delivering a Better Future for Hertsmere (spatial strategy)
Policy SP2 Presumption in Favour of Sustainable Development	Replaced by	HBF 1 Delivering a Better Future for Hertsmere (spatial strategy)
Policy CS1 The supply of new homes	Replaced by	Policy H1 Meeting Hertsmere's Housing Need
Policy CS2 The location of new homes	Replaced by	HBF 1 Delivering a Better Future for Hertsmere (spatial strategy) Part 3 Policies Chapter 14: Borehamwood Area Chapter 15: Potters Bar Area Chapter 16: Bushey Area Chapter 17: Radlett Area Chapter 18: New Settlement
Policy CS3 Housing Delivery and Infrastructure	Replaced by	HBF 1 Delivering a Better Future for Hertsmere (spatial strategy) DM2 Infrastructure funding and planning obligations
Policy CS4 Affordable Housing	Replaced by	H3 Genuinely affordable housing
Policy CS5 Affordable Housing in rural areas on "Exception" sites	Deleted	

Policy CS6 Gypsy and Traveller sites	Replaced by	Policy H8 Gypsy and traveller accommodation
Policy CS7 Housing mix	Replaced by	Policy H1 Meeting Hertsmere's Housing Need
Policy CS8 Scale and distribution of employment land	Replaced by	EC1 Meeting Hertsmere's Economic Needs EC2 Protecting employment land and delivering new workspace
Policy CS9 Local Significant Employment Sites	Replaced by	EC2 Protecting employment land and delivering new workspace
Policy CS10 Land use within employment areas	Replaced by	EC2 Protecting employment land and delivering new workspace EC5 Strategic Level Employment Designations EC6 Local Level Employment Designations
Policy CS11 Promoting film and television production in Hertsmere	Replaced by	HBF 1 Delivering a Better Future for Hertsmere (spatial strategy) EC1 Meeting Hertsmere's Economic Needs HBA1 Borehamwood Principal Location for Growth HBA2 Borehamwood Town Centre Regeneration HBA3 Elstree Way Employment Corridor
Policy CS12 The Enhancement of the Natural Environment	Replaced by	GI4 Protecting and Enhancing Biodiversity, Habitats and Ecological Networks GI5 Protection from Environmental Pollution GI9 Geodiversity
Policy CS13 The Green Belt	Deleted	Duplicates national policy on the Green Belt
Policy CS14 Protection or enhancement of heritage assets	Replaced by	Policy HE1 Hertsmere's Historic Environment

		HE2 Designated Heritage Assets HE3 Non-Designated Heritage Assets
Policy CS15 Promoting recreational access to open spaces and the countryside	Replaced by	GI7 Open space
Policy CS16 Environmental impact of development	Replaced by	GI5 Protection from Environmental Pollution Chapter 11: Sustainable Design
Policy CS17: Energy and CO2 Reductions	Replaced by	SD4 Minimising Green House Gas Emissions SD6 Energy Infrastructure
Policy CS18 Access to services	Replaced by	SC1 Safeguarding and Securing Social and Community Infrastructure TR4 Deliveries, services and construction
Policy CS19 Key community facilities	Replaced by	Chapter 9: Social and Community Infrastructure
Policy CS20 Securing mixed use development	Replaced by	Embedded across a range of policies in Part 2 and Part 3 of the Local Plan
Policy CS21 Standard charges and other planning obligations	Replaced by	(Chapter 19) DM2 Infrastructure funding and planning obligations
Policy CS22 Securing a high quality and accessible environment	Replaced by	Chapter 5: High-Quality Design
Policy CS23 Elstree Way Corridor	Replaced by	HBA3 Elstree Way Employment Corridor
Policy CS24 Development and accessibility to services and employment	Replaced by	Chapter 8: Economy and Culture TR2 Transport Requirements for New Developments
Policy CS25 Accessibility and parking	Replaced by	TR3 Parking
Policy CS26 Promoting alternatives to the car	Replaced by	TR1 Sustainable Transport and Movement
Policy CS27 Town centre strategy	Replaced by	EC12 Hertsmere's Town Centre Network and Hierarchy
Policy CS28 Strengthening town centres	Replaced by	EC11 Town Centres at the Heart of Hertsmere's Communities

Policy CS29 Retail and commercial development in Shenley	Replaced by	EC11 Town Centres at the Heart of Hertsmere's Communities
Policy CS30 Safe and attractive evening economy	Replaced by	EC11 Town Centres at the Heart of Hertsmere's Communities
Site Allocations and Development Management (SADM) Policies		
Policy SADM1-Housing Allocations	Replaced by	Part 3 Policies Chapter 14: Borehamwood Area Chapter 15: Potters Bar Area Chapter 16: Bushey Area Chapter 17: Radlett Area Chapter 18: New Settlement
PolicySADM2-Safeguarded Land for Housing	Deleted	
Policy SADM3 Residential Developments	Replaced by	Chapter 5: High-Quality Design Chapter 7: Housing
Policy SADM4 Gypsy, Traveller and Travelling Show people Sites	Replaced by	Policy H8 Gypsy and traveller accommodation
Policy SADM5 Employment Areas	Replaced by	EC2 Protecting employment land and delivering new workspace EC5 Strategic Level Employment Designations EC6 Local Level Employment Designations
Policy SADM6 Key Employment Site	Replaced by	EC2 Protecting employment land and delivering new workspace EC5 Strategic Level Employment Designations EC6 Local Level Employment Designations
PolicySADM7 Local Significant Employment Sites	Replaced by	EC2 Protecting employment land and delivering new workspace

		EC5 Strategic Level Employment Designations EC6 Local Level Employment Designations
Policy SADM8 Strategically Important Business Locations and Loss of Office Accommodation	Replaced by	EC2 Protecting employment land and delivering new workspace EC5 Strategic Level Employment Designations
Policy SADM9 Safeguarded Land for Employment Development	Deleted	
Policy SADM10 Biodiversity and Habitats	Replaced by	GI4 Protecting and Enhancing Biodiversity, Habitats and Ecological Networks
Policy SADM11 Landscape Character	Replaced by	GI7 Open Space
Policy SADM12 Trees, Landscaping and Development	Replaced by	GI6 Urban Greening, Trees and Landscaping
Policy SADM13 The Water Environment	Replaced by	GI2 Hertsmere's Watercourses and Blue Infrastructure
Policy SADM14 Flood Risk	Replaced by	SD7 Minimising and Managing Flood Risk
Policy SADM15 Sustainable Drainage Systems	Replaced by	GI2 Hertsmere's Watercourses and Blue Infrastructure SD8 Water Supply and Wastewater
Policy SADM16 Watercourses	Replaced by	GI2 Hertsmere's Watercourses and Blue Infrastructure
Policy SADM17 Water Supply and Wastewater	Replaced by	SD8 Water Supply and Wastewater
Policy SADM18 Mineral Consultation Area	Replaced by	SD12 Minerals Consultation Area
Policy SADM19 Waste Storage in New Development	Replaced by	Reducing and Sustainably Managing Waste
Policy SADM20 Environmental Pollution and Development	Replaced by	GI5 Protection from Environmental Pollution
Policy SADM21 Hazardous Substances	Replaced by	Ground Conditions

Policy SADM22 Green Belt Boundary	Deleted	
Policy SADM23 Village Envelopes	Replaced by	Chapter 5: High-Quality Design
Policy SADM24 Key Green Belt Sites	Replaced by	EC10 The Rural Economy
Policy SADM25 South Mimms Special Policy Area	Replaced by	EC10 The Rural Economy EC2 Protecting employment land and delivering new workspace
Policy SADM26 Development Standards in the Green Belt	Replaced by	Part 2 policies
Policy SADM27 Diversification and Development supporting the Rural Economy	Replaced by	EC10 The Rural Economy
Policy SADM28 Watling Chase Community Forest	Replaced by	GI1 Hertsmere's Green and Blue Infrastructure Network GI6 Urban Greening, Trees and Landscaping
Policy SADM29 Heritage Assets	Replaced by	HE1 Hertsmere's Historic Environment HE2 Designated Heritage Assets HE3 Non-Designated Heritage Assets
Policy SADM30 Design Principles	Replaced by	Chapter 5: High-Quality Design
Policy SADM31 Bushey Heath MOD Housing Area	Replaced by	HQD6 High-Quality Housing Design
Policy SADM32 Key Community Facilities	Replaced by	SCI1 Safeguarding and Securing Social and Community Infrastructure SCI2 Delivering High Quality Social and Community Infrastructure
Policy SADM33 Provision for Faith Communities	Replaced by	SCI1 Delivering High Quality Social and Community Infrastructure
Policy SADM34 OpenSpace, Sports and Leisure Facilities	Replaced by	GI7 Open Space
Policy SADM35 Local Green Space	Replaced by	GI7 Open Space
Policy SADM36 Minor Amenity Land	Replaced by	GI7 Open Space

Policy SADM37 New and Improved Public Open Spaces	Replaced by	GI7 Open Space
Policy SADM38 The Road Hierarchy	Replaced by	HBF 1 Delivering a Better Future for Hertsmere (spatial strategy)
Policy SADM39 Transport Development Areas	Replaced by	TR2 Transport Requirements for New Developments
Policy SADM40 Highway and Access Criteria for New Development	Replaced by	TR2 Transport Requirements for New Developments
Policy SADM41 Aviation Safeguarding	Replaced by	TR7 Airspace Safeguarding
Policy SADM42 Town and District Centres	Replaced by	EC12 Hertsmere's Town Centre Network and Hierarchy EC14 Hertsmere's Main Town Centre and Local Town Centre EC15 Hertsmere's District Centres
Policy SADM43 Primary Frontages	Deleted	
Policy SADM44 Secondary Frontages	Deleted	
Policy SADM45 Smaller Centres, Parades and Individual Shops	Replaced by	EC16 Hertsmere's Smaller Centres and Individual Shops
Policy SADM46 Controlling Non-Retail Uses.	Replaced by	EC17 Concentration of Harmful Uses
Policy SADM47 Night-time and Evening Uses	Replaced by	EC11 Town Centres at the Heart of Hertsmere's Communities
Policy SADM48 Opportunities for Residential Use	Replaced by	EC11 Town Centres at the Heart of Hertsmere's Communities
Policy SADM49 Shop Fronts	Replaced by	HQD9 Shopfront Design HQD10 Outdoor Advertisement
Elstree Way Corridor Area Action Plan		
Policy EWC1: Development Strategy	Replaced by	HQD1 Delivering High-Quality Design in Hertsmere HQD6 High-Quality Housing Design H3 Genuinely affordable housing HBA3 Elstree Way Employment Corridor

Policy EWC2: Comprehensive Development	Replaced by	HQD4 Optimising Site Capacity HBA3 Elstree Way Employment Corridor DM3 Masterplans and comprehensive development
Policy EWC3: Housing Density and Distribution	Replaced by	HQD4 Optimising Site Capacity H1 Meeting Hertsmere's Housing Need HBA3 Elstree Way Employment Corridor
Policy EWC4: Supporting Community Facilities	Replaced by	SCI2 Delivering High Quality Social and Community Infrastructure HBA3 Elstree Way Employment Corridor DM2 Infrastructure funding and planning obligations
Policy EWC5: Transport and Accessibility	Replaced by	TR2 Transport Requirements for New Developments HBA3 Elstree Way Employment Corridor HBA4 Sustainable Movement and Connectivity in Borehamwood
Policy EWC6: Public Realm and Townscape	Replaced by	HQD3 Public Realm and Connecting Places HBA5 Green Infrastructure and Landscape Setting
Policy EWC7: General Building Heights	Replaced by	HQD5 Building Heights HBA3 Elstree Way Employment Corridor
Policy EWC8: Parking Requirements	Replaced by	TR3 Parking
Policy EWC9: Developer Contributions	Replaced by	DM2 Infrastructure funding and planning obligations

POLICY DELETED, REPLACED OR NEWLY ADDED	NEW LOCAL PLAN POLICY
Newly Added	GI3 Local Nature Recovery Strategy
Newly Added	TR6 Digital Connectivity

Newly Added	HBA6 Retail Park, Borehamwood
Newly Added	HBA7 The Point, Shenley Road, Borehamwood
Newly Added	HBA8 Regent House & Car Park, Theobald Street, Borehamwood
Newly Added	HBA9 Hertsmere Civic Offices Cluster, Elstree Way, Borehamwood
Newly Added	HBA10 Borehamwood Fire Station and Job Centre Cluster, Elstree Way, Borehamwood
Newly Added	HBA11 Elstree Way Cluster, Borehamwood
Newly Added	HBA12 Imperial Place, Elstree Way, Borehamwood
Newly Added	HBA13 Old Haberdasher's Sports Ground, Croxdale Road, Borehamwood
Newly Added	HBA14 Aycliffe Road and Leeming Road Local Centre
Newly Added	HBA15 North of Allum Lane, Elstree, Borehamwood
Newly Added	HBA16 Land South of Allum Lane, Elstree, Borehamwood
Newly Added	HBA17 Land North of Barnet Lane (West), Elstree, Borehamwood
Newly Added	HBA18 Land West of Vale Avenue, Borehamwood
Newly Added	HBA19 Land north of Barnet Lane, Borehamwood
Newly Added	HBA20 Organ Hall Farm, Theobald Street, Borehamwood
Newly Added	HBA21 Borehamwood Industrial Area Extension
Newly Added	HBA22 Lismirrane Industrial Park Extension
Newly Added	HPBA4 Metropolitan House, 3 Darkes Lane
Newly Added	HPBA5 Canada Life Place
Newly Added	HPBA6 Tesco, Potters Bar
Newly Added	HPBA7 Bus Garage, High Street
Newly Added	HPBA8 Potters Bar Station Car Park
Newly Added	HPBA9 Barnet Road Strategic Urban Extension
Newly Added	HPBA10 Land rear of Park Avenue

Newly Added	HPBA11 Former Potters Bar Golf Course
Newly Added	HPBA12 Dove Lane
Newly Added	HPBA13 Land Southeast of Junction 24 Strategic Industrial Employment Site
Newly Added	HPBA14 St Albans Road Strategic Industrial Employment Site
Newly Added	HBUSA3 Land to the South of Elstree Road and East of Heathbourne Road
Newly Added	HBUSA4 St Hilda's School, High Street
Newly Added	HBUSA5 Land at Little Bushey Lane
Newly Added	HBUSA6 Harts Farm
Newly Added	HBUSA7 Bushey Hall Golf Club, Bushey Hall Drive
Newly Added	HBUSA8 Bushey Golf and Country Club, High Street
Newly Added	HBUSA9 Land adjoining Caldecote Farm
Newly Added	HBUSA10 Land North East Of Elton Way
Newly Added	HBUSA11 The Former Mecure Hotel
Newly Added	HRA2 Land South of Theobald Street
Newly Added	HRA3 Land West of Watling Street
Newly Added	HRA4 Land South of Shenley Hill
Newly Added	HRA5 Home Farm Strategic Urban Extension
Newly Added	HRA6 North West Radlett Strategic Urban Extension
Newly Added	HSN1 Bowmans Cross New Settlement

Appendix 5: Housing Trajectory

				Plan Period Delivery		
Settlement	**Reg 19 reference**	**Site Name/Address**	**Total Site Capacity**	**1-5 years**	**6-10 years**	**11-17 years**
Borehamwood	HBA6	Retail Park, Borehamwood	500			500
Borehamwood	HBA7	The Point, Shenley Road, Borehamwood	200		200	
Borehamwood	HBA8	Regent House & Car Park, Theobald Street, Borehamwood	55	55		
Borehamwood	HBA9	Hertsmere Civic Offices Cluster, Elstree Way	345		250	95
Borehamwood	HBA10	Borehamwood Fire Station and Job Centre Cluster, Elstree Way	63			63
Borehamwood	HBA11	Elstree Way Cluster, Borehamwood	170			170
Borehamwood	HBA12	Imperial Place, Elstree Way, Borehamwood	550	400	150	
Borehamwood	HBA13	Old Haberdasher's Sports Ground, Croxdale Road, Borehamwood	200		100	100
Borehamwood	HBA14	Aycliffe Road and Leeming Road Local Centre	200			200
Borehamwood	HBA15	North of Allum Lane, Borehamwood	486	186	300	
Borehamwood	HBA16	Land South of Allum Lane, Borehamwood	150	150		
Borehamwood	HBA17	Land North of Barnet Lane (West), Borehamwood	74	74		
Borehamwood	HBA18	Land West of Vale Avenue, Borehamwood	98	98		
Borehamwood	HBA19	Land North of Barnet Lane, Borehamwood	220	150	70	
Borehamwood	HBA20	Land at Organ Hall Farm, Theobald Street, Borehamwood	102	102		
Potters Bar	HPBA4	Metropolitan House, 3 Darkes Lane, Potters Bar	96	96		
Potters Bar	HPBA5	Canada Life Place, Potters Bar	369		369	
Potters Bar	HPBA6	Tesco, Potters Bar	588			588
Potters Bar	HPBA7	Bus Garage, Potters Bar, High Street	119			119
Potters Bar	HPBA8	Potters Bar Station Car Park, Potters Bar	55	55		
Potters Bar	HPBA9	Barnet Road Strategic Urban Extension, Potters Bar	900	200	700	
Potters Bar	HPBA10	Land rear of Park Avenue, Potters Bar	260		260	
Potters Bar	HPBA11	Former Potters Bar Golf Course, Potters Bar	550	100	450	
Potters Bar	HPBA12	Dove Lane, Potters Bar	112	112		
Bushey	HBUSA3	Land to the South of Elstree Road and East of Heathbourne Road, Bushey	1500	150	450	900
Bushey	HBUSA4	St Hilda's School, High Street, Bushey	52	52		
Bushey	HBUSA5	Land at Little Bushey Lane, Bushey	280	280		
Bushey	HBUSA6	Harts Farm, Little Bushey Lane	57	57		
Bushey	HBUSA7	Bushey Hall Golf Club, Bushey Hall Drive	500	250	250	
Bushey	HBUSA8	Bushey Golf and Country Club, High Street	250	250		
Bushey	HBUSA9	Land adjoining Caldecote Farm, Bushey	154	100	54	
Radlett	HRA2	Land South of Theobald Street	95	95		
Radlett	HRA3	Land West of Watling Street, Radlett	122		122	
Radlett	HRA4	Land South Of Shenley Hill	195	195		
Radlett	HRA5	Home Farm Strategic Urban Extension	650		300	350
Radlett	HRA6	Northwest Radlett Strategic Urban Extension	1573	151	822	600
New Settlement	HNS1	Land at Coursers Road, Bowmans Cross New Settlement	5000		1000	1500
				3358	**5847**	**5185**
		Commitments (Permitted schemes not included above)		**976**		
		Resolution to Grant (not included above)		**96**		
		Small Windfall Sites (47 x 14 years)		**94**	**235**	**329**
		HELAA (delivering between 5 and 49 units)			**472**	**300**
		Plan Period Supply	**16892**	**4524**	**6554**	**5814**
		Plan Period Requirement (975 x 17 years)	**16575**	**5850**	**4875**	**5850**

Appendix 6: Design sense-check list

This checklist is provided as an example of things that can be considered when designing inclusive, neurodivergent-friendly places. The list is not exhaustive and is taken from best practice, providing an introduction into the types of design features that could be considered in projects, acknowledging that there are many other design consideration than contained below.

Familiarity	
	Create texture in areas to denote certain places rather than the same patterns and designs repeated
Legibility	
	Use colour to highlight certain routes
	Wayfinding markers and continuous footpaths rather than dead ends
	Hierarchy of street types including alternative routes away from crowded areas
	Ease of use of crossing points; signal-controlled most appropriate in relevant places
	Clear sightlines, unclutters views to entrances / exits and natural surveillance
Distinctiveness	
	Are places recognisable along any given journey?
	Building exteriors have variation and do not all look the same along a street but at the same time create a coherent character for wayfinding
	Sensory distinctiveness through plants with colour and fragrance
	Well-defined pedestrian areas and vehicle areas
Accessibility	
	Is an entrance to a building easy to find and easy to notice?
	Is public transport obviously located?
	Visual cues within the urban environment to assist wayfinding – maps, signage, QR codes
	Limited variations in footpaths, level changes and textures
Comfort	
	Private breakout spaces
	Informal settings such as small open spaces with activity
	External façades to have neutral colour palettes / reduction in shiny surfaces
	Blue and green infrastructure to reduce noise and / or glare from buildings
	Outdoor spaces should have seating at regular intervals
Safety	
	Is there passive surveillance of a space?
	More than one way in and out, applies to both external and internal spaces
	Appropriate lighting to spaces both internal and external. Warm, rather than bright white light.
	Do individuals have a degree of control and autonomy over the space? An element of surprise can be positive for some, and negative for others. Therefore, the ability to control the chance of surprise can contribute to feeling safe and comfortable.

Appendix 7: Sustainable Parking Standards

Table 1 Residential Parking Standards

<table>
<tr><th colspan="4">C3 – Residential units[1]</th></tr>
<tr><th></th><th colspan="2">Car parking spaces</th><th>Cycle storage spaces</th><th>Charging Plug in Points</th></tr>
<tr><td>General Needs Housing (including flats and bungalows)</td><td>Curtilage</td><td>Communal</td><td colspan="2"></td></tr>
<tr><td>Studio</td><td colspan="2">0.5 per unit</td><td rowspan="7">1 to 3 bedrooms: 1 per bedroom long term

4 or more bedrooms: 3 per unit long term

1 visitor space per 10 units short term</td><td rowspan="7">1 socket/charging point per house with private parking-

Communal parking - 1 active charging point per dwelling unit

Remaining spaces passive provision over and above 1 space per unit and above 10 units</td></tr>
<tr><td>1 bedroom</td><td colspan="2">0.75 per unit</td></tr>
<tr><td>2 bedroom</td><td>1 per unit</td><td></td></tr>
<tr><td>3 bedroom (flat)</td><td colspan="2">1.5 per unit</td></tr>
<tr><td>3 bedroom (house)</td><td>2 per unit</td><td>1.5 per unit</td></tr>
<tr><td>4 bedroom</td><td colspan="2">2 per unit</td></tr>
<tr><td>5 bedroom</td><td colspan="2" rowspan="2">To be determined on a case-by-case basis</td></tr>
<tr><td>6 + bedroom</td></tr>
<tr><th colspan="5">Additional parking requirements</th></tr>
<tr><td>HMO</td><td colspan="2">0.5 spaces per bed</td><td>1 per bedroom long term</td><td>1 socket/charging point per house with private parking or 1 roadside charging point per house where private parking is no available</td></tr>
<tr><td>Houses with additional habitable rooms on upper floors/ roof space</td><td colspan="2" rowspan="2">1 per additional habitable room[2]</td><td rowspan="2">1 per bedroom long term</td><td rowspan="2">Communal parking 1 in 3 active provisions

Remaining spaces passive provision</td></tr>
<tr><td>Flats or Bungalows with a total of 6 or more habitable rooms and bedrooms</td></tr>
</table>

[1] All spaces to be rounded to the nearest whole number in the case of odd numbers (e.g. 1 x 5 bed HMO, 3 spaces, 3 x 1 bed flats, 2 spaces). For general needs housing, additional visitor parking in larger schemes with communal parking should not exceed 0.2 space per dwelling with 1 disabled visitor space for every 10 visitor spaces.

[2] All rooms over 8 square metres which are not kitchens, utility rooms, bathrooms, WCs or circulation space are a habitable room. Large habitable rooms or open plan areas, typically over 25m^2 and capable of subdivision will be treated as two habitable rooms. Parking requirements for additional habitable rooms on upper floors within townhouses or dwellings with reversed layouts will be considered on their individual merits but will not typically be sought unless there are three or more additional habitable rooms within the entire property.

Houses with 5 or more habitable rooms on the ground or lower ground floor			
Specialist housing with support or care			
Category I – Retirement dwellings, no 24-hour warden control, 1 bedroom	1 per unit	1 per bedroom long term	1 socket/charging point per unit with private parking- 1 in 5 spaces active provision Remaining spaces passive provision
Category I – Retirement dwellings, no 24-hour warden control, 2 or more bedrooms	1 per unit	1 per 20 units short term visitor 1 per 20 bedrooms long term	
Category II – Supported or extra care, self-contained units (with on-site staff), 1 bedroom	. 0.75 per unit for residents and visitors, 0.25 per unit for staff		
Category II – Supported or extra care self-contained units (with on-site staff), 2 or more bedrooms	1 per unit for residents and visitors, 0.25 per unit for staff		
Category III – non-self-contained specialist housing including nursing or care homes	To be determined on a case-by-case basis		

Table 2 Non-Residential Parking Standards[3]
Unless otherwise stated, floor areas are gross measured externally.

Use Class / Type	Required number of parking spaces (including visitor spaces unless otherwise stated)	Minimum cycle parking standard	Electric Vehicle Charging Points
Class E			
Superstores Large supermarkets	1 space per 20m^2	1 s/t space per 100m^2 of floor space 1 l/t space per 200m of floorspace	1 in 10 spaces active provision 1 in 4 spaces passive provision
Retail warehouses Garden centres Other retail uses	1 space per 35 m^2		

[3] FTE = full time equivalent. s/t = short term. l/t = long term
Parking requirements will be rounded up or down to the nearest whole parking space requirement (e.g. a B8 development of 350m^2 would be expected to provide 11 car parking spaces, rather than 11.25 spaces).

Financial and professional services (Banks, building societies etc.)	1 space per 40 m^2 (Town centres) 1 space per 30 m^2 (neighbourhood or local centres)	1 s/t space per 200 m^2 1 l/t space per 200m^2	1 in 10 spaces active provision 1 in 5 passive provision (minimum requirement- 5 spaces)
Restaurants and Cafes	1 space per 5 m^2 of public floorspace	1 s/t space per 100 m^2 1 l/t space per 100m^2	1 in 10 spaces active provision 1 in 4 spaces passive provision
Offices	1 space per 40m2	1 s/t space per 500 m^2 1 l/t space per 200m^2 (Office) staff 1 l/t space per 500m^2 (Industrial)	1 in 5 spaces active provision 1 in 2 spaces passive provision
Research and Development	1 space per 50 m^2 Parking provision for lorries considered on a case-by-case basis		
Light industrial			
Film and Television Production	1 space per 50 m^2 Parking provision for production trucks, trailers and other 'on location' vehicles will be considered on a case-by-case basis	1 l/t space per 200m^2 and 1 s/t space per 1000m^2 (for office accommodation and workshop schemes) 1 l/t space per 500m^2 (for sound stages)	1 in 5 spaces active provision 1 in 2 spaces passive provision
Day centres	1 space per 9 m^2 *or* 1 space per 4 visitors plus 1 space per FTE staff	1 s/t space per 200m^2 1 l/t space per 200m^2	1 in 10 spaces active provision 1 in 4 spaces passive provision
Surgeries and clinics (including doctors, dentists and vets)	1.5 spaces per consulting room 1 space per FTE non-consultant staff	Greatest of: 1 per 50m^2 or 1 per 30 seats/capacity 1 l/t space per 5 staff	1 in 10 spaces active provision 1 in 5 spaces passive provision
Nursery schools / playgroups	1 space per 4 pupils	2 l/t space per 10 staff	1in 5 spaces active provision 1 in 3 spaces passive provision
Class B2			
General industrial up to 250 m^2 floorspace	5 spaces plus 1 space per 50m^2. Parking provision for lorries considered on a case-by-case basis	1 s/t space per 1000 m^2 1 l/t space per 500m^2	1 in 5 spaces active provision 1 in 2 passive provision
General industrial over 250 m2	10 spaces plus 1 space per 75m^2. Parking provision for lorries is considered on a case-by-case basis.		

Class B8			
Storage or distribution up to 250 m^2 floorspace	1 space per 75m2. Parking provision for lorries considered on a case-by-case basis	1 s/t space per 1000m^2 1 l/t space per 500m^2	1 in 5 spaces active provision 1 in 2 spaces passive provision
Storage or distribution over 250 m^2 floorspace	10 spaces plus 1 space per 75m^2. Parking provision for lorries considered on a case-by-case basis		
Class C1			
Hotels and motels[5]	1 space per bedroom plus 1 space per 3 FTE staff plus 1 space per 5 m2 public floor space for conference or exhibition facilities plus 1 coach space per 100 bedrooms (minimum)	1 l/t space per 10 beds 2 l/t space per 10 staff	1 in 5 active provisions Remaining spaces passive provision
Small hostel (single parent or couple with no children)	0.75 spaces per unit	1 l/t space per 2 units	
Family hostel (two adults and two children)	1 space per unit	1 l/t space per unit	
Class C2			
Institutions / homes with care staff on premises at all time[1]	Please see specialist housing requirements		
Supported or other specialist housing [1,2]			
Hospitals	To be assessed on a case-by-case basis		
Education – Halls of Residence	1 space per 2 FTE staff plus 1 space per 6 students	1 l/t space per 3 students 1 l/t space per 10 staff	1 in 5 spaces active provision remaining spaces passive provision
Class F1			
Schools (including residential)	1 space per FTE staff plus 1 visitor space per 100 students	Minimum requirement (based on travel plan mode share targets) 1 space per 10 students 1 space per 20 staff	1 in 5 spaces active provision 1 in 3 spaces passive provision
Further education	1 space per FTE staff, plus 1 space per 5 full-time students	1 l/t space per 5 students 1 l/t space per 10 staff	1 in 5 spaces active provision 1 in 3 spaces passive provision

Places of worship	1 space per 10 m^2	Greatest of: 1 per 50m^2 or 1 per 30 seats capacity	1 in 10 spaces active provision 1 in 4 spaces passive provision
Public halls and places of assembly	1 space per 9 m^2 *or* 1 space per 3 fixed seats plus 3 spaces per 4 FTE staff	Greatest of: 1 per 50m^2 or 1 per 30 seats capacity	1 in 10 spaces active provision 1 in 4 spaces passive provision
Class F2			
Community and family centres	1 space per 9 m^2 plus 1 space per FTE staff	Greatest of: 1 per 50m^2 or 1 per 30 seats capacity	1 in 10 spaces active provision 1 in 4 spaces passive provision
Squash courts	2 spaces per court	1 s/t space per 25 ^{2} 1 space per 10 staff	
Gyms and health clubs	1 space per 15 m^2 public floorspace		
Ice rink	1 space per 12 m^2 rink area		
Ten pin bowling	2 spaces per lane	1 s/t space per 3 lanes /rink 1 s/t space per 25 spectator seats 1 l/t space per 10 staff	
Football pitches	20 spaces per pitch 1 space per 5 paying spectators (where there is fixed or temporary seating)	2 s/t space per pitch	1 in 10 active provisions 1 in 4 passive provisions
Other outdoor pitches	1 space per 2 users (maximum potential usage) 1 space per 5 paying spectators (where there is fixed or temporary seating)		
Golf course	100 spaces plus 50 overflow spaces (18 holes) 9 holes at 50% of above rates	5 l/t spaces per 9 holes	
Golf driving range	1.5 spaces per tee	1 s/t space per 5 tees	1 in 10 active provision 1 in 4 passive provision
Other sports and recreational uses	To be assessed on a site-by-site basis, dependent on anticipated staffing, levels of use and numbers of paying spectators		

Sui Generis			
Multi-screen cinemas and theatres	1 space per 5 seats on free standing development	1 s/t space per 20 seats (up to 500 seats) 25s/t plus 1 l/t per 100 seats (over 500 seats) 1 l/t space per 10 staff	1 in 5 spaces active provision 1 in 3 spaces passive provision
Hot food takeaways	2 spaces per 5m^2 of public floorspace	1 s/t per 100m^2 1 l/t space per 10 staff	1 in 10 spaces active provision 1 in 5 spaces passive provision (min requirement 5 spaces)
Drinking establishments	1 space per 5 m^2 of public Floorspace	1 s/t space per 100 m^2 1 l/t space per 10 staff	1 in 10 spaces active provision 1 in 4 spaces passive provision
Motor Trade related (Sui Generis)			
Staff	0.75 spaces per FTE staff	1 l/t space per 10 staff	1 in 5 spaces active provision 1 in 3 spaces passive provision
Showroom and car sales	1 space per 10 cars displayed		1 in 10 spaces active provision 1 in 5 spaces passive provision
Vehicle storage	1 space per showroom or 10% of annual turnover		1 in 5 spaces active provision 1 in 3 spaces passive provision
Hire cars	1 space per 2 cars based on Site		1 in 5 spaces active provision
Ancillary vehicle storage	2 spaces or 75% of the total if more than 3 vehicles	1 l/t space per 10 staff	Remaining passive provision 3in 10 spaces active 3 in 10 spaces passive
Workshops	3 spaces per bay		1 in 10 spaces active provision 1 in 5 passive provision (5 parking spaces minimum)

Table 3 Car parking for disabled people

Use Class / Type	Minimum Parking Standard
Employment Generating Development	
Up to 25 parking spaces	2 disabled spaces
26 to 50 parking spaces	3 disabled spaces
51 to 75 parking spaces	4 disabled spaces
76 to 100 parking spaces	5 disabled spaces
Thereafter	1 disabled space for every 50 spaces or part thereof
Shops / Buildings to which the public have access and Public Car Parks	
Up to 20 parking spaces	2 disabled spaces
21 to 40 parking spaces	3 disabled spaces
40 to 60 parking spaces	4 disabled spaces
61 to 80 parking spaces	5 disabled spaces
81 to 100 parking spaces	6 disabled spaces
Thereafter	3 disabled spaces for every 100 spaces or part thereof
Hotels	As for employment generating development or 1 disabled space per room built to mobility standards, whichever is the greater

Appendix 8: Further information on proposals for public houses

This Appendix must be read in conjunction with Local Plan Policy EC19 Public Houses, which sets out requirements for submission of viability and marketing information to support certain types of development proposals. The Council may use its discretion in the application of the requirements on a case-by-case basis. This may include, for instance, to take provide flexibility where development proposals involve the retention of a public house in-situ.

Viability statement

To ensure that the Council can make a sound assessment when a change of use is proposed, applicants will be required to submit a Viability Statement. This will need to include:

1. Evidence in the form of at least the last three trading years of audited accounts.
2. All reasonable efforts have been made to preserve the public house (including all diversification options explored) and evidence supplied to illustrate that it would not be economically viable to retain the building or site for its existing use class. Examples of the initiatives or proposals that could be explored are as follows:
    a. adding a kitchen and serving food, or improving the existing food offer
    b. making the pub, garden, food offer more ‘family-friendly’
    c. providing events and entertainment such as quiz nights, amplified or non-amplified live music, comedy/cabaret nights
    d. hiring rooms out or otherwise providing a venue for local meetings, community groups, businesses, youth groups, children’s day nurseries
    e. offering take-away food and off-licence services
    f. provision of bed & breakfast or other guest accommodation
    g. sharing the premises with other businesses
    h. altering business and operating hours.

Marketing statement

The Council will require clear evidence of appropriate marketing to show a lack of demand for the public house. This will mean the submission of a Marketing statement including the following information:

1. Details of the company/person who carried out the marketing exercise.
2. The marketing process should last for at least three years.
3. The asking price should be pre-agreed in writing with the local planning authority following independent valuation (funded by the developer) by a professional RICS valuer with expertise in the licensed leisure sector and who is not engaged to market the property.

4. The marketing exercise should be sufficiently thorough and utilise all available forms of advertising media and therefore include as a minimum:
    a. for Sale/for Rent signboard
    b. adverts in the local press
    c. adverts in appropriate trade magazines/ journals
    d. adverts on appropriate trade websites
    e. adverts through both national and local estate agents (including their websites) and
    f. a targeted mail shot or email to an agreed list of potential purchasers.

Local consultation and use of the public house by community and voluntary organisations

The use of public house space for community groups is a valued resource, and evidence will be required demonstrating consultation has taken place with local community and voluntary organisations. The applicant will be required to carry out an assessment of the needs of the community for community facilities to show that the existing or former public house is no longer needed and that alternative provision is available in the area.

Where there is local need, this use should be retained or replaced within the building, unless an alternative approach can be identified and agreed. The retention of the ground floor for non-residential use will help maintain street activity and a mixed-use neighbourhood.

The Council may also consider adding certain public houses to the Community Assets register if the community support for their retention is significant.

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AECOM

Sustainability Appraisal (SA) of the Hertsmere Local Plan

SA Report
Non-technical Summary (Draft)

September 2026

Delivering a better world

Quality information

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Introduction

This is the non-technical summary of the Sustainability Appraisal (SA) Report that is published alongside the proposed submission version of the Hertsmere Local Plan under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012.

This report is currently in draft form as SA work remains ongoing. It is important that the SA Report is fully up-to-date at the point of publication, accounting for the final evidence-base and any late changes to the plan. However, the appraisal conclusions are unlikely to change.

The primary aim of the SA Report is to present an appraisal of "the plan and reasonable alternatives" (Regulation 12(2) of the SEA Regulations that underpin the SA process).

Reasonable alternatives

The approach taken is to present an appraisal of reasonable alternatives (RAs) in the form of 'growth scenarios', which are defined as alternative approaches to the supply of land (primarily via site allocations) in order to provide for development needs alongside delivering on wider plan objectives. In short, growth scenarios comprise more-or-less alternative key diagrams, and a focus on growth scenarios aims to ensure a focus on RAs that go to the very heart of the plan.

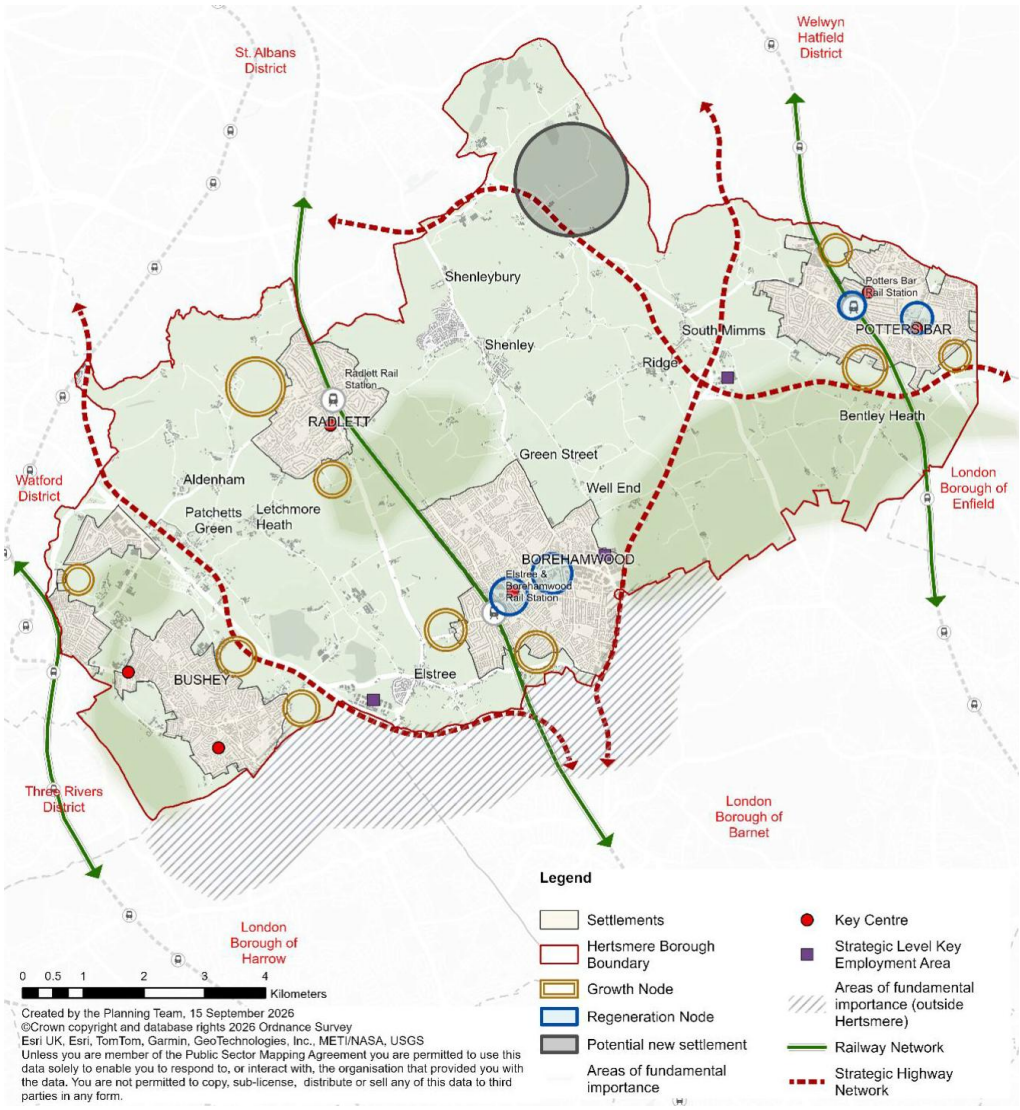
Scenario 1 is the proposed submission approach, i.e. the proposed submission key diagram, which is presented below as Figure A. Scenarios 2 to 7 each then involve higher growth via additional allocation of either one or two of the following 'omission sites':

- 'North Borehamwood' (292 homes) – this site is currently the subject of a live planning application (25/1713/OUT; Land to the West of Green Street and North West of Stapleton Road). It was not shortlisted as a candidate site allocation at the Regulation 18 consultation stage earlier this year, but it did feature within the RA growth scenarios at that time.
- 'North Bushey' (700 homes) – this site is currently the subject of a live planning application (25/0972/FULEI; Land rear of Farm Way (north)) and was previously shortlisted as a candidate site allocation at the Regulation 18 stage (the assumption at the time was 800 homes).
- 'Well End' (1,200 homes) – at the Regulation 18 stage earlier in 2026 one of the shortlisted candidate site allocations was 'Well End Strategic Urban Extension' (3,750 homes), which in practice would involve an urban extension to the north east of Borehamwood. However, there were uncertainties regarding the appropriate scale, and configuration of growth, accounting for growth opportunities and constraints, and so the option of a reduced 2,000 home scheme was tested through the RA growth scenarios. There are three parts to the site: A) the western part of the site (west of Well End Road) that is being promoted for 1,200 homes and where there is a live planning application for 154 homes in part of the site (north of Potters Lane); B) the eastern part of the site (east of Well End Road and north of Rowley Lane) that is being promoted alongside (A), but where there appears to be limited commitment to bringing forward a combined / comprehensive scheme; and C) the south east part of the site (south of Rowley Lane and north of land that has planning permission for an extension to the Sky Studios site to the south) which is being promoted separately for employment land. Overall, at this stage there is a concern regarding sub-optimal piecemeal growth in this area, with opportunities missed in terms of addressing issues and maximising the benefits of growth. As such, the assumption is a 1,200 home scheme in parcel (A), i.e. land to the west of Well End Road.

In summary, the RA growth scenarios at this stage are:

- Scenario 1 – proposed submission approach (supply = 16,892)
- Scenario 2 – proposed submission approach plus North B'wood (supply = 17,184)
- Scenario 3 – proposed submission approach plus North Bushey (supply = 17,592)
- Scenario 4 – proposed submission approach plus Well End (supply = 18,092)
- Scenario 5 – proposed submission approach plus N. B'wood and N. Bushey (supply = 17,884)
- Scenario 6 – proposed submission approach plus N. B'wood and Well End (supply = 18,384)
- Scenario 7 – proposed submission approach plus N. Bushey and Well End (supply = 18,792)

***Figure A**: Growth scenario 1 (the proposed submission key diagram)*



It is considered ‘reasonable’ to only test alternatives to the proposed submission approach that would involve higher growth via omission sites for three main reasons.

Firstly, there is a case for testing higher growth with a view to a more ‘robust’ housing land supply on the assumption that the housing requirement is set at local housing need (LHN), which is 975 dwellings per annum (dpa) or 16,575 homes in total over the 17 year plan period (2026/27 to 2042/43). This is a matter discussed further below.

Secondly, there is a case for testing higher growth scenarios that might enable the housing requirement to be set modestly above LHN (e.g. LHN + 5%) as a proactive response to unmet housing needs in the sub-region (notably Three Rivers District, but also London) and/or affordable housing needs in Hertsmere (which would not be met in full under Scenario 1).

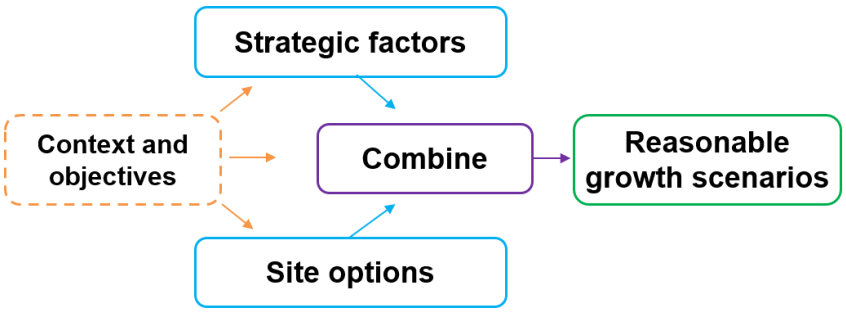
Thirdly, at this stage none of the proposed allocations under Scenario 1 stand out as challenging in suitability terms to the extent that there is a need to test scenarios involving ‘non-allocation’. At the previous stage scenarios were tested involving non-allocation of Bowman’s Cross new settlement; however, at this stage it is considered to be a strongly performing site, including because the latest understanding is that it can deliver 2,500 homes in the plan period (the previous assumption was 500 homes), such that it is centrally important to the Local Plan.

A final point to note, regarding the definition of RA growth scenarios, is that there is feasibly a ‘highest growth’ scenario involving allocation of all three of the variable omission sites (supply would amount to 19,377 homes, i.e. LHN plus 17%). However, this scenario is not tested on balance, including because there is limited strategic case for this level of growth.

Overall, the 7 scenarios are considered to be reasonable at this stage in the process, i.e. given the evidence-base and understanding that has built up over a plan-making process stretching back to 2017 (including more-or-less draft plan consultations in 2021, 2024 and 2026).

A detailed process to define the RA growth scenarios is set out across Section 5 of the main report, which gives 'top down' consideration to strategic factors and 'bottom up' consideration to available site options, before then combining factors at the settlement level to define settlement scenarios and then combining the settlement scenarios to form borough-wide RA growth scenarios. This process is as per the equivalent process set out in Section 5 of the Interim SA Report from the Regulation 18 stage in early 2026, and is summarised in the figure below.

***Figure B**: Summary of the process to define RA growth scenarios*



Having worked through a process to define RA growth scenarios in Section 5 of the main report, the appraisal is then presented in Section 6. The appraisal involves a narrative discussion under the 'SA framework', which is a list of sustainability topics (presented in alphabetical order), each with an associated objective, with the SA framework having been developed through 'scoping'.

The appraisal concludes with a summary appraisal 'matrix' with a row for each of the SA topics and a column for each of the scenarios. The aim of the appraisal matrix is to provide an 'at a glance' understanding of how the scenarios perform both in absolute and relative terms.

The appraisal matrix is presented below, where each row aims to: **1)** rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence, and "?" used where there is uncertainty at this stage); and then **2)** categorise performance in terms of 'significant effects' using **red** / **amber** / **light green** / **green**.[1]

The appraisal shows there to be a clear case for supporting Scenario 1 (the proposed submission approach), in that it is ranked first under the greatest number of sustainability topic headings. However, other scenarios perform better in terms of the number of predicted positive effects.

Also, it is important to caution against a numerical exercise of tallying points on the basis of the rankings and predicted effects. This is because the appraisal is undertaken with no assumptions made regarding the degree of importance ('weight') that should be assigned to each of the topics as part of decision-making (and, to be clear, the topics are not assumed to have equal weight).

It is for the Council to asign weight and reach a decision 'on balance' regarding which of the scenarios is best performing / best represents sustainable development.

Also, it is important to be clear that the appraisal conclusions, as shown in Table A, are reached on the basis of a range of assumptions, and there are inevitably uncertainties regarding the 'on the ground' effects of each of the scenarios given the available evidence base (including noting that a number of important evidence base workstreams remain ongoing at the time of writing).

As part of this, one key point to note is that there are uncertainties under Scenario 1 on the basis of a 'tight' and potentially challenging housing land supply.

[1] **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

Specifically, whilst total plan period supply under Scenario 1 (16,892 homes) is 2% higher than plan period LHN, which would be set as the housing requirement, there are risks around the potential to maintain a rolling five year housing land supply (5YHLS), as measured against the housing requirement (975 dpa), over the early years of the plan period. This is an important consideration because the lack of a 5YHLS leads to 'evidenced unmet need' and, in turn, a situation whereby the presumption in favour of sustainable development (or 'tilted balance') is engaged (Policy S3 of the 2026 NPPF) and the Council struggles to resist 'speculative' planning applications (i.e. applications that do not align with the Local Plan) with negative implications for sustainability objectives. Poorly coordinated growth via speculative applications has been a key issue over recent years. There could be the potential to reduce concerns via an upward 'stepped' housing requirement, i.e. on that is lower in the early years of the plan and then commensurately higher in the later years of the plan, but the potential for a stepped requirement is unclear.

***Table A**: Growth scenarios summary appraisal*

Higher growth at…	**Scenario 1** -	**Scenario 2** N. B'wood	**Scenario 3** N. Bushey	**Scenario 4** Well End	**Scenario 5** N. B'wood N. Bushey	**Scenario 6** N. B'wood Well End	**Scenario 7** N. Bushey Well End
Air quality	=	=	=	=	=	=	=
Biodiversity	1	1	2	1	2	1	2
Climate change adaptation	=	=	=	=	=	=	=
Climate change mitigation	=	=	=	=	=	=	=
Communities 1: Education	2	3	2	2	2	2	1
Communities 2: Services	?	?	?	?	?	?	?
Communities 3: Health	=	=	=	=	=	=	=
Communities 4: Cohesion	1	2	2	2	2	2	2
Economy and employment	=	=	=	=	=	=	=
Historic environment	2	1	2	2	2	2	2
Homes	7	6	5	4	3	2	1
Landscape	2	2	1	2	2	2	2
Soils / resources	=	=	=	=	=	=	=
Transport	?	?	?	?	?	?	?
Water	1	2	3	4	5	6	7

The following bullet points explain the appraisal conclusions under each of the topics:

- **Air quality** – there are no air quality management areas (AQMAs) in the Borough although there are a number of traffic congestion hotspots where air quality is potentially problematic or could become problematic under growth scenarios, including acknowledging the likelihood of significant growth in neighbouring areas, including a potential new town at Crews Hill (Enfield). Higher growth could lead to challenges, but equally the baseline situation is one whereby air quality is improving nationally. Also, there is a need to recognise that Hertsmere is generally well connected in transport terms, that air quality is more of an issue in some neighbouring areas (notably Watford and all neighbouring London Boroughs), and that unmet housing need a sub-region creates challenges for long-term strategic transport planning. Overall, it is difficult to confidently and meaningfully differentiate between the growth scenarios.
- **Biodiversity** – the Borough is overall subject to limited biodiversity constraint, such that there is a case for higher growth, but the primary factor that dictates the order of preference is the approach to growth at Borehamwood. Specifically, one of the two variable sites, namely 'North Borehamwood (292 homes) is currently designated as a Local Wildlife Site (LWS), although at the time of writing this designation is being reviewed through the planning application process. At 'North Bushey' (700 homes) there is an adjacent LWS, which would be protected and enhanced, although there would be recreational pressure, and the potential to amend the masterplan (as understood from the current planning application) to better connect the LWS to the large area of parkland in the north of the site might be considered. At 'Well End' (1,200 homes) there is overall limited biodiversity constraint, but there is a dense network of historic field boundaries, and a related network of surface water flood zones. Also, the concern here is sub-optimal piecemeal growth with opportunities missed to deliver new strategic green and blue infrastructure to deliver on the objectives of the Local Nature Recovery Strategy (LNRS). On balance, the appraisal conclusion reflects a particular concern with 'North Borehamwood'. With regards to significant effects, a key consideration is that strong viability supports a proposed policy requirement for 20% biodiversity net gain, but on balance neutral effects are predicted, including as 20% could be challenging at some sites on viability grounds.
- **Climate change adaptation** – the key issue here is flood risk, although it is acknowledged that the matter of overheating risk is also a significant consideration for the Local Plan given the high urban growth strategy that is assumed as a 'constant' under all of the scenarios.

  Focusing on flood risk, whilst this has fed-in strongly as a factor influencing the selection of sites for inclusion within the growth scenarios, and a Level 2 Strategic Flood Risk Assessment (SFRA) has been completed, there are still a number of sites within Scenario 1 (i.e. sites that feature as a 'constant' across the scenarios) with an element of risk. These are mainly urban sites, where it is reasonable to assume that past lower intensity uses may partly be a reflection of flood risk, but there is a clear wider sustainability case for intensifying uses in urban areas, and urban sites can address flood risk through use mix and design/construction measures.

  With regards to the three 'variable' omission sites that feature across the scenarios, all are subject to a degree of surface water flood risk, but it seems unlikely that this would act as a significant barrier to effective masterplanning or unduly affect site viability, given the potential to design-in green / blue infrastructure and high quality sustainable drainage systems (SuDS). At all three sites, potentially most notably the sites at Borehamwood, downstream surface water flood risk affecting existing residential areas is a consideration, but high quality SuDS can typically ensure 'greenfield runoff rates'.

  Overall, whilst the Environment Agency raised limited concerns in respect of flood risk through the recent consultation, it is appropriate to flag a 'moderate or uncertain' negative effect at this stage ahead of further consultation informed by the Level 2 SFRA and sequential test outcomes (work is ongoing at the time of writing).
- **Climate change mitigation** – the focus under this topic heading is per capita built environment decarbonisation, given that transport decarbonisation factors-in under the 'transport' heading. Development viability is generally strong in Hertsmere, which suggests good potential to deliver 'net zero' developments, and this is the proposed overarching policy requirement within the proposed submission plan. However, viability varies significantly between sites, in particular urban versus non-urban sites, as discussed in the Viability Study (2026), with the implication that there will likely be some sites that cannot deliver 'net zero' development in practice without compromising on wider objectives (e.g. affordable housing).

On the other hand, it is acknowledged that there is a broad climate change mitigation / decarbonisation case to be made for a high urban growth strategy, as discussed within the series of Climate Change Studies (2026) that have been completed in support of the plan. Also, there is support for the proposed significant focus of growth at Radlett because viability here is very strong, such that there is excellent potential to deliver 'net zero' developments.

With regards to the three sites that are a variable across the scenarios, none are thought to be proposing 'net zero' development, and overall it is not clear that any are associated with a particular built environment decarbonisation opportunity. At Well End there could feasibly be 'net zero exemplar' opportunity to be explored were there to be support for a large-scale strategic urban extension in this area; however, there is uncertainty ahead of detailed work to consider development costs (e.g. major transport upgrades) and, in turn, viability 'headroom'.

Overall, it is not possible to differentiate between the scenarios and a 'neutral' effect is predicted. This contrasts to the 'moderate or uncertain' negative effect previously predicted within the Interim SA Report earlier in 2026, reflecting the detailed work that has since been completed, namely the series of three Climate Change Studies and the Viability Study.

- **Communities 1: Education** – the Interim SA Report (2026) stated: *"… secondary school capacity has long been understood to be a key issue for the Local Plan, but planning for secondary school capacity is challenging, both because it is difficult to identify preferred locations for new and/or expanded schools and because the baseline situation is constantly shifting as neighbouring areas explore growth scenarios and consider potential locations for new schools (in particular, the latest situation is that the St Albans Local Plan is near finalisation, and proposes a new secondary at London Colney, and the Three Rivers Local Plan is nearing finalisation and proposes a new secondary at Carpenders Park)."*[2] *It will be for Hertfordshire County Council (HCC) to comment in detail (once again) through the current consultation, but the current appraisal aims to flag support for strategic growth at both Borehamwood and Bowmans Cross (in particular) given potential to deliver a new secondary. It is also important to note that the approach to growth at Radlett is held 'constant' across the growth scenario on balance, with the settlement notably lacking a secondary school."*

  The latest situation is considerably improved because there is now the potential for a strategic urban extension to Radlett (held constant across the growth scenarios) to deliver a secondary school. This is a major benefit of the proposed submission local plan, and is the reason why there is now a predicted 'moderate or uncertain positive effect' across the growth scenarios. However, there remain some uncertainties regarding schools capacity, at least ahead of the Infrastructure Delivery Plan (IDP) being completed (work is ongoing at the time of writing). As part of this, there can be challenges around schools capacity in support of high urban growth.

  With regards to the three variable sites, 'North Bushey' would deliver a new primary school (specifically, land would be made available), which is considered to be a significant benefit. Also, at 'Well End' the current proposal is to deliver a special educational needs school, but the concern is that growth at this scale should also deliver a primary school. Also, the site promoters have provided a concept masterplan for a much larger scheme that would not deliver a primary school. The site does benefit from good access to existing schools, including a secondary, but large strategic urban extensions are an opportunity to deliver new capacity.

- **Communities 2: Services** – the Interim SA Report (2026) stated: *"… planning for healthcare is challenging because the NHS requires flexibility such that it can be difficult to be certain that land provided will ultimately be taken up. Having said this, what can be [said] is that strategic growth locations give rise to an excellent opportunity to deliver new healthcare facilities, and overall there are not known to be any significant concerns under any of the scenarios. The other key consideration is then town centre regeneration, which is assumed as a 'constant' under all scenarios. There is very strong support for the ambitious regeneration strategies, informed by ongoing visioning and wider workstreams."*

  At this stage a key consideration is the proposed town centre regeneration strategies for both Borehamwood and Potters Bar, with it being the case that detailed work is ongoing but overall there is uncertainty regarding what can be viability achieved (and when). This leads to an 'uncertain' appraisal conclusion.

[2] *"There may also be some challenges in respect of primary school capacity, particularly in terms of maintaining the ongoing viability of schools in light of an ageing population at certain villages, notably Shenley and South Mimms."*

With regards to the three variable sites, it is not clear that there is an opportunity to deliver a new health facility (this would certainly be an opportunity to explore were the assumption to alternatively be that 'Well End' would deliver as a larger strategic urban extension). There is also potentially a concern regarding higher growth from greenfield sites at Borehamwood serving to divert investment from town centre regeneration, but this is highly uncertain.

- **Communities 3: Health** – the Interim SA Report (2026) stated: *"… there are also many wider ways in which the Local Plan influences the determinants of good health. One key matter for consideration relates to strategic planning for green and blue infrastructure, both within and outside of development sites, and also the related matter of ensuring that sites are masterplanned and designed with good health as a priority objective. In this regard it is fair to say that a priority objective is simply adopting a Local Plan such that growth comes forward in a plan-led way, as opposed to the baseline situation whereby growth continues to come forward in a piecemeal fashion in the absence of an up-to-date Local Plan with issues arising and opportunities missed in respect of planning for health."*

  Focusing on green and blue infrastructure, at the current stage there is broad support for the proposed submission approach (Scenario 1), including the new focus on coordinated strategic growth at Radlett and the proposed strategic urban extension to the west of Borehamwood. With regards to the three variable sites: A) 'North Borehamwood' has good access to the countryside; B) 'North Bushey' would deliver significant new areas of accessible greenspace; and C) 'Well End' represents an opportunity to design-in high quality green / blue infrastructure, although the concern is that opportunities may not be fully realised, given the concept masterplan submitted by the site promoter and given a risk of sub-optimal piecemeal growth. On balance, the scenarios are ranked on a par and neutral effects are predicted.

- **Communities 4: Cohesion** – the Interim SA Report (2026) stated: *"… it is difficult to confidently and meaningfully differentiate between the growth scenarios. A key issue is an acknowledged local concern with large scale housing growth; however, on the other hand, A) the baseline is a situation whereby growth continues unabated under the presumption in favour of sustainable development (an essential component of the plan-led system under the NPPF, with the aim being to motivate local authorities to maintain an up-to-date local plan); and B) under the lower growth scenarios it could potentially prove challenging to progress the local plan as objectors might argue there is insufficient supply."*

  At this stage it is considered reasonable to flag support for Scenario 1, recognising that this is the outcome of lengthy process of iterating the emerging draft local plan, and recognising that the three variable sites that feature across Scenarios 2 to 7 all generate community concerns (albeit this is likely partly due to all being the subject of current planning applications). This is notwithstanding that there is a strong 'communities' argument for adopting a Local Plan with a robust housing land supply to expedite plan adoption and ensure that the Council can maintain a rolling 5YHLS moving forward and therefore avoid 'evidenced unmet need'.

- **Economy and employment** – employment land needs would be provided for in full under Scenario 1 and none of the three variable omission sites that feature across the higher growth scenarios would deliver significant new employment land. At Well End a comprehensive approach to growth in this area could potentially unlock / facilitate delivery of new strategic employment land to the south of Rowley Lane (north of Sky Studios planning permission); however, there are no clear proposals for a comprehensive strategic urban extension of this nature, nor is there a clear need for additional strategic employment land. Finally, whilst there is a case to be made for higher growth to deliver additional homes in support of a skilled local workforce, it is not clear that this is a significant factor in support of higher growth.

- **Historic environment** – constraints are widespread but concerns with growth are limited, including as understood from recent Historic Impact Assessments (HIAs). High urban growth generates limited concerns, given that Borehamwood and Potters Bar are mainly 20th century towns (although Historic England flagged some issues through their consultation response); and at most of the proposed greenfield urban extensions under Scenario 1 there is notably low constraint or clearly good potential to avoid/minimise impacts through masterplanning. A key site of note is the proposed urban extension to the west of Borehamwood, which would involve significant encroachment towards Aldenham House Registered Park and Garden (Grade II) and the Elstree Village Conservation Area, and where mitigation could be challenging (including noting uncertainties regarding how to masterplan the site to achieve a comprehensive scheme, and noting a pending planning application within the site).

With regards to the three variable sites, all are subject to limited constraint, with this particularly the case for 'North Borehamwood'. At 'North Bushey' there are heritage assets nearby within the sensitive gap between Bushey and North Bushey, but there appears to be good potential for mitigation, to include a large new area of accessible greenspace that would make good use of an area of former parkland. At 'Well End' there are limited concerns on the assumption of a 1,200 home scheme, but the risk is an expanded scheme that encroaches towards a landscape associated with a number of listed buildings and historic lanes, and a concern could also be problematic 'rat running' through village conservation areas.

- **Homes** – as discussed, there is a case for higher growth with a view to boosting the housing requirement and/or ensuring a more robust supply headroom over-and-above the housing requirement, particularly in the crucial early years of the plan period. With regards to the proposed supply trajectory under Scenario 1, whilst this is the outcome of detailed work to consider the capacity and delivery trajectory of sites, there do remain uncertainties regarding a number of challenging urban sites, including some that are relied upon to contribute to 5YHLS in the earlier years of the plan period. Also, it is important to acknowledge that urban regeneration sites often struggle to deliver affordable housing (as discussed in the Viability Study, 2026) and, indeed, it is often the case that urban / brownfield sites are unable to viably deliver any affordable housing (at least at the current time, acknowledging that development viability could well improve over the plan period to 2043). With regards to the three variable sites, all are greenfield sites without any apparent abnormal development costs that can likely deliver the full policy quote of affordable housing (it is understood that certain of the sites are proposing 50% affordable housing), and all are the subject of pending planning applications (in whole or in part) suggestive of good potential to deliver in the first five years of the plan.

  In conclusion, the highest growth scenarios are very strongly supported as there would be the potential to set the housing requirement modestly above LHN and with a robust supply headroom, including in the earlier years of the plan period (a stepped requirement could be considered to ensure this). A housing requirement set above LHN would represent a positive response to unmet housing need in the sub-region and/or a positive response to affordable housing needs (under Scenario 1 around 70% of housing would need to be 'affordable' in order for needs to be met in full, which is not achievable). Under Scenario 1, whilst supply over the plan period matches the housing requirement (indeed exceeds it by 2%), and it has been calculated that there would be a 5YHLS at adoption, there remain uncertainties in both regards due to reliance on challenging urban sites. One notable quote from the Viability Study (2026) is: *"… the delivery of the Tesco / Canada life site is likely to be challenging – like the other flatted typologies… it is recommended that the Council engages further with the promoters… and only includes these sites… if they can be demonstrated to be viable."*

  Finally, there are significant concerns regarding the lack of identified sites to provide for Gypsy and Traveller accommodation needs. 'Well End' is a good example of a strategic site that could be suited to delivering a site for Gypsies and Travellers, e.g. to contribute around 10 pitches to the overall identified need for between 123 and 132 pitches over the plan period.

- **Landscape** – the Interim SA Report stated*: "… whilst there are no designated landscapes within the Borough there is a widespread concern regarding creep of the London suburbs into Hertfordshire, generally loss of open countryside that is highly appreciated and loss of settlement separation. Concerns can be flagged at all settlements, but the appraisal aims to reflect a view that directing growth to Bowmans Cross represents a means of delivering growth in line with landscape objectives."*

  At the current stage there is new evidence in the form of a Landscape Impact Assessment (LIA, 2026), which identifies that around half of the proposed greenfield allocations under Scenario 1 have 'moderate' sensitivity with the others having 'moderate-high' sensitivity. With regards to the three variable sites: A) 'North Borehamwood' is associated with rising land but potentially has limited sensitivity on the assumption of a well-contained scheme (the LIA concludes 'moderate-high' sensitivity for a much larger parcel that stretches all across the entire northern edge of Borehamwood); B) 'North Bushey' has 'moderate' sensitivity and, whilst this is a sensitive Green Belt gap, there appears to be good potential to secure a long-term defensible northern urban edge to Bushey; and C) 'Well End' has 'moderate' sensitivity but, and as discussed, there is a concern regarding sub-optimal development creep / sprawl in light of consultation responses from the site promoters and the current planning application.

On balance, it is considered reasonable to highlight 'North Bushey' as a site subject to relatively limited landscape constraint, and where there is good potential for containment.

- **Soils / resources** – agricultural land quality is not particularly high in the Borough although there is a notable concentration of 'best and most versatile' agricultural land in the vicinity of North Bushey and Radlett, including a band of grade 2 quality land to the south of Radlett that intersects one of the proposed urban extensions that features in Scenario 1. All three of the variable sites that feature across Scenarios 2 to 7 likely comprise grade 3b quality land (not best and most versatile), although if 'Well End' were to expand to the east of Well End Road then this would involve encroaching into an area associated with grade 3a quality land.

  Another point to note is support for a focus on urban growth and also several greenfield sites comprising degraded land or golf courses. Finally, minerals and waste planning is a significant factor in parts of the Borough including Bowmans Cross (with potential implications for timing).

- **Transport** – the Interim SA Report (2026) stated: *"… the Borough is overall very well connected and there are major opportunities to deliver growth in proximity to a well-connected railway stations, along bus corridors and along priority routes identified in the Draft Local Cycling and Walking Infrastructure Plan (LCWIP, 2026). Also, there are significant opportunities to deliver large-scale strategic sites that can deliver strategic infrastructure upgrades and will benefit from a high degree of trip internalisation. However, the emerging preferred growth strategy is a major step-change on that previously consulted-on in 2024, such that it will be crucial to work closely with HCC, National Highways and others ahead of plan finalisation, including informed by transport modelling."*

  Transport work remains ongoing at the time of writing, such that there is a need to conclude considerable uncertainty and, taking a precautionary approach, to flag a 'moderate or uncertain' negative effect across the scenarios. The three variable sites are in reasonably accessible and well-connected locations, but there is a need to consider the cumulative effects of growth for road traffic and, in turn, the ability to support high quality bus services and safe walking and cycling. At 'Well End' there is a clear need to ensure a comprehensive approach to growth that realises opportunities to deliver new and upgraded transport infrastructure, to avoid problematic traffic congestion, support modal shift away from the private car and ultimately to ensure growth in line with 'vision-led' transport planning principles.

- **Water** – the Interim SA Report stated*: "… there are not known to be any key challenges in respect of either water supply or wastewater treatment capacity, but the EA and Thames Water will wish to comment through the consultation. One issue is reliance on Maple Lodge Sewage Treatment Works (at Maple Cross), which serves a very large catchment that includes numerous local authority / local plan areas."*

  At the time of writing a Water Cycle Study (WCS) Scoping Study has been completed that does flag concerns regarding capacity at Maple Lodge STW, including having factored in consultation responses. It also highlights that the proposed level of growth is in excess of that anticipated by the water company when preparing its Water Resource Management Plan (WRMP), which deals with the supply of water, but it is understood that there are no major concerns regarding the supply of water over the plan period (including from a perspective of avoiding low water levels impacting the water environment).

  A final WCS is in preparation at the time of writing, and it may be that through detailed investigation it can be determined that there is capacity at Maple Lodge STW to accommodate the proposed housing land supply trajectory. However, on balance, and taking a precautionary approach, a significant concern is flagged for higher growth scenarios at this stage.

Having appraised the RA growth scenarios there is a need for the Council to prepare a formal response, setting out reasons for supporting Scenario 1 on balance as an appropriate and ultimately 'justified' strategy (NPPF para 36). This statement will be prepared ahead of publication, following final agreement of the Local Plan by elected councillors.

Appraisal of the Local Plan as a whole

In addition to the appraisal of RA growth scenarios, the other key task for the SA Report is to appraise the Proposed Submission Local Plan as a whole, factoring the suite of proposed policies that will be in place to guide planning applications, in particular site specific policies (noting that Borough-wide policies risk having limited weight if they conflict with the new NPPF).

However, this work remains ongoing at the time of writing, including as the Viability Study has only very recently been completed. There is a need to scrutinise proposed policy requirements in light of the Viability Study in terms of: A) the balance struck between competing policy priorities within viability parameters; B) ensuring that the cumulative burden of DM policy requirements does not risk impacting site deliverability; and C) ensuring that DM policies do not lead to false comfort, including regarding affordable housing, biodiversity net gain, net zero development and funding for infrastructure from CIL and S106. Compromises can and often are made at the planning application stage on viability grounds, and there is also the context of the new NPPF (2026) in terms of 'national DM policies' and the new presumption in favour of sustainable development (which includes a new 'permanent presumption' in urban areas).

Next steps

Finally, the SA Report discusses next steps. Specifically, the next step is to consider representations received and implications for soundness. Assuming that the plan can still be considered 'sound' it will then be submitted for Examination in Public (EiP) alongside a summary of the issues raised. It is important to be clear that there will not be the potential to make amendments to the plan (although modifications can be suggested as part of the submission material and indeed through the examination).

The EiP will be overseen by one or more Planning Inspectors, and there will invariably be a consultation on 'main modifications' in order to address matters of plan soundness.

Once found to be sound following EiP the Local Plan will be adopted and then implemented, monitored and evaluated. At this stage a number of matters that might be a focus of future monitoring efforts are suggested, essentially with a view to evaluating whether the plan delivers on policy priorities in practice.

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AECOM

Hertsmere Local Plan HRA

Regulation 19 Habitats Regulations Assessment

Hertsmere Borough Council

September 2026

Quality information

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Revision History

Revision	Revision date	Details	Authorized	Name	Position
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1. Introduction

1.1 Background

1.1.1 AECOM has been appointed by Hertsmere Borough Council (the Council) to undertake a Habitats Regulations Assessment (HRA) of the emerging Hertsmere Local Plan (HLP). The first stage of this process is an initial Test of Likely Significant Effects (or HRA Screening) on the identified (those sites previously allocated and with planning permission) and potential sites, for housing and commercial development and associated proposed policies.

1.1.2 The objective of the screening is to identify any aspects of the HLP that may result in Likely Significant Effects (LSE) on the integrity of the National Site Network (NSN), either in isolation or in combination with other plans and projects. The NSN comprises Habitats Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites).

1.1.3 The planning period for the emerging HLP is 2026 to 2043.

1.2 Legislation

1.2.1 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). While the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment will continue as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019[1].

1.2.2 The HRA process applies the 'Precautionary Principle'[2] to Habitats Sites. Plans and projects can only be permitted after ascertaining that there will be no adverse effect on the integrity of the Habitats Site(s) (formerly referred to as European Sites) in question. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the Plan or project in question.

1.2.3 Figure 1 below sets out the legislative basis for Appropriate Assessment.

1.2.4 Plans and projects that are associated with potential adverse impacts on Habitats Sites may still be permitted if there are no reasonable alternatives and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

"*A competent authority, before deciding to … give any consent, permission or other authorisation for, a plan or project which – (a) is likely to have a significant effect on a European site … (either alone or in combination with other plans or project)… must make an appropriate assessment of the implications of the plan or project in view of the site's conservation objectives… The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site*".

Figure 1: The legislative basis for Appropriate Assessment

1.2.5 Over time, the phrase 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Regulations from screening through to IROPI. This has

[1] These don't replace the 2017 Regulations but are just another set of amendments.
[2] The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: *"When human activities may lead to morally unacceptable harm* [to the environment] *that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis".*

arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'.

1.2.6 In spring 2018, the 'Sweetman' European Court of Justice ruling[3] clarified that 'mitigation' (i.e., measures that are specifically introduced to avoid or reduce a harmful effect on a Habitats Site that would otherwise arise) should not be taken into account when forming a view on Likely Significant Effects. Mitigation should be considered only at the Appropriate Assessment stage. This HRA is cognisant of that ruling.

1.3 Scope of Assessment

1.3.1 There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Current guidance suggests that the following Habitats Sites should be included in the scope of an HRA assessment:

- All Habitats Sites within the boundary of the Hertsmere District; and,
- Habitats Sites located outside of the District boundary shown to be linked to development in the Hertsmere Local Plan through a known 'pathway' (discussed below).

1.3.2 Generally, it is uncommon for development plans to be deemed to have significant impacts on Habitats Sites situated more than 10km from areas of growth. For example, most core recreational catchments (except for some coastal sites) are under 10km in size, and the average vehicle commuting distance of a UK resident is approximately 10km. However, there are exceptions, and it should be noted that the presence of a conceivable impact pathway linking a Plan to a Habitats Site does not mean that Likely LSEs.

1.3.3 Development impacts can extend beyond 10km, particularly where hydrological pathways and surface water catchments are involved, which is why the source-pathway-receptor concept is also used to help determine whether there are potential pathways connecting development to Habitats Sites. This takes site-specific sensitivities into account, including issues such as nutrient neutrality or water levels, quantity and flow.

1.3.4 Briefly defined, impact pathways are routes by which the implementation of a policy within a Local Plan document can lead to an effect upon a Habitats Site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could affect Habitats Sites through, for example, disturbance of ground-nesting birds. Guidance from the Ministry of Housing, Communities and Local Government (MHCLG, now the Department for Levelling Up, Housing and Communities (DLUHC)) states that the HRA should be '*proportionate to the geographical scope of the* [plan policy]' and that '*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*' (MHCLG, 2006, p.6)[4].

1.3.5 Some Habitats Sites close to the HLP area (HRLPA) are known to have recreational catchment zones greater than 10km so a precautionary distance of 15km has been used for this HRA.

1.3.6 This basic principle has also been reflected in court rulings. The Court of Appeal[5] has ruled that provided the Council (competent authority) was duly satisfied that proposed mitigation could be 'achieved in practice' to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to planning permissions (rather than a Plan level document)[6]. In this case the High Court ruled that for '*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations'*.

[3] People Over Wind and Sweetman v Coillte Teoranta (C-323/17)
[4] Ministry of Housing, Communities and Local Government. 2006. *Planning for the Protection of European Sites: Appropriate Assessment*. http://www.communities.gov.uk/index.asp?id=1502244
[5] No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015
[6] High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

1.4 Quality assurance

1.4.1 This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2008 and 14001:2004 and BS OHSAS 18001:2007. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.

1.4.2 All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2025)[7]

2. Methodology

2.1 Introduction to HRA Methodology

2.1.1 The HRA will be carried out with reference to the general EC guidance on HRA[8] and that of the UK government[9].

2.1.2 **Figure 2** below outlines the stages of HRA. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan until no significant adverse effects remain.

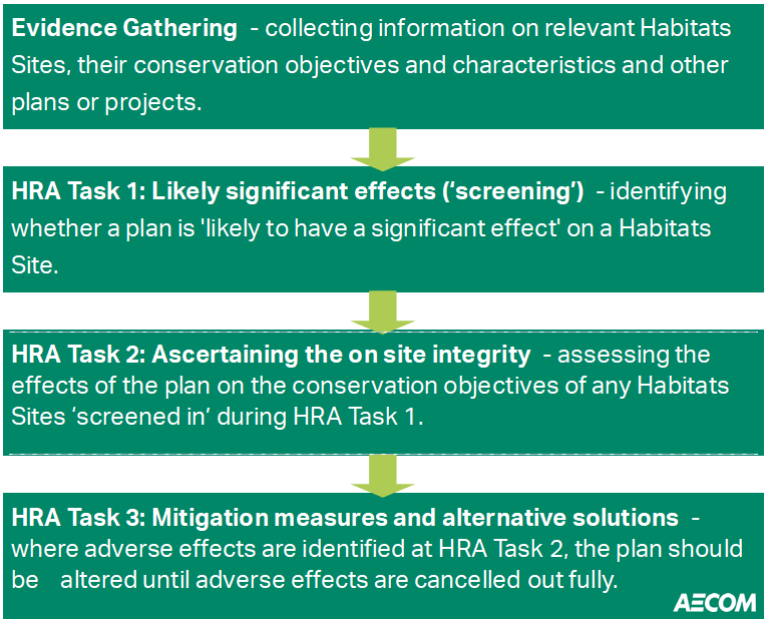


Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source EC, 2021.

[7] CIEEM (2025) Code of Professional Conduct available at cieem.net/wp-content/uploads/2019/02/Code-of-Professional-Conduct-April-2025.pdf
[8] European Commission (2021): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.
[9] https://www.gov.uk/guidance/appropriate-assessment

2.2 Description of HRA Tasks

HRA Task 1 – Screening for Likely Significant Effects

2.2.1 Following evidence gathering, the first stage of any Habitats Regulations Assessment is the screening for LSE, essentially a high-level assessment to decide whether the full subsequent stage, known as Appropriate Assessment, is required. The essential question is:

"Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon Habitats sites?"

2.2.2 The objective is to filter out those Plans and projects that can, without any detailed appraisal, be concluded to be unlikely to result in any impacts upon Habitats Sites, usually because there is no mechanism for a negative interaction. This stage is undertaken in Chapter 5 of this report and in Appendices B and C.

HRA Task 2 – Appropriate Assessment

2.2.3 Where a conclusion of 'no Likely Significant Effects' cannot be drawn, the analysis proceeds to the next stage of HRA known as Appropriate Assessment (AA). Case law has clarified that 'Appropriate Assessment' is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to AA compared to the screening stage.

2.2.4 By virtue of the fact that it follows screening for LSE, there is a clear implication that the analysis will be more detailed than undertaken at the previous stage. One of the key considerations during AA is whether there is available mitigation that would entirely address the potential effect. In practice, the AA would take any proposed policies or identified and potential sites that could not be dismissed following the high-level screening and assess the potential for an effect in more detail, with a view to concluding whether there would be a potential for an adverse effect on site integrity (in other words, disruption of the coherent structure and function of the Habitats Site(s)). A decision by the European Court of Justice[10] concluded that measures intended to avoid or reduce the harmful effects of a proposed Plan or project on a Habitats Site may no longer be considered by competent authorities at the screening for LSEs stage of HRA. That ruling has been taken into account in producing this HRA.

2.2.5 Also, in 2018, the Holohan ruling[11] was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that '*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, … typical habitats or species must be included in the appropriate assessment, <u>if they are necessary to the conservation of the habitat types and species listed for the protected area</u>*' [emphasis added]. Due account of this decision has been given in this HRA.

HRA Task 3 – Avoidance and Mitigation

2.2.6 Where necessary, measures are recommended for incorporation into the Plan in order to mitigate and/or avoid adverse effects on Habitats Sites. There is considerable precedent for the level of detail a Local Plan document should include regarding mitigation for impact pathways on Habitats Sites (e.g., recreational pressure). The implication of this precedent is that it is not necessary for all measures to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.

2.2.7 When discussing mitigation for a Local Plan, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves, since a Local Plan document is a high-level policy document.

2.2.8 In any Local Plan, there are numerous policies for which there is a limit to the degree of assessment that is possible at the Plan level. This is because either:

- The policy in question does not contain any specifics as to what will be delivered or where, and so cannot be assessed in detail at the Plan level. In these cases, the Appropriate Assessment focuses

[10] People Over Wind and Sweetman v Coillte Teoranta (C-323/17)
[11] Case C-461/17

on precautionary mitigation that can be included in the plan to ensure that whatever proposals come forward will not result in adverse effects on integrity; or

- The nature of potential impacts (e.g. visual and noise disturbance arising from construction or loss of functionally linked habitat) is related to how the development will be designed and constructed and therefore cannot be assessed in detail at the plan level. In these instances, the Appropriate Assessment focuses on available mitigation measures, the extent to which such measures would be achievable and effective, and whether an adequate protective framework exists to ensure that the policy would not lead to an adverse effect on the integrity of any internationally designated sites.

2.2.9 In these instances, the advice of Advocate-General Kokott[12] is also worth considering. She commented that: *'It would …hardly be proper to require a greater level of detail in preceding plans* [rather than planning applications] *or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure* ***to the extent possible on the basis of the precision of the plan****.* ***This assessment is to be updated with increasing specificity in subsequent stages of the procedure.'*** [emphasis added].

2.3 In-combination Plans

2.3.1 The following plans are considered to have the potential to act in-combination with the HLP:

- Affinity Water: Water Resource Management Plan[13]
- Barnet Local Plan 2021-2036[14]
- Enfield Regulation 19 Draft Local Plan[15]
- The London Plan 2021[16]
- Harrow Regulation 18 Draft Local Plan 1021-2041[17]
- Hertfordshire Minerals and Waste Local Plan to 2040 (Draft)[18]
- St Albans Regulation 18 Draft Local Plan to 2041[19]
- Three Rivers Local Development Framework Core Strategy[20] to 2026
- Watford Local Plan 2021-2038[21]
- Welwyn Hatfield Local Plan 2016-2036[22]

2.3.2 It should be noted that, while their broad potential effects are considered, this assessment does not undertake full HRA of each of these planning documents. Instead, existing HRAs conducted for surrounding LPAs and other relevant bodies were drawn upon.

[12] Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49 http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN
[13] Available at: https://affinitywater.uk.engagementhq.com/wrmp [Accessed 27/01/2026]
[14] Available at: https://www.barnet.gov.uk/planning-and-building-control/planning-policies-and-local-plan/barnet-local-plan-2021-2036/adoption-documents [Accessed 27/01/2026]
[15] Available at: https://enfield.moderngov.co.uk/documents/s110940/Traveller%20Local%20Plan%20Regulation%2019%20report.pdf [Accessed 27/01/2026]
[16] Available at: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf [Accessed 01/04/2026]
[17] Available at: https://www.harrow.gov.uk/planning-developments/new-local-plan-consultation [Accessed 27/01/2026]
[18] Available at: https://www.hertfordshire.gov.uk/media-library/documents/waste/mwlp/core-document-library/core-documents/cd-01-minerals-and-waste-local-plan-draft-plan-jul-2022.pdf [Accessed 27/01/2026]
[19] Available at: https://stalbans.objective.co.uk/file/6193723 [Accessed 27/01/2026]
[20] Available athttps://cdn-trdc.prod.trdc.blazecms.app/files/2023/01/945fc600-9ff2-11ed-8d80-6dc425ce7e94-core-strategy-adopted-17-oct-2011%20(1).pdf [Accessed 01/04/2026]
[21] Available at: https://www.watford.gov.uk/downloads/file/1264/watford-local-plan [Accessed 27/01/2026]
[22] Available at: https://www.welhat.gov.uk/downloads/file/876/welwyn-hatfield-local-plan-2016-2036 [Accessed 27/01/2026]

3. Habitats Sites Background

3.1 Chilterns Beechwoods SAC

Introduction[23]

3.1.1 The Chilterns Beechwoods represent a very extensive tract of ancient semi-natural beech Fagus sylvatica forests in the centre of the habitat's UK range. The woodland is an important part of a mosaic with species-rich chalk grassland and scrub. A distinctive feature in the woodland flora is the occurrence of the rare coralroot *Cardamine bulbifera*. Standing and fallen dead timber provide habitat for dead-wood (saproxylic) invertebrates, including stag beetle *Lucanus cervus*.

Qualifying Features[24]

3.1.2 Chilterns Beechwoods qualifies as a SAC for both habitats and species.

- *Asperulo-Fagetum* beech forests. (Beech forests on neutral to rich soils)
- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*). (Dry grasslands and scrublands on chalk or limestone)
- Stag beetle *Lucanus cervus*

Conservation Objectives[25]

3.1.3 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species.
- The structure and function (including typical species) of qualifying natural habitats.
- The structure and function of the habitats of qualifying species.

Environmental Vulnerabilities[26]

3.1.4 The main threats and activities with impacts on the site are:

- Forestry and woodland management,
- Deer,
- Changes in species distributions,
- Invasive species,
- Disease,
- Public access/ disturbance, and
- Air pollution: Nitrogen deposition.

3.2 Epping Forest SAC

Introduction[27]

3.2.1 Part of the Epping Forest SAC is located within Epping Forest District. Approximately 70% of the 1,600 hectare site consists of broadleaved deciduous woodland, and it is one of only a few remaining large-

[23] Available at: https://publications.naturalengland.org.uk/file/4855330563424256 [Accessed 27/01/2026]
[24] Ibid
[25] Available at: https://publications.naturalengland.org.uk/file/4961243408629760 [Accessed 27/01/2026]
[26] Available at: https://publications.naturalengland.org.uk/file/5908864568393728 [Accessed 27/01/2026]
[27] Available at: https://publications.naturalengland.org.uk/file/5153389482606592 [Accessed 27/01/2026]

scale examples of ancient wood-pasture in lowland Britain. Epping Forest SAC supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

Qualifying Features[28]

3.2.2 Epping Forest qualifies as a SAC for both habitats and species.

- Beech forests on acid soils with Ilex and sometime *Taxus* in the shrublayer.
- Wet heathland with cross-leaved heath; and
- Dry heath
- Stag beetle *Lucanus cervus*

Conservation Objectives[29]

3.2.3 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species

Environmental Vulnerabilities[30]

3.2.4 The main threats and activities with impacts on the site are:

- Air pollution,
- Under grazing,
- Public disturbance,
- Changes in species distribution,
- Inappropriate water levels,
- Water pollution,
- Invasive species, and
- Disease.

3.3 Lee Valley Ramsar

Introduction[31]

3.3.1 The Lee Valley SPA comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits along approximately 24km of the valley. These waterbodies support internationally important numbers of wintering gadwall and shoveler and nationally important numbers of several other bird species.

3.3.2 The site also contains a range of wetland and valley bottom habitats, both man-made and semi-natural, which support a diverse range of wetland fauna and flora.

[28] Ibid
[29] Available at: https://publications.naturalengland.org.uk/file/5442443424301056 [Accessed 27/01/2026]
[30] Available at: https://publications.naturalengland.org.uk/file/5732004727881728 [Accessed 27/01/2026]
[31] Available at: https://rsis.ramsar.org/RISapp/files/RISrep/GB1037RIS.pdf [Accessed 27/01/2026]

Qualifying Features[32]

3.3.3 The Ramsar is designated for the following features:

- Criterion 2: The site supports the nationally scarce whorled watermilfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a waterboatman).
- Criterion 6: Over winter the site regularly supports internationally important populations of: Gadwall *Ansa strepara*, Shoveler *Anas clyptea*

Conservation Objectives

3.3.4 The legal conservation status is as defined for;

- Lee Valley SPA.

Environmental Vulnerabilities

3.3.5 Conservation objectives are taken to be the same as those for Lee Valley SPA.

3.4 Lee Valley SPA

Introduction[33]

3.4.1 The Lee Valley SPA comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of man-made and semi-natural wetland and valley bottom habitats.

Qualifying Features[34]

3.4.2 The SPA is designated for the following features:

- Bittern *Botaurus stellaris* (Wintering)
- Shoveler *Anas clypteata* (Wintering)
- Gadwall *Anas strepera* (Wintering)

Conservation Objectives[35]

3.4.3 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Environmental Vulnerabilities[36]

3.4.4 The main threats and activities with impacts on the site are:

- Water pollution,
- Hydrological Changes,

[32] ibid
[33] Available at: https://publications.naturalengland.org.uk/file/6230224169598976 [Accessed 27/01/2026]
[34] ibid
[35] Available at: https://publications.naturalengland.org.uk/file/6516586265706496 [Accessed 27/01/2026]
[36] Available at: https://publications.naturalengland.org.uk/file/5788502547496960 [Accessed 27/01/2026]

- Public Access/ Disturbance,
- Inappropriate scrub control,
- Fisheries: Fish stocking,
- Invasive species,
- Inappropriate cutting/ mowing, and
- Air pollution: risk of atmospheric nitrogen deposition.

3.5 Wormley-Hoddesdonpark SAC

Introduction[37]

3.5.1 Wormley Hoddesdonpark Woods has large stands of almost pure hornbeam *Carpinus betulus* (former coppice), with sessile oak *Quercus petraea* standards. Areas dominated by bluebell *Hyacinthoides non-scripta* do occur, but elsewhere there are stands of great wood-rush *Luzula sylvatica* with carpets of the mosses *Dicranum majus* and *Leucobryum glaucum*. Locally, a bryophyte community more typical of continental Europe occurs, including the mosses *Dicranum montanum, D. flagellare* and *D. tauricum*.

Qualifying Features[38]

3.5.2 The SAC is designated for the following features:

- Sub-Atlantic and medio-European oak or oak-hornbeam forests of the *Carpinion betuli*. (Oak-hornbeam forests).

Conservation Objectives[39]

3.5.3 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

Environmental Vulnerabilities[40]

3.5.4 The main threats and activities with impacts on the site are:

- Disease,
- Invasive species,
- Air pollution: risk of atmospheric nitrogen deposition,
- Deer,
- Vehicles: illicit,
- Forestry and woodland management, and
- Public access/ disturbance.

[37] Available at: https://publications.naturalengland.org.uk/file/5608903748354048 [Accessed 27/01/2026]
[38] Ibid
[39] Available at:https://publications.naturalengland.org.uk/file/4515961222987776 [Accessed 27/01/2026]
[40] Available at: https://publications.naturalengland.org.uk/file/6541134543192064 [Accessed 27/01/2026]

4. Identified Impact Pathways

4.1 Evaluation of impact pathways

4.1.1 Impact pathways of possible relevance to each Habitats Site have been identified based on the environmental vulnerabilities listed in the Site Improvement Plans and professional judgement, these are listed in Table 1.

Table 1. Potential Impact pathways applicable to Habitats Sites

Habitats Sites	Potential Impact Pathways
Chilterns Beechwoods SAC	• Air pollution: Nitrogen deposition • Loss of functionally linked habitat for stag beetle • Recreational Pressure
Epping Forest SAC	• Air pollution: Nitrogen deposition • Loss of functionally linked habitat for stag beetle • Recreational pressure • Water quality • Water quantity, Level and Flow
Lee Valley SPA / Ramsar	• Air pollution: Nitrogen deposition • Loss of functionally linked habitat • Recreational pressure • Water quality • Water quantity, Level and Flow
Wormley-Hoddesdonpark SAC	• Air pollution: Nitrogen deposition • Recreational pressure

4.2 Atmospheric Pollution (Nitrogen Deposition)

4.2.1 The main pollutants of concern for Habitats Sites are oxides of nitrogen (NOx), ammonia (NH3) and sulphur dioxide (SO2) and are summarised in Table 2. Ammonia can have a direct toxic effect upon vegetation, particularly at close distances to the source, such as near road verges[41]. NOx can also be toxic at very high concentrations (far above the annual average Critical Level). High levels of NOx and NH3 are likely to increase the total nitrogen (N) deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in atmospheric nitrogen deposition can, if sufficiently large, enhance soil fertility and lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats[42] [43].

Table 2. Main sources and effects of air pollutants on habitats and species[44]

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO_2)	The main sources of SO2 are electricity generation and industrial and domestic fuel combustion. However, total SO2 emissions in the UK have decreased substantially since the 1980s. Another origin of sulphur dioxide is the shipping industry, and high atmospheric concentrations of SO2 have been documented in busy ports. In	Wet and dry deposition of SO2 acidifies soils and freshwater, and may alter the composition of plant and animal communities. The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species. However, SO2 background levels have fallen considerably since the 1980s and are now not

[41] http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.
[42] Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. (2006). Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* **38**: 161-176.
[43] Dijk, N. (2011). Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation. *Global Change Biology* **17**: 3589-3607.
[44] Information summarised from the Air Pollution Information System (http://www.apis.ac.uk/).

	future years, shipping is likely to become one of the most important contributors to SO2 emissions in the UK.	regarded as a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to the return of lichen species and improved tree health in London.
Acid deposition	Leads to acidification of soils and freshwater via atmospheric deposition of SO2, NOx, ammonia, and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, with most of this attributed to lower sulphate levels.	Gaseous precursors (e.g. SO2) can cause direct damage to sensitive vegetation, such as lichen, upon deposition. Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds/plants. Not all sites are equally susceptible to acidification. This varies depending on soil type, bedrock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz-rich rocks tend to be more susceptible.
Ammonia (NH_3)	Ammonia is a reactive, soluble, alkaline gas released following the decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock, and it is also emitted from some industrial processes and vehicle exhausts. Ammonia reacts with acid pollutants such as the products of SO_2 and NO_X emissions to produce fine ammonium (NH_4+) – containing aerosol. Due to its significantly longer lifetime, NH_4+ may be transferred much longer distances (and can therefore be a significant transboundary issue). While ammonia deposition rates can be estimated from atmospheric concentrations; they are strongly influenced by meteorology and ecosystem type.	The negative effect of NH_4+ may occur via direct toxicity, when uptake exceeds detoxification capacity and via nitrogen accumulation. Its main adverse effect is eutrophication, leading to assemblages dominated by fast-growing, tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen. As emissions mostly occur at ground level in rural environments and NH3 is rapidly deposited, some of the most acute problems of NH3 deposition occur in small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO_x)	Nitrogen oxides are mostly produced in combustion processes. Half of NO_X emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. NOx concentrations have been falling for decades due to improvements in vehicle emissions technology, and this will accelerate after 2035 as electric vehicles (or other non-combustion engine vehicles) spread through the vehicle fleet following the Government's ban on the sale of new petrol and diesel cars and vans in 2035.	Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of Nox for all vegetation types has been set to 30 ug/m3. Deposition of nitrogen compounds (nitrates (NO_3), nitrogen dioxide (NO_2) and nitric acid (HNO_3)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. In addition, NO_x contributes to soil and water eutrophication, altering plant community species composition at the expense of sensitive species.
Nitrogen (N) deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidised (e.g. NO_X) or reduced (e.g. NH_3) nitrogen emissions (described separately above). While oxidised nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. The nitrogen pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but excessive overall N is widely regarded as the major driver of biodiversity change globally. Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from nitrogen eutrophication. This is because many semi-natural plants cannot assimilate the surplus nitrogen as well as many graminoid (grass) species. Nitrogen deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O_3)	A secondary pollutant generated by photochemical reactions involving NOx, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above). Increasing anthropogenic emissions of ozone precursors in the UK have led to more days when ozone levels exceed 40 ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to	Concentrations of O_3 above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O_3 concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reductions in floral biomass, reductions in crop yield (e.g., cereal grains, tomato, potato), reductions in the number of flowers, decreases in forest production, and altered species composition in semi-natural plant communities.

require action at the international level to reduce levels of the precursors that form ozone.

4.2.2 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping[45]. As such, these will not be associated with Local Plan growth. Ammonia emissions originate from agricultural practices[46], with some chemical processes also making notable contributions and traffic also contributing materially at a local scale. NOx emissions are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion of its overall NOx footprint (92%) through associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison[47]. Therefore, emissions of NOx and ammonia can reasonably be expected to increase as a result of the Plan, primarily due to increased commuter traffic associated with housing growth.

4.2.3 The World Health Organisation has the following critical thresholds for plant communities: The critical NOx concentration (critical level) for the protection of vegetation is 30 μgm^{-3} and the critical level for ammonia 1-3 μgm^{-3} (depending on whether normal vegetation or lichens and bryophytes are involved). Additionally, ecological studies have determined 'Critical Loads'[48] of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH_3).

4.2.4 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roads to local pollution levels is insignificant (Figure 3 and reference [49]). Therefore, this distance has been used throughout this HRA to determine whether Likely Significant Effects (LSEs) on sensitive Habitats Sites may arise due to implementation of the Plan.

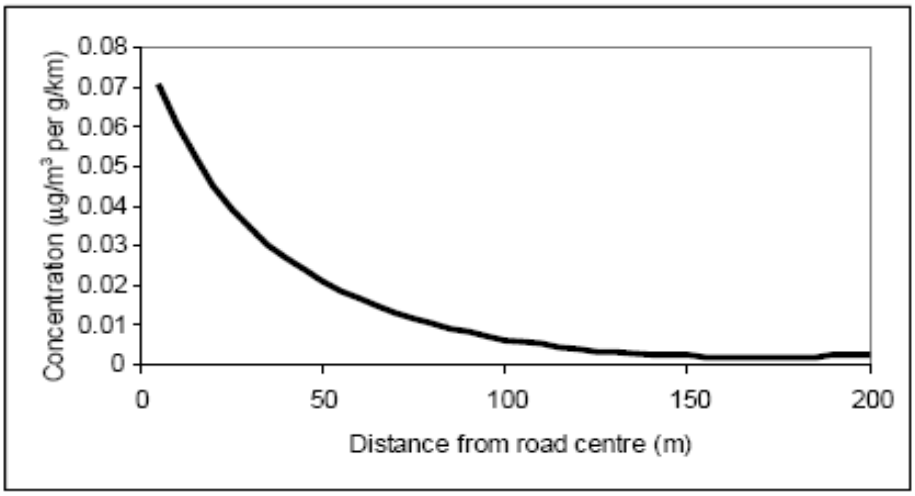


Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT[50])

4.2.5 Overall, the following Habitats Sites are considered potentially sensitive to atmospheric nitrogen deposition, primarily due to the presence of nutrient-limited habitats and are taken forward into screening:

- Chilterns Beechwoods SAC,
- Epping Forest SAC,
- Lee Valley SPA /Ramsar, and

[45] http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.
[46] Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. (1998). A new inventory for ammonia emissions from U.K. agriculture. *Atmospheric Environment* **32**: 309-313.
[47] Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. http://www.airquality.co.uk/archive/index.php [Accessed on the 21/10/2021]
[48] The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.
[49] Available at: http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013 [Accessed on the 21/10/2021]
[50] Available at: http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf [Accessed on the 21/10/2021]

- Wormley-Hoddesdonpark SAC.

4.3 Loss of Functionally Linked Habitat

4.3.1 While most Habitats Sites have been geographically defined to encompass the key features that are necessary for coherence of their structure and function, and the support of their qualifying features, this is not necessarily the case. A diverse array of qualifying species, including birds, bats and amphibians, are not always confined to the boundary of designated sites.

4.3.2 For example, the highly mobile nature of both wader and waterfowl species implies that areas of habitat of crucial importance to the integrity of their populations lie outside the physical limits of Habitats Sites. Although not part of the formal designation, these habitats are integral to the maintenance of the designated site's structure and function, for example, by encompassing important foraging grounds. Therefore, land use plans that may affect such functionally linked habitats require further assessment.

4.3.3 There is now an abundance of authoritative examples of HRA cases on plans affecting bird populations, where Natural England has identified the potential importance of functionally linked land. For example, bird surveys conducted in relation to a previous HRA indicated that approximately 25% of the golden plover population in the Somerset Levels and Moors SPA were affected while on functionally linked land, which required the inclusion of mitigation measures in the relevant plan policy wording. Another important case study originates from the Mersey Estuary SPA/Ramsar, where adjacent, functionally linked land had a peak survey count of 108% of the 5-year mean peak population of golden plover. This finding led to significant amendments to the planning proposal to ensure that site integrity was not adversely affected.

4.3.4 Research on stag beetle dispersal[51] concludes that, *"for the conservation of the European stag beetle, it is essential to provide stepping-stones of suitable dead wood, preferably every 100m and not more than 1km apart".* These may be outside the SAC, and their presence or absence may influence connectivity and the SAC's ability to meet its conservation objectives.

4.3.5 Generally, the identification of an area as functionally linked habitat is not always a straightforward process. The importance of non-designated land parcels may not be apparent and thus might require the analysis of existing data sources (e.g. Bird Atlases or data from records centres) to be firmly established. In some cases, data may not be available, requiring additional survey work.

4.3.6 Overall, the available baseline information suggests that the following Habitats Sites are sensitive to the loss of functionally linked habitats due to the presence of mobile waterfowl and are taken forward into screening:

- Chilterns Beechwoods SAC (stag beetle)
- Epping Forest SAC (stag beetle)
- Lee Valley SPA/Ramsar (gadwall and shoveler)

4.4 Recreational Pressure

4.4.1 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfil conservation objectives while also providing recreational opportunities. Various research reports have provided compelling links between changes in housing and access levels[52], and impacts on Habitats protected sites[53] [54]. This applies to any habitat, but recreational pressure from housing growth is of particular significance for Habitats Sites designated for their bird interest. Different Habitats Sites are subject to different types of recreational pressures and have different vulnerabilities.

[51] Thomaes, A., Dhont, P., Dekeukeleire, D. and Vandekerkhove, K. (2018), Dispersal behaviour of female stag beetles (Lucanus cervus) in a mosaic landscape: when should I stay and where should I go. Insect Conserv Divers, 11: 523-533. Available at: https://doi.org/10.1111/icad.12325
[52] Weitowitz D.C., Panter C., Hoskin R. & Liley D. (2019). The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology* **5**. https://doi.org/10.1093/jue/juz019
[53] Liley D, Clarke R.T., Mallord J.W., Bullock J.M. (2006a). The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.
[54] Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. (2006b). Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.

Studies across a range of species have shown that the effects of recreation can be complex. HRAs of planning documents tend to focus on recreational sources of disturbance as a result of new residents[55].

4.4.2 Most terrestrial habitats (especially heathland, woodland and dune systems) can be affected by trampling and other mechanical damage, which dislodges individual plants, leads to soil compaction and erosion. The following studies have assessed the impact of trampling associated with different recreational activities in different habitats:

- Wilson & Seney)[56] examined the degree of track erosion caused by hikers, motorcyclists, horse riders and cyclists in 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks and, therefore, caused more erosion than motorcycles and bicycles.

- Cole et al[57] conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks, indicating some recovery of the vegetation. Differences in plant morphology were found to explain more variation in response than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks, but had recovered well after one year, and as such, these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.

- Cole [58] conducted a follow-up study (across four vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier tramplers caused a greater reduction in vegetation height than lighter tramplers, but there was no differential impact on vegetation cover.

- Cole & Spildie[59] experimentally compared the effects of off-track trampling by hikers and horse riders (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered the greatest disturbance but recovered rapidly. Generally, higher trampling intensity led to greater disturbance.

- In heathland sites, trampling damage can affect the value of a site to wildlife. For example, heavy use of sandy tracks loosens and continuously disturbs sand particles, reducing the habitat's suitability for invertebrates[60]. Species that burrow into flat surfaces, such as the centres of paths, are likely to be particularly vulnerable, as loose sediment can no longer support their burrows. In some instances, nature conservation bodies and local authorities resort to hardening paths to

[55] The RTPI report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.
[56] Wilson, J.P. & J.P. Seney. (1994). Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* **14**:77-88
[57] Cole, D.N. (1995a). Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* **32**: 203-214
Cole, D.N. (1995b). Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* **32**: 215-224
[58] Cole, D.N. (1995c). Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.
[59] Cole, D.N., Spildie, D.R. (1998). Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* **53**: 61-71
[60] Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

prevent further erosion. However, this is concomitant with the loss of habitat used by wildlife, such as sand lizards and burrowing invertebrates.

4.4.3 A major concern for nutrient-poor terrestrial habitats (e.g. heathlands, sand dunes, bogs and fens) is nutrient enrichment associated with dog fouling (addressed in various reviews, e.g.[61]). It is estimated that dogs will defecate within 10 minutes of starting a walk, and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a wider distribution of urine. For example, in Burnham Beeches National Nature Reserve, it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually[62]. While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components[63]. Nutrient availability is the major determinant of plant community composition, and the effect of dog defecation in sensitive habitats is comparable to a high-level fertiliser application, potentially shifting plant communities towards those more typical of improved grasslands.

4.4.4 Human activity can affect birds either directly (e.g. by eliciting flight responses) or indirectly (e.g. by damaging habitat or reducing bird fitness in less obvious ways, such as through inducing stress responses). The most obvious direct effect is that of immediate mortality, such as death by shooting, but human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub-optimal areas, etc.) and physiological changes (e.g. an increase in heart rate). While such changes are less noticeable, they might result in major population-level changes by altering the balance between immigration/birth and emigration/death[64].

4.4.5 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily, and the time spent responding to disturbance is time that is not spent feeding[65]. Disturbance therefore increases energetic expenditure while reducing energetic intake, which can adversely affect the 'condition' and ultimately survival of birds. Additionally, displacement of birds from one feeding site to another can increase pressure on resources at alternative foraging sites, which must sustain a greater number of birds[66]. Moreover, the higher proportion of time a breeding bird spends away from its nest, the more likely it is that eggs will cool and the more vulnerable they, or any nestlings, are to predators. Recreational effects on ground-nesting birds are particularly severe, with many studies concluding that urban sites support lower densities of key species, such as stone curlew and nightjar[67,68].

4.4.6 Several factors (e.g. seasonality, type of recreational activity) may have pronounced impacts on the nature of bird disturbance. Disturbance in winter may be more impactful because food shortages make birds more vulnerable at this time of the year. In contrast, this may be counterbalanced by fewer recreational users in the winter months and lower overall sensitivity of birds outside the breeding season. The literature suggests that the magnitude of disturbance differs significantly across types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance compared to hiking[69]. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers[70]. Furthermore, differences in on-site route lengths and usage patterns likely imply that key spatial and temporal parameters (such as the area of a site potentially impacted and the frequency of disturbance) will also differ between recreational activities. This suggests that activity type should be taken into account in HRAs.

[61] Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. (2005). Dogs, access and nature conservation. English Nature Research Report, Peterborough.
[62] Barnard A. (2003). Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. *Countryside Recreation* **11**:16-19.
[63] Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.
[64] Riley, J. (2003). Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.
[65] Riddington, R. *et al*. (1996). The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* **43**:269-279.
[66] Gill, J.A., Sutherland, W.J. & Norris, K. (1998). The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* **12**: 67-72.
[67] Clarke R.T., Liley D., Sharp J.M., Green R.E. (2013). Building development and roads: Implications for the distribution of stone curlews across the Brecks. *PLOS ONE*. https://doi:10.1371/journal.pone.0072984.
[68] Liley D. & Clarke R.T. (2003). The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. Biological Conservation **114**: 219-230.
[69] Banks P.B., Bryant J.Y. (2007). Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* **3**: 14pp.
[70] Miller S.G., Knight R.L., Miller C.K. (2001). Wildlife responses to pedestrians and dogs. *Wildlife Society Bulletin* **29**: 124-132.

4.4.7 Overall, the available baseline information suggests that the following Habitats Sites are sensitive to recreational pressure:

- Chilterns Beechwoods SAC
- Epping Forest SAC
- Lee Valley SPA/Ramsar
- Wormley-Hoddesdonpark SAC

4.5 Water Quality

4.5.1 The quality of the water that feeds Habitats Sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

4.5.2 At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.

- Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen-depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient, and so eutrophication is associated with discharges containing available nitrogen.
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.

4.5.3 Sewage and some industrial effluent discharges contribute to increased nutrients in Habitats Sites and particularly to phosphate levels in watercourses. However, these will not be associated with FOTP interventions. Road and rail schemes can, however, result in pollution (such as runoff of sediment, hydrocarbons and salt spray from de-icing) of aquatic, marine and riverine Habitats Sites during construction and operation, if they occur within close proximity of that site.

4.5.4 Overall, the following Habitats Sites are potentially sensitive to negative changes in water quality and are taken forward into screening:

- Epping Forest SAC, due to its wet heathland qualifying feature
- Lee Valley SPA/Ramsar due to its wetland features

4.6 Water Quantity, Level and Flow

4.6.1 The water level, its flow rates and the mixing conditions are important determinants of the condition of Habitats Sites and associated qualifying features. Hydrological processes are critical in influencing habitat characteristics in wetlands, terrestrial systems with hydrological associations (e.g., wet heath), and coastal waters, including current velocity, water depth, dissolved oxygen levels, salinity, and water temperature. In turn, these parameters determine the short- and long-term viability of plant and animal species, as well as overall ecosystem composition.

4.6.2 Reduced flow as a result of abstraction, in rivers and connected water-dependent ecosystems, can have significant ecological effects. Droughts (ranging in their magnitude from flow reduction to a complete loss of surface water) have both direct and indirect effects on dependent floral and faunal communities. For example, the unique nature of wetlands combines shallow water with conditions ideal for the growth of organisms at the base of food webs, which feed many species of birds, mammals, fish, and amphibians.

4.6.3 Maintaining a steady water supply is of critical importance for many hydrologically dependent SPA, SAC and Ramsar sites. For example, in many wetlands, winter flooding is essential for sustaining a variety of foraging habitats for SPA / Ramsar wader and waterbird species. However, different species

vary in their requirements for specific water levels. Splash and/or shallow flooding is required to provide suitable feeding areas and roosting sites for ducks and waders. In contrast, deeper flooding is essential to provide foraging habitats for Bewick's swans and other ducks.

4.6.4 Wetland habitats rely on hydrological connections with other surface waters, such as rivers, streams and lakes. A constant water supply is fundamental to maintaining the ecological integrity of sites. However, while the natural fluctuation of water levels within narrow limits is desirable, excess or too little water supply might cause the water level to be outside of the required range of qualifying birds, invertebrates or plant species. This might lead to the loss of the structure and functioning of wetland habitats. There are two mechanisms through which urban development might negatively affect the water level in Habitats Sites:

- The supply of new housing with potable water will require increased abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this may reduce the water levels in Habitats Sites sharing the same catchment.
- The proliferation of impermeable surfaces in urban areas increases the volume and speed of surface water runoff. As traditional drainage systems often cannot cope with the volume of stormwater, sewer overflows are designed to discharge excess water directly into watercourses. Often, this pluvial flooding results in downstream inundation of watercourses and the potential flooding of wetland habitats.

4.6.5 Overall, the following Habitats Sites are potentially sensitive to changes in water quantity, level and flow and are taken forward into screening:

- Epping Forest SAC due to its wet heathland qualifying feature
- Lee Valley SPA/Ramsar due to its wetland features

5. Screening for Likely Significant Effects

5.1 Atmospheric Pollution (Nitrogen Deposition)

Screening Methodology

5.1.1 Habitats Sites have initially been screened for LSE on the basis of:

- Proximity to (within 200m of) a major road
- Distance of Habitats Site from the HLPA when compared to the average trip distance

5.1.2 As described in Section 4.2, nitrogen deposition of significance, with the potential to impact habitats and species, occurs on land within 200m of a major road. Habitats Sites with no major road within 200m are screened out for this pathway.

5.1.3 Data from the 2021 Census[71] indicates that the majority (nearly 70%) of people in employment in the UK travel less than 10 km to work, and the remainder will generally have dispersed across the network by that distance. Habitats Sites are screened out beyond this distance from the HPLA.

Chilterns Beechwoods SAC

5.1.4 The Chilterns Beechwoods SAC is bisected by the B4506, and there is therefore a major road within 200m of the SAC.

[71] Travel to Work: Census 2021 available at Travel to work, England and Wales - Office for National Statistics [Accessed 09/02/2026]

5.1.5 The Chilterns Beechwoods SAC is extensive, covering a number of locations. At its closest point, the SAC is just over 15 km from the HLPA boundary and therefore beyond the distance at which impacts are likely to occur.

5.1.6 It is therefore concluded that the HLP will not result in LSE on Chilterns Beechwoods SAC through the impact pathway of atmospheric pollution, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Epping Forest SAC

5.1.7 The Epping Forest SAC is bisected by a number of “A” roads and is within 200m of the M25.

The Epping Forest SAC is approximately 11.5 km east of the HLPA and therefore beyond the distance where impacts are likely to occur. Furthermore, the most likely route for taking commuters from Hertsmere to the SAC is the M25, which passes through the Bell Common Tunnel, designed to protect Epping Forest SAC by taking traffic under it.

Whilst a number of strategic employment allocations are located close to Junction 24 of the M25 and South Mimms, Epping Forest SAC remains beyond the screening distance applied within this HRA. Potential effects associated with additional HGV movements have been considered. However, no evidence has been identified indicating that employment-related traffic generated by the Local Plan would result in a measurable effect on habitat conditions within the SAC. Furthermore, the section of the M25 passing through Epping Forest is located within the Bell Common Tunnel, reducing the potential for direct atmospheric deposition effects on SAC habitats. Accordingly, Epping Forest SAC is not considered likely to be significantly affected through atmospheric pollution arising from Local Plan growth.

It can therefore be concluded that the HLP will not result in LSE on Epping Forest SAC through the impact pathway of atmospheric pollution, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Lee Valley SPA /Ramsar

5.1.8 The northernmost parts of the SPA/Ramsar are approximately 50m from the A414. Southern parts of the SPA/Ramsar are within 200m of the A503 and A1055

5.1.9 Natural England’s Site Improvement Plan (SIP) indicates that air pollution in the form of nitrogen deposition is a threat to the qualifying species, bittern. Note that bittern is not a qualifying species of the Ramsar and therefore no further consideration of the Ramsar is given in this assessment.

5.1.10 The Lee Valley SPA covers a number of sites over approximately 25km on a north/south axis. Areas in close proximity to major roads are localised to the Rye Meads SSSI in the north and the Walthamstow Reservoirs SSSI in the south. Both of these SSSIs are more than 12km from the HLPA and therefore beyond the distance where impacts are likely to occur.

5.1.11 It can therefore be concluded that the HLP will not result in LSE on Lee Valley SPA / Ramsar through the impact pathway of atmospheric pollution, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Wormley-Hoddesdonpark SAC

5.1.12 The SAC is within 200m of the A10, a major road. The point at which the road comes into proximity with the SAC is approximately 11 km distant and therefore beyond the distance where impacts are likely to occur.

5.1.13 It can therefore be concluded that the HLP will not result in LSE on Wormley-Hoddesdonpark SAC through the impact pathway of atmospheric pollution, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

5.2 Loss of Functionally Linked Habitat

Chilterns Beechwoods SAC

5.2.1 The stag beetle is a qualifying feature of the Chilterns Beechwoods SAC. Research[72] indicates that stag beetles disperse from their hatching sites. For the continued success (and range expansion) of the species, therefore, functionally linked habitat can be important. Dispersal is to a maximum range of 1km, whereas the SAC is approximately 15km from the HLPA. Land within the HLPA cannot be reasonably deduced to be functionally linked to the SAC.

5.2.2 It can therefore be concluded that the HLP will not result in LSE on Chilterns Beechwoods SAC through the impact pathway of functionally linked land, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Epping Forest SAC

5.2.3 The stag beetle is a qualifying feature of the Epping Forest SAC. Research[73] indicates that stag beetles disperse from their hatching sites. For the continued success (and range expansion) of the species, therefore, functionally linked habitat can be important. Dispersal is to a maximum range of 1km, whereas the SAC is approximately 11.5km from the HLPA. Land within the HLPA cannot be reasonably deduced to be functionally linked to the SAC.

5.2.4 It can therefore be concluded that the HLP will not result in LSE on Epping Forest SAC through the impact pathway of functionally linked land, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Lee Valley SPA/Ramsar

5.2.5 The qualifying species for the Lee Valley Sites are bittern (SPA only), gadwall and shoveler. Although shovelers and gadwalls may occasionally breed away from the water, the designation is for wintering, not breeding, birds.

5.2.6 Natural England's Impact Risk Zones for Sites of Special Scientific Interest[74] concludes a maximum foraging distance of 500m for gadwall and other dabbling ducks.

5.2.7 Lee Valley SPA and Ramsar sites are over 12km from the HLPA.

5.2.8 It can therefore be concluded that the HLP will not result in LSE on Lee Valley SPA/Ramsar through the impact pathway of functionally linked land, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

5.3 Recreational Pressure

Chilterns Beechwoods SAC

5.3.1 The Chilterns Beechwoods SAC is extensive, covering a number of locations. Within the SAC, the Ashridge Commons and Woods SSSI is vulnerable to recreational pressure, and the Recreational Pressure Mitigation Strategy for Ashridge Commons and Woods Site of Special Scientific Interest[75] identifies the recreational zone of influence for the SSSI as 12.6km.

[72] Thomaes, A., Dhont, P., Dekeukeleire, D. and Vandekerkhove, K. (2018), Dispersal behaviour of female stag beetles (Lucanus cervus) in a mosaic landscape: when should I stay and where should I go. Insect Conserv Divers, 11: 523-533. Available at: https://doi.org/10.1111/icad.12325

[73] Thomaes, A., Dhont, P., Dekeukeleire, D. and Vandekerkhove, K. (2018), Dispersal behaviour of female stag beetles (Lucanus cervus) in a mosaic landscape: when should I stay and where should I go. Insect Conserv Divers, 11: 523-533. Available at: https://doi.org/10.1111/icad.12325

[74] Knight, M (2019) Impact Risk Zones Guidance Summary Sites of Special Scientific Interest Notified for Birds Version 1.1. Natural England

[75] Available at: https://www.buckinghamshire.gov.uk/documents/34230/Chiltern_Beechwoods_SAC_Mitigation_Strategy_-_August_2024_Version_2_accessibleAH.pdf [Accessed [28/01/2026]

5.3.2 At its closest point, the SAC is just over 15km from the boundary of the HLPA and therefore, no new residential dwellings will be built within the catchment zone as a result of the HLP.

5.3.3 It is therefore concluded that the HLP will not result in LSE on Chilterns Beechwoods SAC through the impact pathway of recreational pressure, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Epping Forest SAC

5.3.4 The Epping Forest SAC is approximately 11.5km east of the HLPA. Based on visitor survey data, the Enfield Epping Forest SAC Mitigation Strategy[76] identifies the recreational zone of influence as 6.2km.

5.3.5 Therefore, no new residential dwellings will be built within the catchment zone as a result of the HLP.

5.3.6 It is therefore concluded that the HLP will not result in LSE on Epping Forest SAC through the impact pathway of recreational pressure, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Lee Valley SPA/Ramsar

5.3.7 There is no specific recreational zone of impact for the Lee Valley SPA; however, 7km is used in this HRA based on this being a commonly used recreational catchment for other inland Habitats Sites, and as the catchment applied in HRAs of adopted Local Plans around the SPA/Ramsar site such as Epping Forest District Local Plan[77]

5.3.8 The Lee Valley SPA/Ramsar is approximately 10km southeast of the HLPA and therefore no new residential dwellings will be built within the catchment zone as a result of the HLP.

5.3.9 It is therefore concluded that the HLP will not result in LSE on Lee Valley SPA / Ramsar through the impact pathway of recreational pressure, either alone or in combination with other plans, and the sites are screened out for AA in respect of this pathway.

Wormley-Hoddesdonpark SAC

5.3.10 The SAC is located approximately 4.5km northwest of the Hertsmere district boundary. There is no recreational impact zone specifically defined for the SAC; however, 7km is used in this HRA based on the recreational catchment defined by Wealden Council for Ashdown Forest SAC/SPA and is larger than the 6.2km core catchment of Epping Forest SAC, which are both woodland SACs that have a probably greater recreational draw than Wormley Hoddesdonpark Woods SAC[78]

5.3.11 The following HLP policies provide for residential development within the Zone of Influence (ZoI) for this SAC.

- Policy HPBA1 Potters Bar Town Centres

5.3.12 The specific residential site allocations proposed within the ZoI are:

- HPBA SA1 (588 dwellings)
- HPBA SA2 (369 dwellings)
- HPBA SA4 (55 dwellings)
- HPBA SA5 (96 dwellings)
- HPBA SA6 (119 dwellings)
- HPBA SA12 (260 dwellings)

[76] Available at: https://www.enfield.gov.uk/__data/assets/pdf_file/0013/53104/Enfield-recreation-mitigation-strategy-2023-Planning.pdf [Accessed [28/01/2026]
[77] Available at: Microsoft Word - Draft final Epping Forest Local Plan HRA 2022.docx [Accessed [28/01/2026]
[78] Available at: https://www.wealden.gov.uk/UploadedFiles/I1.-Ashdown-Forest-SPA-Mitigation-Zone.pdf [Accessed [28/01/2026] and EFSAC Guidance Note [Accessed 21/09/26]

- HPBA SA13 (550 dwellings)
- HPBA SA14 (112 dwellings)
- Barnet Road Strategic Urban Extension (Previously CFS-2025-163) (900 dwellings)

5.3.13 The sum of dwellings from these proposed site allocations, within the ZoI for the SAC is 3,049 dwellings.

5.3.14 Natural England, in its response to Regulation 18 consultation, identified that recent condition assessment work undertaken within Wormley-Hoddesdonpark Woods SAC had identified evidence of recreational damage and noted that as a result several component SSSI units are currently assessed as being in unfavourable condition. The evidence includes vegetation trampling, littering and eutrophication associated with recreational activity including dogs.

5.3.15 Whilst recreational impacts are known to occur at the SAC, there is currently no visitor survey and therefore no evidence of the origin of these visitors. The available evidence confirms that recreational effects are occurring but does not identify the geographical origin of visitors or demonstrate that future Local Plan growth within Hertsmere would materially contribute to those impacts. While this HRA has used a core recreational catchment of 7km this may be an overestimate (for example Epping Forest SAC which is likely a much bigger recreational draw has a recreational catchment of 6.2km with most visitors outside London coming from within 3km).

5.3.16 Updated GIS analysis identifies that the allocations located within the 7km assumed recreational catchment comprise HPBA SA1, HPBA SA2, HPBA SA4, HPBA SA5, HPBA SA6, HPBA SA12, HPBA SA13, HPBA SA14 and Barnet Road Strategic Urban Extension (Previously CFS-2025-163). These allocations are all located approximately 5.4km to 6.7km from the SAC and therefore on the outer reaches of that assumed catchment. No allocations elsewhere within the Borough fall within the precautionary 7km recreational catchment, with the next nearest major allocation (HBCA SA1) located approximately 9.3km from the SAC. Most Borehamwood, Radlett and Bushey allocations are located more than 11km from the site.

5.3.17 The existing surrounding settlement pattern suggests that existing communities within Broxbourne are likely to represent the principal source of routine recreational use as existing settlements around the SAC are not evenly spread across the 7km assumed catchment. Residential areas within Broxbourne (which will also be a core location for future growth in the Broxbourne Local Plan) are substantially closer to the SAC than any in Hertsmere, with some settlements located within approximately 1-1.5km of the designated site, easy walking distance. By contrast, residents of Potters Bar generally require access by private vehicle and there is limited parking at the SAC which will inherently limit the number of visitors who can drive to site within a day, and no direct highways linkage between the principal growth locations and the SAC.

5.3.18 The SAC also benefits from existing active visitor management although Natural England's condition assessment suggests the existing management needs to be more targeted within the SAC. Recreational activity is concentrated along a well-established path network and the site is managed through long-term woodland and access management measures. The Wormley Wood and Nut Wood Management Plan confirms the continued maintenance and improvement of visitor infrastructure, including surfaced routes and associated access facilities intended to accommodate recreational use whilst protecting ecological interest features.

5.3.19 The physical capacity of the SAC to accommodate additional vehicle-borne visitors is also relevant. The SAC is served by only two relatively small car parks, which naturally limits the number of visitors arriving by private vehicle at any one time. This contrasts with the larger and more accessible recreational destinations located closer to Potters Bar. Whilst not eliminating the possibility of additional visits, the limited parking provision acts as a practical constraint on substantial increases in visitor pressure arising from more distant settlements.

5.3.20 In addition, residents of Potters Bar have access to a range of alternative recreational destinations located closer to the proposed growth areas than Wormley-Hoddesdonpark Woods SAC, including Northaw Great Wood Country Park, Trent Country Park, Gobions Wood Nature Reserve and other areas of accessible woodland and parkland within the wider area. These destinations are likely to accommodate a substantial proportion of routine recreation generated by new residents.

5.3.21 Impacts in combination must also be considered. The SAC is located within the Borough of Broxbourne. The Habitats Regulations Assessment for the Broxbourne Local Plan considered recreational disturbance at Wormley-Hoddesdonpark Woods SAC and concluded that a likely significant effect arising from the Local Plan, both alone and in combination with other plans and projects, could be objectively ruled out despite the proximity of settlements in Broxbourne to the SAC. Whilst each plan must be assessed on its own merits, the findings of the neighbouring authority's HRA provide additional evidence regarding the ability of the SAC to accommodate planned growth without likely significant effects.

5.3.22 Taking these factors together, there is no objective evidence to conclude that residential growth proposed by the Hertsmere Local Plan would result in a Likely Significant Effect on Wormley-Hoddesdonpark Woods SAC through recreational pressure, either alone or in combination with other plans and projects. Accordingly, Wormley-Hoddesdonpark Woods SAC can be screened out from further assessment in relation to this pathway.

5.4 Water Quality

5.4.1 The HPLA is largely within the Colne Water Management Catchment. However, part of the eastern area of Potters Bar falls within the Lee Lower Rivers and Lakes Catchment (Turkey Brook and Cuffley Brook catchments).

5.4.2 A limited number of allocations are located within this catchment and therefore a potential hydrological pathway exists between development proposed through the Local Plan and Lee Valley SPA/Ramsar. These pathways are considered further below.

Epping Forest SAC

5.4.3 The Site Improvement Plan[79] for Epping Forest SAC indicates that the potential threat from water quality to the SAC arises from runoff from roads. As discussed in the screening for Air Pollution, the likely pathway is through commuting traffic on the M25, which goes through a tunnel at the point of proximity to the SAC, thereby protecting the SAC from surface water runoff.

5.4.4 The Epping Forest SAC is bisected by a number of “A” roads and is within 200m of the M25.

5.4.5 The Epping Forest SAC is approximately 11.5 km east of the HLPA and therefore within the average car/van journey distance of 13.2 km.

5.4.6 Epping Forest SAC is hydrologically connected to the HPLA, specifically to HPBA SA12 and HEM SA01 via the Lee Lower Rivers and Lakes catchment. However, water runoff from the sites and entering the water system flows east before joining the Lee River which then flows away from Epping Forest and towards London. Surface runoff from these sites cannot therefore impact Epping Forest SAC.

5.4.7 It can therefore be concluded that the HLP will not result in LSE on Epping Forest SAC through the impact pathway of water quality, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Lee Valley SPA/Ramsar

5.4.8 Lee Valley SPA and Ramsar site are susceptible to changes in water quality. Parts of the Hertsmere Local Plan Area, specifically the eastern Potters Bar area, fall within the Lee Lower Rivers and Lakes catchment and therefore a potential hydrological pathway exists between a limited number of allocations and the Lee Valley SPA/Ramsar. The allocations identified within the Lee catchment are HPBA SA12 (Land rear of Park Avenue, Potters Bar) and HEM SA01 (Land southeast of Junction 24, M25).

5.4.9 Natural England's Regulation 18 response to the HLP noted that consideration should be given to all hydrological pathways affecting Lee Valley SPA/Ramsar and not solely the relationship between growth and Rye Meads Wastewater Treatment Works. Natural England further noted that parts of

[79] Available at: https://publications.naturalengland.org.uk/file/5732004727881728 [Accessed 06/02/2026]

Hertsmere fall within the Lee Lower Rivers and Lakes Catchment and considered that additional evidence was required to demonstrate that likely significant effects could be ruled out [80].

5.4.10 However, Lee Valley SPA/Ramsar does not comprise a single wetland system and instead consists of a number of physically distinct component sites. The SPA/Ramsar includes Rye Meads SSSI, Amwell Quarry SSSI, Turnford and Cheshunt Gravel Pits SSSI and Walthamstow Reservoirs SSSI. Each of these supports the qualifying bird interest of the SPA/Ramsar and in some cases the aquatic plant interest of the Ramsar site, but differs in terms of its physical characteristics, management and hydrological context [81].

5.4.11 Rye Meads SSSI predominantly comprises flood meadows and lagoons and is closely associated with the Rye Meads wastewater treatment and wetland system. By contrast, Amwell Quarry SSSI comprises six former gravel pits that now function as lakes, whilst Turnford and Cheshunt Gravel Pits SSSI also comprises a series of former gravel pits and associated open water habitats. Walthamstow Reservoirs SSSI comprises a large sealed storage reservoir complex. Therefore, whilst hydrological connectivity exists at a broad catchment level, the SPA/Ramsar should not be regarded as a single uniform receptor and it cannot be assumed that all components have an equivalent relationship with treated wastewater pathways. All component parts of the SAC except for Rye Meads SSSI are physically separated from the River Lee and depend on either groundwater (the flooded gravel pits) or active pumping.

5.4.12 A review of available strategic water planning evidence also indicates that Lee Valley SPA/Ramsar has been considered extensively through Thames Water's strategic planning framework. Thames Water's Water Resources Management Plan Habitats Regulations Assessment assessed Lee Valley SPA/Ramsar in relation to major strategic water resource schemes and concluded that adverse effects on site integrity could be ruled out following implementation of mitigation measures [82]

5.4.13 The Thames Water's Drainage and Wastewater Management Plan Habitats Regulations Assessment specifically assessed potential impacts associated with water pollution and hydrological change. Lee Valley SPA and Lee Valley Ramsar were included within that assessment and, taking account of proposed mitigation and project-level assessment requirements, Thames Water concluded that it was unlikely that the DWMP would adversely affect the integrity of Habitats Sites either alone or in combination with other plans and projects [83].

5.4.14 The Thames Water WRMP and DWMP are both based on robust population projections and therefore provide strategic evidence that future growth, wastewater infrastructure upgrades, treatment works expansion, catchment transfers and wider wastewater network improvements can be planned and delivered within the Thames Water region whilst avoiding adverse effects on the integrity of Lee Valley SPA/Ramsar.

5.4.15 Taking these factors together, whilst a broad hydrological pathway exists via the Lee catchment, there is no objective evidence that growth proposed through the Hertsmere Local Plan would result in a likely significant effect on Lee Valley SPA/Ramsar through water quality impacts, either alone or in combination with other plans and projects. Natural England's concern regarding consideration of downstream SPA/Ramsar components has been addressed through explicit consideration of the individual component sites and their differing hydrological characteristics. Accordingly, Lee Valley SPA/Ramsar can be screened out from further assessment in relation to water quality.

[80] Natural England (2018) *Site Improvement Plan: Lee Valley SPA/Ramsar*. SIP141218FINAL v1.0. Site Improvement Plan: Lee Valley - SIP118

[81] Lepus Consulting (2019) *Broxbourne Local Plan Proposed Main Modifications Habitats Regulations Assessment Addendum*. Prepared for Broxbourne Borough Council. exam-32f-main-modifications-hra

[82] Thames Water (2024) *Water Resources Management Plan 2024 Habitats Regulations Assessment*. Technical Appendix C. C - Habitat Regulation Assessment

[83] Thames Water (2023) *Drainage and Wastewater Management Plan 2025-2050: Habitats Regulations Assessment (Appendix L)*. Atkins, April 2023. appendix-l-habitats-regulations-assessment.pdf

5.5 Water Quantity, Level and Flow

5.5.1 The HPLA is largely in the Colne Water Management Catchment, however part of the HPLA to the east of Potters bar is within the Lee Lower Rivers and Lakes (Turkey Brook and Cuffley Brook Catchment).

5.5.2 A limited number of allocations are located within the Lee Lower Rivers and Lakes catchment and therefore a potential hydrological pathway exists between development proposed through the Local Plan and the Lee Valley SPA/Ramsar. These pathways are considered further below.

Epping Forest SAC

5.5.3 The Site Improvement Plan[84] for Epping Forest SAC indicates that the potential threat is inappropriate water levels. The SAC is within the "Lee Lower Rivers and Lakes" catchment.

5.5.4 Epping Forest SAC is hydrologically connected to the HPLA, specifically to HPBA and HEM SA01 via the Lee Lower Rivers and Lakes catchment. However, the Lee River flows away from Epping Forest SAC and therefore no pathway exists by which abstraction or hydrological changes associated with the Hertsmere Local Plan could affect the SAC.

5.5.5 It can therefore be concluded that the HLP will not result in LSE on the Epping Forest SAC through the impact pathway of water quantity, level and flow, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Lee Valley SPA/Ramsar

5.5.6 Lee Valley SPA and Ramsar are susceptible to hydrological changes and alterations in water availability. Parts of the Hertsmere Local Plan Area fall within the Lee Lower Rivers and Lakes catchment and therefore a potential pathway exists whereby planned growth could increase demand for potable water supplies and, in turn, influence abstraction regimes within the wider Lee catchment.

5.5.7 The Hertsmere Local Plan will deliver significant housing and employment growth, including allocations within the Lee catchment. Increased population growth has the potential to increase demand for public water supply. The Hertsmere Water Cycle Study[85] identifies that Hertsmere lies within an area of serious water stress and identifies a difference between Local Plan growth assumptions and those utilised within the Affinity Water WRMP24[86][87]. The Water Cycle Study therefore identifies water supply as a potential constraint requiring further consideration.

5.5.8 **As a credible hydrological pathway exists between plan growth and the water resources supporting Lee Valley SPA/Ramsar, likely significant effects cannot be ruled out at the screening stage. Lee Valley SPA and Lee Valley Ramsar are therefore taken forward to Appropriate Assessment in respect of water quantity, level and flow.**

6. Appropriate Assessment

6.1 Water Quantity, Level and Flow

Lee Valley SPA/Ramsar

6.1.1 Lee Valley SPA and Ramsar are vulnerable to hydrological change. The Site Improvement Plan identifies hydrological changes and water level management as pressures affecting the site and its

[84] Available at: https://publications.naturalengland.org.uk/file/5732004727881728 [Accessed 06/02/2026]
[85] AECOM (2026). *Hertsmere Water Cycle Study (Final Report P03, September 2026).* Prepared for Hertsmere Borough Council.

[86] Affinity Water (2024). *Water Resources Management Plan 2024 (WRMP24).* October 2024.

[87] Affinity Water (2026). *Water Resources Management Plan 2024: Annual Review 2025/26.* June 2026.

qualifying interests. Increased population growth arising from the Hertsmere Local Plan has the potential to increase demand for potable water supplies and therefore a potential pathway exists whereby abstraction regimes within the wider Lee catchment could be affected.

6.1.2 The AECOM Water Cycle Study prepared for Hertsmere Borough Council identifies that Hertsmere lies within an area of serious water stress and notes that the level of growth proposed through the Local Plan exceeds the growth assumptions utilised within the Affinity Water WRMP24[88] [89]. The Water Cycle Study identifies a difference of approximately 11,000 dwellings between the growth assumptions used in the WRMP and those proposed through the Local Plan. However, the Water Cycle Study also records that Affinity Water confirmed that sufficient measures are proposed to manage demand and increase supply to meet future demand requirements[90]. This applies in combination as well as alone because Affinity Water's future planning process is based on population growth assumptions across their supply area.

6.1.3 The statutory water resources planning framework provides the primary mechanism by which future water demand and abstraction pressures are addressed. The Affinity Water WRMP24 incorporates local authority growth forecasts and identifies a programme of abstraction reductions, environmental destination commitments, strategic transfers, demand management measures and new supply infrastructure intended to ensure long-term water resource resilience whilst reducing environmental pressure on sensitive catchments.

6.1.4 Further evidence is provided through the Affinity Water WRMP24 Annual Review 2025/26. This confirms that sustainability reductions identified through the Water Industry National Environment Programme have been implemented, including abstraction reductions affecting catchments associated with the River Lee system. The Annual Review further confirms that additional abstraction reductions and environmental destination measures continue to be developed, and that major strategic transfer and resilience schemes are progressing.

6.1.5 The relationship between water resource planning and Habitats Sites has itself been considered through the Affinity Water WRMP24 Habitats Regulations Assessment. The WRMP HRA specifically assessed pathways affecting Lee Valley SPA and Lee Valley Ramsar in relation to strategic water resource options associated with the River Lee system. Following Appropriate Assessment and implementation of mitigation measures, the WRMP HRA concluded that adverse effects on the integrity of Lee Valley SPA and Lee Valley Ramsar would not occur. The overall conclusion of the WRMP HRA was that implementation of WRMP24 would not adversely affect the integrity of any Habitats Site [91]. This included assessment of pathways affecting Lee Valley SPA and Lee Valley Ramsar associated with abstraction and water resource management within the wider Lee catchment.

6.1.6 In addition, Policy SDI8 (Water Supply and Wastewater) requires development to demonstrate adequate water supply capacity and secure infrastructure upgrades where required. Site allocation policies similarly require engagement with the relevant water companies and delivery of infrastructure in step with development. These policy safeguards provide an additional mechanism through which growth can only proceed where adequate infrastructure capacity is available.

6.1.7 **It is recommended that Policy SDI8 Water Supply and Wastewater be amended to include the following wording:**

6.1.8 ***'Planning Applications that may affect a Habitats Site, either alone or in combination with other plans or projects, must provide sufficient information to enable Habitats Regulations Assessment to be undertaken where required under the Conservation of Habitats and Species Regulations 2017 (as amended).'***

[88] Affinity Water (2024) *Water Resources Management Plan 2024 (WRMP24).*

[89] Affinity Water (2026) *Water Resources Management Plan 2024: Annual Review 2025/26.*

[90] AECOM (2026) *Hertsmere Water Cycle Study (P03 Final Report, September 2026).*

[91] Mott MacDonald (2023) *Affinity Water WRMP24 Habitats Regulations Assessment. SEA Environmental Report Appendix D.*

Appropriate Assessment Conclusion

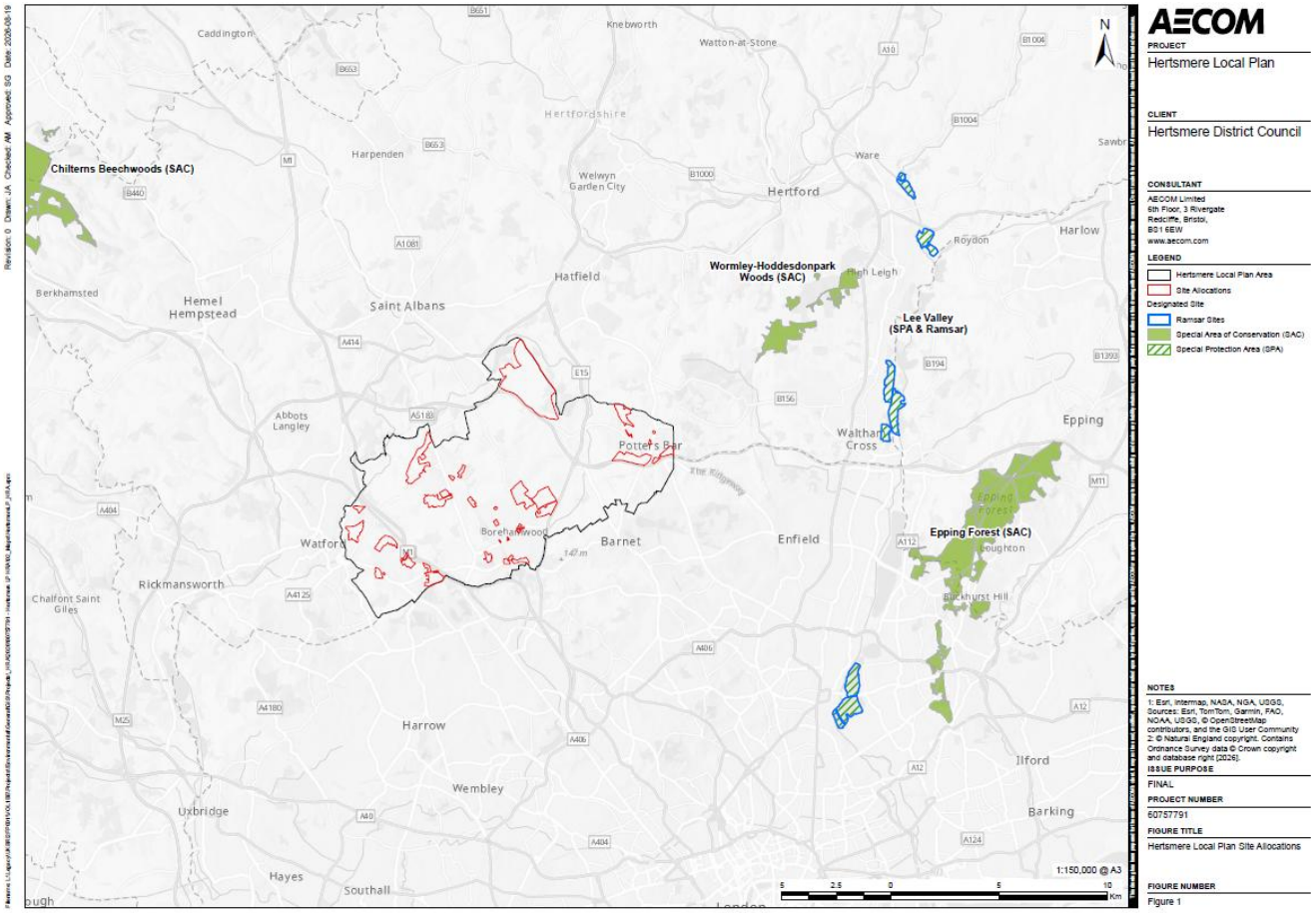
6.1.9 Taking account of:

- The Hertsmere Water Cycle Study;
- The Affinity Water WRMP24;
- The Affinity Water WRMP24 Annual Review 2025/26;
- The Affinity Water Habitats Regulations Assessment;
- The statutory water resources planning framework;
- Policy SDI8 and allocation-specific infrastructure requirements;

6.1.10 **It can be concluded that the Hertsmere Local Plan will not result in adverse effects on the integrity of Lee Valley SPA or Lee Valley Ramsar through the pathway of water quantity, level and flow, either alone or in combination with other plans and projects.**

Appendix A Figures

Figure 4 Site Allocations and Habitats Sites



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Hertsmere Local Plan

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LEGEND
Hertsmere Local Plan Area
Site Allocations
Designated Site
Ramsar Sites
Special Area of Conservation (SAC)
Special Protection Area (SPA)

NOTES
1: Esri, Intermap, NASA, NGA, USGS, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community
2: © Natural England copyright. Contains Ordnance Survey data © Crown copyright and database right [2026].

ISSUE PURPOSE
FINAL

PROJECT NUMBER
60757791

FIGURE TITLE
Hertsmere Local Plan Site Allocations

FIGURE NUMBER
Figure 1

Appendix B LSE Screening of Site Allocations

Table 3. Screening of Site Allocations

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark SAC (km)	Screening outcome
CFS-2025-080 Land West of Vale Avenue, Borehamwood	Urban extension; residential development comprised of housing, open space and associated green infrastructure.	Residential: 98 dwellings	24	18	16	14	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA1 Borehamwood Town Centre Retail Park	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 501 dwellings	23	19	17	14	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA2 The Point, Shenley Road, Borehamwood	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town centre uses (at ground and lower levels) and residential above (with vertical intensification)	Residential: 200 dwellings	23	19	17	14	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA4, EWC Elstree Way North, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure and leisure uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 150 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA5 Hertsmere Civic Centre, Elstree Way,	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure and leisure uses (at ground and lower	Residential: 95 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark SAC (km)	Screening outcome
Borehamwood	levels) and residential above (with vertical intensification).						
HBA SA6 EWC Civic Car Park, Elstree Way, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure and leisure uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 100 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA9 Borehamwood Fire Station, Elstree Way, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure (at ground level) and residential above (with vertical intensification).	Residential: 36 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA10 Borehamwood Job Centre, Elstree Way, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure (at ground level) and residential above (with vertical intensification).	Residential: 27 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA11 Cluster on Elstree Way, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure (at ground level) and residential above (with vertical intensification).	Residential: 74 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA13 Regent House & Car Park, north of Allum LaneBorehamwood	Urban Site; Comprehensive redevelopment comprised of residential and public realm (with vertical intensification).	Residential: 55 dwellings	23	19	17	14	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA14 Aycliffe Road and Leeming Road - shops and residential, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of main town centre/ employment uses (at ground level), public realm and residential above (with vertical intensification).	Residential: 200 dwellings	22	19	18	14	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark SAC (km)	Screening outcome
HBA SA17 Land North of Barnet Lane (West), Elstree	Urban extension; Development comprised of higher density residential and open space uses.	Residential: 73 dwellings	24	19	17	15	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA18 Land north of Barnet Lane, Borehamwood	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland).	Residential: 220 dwellings	24	18	18	14	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA19 Land south of Allum Lane to the west of Borehamwood. Elstree,	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained trees, woodland and hedgerows).	Residential: 150 dwellings	23	19	17	15	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA24 North of Allum Lane and Golf Course	Urban extension; residential development comprised of housing, open space and associated green infrastructure.	Residential: 486 dwellings	22	19	18	15	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA22 Old Haberdasher's Sports Ground - Croxdale Road, Borehamwood	Urban Site; Comprehensive redevelopment comprised of residential, open space and public realm (with vertical intensification).	Residential: 200 dwellings	23	19	18	14	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBA SA26 Organ Hall Farm, Theobald Street, Borehamwood	Urban extension; Development comprised of higher density residential and open space uses.	Residential: 102 dwellings	20	15	19	20	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBCA SA1 Land at Coursers Road, Bowmans Cross New Settlement	Strategic Site/ New Settlement; comprised of residential, main town centre, employment, open space, social community infrastructure, and infrastructure networks. Inclusive of retained woodland, trees, hedgerows and other natural landscape features.	Residential: 5000 dwellings (2500 in the plan period)	20	17	15	9.4	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark SAC (km)	Screening outcome
CFS-2025-051 St Hilda's School, High Street, Bushey, Hertfordshire	Urban redevelopment site; residential-led redevelopment of previously developed land.	Residential: 52 dwellings	20	24	22	20	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBUSA SA4 Land at Little Bushey Lane (west), Bushey	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained hedgerows).	Residential: 280 dwellings	20	23	21	18	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBUSA SA6 Land to the South of Elstree Road and East of Heathbourne Road, Bushey	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained hedgerows and woodland).	Residential: 1500 dwellings	21	22	19	18	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBUSA SA7 Bushey Golf and Country Club (Former Bushey Golf Course)	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained hedgerows and woodland).	Residential: 286 dwellings	20	24	24	20	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HBUSA SA8 Bushey Hall Golf Course, Bushey	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained hedgerows and woodland).	Residential: 500 dwellings	17	25	24	20	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
CFS-2025-167 Land On The North-West Side Of Caldecote Farm Caldecote Lane, Bushey	Urban extension; residential development.	Residential: 98 dwellings	21	22	20	18	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
Barnet Road Strategic Urban Extension, Potters Bar Land to the south of Potters Bar, east of Baker Street and west of Barnet Road	Strategic urban extension; residential-led development with supporting infrastructure, open space and associated community uses.	Residential: 900 dwellings	26	13	11	6	Screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it lies within the core 7km ZoI. Likely Significant Effects. The following impact pathways are present: • Recreational pressure

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark SAC (km)	Screening outcome
HEL-0336-22 Harts Farm, Little Bushey Lane	Urban extension; residential development.	Residential: 57 dwellings	20	23	21	18	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HPBA SA1 Tesco Superstore, Mutton Lane, Potters Bar	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 588 dwellings	27	13	11	6	Screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it lies within the core 7km ZoI. Likely Significant Effects. The following impact pathways are present: • Recreational pressure
HPBA SA2 Canada Life Place, Potters Bar	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town employment centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 369 dwellings Main Town Centre:	25	14	11	6	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km ZoI for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure
HPBA SA4 Potters Bar Railway Station Car Park, Darkes Lane, Potters Bar	Strategic Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification)	Residential: 55 dwellings Main Town Centre:	25	14	11	7	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km ZoI for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure
HPBA SA5 11 Darkes Lane, Potters Bar	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town employment centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 96 dwellings Main Town Centre:	25	14	11	7	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km ZoI for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark SAC (km)	Screening outcome
HPBA SA6 Bus Garage, High Street, Potters Bar	Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification).	Residential: 119 dwellings Main Town Centre:	27	13	10	6	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km ZoI for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure
HPBA SA12 Land East of Southgate Road, Potters Bar	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland).	Residential: 260 dwellings	28	14	10	5	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km ZoI for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure • Water quality • Water quantity, level and flow
HPBA SA13 Potters Bar Golf Course	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland).	Residential: 550 dwellings	25	14	11	6	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km ZoI for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure
HPBA SA14 Dove Lane, Potters Bar	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained trees and hedgerows)	Residential: 112 dwellings	25	14	11	6	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km ZoI for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure
CFS-2025-064 Land South of Theobald Street	Urban extension; residential development.	Residential: 95 dwellings	19	21	20	15	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark SAC (km)	Screening outcome
CFS-2025-075 Land West of Watling Street, Radlett, Hertfordshire	Urban extension; residential development.	Residential: 122 dwellings	19	21	20	15	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HRA SA3 Kemprow Farm, Watford Road, Radlett	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland and hedgerows).	Residential: 972 dwellings	18	23	21	17	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HRA SA5 Land South Of Shenley Hill Radlett Hertfordshire	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland and hedgerows).	Residential: 195 dwellings	20	21	20	15	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HRA SA6 Home Farm Meadows, Radlett	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland and hedgerows).	Residential: 650 dwellings	19	22	21	16	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HRA SA7 Land off Watford Road, Radlett, Hertfordshire	Strategic urban extension; residential-led development with supporting infrastructure, open space and green infrastructure.	Residential: 350 dwellings	18	23	21	17	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
CFS-2025-194 Land off Oakridge avenue	Urban extension; residential development.	Residential: 101 dwellings	18	23	21	17	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
Additional Land between SA7 and Hill Farm	Strategic urban extension; residential-led development with supporting infrastructure, open space and green infrastructure.	Residential: 150 dwellings	18	23	21	17	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark SAC (km)	Screening outcome
HEM SA01 Land Southeast of Junction 24 (M25) Strategic Industrial Employment Site	Strategic industrial employment site	Employment floorspace: c.30,000 sqm	28	12	10	6	This site is potentially hydrologically connected to the Lee Valley SPA/Ramsar and is therefore screened in for: • Water quality • Water quantity, level and flow
HEM SA02 St Albans Road Strategic Industrial Employment Site	Strategic industrial employment site	Employment floorspace: up to 187,000 sqm B8 / data centre development	24	15	13	8	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HEM SA03 Borehamwood Industrial Area Extension	Strategic industrial employment site / employment area extension	Employment floorspace: c.82,925 sqm	24	17	15	12	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HEM SA04 Extension to Lismirrane Industrial Park	Strategic industrial employment site / employment area extension	Employment floorspace: c.39,781 sqm	22	21	19	17	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HEM SA05 Land northeast of Elton Way, Bushey, WD25 8HB	Strategic industrial employment site	Employment floorspace: c.45,000 sqm	18	24	22	18	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HEM SA06 Former Mercure Hotel and Land to the East	Strategic industrial employment site	Employment floorspace: c.137,410 sqm data centre floorspace	18	23	21	19	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.

Appendix C LSE Screening of Policies

Table 4. Screening of Policies

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy HBF1 Delivering a Better Future for Hertsmere (Spatial Strategy)	Strategic policy establishing the overall spatial strategy for the Borough. The policy directs development towards Regeneration Nodes in Borehamwood and Potters Bar, Growth Nodes associated with the four main towns, and the proposed new settlement at Bowman's Cross. It supports the delivery of housing, employment, town centre, leisure, cultural, community and infrastructure development over the plan period, including strategic urban extensions and other allocated growth locations. The policy also supports small-scale housing development within the four main towns and seeks to secure the infrastructure necessary to accommodate planned growth.	**Likely Significant Effects** This strategic policy facilitates growth across the Borough through the delivery of housing, employment and supporting infrastructure. Potential impact pathways include recreational pressure on Wormley-Hoddesdonpark Woods SAC and water quality and water quantity impacts on Lee Valley SPA/Ramsar. These pathways have been screened in for further consideration through the assessment of site allocations and associated growth. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy HQD1 Delivering High Quality Design in Hertsmere	A strategic development management policy which requires all development proposals to follow a design-led approach. The policy seeks to secure high-quality, sustainable and inclusive development by ensuring proposals respond positively to local character, landscape, biodiversity, heritage, amenity, climate change, infrastructure and local distinctiveness. The policy establishes overarching design principles that apply to all forms of development across the Borough and promotes successful and sustainable placemaking.	**No Likely Significant Effects.** This is a management policy which provides guidance and controls on the design and delivery of development. Whilst it applies to development proposals across the Borough, it does not in itself allocate land, identify development locations or result in additional development beyond that already provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD2 Inclusive and Welcoming Design	A non-strategic development management policy which seeks to ensure that development achieves high standards of inclusive, accessible and equitable design. The policy requires proposals to provide safe, welcoming and accessible environments for all users, including accessible housing, inclusive public realm, equitable access to facilities and appropriate adaptation of heritage assets. The policy also requires Inclusive Design Statements and sets accessibility requirements for residential development.	**No Likely Significant Effects.** This is a management policy which provides guidance and controls on the design and delivery of development. It does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD3 Public Realm and Connecting Places	A non-strategic development management policy that requires development proposals to deliver high-quality, safe, accessible and well-connected public realm. The policy promotes the design-led approach to public spaces, active travel, public realm enhancement, placemaking, public art, green and blue infrastructure integration, healthy streets principles and the long-term management of publicly accessible spaces. It seeks to improve connectivity between neighbourhoods, open spaces, community facilities and transport infrastructure whilst supporting inclusive and sustainable movement.	**No Likely Significant Effects.** This is a management policy which provides guidance and controls on the design, delivery and management of public realm associated with development. It does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD4 Optimising Site Capacity	A non-strategic development management policy which seeks to ensure that development proposals make effective and efficient use of land through a design-led approach. The policy requires proposals to optimise site capacity whilst responding positively to local character, infrastructure capacity, environmental constraints, amenity considerations, biodiversity, climate resilience and placemaking objectives. It also requires larger and strategic sites to demonstrate coordinated and comprehensive development through masterplanning, design coding and supporting evidence.	**No Likely Significant Effects.** This is a management policy which provides guidance and controls on the form, density and design of development. Whilst it seeks to optimise the capacity of development sites, it does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD5 Building Heights	A strategic development management policy that establishes Hertsmere's approach to tall buildings. The policy defines tall buildings, identifies suitable locations through Tall Building Suitability Zones, sets maximum height parameters and requires development proposals to demonstrate high-quality design, positive townscape integration, environmental performance, public realm improvements and appropriate infrastructure provision. The policy also requires consideration of cumulative impacts, heritage, biodiversity, climate resilience, amenity and building safety.	**No Likely Significant Effects.** This is a management policy which provides guidance and controls on the location, design, scale and environmental performance of tall buildings. Whilst it may influence the form and density of development within suitable locations, it does not allocate land, identify additional development sites or result in development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD6 High Quality Housing Design	A non-strategic development management policy which seeks to secure high-quality residential development across the Borough. The policy establishes requirements relating to internal space standards, amenity provision, accessibility, tenure-neutral design, residential amenity, daylight and sunlight, outdoor space, landscaping, servicing and the overall quality and adaptability of housing development. It applies to new-build housing, conversions, alterations and extensions and seeks to ensure that new homes provide a high standard of accommodation for future occupiers.	**No Likely Significant Effects.** This is a management policy which provides guidance and controls on the design and quality of housing development. Whilst it applies to residential development, it does not allocate land, identify development locations or provide for additional development beyond that proposed elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy HQD7 Building Alterations and Extensions	A non-strategic development management policy which establishes design and amenity requirements for building alterations, extensions, basement development and light wells. The policy seeks to ensure that alterations and extensions are of a high-quality design, respond positively to local character, protect residential amenity, safeguard heritage assets, and avoid adverse effects on the environment, flood risk, structural stability and the public realm. It also sets criteria for basement development and associated features such as light wells.	**No Likely Significant Effects.** This is a management policy which provides guidance and controls on building alterations, extensions, basement development and associated works. The policy does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD8 Infill and Backland sites, Garden Land and Amenity Areas	A non-strategic policy which sets out the criteria for the development of infill sites, backland sites, garden land and amenity areas within existing settlements. The policy supports the efficient use of land through appropriately designed development whilst protecting local character, residential amenity, biodiversity, green infrastructure, drainage, trees, open space and access arrangements. It also establishes criteria for development on garden land and communal amenity areas and supports small-scale housing delivery within the existing urban area.	**Likely Significant Effects** This policy supports the delivery of windfall residential development on infill sites, backland sites, garden land and amenity areas within existing settlements. Although precise locations are not identified, development delivered through this policy could potentially occur within areas linked to Habitats Sites. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy HQD9 Shopfront Design	A non-strategic development management policy which seeks to secure high-quality shopfront design across Hertsmere's town centres, shopping areas and commercial frontages. The policy establishes design requirements for shopfronts, signage, canopies, security measures, public realm integration, accessibility and the protection of historic shopfronts. It seeks to maintain local character, improve townscape quality and support the vitality and viability of shopping areas.	**No Likely Significant Effects** This is a management policy which provides guidance and controls on the design and appearance of shopfronts, signage and associated features. It does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD10 Outdoor Advertisements, Digital Displays and Hoardings	A non-strategic development management policy which establishes design, amenity and public safety requirements for outdoor advertisements, digital displays and hoardings. The policy seeks to ensure that advertisements are appropriately designed, sited and maintained, protect local character and	**No Likely Significant Effects** A non-strategic development management policy which establishes design, amenity and public safety requirements for outdoor advertisements, digital displays and hoardings. The

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	heritage assets, avoid visual clutter, safeguard amenity and highway safety, and prevent adverse impacts on trees and the public realm.	policy seeks to ensure that advertisements are appropriately designed, sited and maintained, protect local character and heritage assets, avoid visual clutter, safeguard amenity and highway safety, and prevent adverse impacts on trees and the public realm.
Policy HE1 Hertsmere's Historic Environment	A strategic policy establishing the Council's overarching approach to the conservation, enhancement and management of Hertsmere's historic environment. The policy seeks to conserve and enhance designated and non-designated heritage assets and their settings through appropriate design, reuse, interpretation and management. It requires development proposals affecting heritage assets to be supported by proportionate Heritage Statements and ensures that any harm to significance is clearly justified and appropriately mitigated.	**No Likely Significant Effects** This is a management policy which provides guidance and controls relating to the conservation, enhancement and management of heritage assets and the historic environment. It does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HE2 Designated Heritage Assets	A non-strategic development management policy which sets out the Council's approach towards the conservation, enhancement and management of designated heritage assets, including conservation areas, listed buildings, registered parks and gardens, scheduled monuments and their settings. The policy establishes criteria for assessing development affecting designated heritage assets, including requirements relating to significance, setting, design, archaeology, reuse, repair, demolition and heritage-led regeneration.	**No Likely Significant Effects** This is a management policy concerned with the conservation, enhancement and management of designated heritage assets and their settings. It does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HE3 Non-Designated Heritage Assets	A non-strategic development management policy which establishes the Council's approach towards the conservation, enhancement and management of non-designated heritage assets. The policy requires development proposals affecting non-designated heritage assets to assess significance, minimise harm, support retention and reuse where appropriate, and ensure that any justified loss is appropriately recorded and mitigated. The policy also supports the identification of additional non-designated heritage assets through evidence-based processes.	**No Likely Significant Effects** This is a management policy concerned with the conservation, enhancement and management of non-designated heritage assets and their settings. It does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy H1 Meeting Hertsmere's Housing Need	A strategic housing policy which establishes Hertsmere's housing requirement and approach to housing delivery over the plan period. The policy provides for the delivery of at least 16,490 net additional homes, supports strategic allocations, housing growth within the Borough's four main settlements, a new settlement at Bowman's Cross, small site delivery, urban intensification and the provision of affordable and specialist housing. The policy also sets out the Council's approach to housing mix, housing choice and the delivery of inclusive and mixed communities.	**Likely Significant Effects** This strategic policy supports the delivery of significant levels of housing growth across the Borough and provides the overarching framework for residential development throughout the plan period. As the policy facilitates population growth and associated development, there is potential for linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy H2 Optimising Delivery from Small Urban Sites	A strategic housing policy which seeks to increase housing delivery from small urban sites across the Borough. The policy supports the redevelopment and intensification of small sites, including vacant and underused brownfield land, housing conversions, housing alterations and extensions, and infill and backland development. The policy promotes small-site housing delivery as an important source of housing supply and supports residential intensification within Hertsmere's settlements, subject to design, amenity, infrastructure and environmental safeguards.	**Likely Significant Effects** This strategic policy facilitates the delivery of additional housing through the redevelopment, conversion and intensification of small urban sites across the Borough. Whilst specific development locations are not identified, the policy is intended to increase housing delivery and population growth within Hertsmere. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy H3 Genuinely Affordable Housing	A strategic housing policy that establishes the Borough's approach to the delivery of genuinely affordable housing. The policy requires major residential developments to provide affordable housing, sets affordable housing targets and tenure requirements, establishes mechanisms for viability assessment and review, supports inclusive and mixed communities, and seeks to maximise the delivery of affordable housing across Hertsmere through both market and subsidised development.	No **Likely Significant Effects** This is a management policy concerned with the tenure, mix and delivery of affordable housing within residential developments. The policy does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy H4 Accommodation for Older People	A non-strategic housing policy which seeks to meet the accommodation needs of Hertsmere's ageing population through the delivery of adaptable mainstream housing, specialist older persons' accommodation and care accommodation. The policy establishes criteria relating to accessibility, location, tenure mix, affordable housing provision, design quality, access to services and the suitability of accommodation to meet the needs of older residents.	**Likely Significant Effects** This policy supports the delivery of specialist accommodation and housing for older people. Whilst specific development sites are not identified, the policy facilitates additional residential accommodation and associated population growth within the Borough.The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		• Loss of functionally linked habitat
Policy H5 Supported and Specialised Accommodation	A non-strategic housing policy which supports the delivery, retention and appropriate management of supported and specialised accommodation to meet identified needs within the Borough. The policy establishes criteria relating to location, tenure, design quality, accessibility, community integration, care provision and the protection of existing supported accommodation. It seeks to ensure that supported and specialised accommodation is delivered in suitable locations and contributes positively to inclusive and mixed communities.	**Likely Significant Effects** This policy supports the delivery and retention of supported and specialised accommodation and therefore facilitates additional residential accommodation within the Borough. Whilst specific development sites are not identified, the policy supports development that may contribute to population growth and associated demands on infrastructure. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy H6 Housing with Shared Facilities/ Homes in Multiple Occupation	A non-strategic housing policy which manages the provision, retention and location of Houses in Multiple Occupation (HMOs), supported and shared accommodation, and large-scale purpose-built shared living developments. The policy seeks to ensure that this form of accommodation contributes positively to housing choice, meets identified need, avoids harmful concentrations, protects local amenity and secures high-quality accommodation and management standards.	**Likely Significant Effects** This policy supports the provision and retention of HMOs and other forms of shared residential accommodation within the Borough. Whilst specific sites are not identified, the policy facilitates residential accommodation and population growth through the delivery of additional housing provision. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy H7 Self and Custom Build Housing	A non-strategic housing policy which sets out the Council's approach towards self-build and custom-build housing. The policy supports the maintenance of a self-build register, identifies how need will be monitored, and establishes criteria for the assessment of self-build and custom-build housing proposals, including design quality, affordable housing contributions and compliance with the spatial strategy.	**No Likely Significant Effects** This is a management policy concerned with the provision of self-build and custom-build housing and the monitoring of identified need. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy H8 Gypsy and Traveller Accommodation	A non-strategic policy which supports the delivery of Gypsy and Traveller accommodation to meet identified needs within the Borough. The policy establishes requirements for the provision of pitches and associated facilities, including access, servicing, amenity provision, infrastructure, design quality,	**Likely Significant Effects**

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	public health and safety considerations. The policy also references the allocation of land within the Local Plan to meet identified accommodation needs.	This policy supports the delivery of Gypsy and Traveller accommodation and identifies a need for additional permanent pitches within the Borough. The policy facilitates residential accommodation and associated population growth through the delivery of new pitches and related infrastructure. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy H9 New Homes in the Countryside/ Green Belt	A non-strategic housing policy which sets out the Council's approach towards speculative small-scale housing development within the countryside and Green Belt outside the Borough's four main towns. The policy supports appropriately located housing proposals which contribute towards identified housing needs, are of a high-quality design, support mixed communities and are delivered in a timely manner. The policy resists major housing development in the countryside and Green Belt that would conflict with the Spatial Strategy.	**Likely Significant Effects** This policy supports the delivery of additional housing development within the Borough through small-scale residential proposals in the countryside and Green Belt. Although specific development locations are not identified, the policy facilitates residential development and associated population growth. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy EC1 Meeting Hertsmere's Economic Needs	A strategic economic policy which supports the growth and diversification of Hertsmere's economy through the protection and expansion of employment opportunities, including the film and television industry, logistics, data centres, green industries, office development and other employment uses. The policy supports business growth, employment land provision, workforce training and the delivery of infrastructure necessary to support economic development.	**Likely Significant Effects** This policy supports the delivery of new housing development within the Borough through small-scale housing proposals in the countryside and Green Belt. Although specific development locations are not identified, the policy facilitates residential development and associated population growth. The following impact pathways are present: • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy EC2 Protecting Employment Land and Delivering New Workspace	A strategic economic policy which establishes Hertsmere's Employment Land Hierarchy and seeks to safeguard, intensify and expand employment land and floorspace across the Borough. The policy sets employment floorspace and land requirements, supports industrial, office, logistics, film industry and data centre development, protects designated employment areas from inappropriate change of use, and directs employment growth to locations identified within the Employment Land Hierarchy.	Sites.**Likely Significant Effects** This policy facilitates the delivery of new employment floorspace, industrial development, office accommodation, logistics uses, film industry development and data centres across the Borough. The policy identifies employment growth requirements, employment land provision and intensification opportunities and therefore has the potential to facilitate development and associated infrastructure provision. The following impact pathways are present: • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy EC3 Delivering High Quality Employment Sites and Workspaces	A non-strategic policy which seeks to secure high-quality employment development across the Borough. The policy establishes design, operational, environmental and amenity requirements for Class E(g), B2, B8 and related sui generis employment uses. It promotes flexible workspace, high-quality working environments, biodiversity enhancement, urban greening, sustainable drainage, water efficiency and provision for small and medium enterprises.	. **No Likely Significant Effects** This is a management policy which provides guidance and controls on the design, layout and operation of employment development. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC4 Affordable Workspace	A strategic policy which seeks to secure the provision, retention and long-term management of affordable workspace within employment developments across the Borough. The policy establishes affordable workspace requirements for major commercial development, sets out criteria for on-site and off-site provision, viability assessment requirements, management arrangements and mechanisms for securing affordable workspace through planning obligations.	**No Likely Significant Effects** This policy is concerned with the provision, retention and management of affordable workspace within commercial and employment developments. Whilst it applies to employment development, it does not allocate land, identify development locations or increase the quantum of employment development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC5 Strategic Level Employment Sites/ Designations	A non-strategic employment policy which seeks to safeguard and manage Hertsmere's strategic employment sites. The policy supports appropriate employment uses within designated Key Employment Sites and Employment Areas, protects their continued employment function and supports the retention and intensification of strategic employment activities, including film and television industries, logistics, servicing industries, waste management and nationally important infrastructure.	**No Likely Significant Effects** This is a management policy concerned with the protection, safeguarding and operation of existing strategic employment sites. It does not allocate land, identify new development

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		locations or increase the quantum of employment development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC6 Local Level Employment Sites/ Designations	A non-strategic employment policy which seeks to safeguard and manage Main Employment Areas and Locally Significant Employment Sites identified within Hertsmere's Employment Land Hierarchy. The policy protects these locations for employment-generating uses, supports industrial intensification, manages the location of employment uses within the hierarchy and resists inappropriate non-employment development that would undermine their employment function.	**No Likely Significant Effects** This is a management policy concerned with the protection, safeguarding and operation of existing employment sites and designations. It does not allocate land, identify new development locations or increase the quantum of employment development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC7 Rural Employment Areas	A non-strategic employment policy which establishes the approach towards designated Rural Employment Areas. The policy supports employment uses that are ancillary to existing rural employment activities, requires compliance with Green Belt policy and seeks to safeguard existing rural employment land whilst resisting inappropriate alternative uses, particularly new residential development. .	**No Likely Significant Effects** This is a management policy concerned with the safeguarding and operation of existing Rural Employment Areas. It does not allocate land, identify new development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. The policy primarily restricts development and protects existing employment uses in rural locations. There are no linking impact pathways to Habitats Sites.
Policy EC8 Hertsmere's Non-Designated Employment Sites	A non-strategic employment policy which seeks to safeguard and manage non-designated employment sites outside the Borough's designated employment areas. The policy supports the retention of viable employment uses, encourages employment-led mixed-use redevelopment in appropriate locations, seeks to maximise industrial capacity, and establishes criteria for the release of employment land where continued employment use is no longer viable. It also requires affordable housing provision where residential development is considered acceptable.	**No Likely Significant Effects** This is a management policy concerned with the protection, retention and redevelopment of existing non-designated employment sites. Whilst limited mixed-use redevelopment may be supported in some circumstances, the policy primarily safeguards existing employment land and manages the circumstances under which alternative uses may be permitted. It does not allocate land, identify new development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC9 Workplace Training and Job Opportunities	A non-strategic policy which seeks to improve access to employment, skills, apprenticeships and workplace training opportunities for Hertsmere residents. The policy requires major development proposals to contribute towards local labour, training and employment initiatives through financial	

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	contributions and Employment and Skills Plans. It also supports the recruitment of local labour and the use of local businesses during construction and operational phases of development.	**No Likely Significant Effects** This is a management policy which seeks to secure training, skills development and employment opportunities associated with development. Whilst the policy applies to major development proposals, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC10 The Rural Economy	A non-strategic policy which supports the continued operation and diversification of rural businesses, agricultural enterprises and equine uses within the countryside and Green Belt. The policy seeks to protect agricultural land, support appropriate farm diversification, manage the re-use of rural buildings, support equine development and encourage sustainable agriculture and food growing, whilst ensuring compatibility with Green Belt policy and the rural character of the area.	. **No Likely Significant Effects** This is primarily a management policy which seeks to support and regulate existing rural economic activities, agricultural diversification and the reuse of rural buildings. Whilst limited development may arise through farm diversification and building re-use proposals, the policy does not allocate land, identify development locations or facilitate strategic growth beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC11 Town Centres at the Heart of Hertsmere's Communities	. A strategic policy which seeks to maintain and enhance the vitality, viability and resilience of Hertsmere's town centres. The policy supports high-quality public realm, sustainable movement, green and blue infrastructure, mixed-use centres, cultural and community activity, environmental improvements and the adaptation of town centres to changing economic and social circumstances.	**No Likely Significant Effects** This is a management policy which provides guidance and controls relating to the function, quality and operation of town centres. Whilst the policy supports the vitality and viability of town centres, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC12 Hertsmere's Town Centre Network and Hierarchy	A strategic policy which establishes Hertsmere's town centre network and hierarchy and sets out the Borough's "town centre first" approach to development. The policy directs main town centre uses to designated centres, applies the Sequential Test and Retail Impact Assessment requirements, identifies the hierarchy of centres across the Borough and seeks to maintain and enhance the vitality and viability of those centres. It also supports the delivery of the spatial strategy through the appropriate distribution of retail, commercial, community and service uses.	**No Likely Significant Effects** This is a management policy which establishes the town centre hierarchy and sets out the framework for assessing proposals for main town centre uses. Whilst it supports the vitality and viability of town centres, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. Any growth associated with town centres is assessed through the

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		spatial strategy, site allocations and settlement-specific policies. There are no linking impact pathways to Habitats Sites.
Policy EC13 Optimising the Use of Town Centre Land and Floorspace	A strategic policy which seeks to optimise the use of land and floorspace within town centres and edge-of-centre locations. The policy supports mixed-use development, redevelopment, intensification, reconfiguration of existing buildings and the incorporation of residential uses within town centres. It promotes higher-density development, efficient use of previously developed land and the integration of commercial, community and residential uses within Hertsmere's centres.	**Likely Significant Effects** This policy supports the redevelopment, intensification and mixed-use development of sites within town centres. The policy specifically supports additional residential development, the reconfiguration of existing buildings and the intensification of land use within highly accessible locations. Although specific sites are not identified, the policy facilitates development and population growth within Hertsmere's town centres. The following impact pathways are present: • Atmospheric Pollution • Water quality • Water quantity, level and flow • Recreational Pressure
Policy EC14 Hertsmere's Main Town Centre and Local Town Centre	A strategic policy which seeks to maintain and enhance the vitality, viability and retail function of Hertsmere's Main and Local Town Centres. The policy establishes Primary Shopping Areas, supports appropriate main town centre uses, applies Shopping Area Impact Statements, manages the mix of uses within shopping frontages and provides a framework for residential development within town centres. It also supports regeneration, redevelopment and intensification in town centre locations where consistent with the role and function of the centre.	**No Likely Significant Effects** This policy primarily provides a framework for managing the mix, distribution and function of uses within designated town centres and Primary Shopping Areas. Whilst it references residential development and mixed-use schemes, these are principally delivered through the Spatial Strategy, settlement policies and specific site allocations assessed elsewhere in the HRA. The policy does not itself allocate land or establish additional development requirements beyond those already provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC15 Hertsmere's District Centres	A non-strategic policy which seeks to maintain and enhance the vitality, viability and function of Hertsmere's District Centres. The policy establishes requirements relating to Primary Shopping Areas, the protection of retail and service uses, the provision of active frontages, support for small and independent businesses, the management of changes of use and the retention of main town centre functions within District Centres.	. **No Likely Significant Effects** This is a management policy which provides guidance and controls on the mix, distribution and operation of uses within

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		District Centres. Whilst the policy supports the vitality and viability of centres and manages changes of use, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC16 Hertsmere's Smaller Centre and Individual Shops	A non-strategic policy which seeks to protect and support smaller retail centres, shopping parades, neighbourhood centres and individual shops across Hertsmere. The policy safeguards local retail provision, manages changes of use, protects active frontages and supports continued access to day-to-day goods and services within local communities. It also establishes criteria for the loss of retail units and promotes the retention of local shopping facilities where possible.	**No Likely Significant Effects** This is a management policy concerned with the protection, retention and operation of existing local centres, shopping parades and retail units. Whilst the policy provides a framework for the assessment of changes of use and supports the continued provision of local services, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC17 Concentration of Harmful Uses	A non-strategic policy which seeks to manage the concentration of specific sui generis uses, including hot food takeaways, betting offices, vape shops, payday loan shops, drinking establishments and similar uses. The policy establishes thresholds and assessment criteria to protect amenity, public health, public safety, town centre vitality and local character. It also sets requirements for food and drink uses and associated health impact considerations.	**No Likely Significant Effects** This is a management policy which regulates the concentration, distribution and operation of specific town centre and commercial uses. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites. .
Policy EC18 Public Houses	A non-strategic policy which seeks to protect, retain and where appropriate re-provide public houses within Hertsmere. The policy establishes a presumption in favour of retaining public houses with community, cultural, heritage or economic value, sets criteria for assessing proposals involving loss or redevelopment, requires evidence of viability and marketing, and supports new public houses where they improve access to community facilities and contribute to sustainable neighbourhoods.	**No Likely Significant Effects** This is a management policy concerned with the protection, retention, reuse and replacement of existing public houses and associated community facilities. Whilst the policy supports new public houses in certain circumstances, it does not allocate land, identify development locations or increase the quantum of

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC19 Markets	A non-strategic policy which seeks to protect, retain and enhance existing markets and market spaces within Hertsmere and support the provision of new markets where appropriate. The policy promotes a town centre first approach for market provision, safeguards existing markets, supports temporary and meanwhile uses, and establishes criteria to ensure markets contribute positively to town centre vitality, small business opportunities, local character and the public realm.	. **No Likely Significant Effects** This is a management policy concerned with the protection, operation and location of markets and market spaces. Whilst the policy supports the provision of new markets in appropriate circumstances, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC21 Visitor Accommodation	A non-strategic policy which supports the provision of serviced visitor accommodation, including hotels, bed and breakfasts, hostels, serviced apartments and other visitor accommodation. The policy establishes locational, design, accessibility and operational requirements for visitor accommodation, seeks to ensure it is appropriately located within or close to town centres, prevents the loss of housing stock, and manages the relationship between visitor accommodation and surrounding uses.	**Likely Significant Effects** This policy supports the delivery of new visitor accommodation within the Borough. Although specific development locations are not identified, the policy facilitates new built development and associated increases in visitor accommodation capacity. The following impact pathways are present: • Atmospheric Pollution • Water quality • Water quantity, level and flow • Recreational Pressure • Loss of Functionally Linked Habitat
Policy SCI1 Safeguarding and Securing Social and Community Infrastructure	A strategic policy which seeks to safeguard, enhance and secure the delivery of social and community infrastructure across Hertsmere. The policy requires development to address infrastructure needs arising from growth, supports the delivery of new and expanded community facilities, protects existing infrastructure from loss, and ensures that infrastructure is delivered in a timely manner alongside development through direct provision, off-site provision or developer contributions.	**No Likely Significant Effects** This policy supports the delivery of social and community infrastructure required to serve planned growth within the Borough. Whilst the policy facilitates the provision of infrastructure and community facilities, it does not itself allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. Infrastructure provision arises as a consequence of growth already assessed through the Spatial Strategy, housing, employment and allocation policies.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		There are no linking impact pathways to Habitats Sites.
Policy SCI2 Delivering High Quality Social and Community Infrastructure	A non-strategic policy which supports the delivery, expansion, alteration and improvement of social and community infrastructure across the Borough. The policy establishes design, accessibility, management and operational requirements for community facilities and promotes co-location, shared use, community hubs and the efficient use of public and community assets. It also seeks to ensure that facilities are appropriately managed, maintained and accessible to the communities they serve.	No Likely Significant Effects This is a management policy concerned with the design, delivery, operation and management of social and community infrastructure. Whilst it supports new and improved community facilities, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. Any growth associated with community infrastructure provision arises as a consequence of development already provided for through the Spatial Strategy, site allocations and other growth policies. There are no linking impact pathways to Habitats Sites.
Policy SCI3 Delivering Sports, Recreation and Play Spaces	A non-strategic policy which seeks to protect, enhance and provide sports, recreation and play facilities across the Borough. The policy supports the retention and improvement of existing facilities, requires new housing development to provide play space, establishes standards for formal and informal recreation provision, and seeks to ensure that sports, recreation and play facilities are accessible, inclusive and appropriately maintained. .	**No Likely Significant Effects** This policy seeks to secure sports, recreation and play facilities as supporting infrastructure for existing and future communities. Whilst it supports the provision of new and enhanced recreation facilities, it is primarily a management policy which responds to growth already provided for elsewhere in the Local Plan. The policy does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SCI4 Nurseries and Childcare Facilities	A non-strategic policy which supports the provision of nurseries and childcare facilities across the Borough. The policy establishes criteria relating to location, accessibility, highway impacts, amenity, design quality and operational requirements. It also sets requirements for proposals involving childcare provision within existing residential properties and seeks to ensure that facilities are appropriately located and designed to meet identified needs.	**No Likely Significant Effects** This is a management policy concerned with the provision and operation of nurseries and childcare facilities. Whilst it supports childcare provision where a need is identified, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SCI5 Burial Spaces	A non-strategic policy which seeks to ensure that sufficient burial provision is available to meet the current and future needs of Hertsmere's communities. The policy supports the safeguarding of existing cemeteries and burial grounds, the expansion of existing facilities and the provision of new burial	

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	capacity where an identified need exists. It establishes criteria relating to accessibility, environmental impacts, biodiversity, heritage, hydrogeology and supporting infrastructure.	**No Likely Significant Effects** This policy supports the safeguarding, expansion and provision of burial space and associated facilities to meet identified needs within the Borough. Whilst proposals for new burial provision may arise, the policy does not allocate land, identify specific development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. Any proposals brought forward under this policy would be subject to project-level assessment where appropriate. There are no linking impact pathways to Habitats Sites.
Policy GI1 Hertsmere's Green and Blue Infrastructure Network	A strategic policy which seeks to protect, enhance, restore and expand Hertsmere's green and blue infrastructure network. The policy promotes habitat connectivity, biodiversity recovery, landscape protection, ecological resilience, urban greening, sustainable drainage, climate resilience and improved access to green and blue infrastructure. It requires development proposals to integrate green infrastructure into site design and avoid fragmentation of strategically important ecological networks.	**No Likely Significant Effects** This is a protection and enhancement policy which seeks to safeguard, strengthen and expand Hertsmere's green and blue infrastructure network. The policy promotes biodiversity conservation, habitat creation, ecological connectivity and environmental enhancement. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI2 Hertsmere's Watercourses and Blue Infrastructure	A strategic policy which seeks to protect, restore and enhance Hertsmere's watercourses, rivers, chalk streams and wider blue infrastructure network. The policy requires development proposals to safeguard riparian corridors, enhance aquatic habitats, improve ecological connectivity, support natural flood management, protect water quality, promote river restoration and de-culverting, and integrate biodiversity, recreation and environmental improvements into waterside development.	**No Likely Significant Effects** This is a protection and enhancement policy concerned with the conservation, restoration and management of watercourses, chalk streams and blue infrastructure. The policy seeks to improve ecological conditions, water quality, habitat connectivity and biodiversity value across the Borough. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI3 Local Nature Recovery Strategy	A strategic policy which supports the implementation of the Hertfordshire Local Nature Recovery Strategy (LNRS). The policy seeks to avoid harm to biodiversity, support habitat creation, restoration and enhancement, improve ecological connectivity and deliver a coherent Nature Recovery Network	**No Likely Significant Effects**

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	across the Borough. It requires development proposals to contribute towards nature recovery priorities and biodiversity enhancement opportunities identified within the LNRS.	This is a protection and enhancement policy concerned with biodiversity conservation, habitat creation, ecological restoration and nature recovery. The policy seeks to conserve and enhance ecological networks and support the delivery of the Hertfordshire Local Nature Recovery Strategy. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI4 Protecting and Enhancing Biodiversity, Habitats and Ecological Networks	A strategic biodiversity policy which seeks to protect, maintain and enhance biodiversity, habitats and ecological networks across the Borough. The policy safeguards designated and non-designated sites, protected species, priority habitats, irreplaceable habitats and ecological networks. It requires application of the mitigation hierarchy, delivery of Biodiversity Net Gain, protection of international and national nature conservation sites, and supports the implementation of the Hertfordshire Local Nature Recovery Strategy. It also promotes ecological restoration, habitat creation, species recovery and improved access to nature. .	**No Likely Significant Effects** This is a protection and enhancement policy concerned with biodiversity conservation, habitat protection, ecological connectivity and nature recovery. The policy seeks to avoid impacts on designated sites and biodiversity interests, improve ecological networks, deliver biodiversity net gain and ensure that impacts on nationally and internationally designated sites are appropriately assessed. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI5 Protection from Environmental Pollution	A strategic environmental protection policy which seeks to prevent and minimise environmental pollution arising from development. The policy addresses air pollution, soil contamination, water pollution, groundwater protection, noise pollution and light pollution. It requires appropriate assessments, mitigation measures and environmental safeguards to ensure that development does not adversely affect human health, the environment or ecological receptors.	**No Likely Significant Effects** This is a protection and mitigation policy concerned with avoiding, reducing and managing environmental pollution arising from development. The policy seeks to protect air quality, water quality, soils, groundwater, biodiversity, residential amenity and sensitive environmental receptors. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI6 Urban Greening, Trees and Landscaping	A non-strategic policy which seeks to increase urban greening, tree cover, landscaping and biodiversity throughout the Borough. The policy promotes the integration of green infrastructure measures including street trees, green roofs, living walls, SuDS, wildlife habitats, landscaping and biodiversity enhancement. It also establishes requirements relating to tree retention, replacement planting, Urban Greening Factors, Landscape Design Strategies, bat and swift bricks and the long-term management of green infrastructure.	**No Likely Significant Effects** This is a management policy which seeks to protect, enhance and expand green infrastructure, landscaping, tree cover and biodiversity throughout the Borough. The policy promotes

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	.	habitat creation, urban greening, ecological enhancement and biodiversity net gain measures. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI7 Open Space	A strategic policy which seeks to protect, enhance and expand Hertsmere's network of publicly accessible open spaces. The policy safeguards existing open space, requires replacement provision where losses occur, supports the provision of new open space to meet development needs, promotes improvements to the quality, accessibility and connectivity of open spaces, and supports ancillary uses that enhance the function and enjoyment of open space.	. **No Likely Significant Effects** This is a management policy concerned with the protection, enhancement and provision of open space. The policy seeks to safeguard existing open spaces and ensure that appropriate open space provision is delivered alongside development already proposed elsewhere in the Local Plan. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI8 Communal Gardens and Food Growing	A non-strategic policy which seeks to protect existing allotments and community gardens and promote new opportunities for food growing within the Borough. The policy supports allotments, community gardens, orchards and other food-growing initiatives, safeguards existing provision from loss, and sets requirements for the design, accessibility, management and long-term maintenance of food-growing spaces within new development.	No Likely Significant Effects This is a management policy concerned with the protection, enhancement and provision of allotments, community gardens and other food-growing spaces. The policy seeks to safeguard existing provision and encourage opportunities for food growing as part of healthy and sustainable communities. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
GI9 Geodiversity	A non-strategic policy which seeks to conserve, enhance and improve understanding of Hertsmere's geodiversity resource. The policy protects designated geodiversity sites, Regionally Important Geological Sites and other geological assets, requiring development proposals to avoid harm where possible and secure appropriate mitigation or compensation where impacts cannot be avoided.	**No Likely Significant Effects** This is a management policy concerned with the protection and enhancement of geodiversity assets and geological features. The policy seeks to safeguard geological interests and improve understanding of the Borough's geodiversity resource. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy SDI1 Responding to the Climate Emergency	A non-strategic policy which seeks to conserve, enhance and improve understanding of Hertsmere's geodiversity resource. The policy protects designated and non-designated geological assets, including Regionally Important Geological Sites, and requires development proposals to avoid harm where possible and secure appropriate mitigation or compensation where impacts cannot be avoided.	. **No Likely Significant Effects** This is a management policy concerned with the protection and enhancement of geodiversity assets and geological features. The policy seeks to conserve geological interests and improve understanding of the Borough's geodiversity resource. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI2 Sustainable Design and Retrofitting	A strategic policy which seeks to improve the environmental performance and sustainability of development across Hertsmere. The policy requires Sustainable Design Statements, promotes the achievement of recognised sustainability standards such as BREEAM and the Home Quality Mark, supports sustainable retrofitting of existing buildings and encourages improvements in energy efficiency, environmental performance and climate resilience.	**No Likely Significant Effects** This is a management policy which establishes sustainability and environmental performance requirements for development proposals. The policy promotes sustainable design, energy efficiency, environmental enhancement and climate change mitigation measures. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI3 Managing Heat Risk	A strategic policy which seeks to minimise the impacts of overheating and the urban heat island effect through the design of buildings and spaces. The policy requires development proposals to incorporate passive cooling measures, minimise reliance on air conditioning, provide Energy Statements for major developments and integrate urban greening, shading and climate resilience measures into development proposals.	**No Likely Significant Effects** This is a management policy which establishes requirements relating to climate resilience, overheating and urban heat island mitigation. The policy seeks to improve the environmental performance of development and reduce the impacts of climate change. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI4 Minimising Green House Gas Emissions	A strategic policy which seeks to minimise greenhouse gas emissions from development and support the transition to a net zero-carbon Borough. The policy requires major developments to reduce operational carbon emissions, achieve net zero-carbon outcomes, prepare Energy Strategies, minimise energy demand, consider embodied carbon, and where necessary provide off-site carbon	**No Likely Significant Effects** This is a management policy which establishes carbon reduction, energy efficiency and sustainability requirements for

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	offsetting measures. It also promotes energy efficiency through the application of recognised standards and guidance.	development proposals. The policy seeks to reduce greenhouse gas emissions and improve environmental performance but does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI5 Improving Air Quality	A strategic environmental protection policy which seeks to protect and improve air quality across Hertsmere. The policy requires development proposals to minimise air pollution, avoid deterioration in air quality, reduce exposure of sensitive receptors, provide Air Quality Assessments where appropriate, and implement suitable mitigation measures. The policy also addresses impacts during construction and operational phases of development and requires consideration of cumulative air quality effects.	**No Likely Significant Effects** This is a management policy concerned with the protection and improvement of air quality and the mitigation of environmental effects arising from development. The policy seeks to minimise pollution, protect sensitive receptors and ensure compliance with relevant air quality standards. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI6 Energy Infrastructure	A strategic policy which seeks to ensure that development is supported by appropriate and sustainable energy infrastructure. The policy promotes connection to decentralised heat networks, requires feasibility assessments for heat network connections, supports future energy infrastructure planning, requires consideration of electricity network capacity, promotes low-carbon energy solutions and establishes requirements for Energy Statements and energy strategies for major development proposals.	**No Likely Significant Effects** This is a management policy concerned with the provision, assessment and delivery of energy infrastructure required to support development. The policy promotes sustainable energy supply, energy efficiency and low-carbon infrastructure but does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI7 Minimising and Managing Flood Risk	A strategic policy which seeks to minimise and manage flood risk from all sources across the Borough. The policy requires the application of the Sequential and Exception Tests where appropriate, the preparation of Flood Risk Assessments, the protection of floodplains and watercourses, the incorporation of flood mitigation measures, and the delivery of flood-resilient development that remains safe throughout its lifetime. .	**No Likely Significant Effects** This is a management policy concerned with flood risk avoidance, mitigation and resilience. The policy seeks to reduce flood risk, safeguard floodplains, protect watercourses and ensure that development is designed and located appropriately in relation to flood risk. It does not allocate land,

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI8 Water Supply and Wastewater	A strategic policy which seeks to ensure that development is supported by adequate water supply, wastewater and drainage infrastructure. The policy supports the provision and expansion of water and wastewater infrastructure, requires assessment of network capacity, promotes water efficiency, requires sustainable drainage and foul drainage strategies, protects groundwater resources and Source Protection Zones, and seeks to ensure that development does not adversely affect water quality or water resources.	**No Likely Significant Effects** This is a management policy concerned with the delivery, protection and operation of water supply, wastewater and drainage infrastructure. The policy seeks to ensure that development is supported by adequate infrastructure capacity, protects water resources and groundwater quality, promotes water efficiency and requires mitigation of potential impacts on the water environment. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI9 Ground Conditions	A strategic policy which seeks to ensure that contaminated land and sites affected by hazardous substances are appropriately assessed, remediated and managed. The policy requires risk assessments, site investigations, remediation strategies and verification measures where necessary to ensure development is safe for future occupiers and does not adversely affect human health, public safety or the environment.	**No Likely Significant Effects** This is a management policy concerned with land contamination, hazardous substances and environmental protection. The policy requires the investigation, remediation and management of contaminated land and associated risks but does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI10 Reducing and Sustainably Managing Waste	A strategic policy which seeks to ensure that waste is managed sustainably across the Borough through the application of the waste hierarchy and circular economy principles. The policy safeguards strategic waste sites, supports waste management infrastructure where an identified need is demonstrated, protects existing waste management capacity, and establishes criteria for new waste facilities, including environmental protection, carbon performance and amenity considerations.	. **No Likely Significant Effects** This is a management policy concerned with the sustainable management of waste, protection of existing waste infrastructure and delivery of waste facilities required to meet identified needs. The policy does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy SDI11 Securing a Circular Economy	A strategic policy which promotes the application of circular economy principles to development and seeks to reduce waste generation during construction and occupation. The policy requires major development to minimise waste, provide appropriate recycling and waste storage infrastructure, support resource efficiency and ensure that waste management facilities are integrated into development design. .	. **No Likely Significant Effects** This is a management policy concerned with waste reduction, recycling, resource efficiency and the sustainable management of waste arising from development. The policy seeks to improve environmental performance and does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI12 Minerals Consultation Area	A non-strategic policy which identifies the Minerals Consultation Area and requires development proposals within that area to consider their impact on mineral resources and future mineral extraction. The policy seeks to safeguard mineral resources from sterilisation, requires engagement with the Mineral Planning Authority and ensures that development does not prejudice future mineral working.	**No Likely Significant Effects** This is a management policy concerned with safeguarding mineral resources and ensuring that development does not prejudice future mineral extraction. The policy does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy TR1 Sustainable Transport and Movement	A strategic transport policy which seeks to integrate land use and transport planning across the Borough. The policy promotes sustainable transport, active travel, public transport use and improvements to transport infrastructure. It requires development proposals to support sustainable movement, protect transport infrastructure, assess transport impacts, mitigate adverse effects on the transport network and support modal shift away from private car use.	**No Likely Significant Effects** This is a management policy concerned with the operation, protection and improvement of Hertsmere's transport network and associated infrastructure. The policy promotes sustainable travel, public transport, walking and cycling, and seeks to mitigate transport impacts arising from development. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy TR2 Transport Requirements for New Developments	A strategic transport policy which promotes the Healthy Streets Approach and requires development proposals to prioritise walking, cycling and public transport. The policy seeks to improve public realm, active travel infrastructure, accessibility, connectivity and the quality of the transport environment, whilst requiring Healthy Streets Assessments, transport mitigation measures and improvements to walking and cycling networks.	**No Likely Significant Effects** This is a management policy concerned with the design, accessibility and transport performance of development proposals. The policy promotes sustainable transport, healthy

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		streets, walking, cycling and public realm improvements and seeks to mitigate transport impacts arising from development. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy TR3 Parking	A non-strategic transport policy which establishes Hertsmere's approach to parking provision, car-free and car-lite development, cycle parking, controlled parking zones, electric vehicle charging and parking design. The policy seeks to manage parking demand, support modal shift towards sustainable transport, improve accessibility and ensure that parking provision is integrated appropriately within development proposals.	. **No Likely Significant Effects** This is a management policy concerned with the provision, design and management of parking and associated transport infrastructure. The policy seeks to encourage sustainable travel patterns, manage parking demand and support the implementation of sustainable transport objectives. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy TR4 Deliveries, Services and Construction	A non-strategic transport policy which seeks to ensure that development proposals appropriately accommodate deliveries, servicing, freight movement and construction logistics. The policy promotes sustainable freight movement, requires adequate servicing arrangements, supports delivery and servicing plans, encourages consolidation facilities and seeks to minimise impacts on the transport network, local amenity and public realm.	**No Likely Significant Effects** This is a management policy concerned with the movement of freight, deliveries, servicing and construction logistics associated with development. The policy seeks to manage operational impacts arising from development already provided for elsewhere in the Local Plan and does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy TR5 Taxis and Private Hire Vehicles	A non-strategic transport policy which sets out the criteria for offices, taxi ranks and operational facilities associated with taxis and private hire vehicle businesses. The policy seeks to ensure that such facilities are appropriately located, do not adversely affect amenity or the highway network, are accessible and safe for users, and provide suitable operational and charging infrastructure.	. **No Likely Significant Effects** This is a management policy concerned with the location, design and operation of facilities associated with taxis and private hire vehicles. The policy provides guidance and controls for development proposals but does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		There are no linking impact pathways to Habitats Sites.
Policy TR6 Digital Connectivity	A strategic policy which seeks to improve digital connectivity across Hertsmere by supporting the provision of full-fibre broadband, telecommunications infrastructure and associated digital infrastructure. The policy requires new development to be connection-ready, supports improvements to digital connectivity in underserved areas, and establishes design, siting and environmental requirements for telecommunications equipment and associated infrastructure.	**No Likely Significant Effects** This is a management policy concerned with the provision, design and operation of digital connectivity infrastructure and telecommunications equipment. The policy seeks to improve digital connectivity and ensure that associated infrastructure is appropriately located and designed. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy TR7 Airspace Safeguarding	A strategic policy which seeks to safeguard the operational integrity and safety of airspace associated with Elstree Aerodrome, Heathrow Airport and RAF Northolt. The policy requires consultation with relevant airport operators and safeguarding bodies, protects aerodrome operations and associated infrastructure, and ensures that development does not compromise the safe operation of civil or military aviation facilities.	**No Likely Significant Effects** This is a management policy concerned with safeguarding airspace, aerodrome operations and aviation safety. The policy establishes consultation and assessment requirements for development proposals within identified safeguarding areas but does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HBA1 Borehamwood Principal Location for Growth	A strategic policy establishing Borehamwood as the principal focus for housing-led growth, regeneration and infrastructure investment within Hertsmere. The policy supports residential-led mixed-use development, regeneration opportunities, intensification of previously developed land and investment in supporting infrastructure..	**No Likely Significant Effects** This policy includes proposed site allocations including location and quantum of development. The assessment of these allocations in Appendix B demonstrates that there are no linking impact pathways to Habitats Sites as the growth locations are outside the zones of influence of the relevant Habitats Sites..
Policy HBA2 Borehamwood Town Centre Regeneration	A strategic policy which supports the regeneration and renewal of Borehamwood Town Centre through residential-led mixed-use development, public realm improvements, active frontages, town centre uses, infrastructure improvements and enhanced walking, cycling and public transport connections.	**No Likely Significant Effects** This is a management policy which establishes design, regeneration and placemaking requirements for Borehamwood

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		Town Centre. It supports the coordinated regeneration of the town centre but does not in itself allocate land or identify development beyond that provided for through site allocations and other Local Plan policies. There are no linking impact pathways to Habitats Sites.
Policy HBA3 Elstree Way Employment Corridor	A strategic place-based policy which establishes the Elstree Way Employment Corridor as a mixed-use regeneration area linking Borehamwood Town Centre, employment areas, civic facilities and surrounding neighbourhoods. The policy supports residential-led mixed-use redevelopment, employment growth, creative industries, community infrastructure, public realm improvements and enhanced walking, cycling and public transport connections. It seeks to ensure that development contributes to the coordinated regeneration of the wider corridor.	. **No Likely Significant Effects** This policy includes proposed site allocations including location and quantum of development. The assessment of these allocations in Appendix B demonstrates that there are no linking impact pathways to Habitats Sites as the growth locations are outside the zones of influence of the relevant Habitats Sites.
Policy HBA4 Sustainable Movement and Connectivity in Borehamwood	A strategic place-based policy which seeks to improve sustainable movement and connectivity across Borehamwood. The policy promotes walking, cycling, wheeling and public transport, supports improvements to the station gateway, public realm and movement corridors, and requires development proposals to contribute towards sustainable travel infrastructure, transport mitigation and coordinated movement networks within the town.	. **No Likely Significant Effects** This is a management policy which seeks to improve sustainable movement, connectivity and accessibility within Borehamwood. The policy promotes active travel, public transport improvements and transport infrastructure required to support growth already provided for elsewhere in the Local Plan. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HBA5 Green Infrastructure and Landscape Setting	A strategic place-based policy which seeks to protect, enhance and extend Borehamwood's green and blue infrastructure network. The policy requires development to safeguard parks, open spaces, trees, habitats, watercourses and landscape features, improve ecological connectivity and access to open space, provide green infrastructure to support growth, and protect the landscape setting of Borehamwood through landscape-led design and mitigation measures.	**No Likely Significant Effects** This is a management policy concerned with the protection, enhancement and delivery of green and blue infrastructure associated with development. The policy seeks to protect biodiversity, open space, landscape character and ecological networks and to mitigate the environmental effects of growth already provided for elsewhere in the Local Plan. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		There are no linking impact pathways to Habitats Sites.
Policy HPBA1 Potters Bar Town Centres	A strategic policy which establishes Darkes Lane and the High Street as the primary focus for housing-led mixed-use regeneration, town centre renewal and public realm improvement within Potters Bar. The policy supports residential-led mixed-use development, town centre regeneration, employment renewal, public realm improvements, sustainable movement and infrastructure delivery within Potters Bar's town centres and opportunity areas..	**Likely Significant Effects** This policy includes proposed site allocations including location and quantum of development. The assessment of these allocations in Appendix B demonstrates that there is a linking impact pathway of recreational pressure to Wormley-Hoddesdonpark Woods SAC. The policy itself does not lead to development beyond that assessed through the associated site allocations.
Policy HPBA2 Movement and Connectivity in Potters Bar	A strategic policy which seeks to improve sustainable movement and connectivity across Potters Bar. The policy promotes walking, cycling, wheeling and public transport, supports improvements to the railway station, public realm, crossings, active travel infrastructure and sustainable transport connections, and requires development proposals to contribute towards transport mitigation and movement improvements. .	**No Likely Significant Effects** This is a management policy which seeks to improve sustainable movement, connectivity and accessibility within Potters Bar. The policy promotes active travel, public transport improvements and transport infrastructure required to support growth already provided for elsewhere in the Local Plan. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HPBA3 Character, green Infrastructure and Setting	A strategic place-based policy which seeks to protect and enhance the character, heritage, green infrastructure, blue infrastructure and landscape setting of Potters Bar. The policy requires development to safeguard and enhance biodiversity, open spaces, watercourses, landscape features, ecological connectivity, sustainable drainage and green infrastructure networks, whilst ensuring that growth responds positively to local character and environmental constraints.	. **No Likely Significant Effects** This is a management policy concerned with the protection, enhancement and delivery of green and blue infrastructure, biodiversity, landscape character and environmental quality within Potters Bar. The policy seeks to manage and mitigate the impacts of growth already provided for elsewhere in the Local Plan and does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HBUSA1 Bushey Local Centres	A strategic place-based policy which seeks to strengthen Bushey Village, Bushey Heath and other local centres and parades as attractive, accessible and distinctive places serving local communities. The policy supports the vitality and viability of local centres through appropriate mixed-use	**No Likely Significant Effects**

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	development, public realm improvements, heritage conservation, local services, small-scale workspace, community facilities and active frontages.	This policy includes proposed site allocations including location and quantum of development. The assessment of these allocations in Appendix B demonstrates that there are no linking impact pathways to Habitats Sites as Bushey is outside the identified zones of influence of the relevant Habitats Sites.
Policy HBUSA2 Movement and Connectivity in Bushey	A strategic policy which seeks to improve sustainable movement and connectivity throughout Bushey. The policy promotes walking, cycling, wheeling and public transport, supports improvements to connections between Bushey Village, Bushey Heath, North Bushey, Bushey railway station and neighbouring centres, and requires development proposals to contribute towards sustainable travel infrastructure, accessibility improvements and transport mitigation measures. .	**No Likely Significant Effects** This is a management policy which seeks to improve movement, accessibility and sustainable transport within Bushey. The policy promotes active travel, public transport improvements and transport infrastructure required to support growth already provided for elsewhere in the Local Plan. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HRA1 Radlett Centre	A strategic policy supporting the vitality and viability of Radlett Centre through sensitive mixed-use development, infill, refurbishment, town centre enhancement, public realm improvements, active frontages, workspace provision, local services and housing above or alongside centre uses. .	. **No Likely Significant Effects** This policy includes proposed site allocations including location and quantum of development. The assessment of these allocations in Appendix B demonstrates that there are no linking impact pathways to Habitats Sites as Radlett lies outside the identified zones of influence of the relevant Habitats Sites.
Policy DM1 Working with Stakeholders to Deliver the Local Plan	A strategic policy setting out the Council's approach to partnership working, monitoring, implementation and review of the Local Plan. The policy supports collaboration with stakeholders, monitoring of delivery and the use of planning powers to support successful implementation of the spatial strategy.	**No Likely Significant Effects** This is a management policy concerned with the implementation, monitoring and review of the Local Plan. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
DM2 Infrastructure funding and planning obligations	A strategic policy setting out the Council's approach to partnership working, monitoring, review and implementation of the Local Plan. The policy promotes collaborative working with stakeholders,	**No Likely Significant Effects**

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	monitoring of plan delivery and the use of planning powers to support implementation of the spatial strategy.	This is a management policy concerned with the implementation, monitoring and review of the Local Plan. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy DM3 Masterplans and Comprehensive Development	A strategic policy which requires site-wide masterplanning and comprehensive development for strategic allocations and other specified sites. The policy seeks to ensure coordinated delivery, effective land use, infrastructure planning, development phasing, stakeholder engagement and integration with the wider spatial strategy. It establishes requirements for masterplans, delivery strategies and comprehensive planning across larger or more complex development sites.	**No Likely Significant Effects** This is a management policy concerned with the planning, coordination and delivery of development proposals. The policy establishes requirements for masterplanning, site-wide coordination and delivery strategies but does not allocate land, identify development locations or increase the quantum of development beyond that already provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy DM4 Land Assembly	A non-strategic policy which supports land assembly and, where appropriate, the use of compulsory purchase powers and other statutory powers to facilitate the comprehensive development of land. The policy seeks to support the delivery of the spatial strategy, strategic allocations and wider regeneration objectives through coordinated land assembly and comprehensive planning.	**No Likely Significant Effect** This is a management policy concerned with the assembly of land and the implementation of development already provided for elsewhere in the Local Plan. The policy establishes mechanisms to facilitate comprehensive development and delivery of site allocations but does not allocate land, identify new development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy DM5 Meanwhile Uses	A non-strategic policy which supports the temporary or meanwhile use of vacant land and buildings where this would provide beneficial economic, community, cultural or other appropriate uses pending permanent redevelopment. The policy establishes criteria for temporary uses, seeks to ensure that they do not prejudice allocated development sites or town centre and employment functions, and promotes the productive use of vacant sites and premises.	**No Likely Significant Effects** This is a management policy concerned with the temporary use of vacant land and buildings pending their permanent redevelopment or occupation. The policy supports interim uses that do not prejudice the delivery of site allocations or the implementation of the Local Plan. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy DM6 Health Impact Assessments	A non-strategic policy which requires Health Impact Assessments (HIAs) to be submitted for major developments and other forms of development that are likely to have implications for public health and wellbeing. The policy seeks to ensure that health considerations are integrated into the design process and that opportunities to improve health outcomes and reduce health inequalities are identified and addressed through development proposals.	**No Likely Significant Effects** This is a management policy concerned with the assessment of potential health impacts arising from development proposals. The policy requires Health Impact Assessments to inform the design and assessment of development but does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy DM7 Monitoring and Review	A non-strategic policy which establishes the monitoring and review framework for the Hertsmere Local Plan. The policy requires annual monitoring through the Authority Monitoring Report (AMR), monitoring of Local Performance Indicators, review of development viability and consideration of policy updates where monitoring indicates that strategic objectives, delivery targets or the spatial strategy are not being achieved.	**No Likely Significant Effects** This is a management policy concerned with the monitoring, implementation and review of the Local Plan. The policy establishes procedures for assessing performance against plan objectives and responding to changing circumstances through future plan reviews. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.

Prepared For: Hertsmere Borough Council

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1. Non-Technical Summary

Hertsmere Borough Council is preparing a new Local Plan to guide development and investment across the borough. Once adopted, the Plan will help determine where new homes, jobs and infrastructure should be located and how Hertsmere's environment, heritage and local character should be protected. This statement explains how the Council consulted on its emerging Local Plan between 16 April and 29 May 2026, summarises the responses received and sets out how that feedback is being considered in the ongoing preparation of the Plan.

How the consultation was carried out

The consultation was an early opportunity for residents, businesses, community groups, landowners, developers, public bodies and other organisations to comment on the Council's proposed approach to growth, potential development sites and emerging planning policies.

The consultation documents could be viewed and responded to online through the Commonplace consultation platform, by email or in writing. Paper copies were also made available at key Council locations.

The Council held seven public information events in South Mimms, Borehamwood, Radlett, Elstree, Shenley, Potters Bar and Bushey. These gave people an opportunity to speak directly to Council officers and ask questions about the proposals. The consultation was also promoted through social media, local newspapers and emails to people and organisations registered on the Council's consultation database.

The consultation generated significant interest. The Council received 6,374 individual responses, which included 4,733 responses based on templates produced by community organisations.

Feedback received

Every response was recorded, reviewed and divided into individual points so that the issues raised could be properly considered. The most frequently discussed subjects were:

- housing, including the number, type, affordability and location of new homes;
- the potential release of Green Belt or "grey belt" land for development;
- the overall vision for Hertsmere and the proposed approach to distributing growth;
- pressure on roads, public transport, schools, healthcare and other infrastructure;
- the environmental effects of development, including flooding, climate change, biodiversity and the loss of agricultural land;
- the effect of development on the character and identity of towns and villages;
- the design, height and density of new development; and

- the proposed housing and employment sites, particularly those around Radlett and Bowmans Cross.

Many respondents were worried that development could increase traffic and pressure on existing services, result in the loss of green spaces or Green Belt land, increase flood risk, and affect local character, heritage and wildlife. There were frequent calls for infrastructure to be provided before or alongside new development.

Views were not uniform. Some respondents supported the need for more homes, including affordable and accessible housing, and recognised that some Green Belt development may be necessary. There was also support for high-quality and sustainable design, stronger environmental policies, improved walking, cycling and public transport connections, and the creation of new employment opportunities. Others felt that the proposed level or location of growth was unsuitable and should be reconsidered.

The consultation also produced mixed views about individual sites. Some locations were considered accessible and capable of supporting sustainable development, while others attracted objections because of Green Belt status, traffic impacts, limited public transport, environmental constraints or potential effect on nearby communities.

How the feedback is being used

The Council has reviewed the points raised alongside updated technical evidence and national planning requirements. Feedback has been used to:

- reconsider which potential development sites should be taken forward;
- refine the number, type and location of new homes and employment sites;
- strengthen policies covering design, climate change, biodiversity, heritage and infrastructure;
- examine transport, flooding, utilities and public-service capacity in more detail;
- improve the clarity of policies, maps and supporting evidence; and
- identify measures needed to reduce or manage the effects of development; and
- reduce the quantum of Green Belt release required.

Not every concern can be resolved through the Local Plan. The Government requires councils to plan for identified housing and economic needs, and Hertsmere has a limited supply of land that is suitable, available and realistically capable of being developed. This means the Council must make difficult choices, including considering some land that is currently within the Green Belt.

The Local Plan gives the Council an opportunity to coordinate growth, direct it towards the most appropriate locations and ensure that development contributes to infrastructure, affordable housing and environmental improvements. Without an up-to-date Plan, the Council would have less control over where development happens and how it is designed.

What happens next

The Council has used the Regulation 18 consultation feedback and updated evidence to prepare the Regulation 19 Publication Local Plan. This is the version of the Plan that the Council intends to submit for independent examination. It will be published under Regulation 19 so that representations can be made on its legal compliance and soundness.

Following the Regulation 19 Publication period, the Council intends to submit the Local Plan, the representations received and the supporting documents to the Secretary of State under Regulation 22. An independent Planning Inspector will then examine whether the Plan meets the relevant legal and procedural requirements and whether it is sound. Subject to the examination and any necessary main modifications, the Council may then adopt the Local Plan.

2. Introduction

2.1 Purpose of the Statement

2.1.1 This Consultation Statement summarises the Regulation 18 consultation undertaken by Hertsmere Borough Council (hereafter referred to as HBC or 'the Council') between 16 April and 29 May 2026 on the emerging Local Plan, and the representations received from stakeholders in response to the consultation.

2.1.2 The Statement sets out:

- the bodies and persons invited to make representations,
- how those bodies and persons were consulted,
- a summary of the main points raised by respondents, and
- how representations have been considered in progressing the Local Plan.

2.1.3 This Statement reflects the regulatory requirements for consultation reporting and aligns with the Council's Statement of Community Involvement (SCI).

2.2 Structure of the Statement

2.2.1 This Consultation Statement includes seven sections. Section 1 provides a Non-Technical Summary. Section 2 introduces the Statement and sets out its purpose. Section 3 explains the background to the Local Plan. Section 4 explains the Regulation 18 consultation undertaken in 2026. Section 5 summarises the main issues raised by theme and the Council's response. Section 6 summarises responses by consultee group. Section 7 sets out the conclusions and next steps.

2.2.2 Appendix A includes press releases, social media posts, advertisements and other promotion of the Local Plan consultation. Appendix B includes consultation material from the in-person events. Appendix C provides a summary of key information published as part of the consultation. Appendix D provides summaries of the key points made in representations and the Council's response to each point.

3. Background to the Local Plan

3.1 National Plan-Making Context

3.1.1 HBC is preparing a new Local Plan to guide how growth, development and investment will be managed across the borough, under The Town and Country Planning (Local Planning) (England) Regulations 2012[1] and the National Planning Policy Framework 2024. Once adopted, the Local Plan will provide the statutory planning framework for determining planning applications and will identify how future development needs for homes, employment, infrastructure, services, open space and environmental protection will be addressed.

3.1.2 The current Hertsmere Local Plan 2012–2027 comprises the Core Strategy, adopted in January 2013; the Elstree Way Corridor Area Action Plan, adopted in July 2015; the Site Allocations and Development Management Policies Plan, adopted in November 2016; and the Policies Map. The Local Plan is now out of date in a number of respects. National planning policy and housing requirements have changed, requiring the Council to prepare a new Local Plan and consider additional sources of housing supply and a range of potential development sites.

3.1.3 A new local plan-making system came into force in March 2026. However, transitional arrangements allow legacy Local Plans such as the Hertsmere Local Plan to continue under the 2012 Regulations, provided they are submitted under Regulation 22 by 31 December 2026.

3.1.4 Although the Hertsmere Local Plan is being prepared and will be examined under the legacy plan-making system and the applicable transitional arrangements, a new National Planning Policy Framework was published on 17 August 2026. The new Framework includes national decision-making policies which took effect on publication and are material considerations in planning decisions. The Council has therefore reviewed the emerging Regulation 19 Local Plan against the new Framework, including to avoid unnecessary duplication or material inconsistency with national decision-making policies. Annex A of the 2026 NPPF provides that existing development plan policies which are materially inconsistent with the national decision-making policies should be given very limited weight.

3.2 Previous Consultation Stages

3.2.1 The Council undertook earlier Regulation 18 consultation and engagement on the emerging Local Plan in 2020/21 and 2024. Those earlier stages were prepared under different national planning policy contexts. Feedback received through those exercises has informed subsequent plan preparation, alongside updated evidence and changes to national policy and housing requirements.

3.2.2 Feedback received during the 2024 consultation has been used to inform the development of the 2026 Regulation 18 consultation material, including

[1] Where “Regulation(s)” are referred to in this report by numbers (e.g. Regulation 18, 19 or 22), these references relate to numbered provisions within The Town and Country Planning (Local Planning) (England) Regulations 2012, available here: **The Town and Country Planning (Local Planning) (England) Regulations 2012**

the approach to growth, the assessment of reasonable alternatives and the identification of candidate sites.

4. 2026 Regulation 18 Consultation

4.1 Overview

4.1.1 The Hertsmere Regulation 18 consultation provides an opportunity for residents, businesses, landowners, prescribed consultation bodies and other stakeholders to comment on the emerging Hertsmere Local Pan, its draft policy direction and potential growth locations before it is refined for the next stage.

4.1.2 The Regulation 18 Local Plan, as well as its evidence base and other important documents, can be found on the Council's Local Plan webpage. Appendix C of this consultation statement contains a non-technical summary of the Local Plan.

4.1.3 The Regulation 18 consultation opened on 16 April 2026 and closed on 29 May 2026. The Regulation 18 draft and associated consultation represented an early formal stage in the preparation of the new Local Plan, exploring how the borough will grow over time. The consultation sought views on the Council's early ideas for the new Local Plan, including the proposed approach to sustainable growth, potential site options and draft policy themes.

The consultation was undertaken at an early stage of Plan preparation so that feedback can be used to inform the next iteration of the Local Plan, the Regulation 19 Version. Following the close of the consultation, representations were registered and considered by the Council in its preparation of the Regulation 19 version of the Plan, which is due to be published later in 2026.

4.2 Consultation Methods

4.2.1 The consultation was promoted through a dedicated online consultation platform, Commonplace. This enabled respondents to review the consultation material and submit comments electronically. Alternatively, respondents were able to submit representations via email or as paper letters.

4.2.2 The Local Plan and supporting evidence base are available online through the Council's website, as well as being made available in paper format at the following deposit points across the borough:

- Borehamwood Civic Offices- Elstree Way, Borehamwood, WD6 1WA
- Borehamwood Library - 96 Shenley Road, Borehamwood, WD6 1EB
- Elstree and Borehamwood Town Council - Brook Close, Borehamwood, WD6 5BT
- Potters Bar Oakmere Library - High Street, Potters Bar, EN6 5BZ
- Potters Bar Wyllyotts Theatre and Cinema – Wyllyotts Place, Potters Bar En6 2HZ
- South Mimms Parish Council - Blanche Lane, South Mimms, EN6 3PD
- Aldenham Parish Council / Radlett Library - 1st Floor, The Radlett Centre, 1 Aldenham Avenue, Radlett, Hertfordshire WD7 8HL
- Bushey Library - Sparrows Herne, Bushey, WD23 1FA
- Shenley Parish Council - 'The Hub', London Road, Shenley, Hertfordshire, WD7 9BS

4.2.3 To support participation across the borough, the Council ran seven public information events in the following locations:

- South Mimms (Monday 27 April at South Mimms Village Hall),
- Borehamwood (on Wednesday 29 April at Borehamwood Civic Centre),
- Radlett (Thursday 30 April at the Radlett Centre),
- Elstree (Wednesday 6 May at The Manor Elstree),
- Shenley (Monday 11 May at Shenley Chapel),
- Potters Bar (Monday 18 May: Wyllyotts Theatre), and
- Bushey (Tuesday 19 May at St James's Church House).

4.2.4 These sessions provided opportunities for residents and stakeholders to discuss the emerging Local Plan with Council officers and ask questions about the consultation materials.

4.2.5 Additionally, the Council publicised the consultation via social media and the local press (Borehamwood & Elstree Times, The Herts Advertiser, Watford Observer and Welwyn Hatfield Times). The Council also emailed updates and notifications to consultees registered on its consultation database. The consultation webpage was available at: Have Your Say Today - Hertsmere Local Plan - Commonplace.

4.2.6 Event, media and social-media monitoring undertaken during the consultation identified significant levels of community interest and online discussion. A public meeting at the Radlett Centre attracted around 200 attendees—approximately two-thirds of the venue's capacity. Monitoring also identified a series of independently organised community response events across the borough, including three events in Shenley and Potters Bar during a single week. Note that these latter figures relate to third-party social-media content and independently organised events identified through Council monitoring rather than Council-led events. They should not be treated as measures of the Council's own consultation reach or as unique participant numbers.

4.3 Consultation Processing

4.3.1 All representations received during the consultation were either collated into a consistent format on Commonplace for processing, or downloaded as emails, or scanned in the case of paper letters. All representations received, regardless of what format they were received in, were assembled in a single coding tool and given a unique identifying number, to ensure no representation was missed.

4.3.2 Representations made were then categorised by consultee groups, and points made were tagged with themes and summarised. Where points made represented similar views, these points were tagged to the same summary. The Council then considered and responded to points made in line with these themes and summaries. This process enabled the Council to respond to a large number of representations. The Regulation 18 consultation received a total of 6,374 unique responses from residents and other stakeholders engaging in the Plan for the Borough's future development. 4,049 of these were email template responses and 684 were letter template responses, which were received from residents and based on templates provided by community organisations.

4.3.3 To ensure an effective and fair consultation process, and to allow the Council to process and respond to representations, it is important that stakeholders who made representations can be identified. The importance of identifying those making representations will continue at Regulation 19 stage and beyond, to enable the Local Plan Inspector and other relevant parties to develop a full picture of respondents and key themes. This information will feed into examination materials including matters statements.

4.3.4 The Council therefore has been unable to accept any representations which do not include at least a name and contact details. However, address details of respondents will not be made publicly available. All personal data will be handled in line with the Council's Privacy Policy. You can view the

Council's privacy notices as well as those of its partners helping with the consultation process online.

4.3.5 At Regulation 19 Publication stage, representations will be processed and made available in accordance with the 2012 Regulations and the Council's privacy notice. To ensure an open and fair examination, the names of people and organisations making representations must be available to the Inspector and other examination participants. Postal addresses, email addresses, telephone numbers and other contact details will not normally be published. However, the Programme Officer, and where necessary the Planning Inspectorate, will require access to appropriate contact details in order to administer the examination. Personal data will be processed and shared only where there is an appropriate lawful basis and in accordance with the Council's privacy notice and the Planning Inspectorate's privacy arrangements.

4.3.6 By submitting a representation, consultees therefore confirm that they agree to this and accept responsibility for their comments. The Planning Inspectorate's privacy statement for local plan examinations is available at: www.gov.uk/government/publications/planning-inspectorate-privacy-notices/customer-privacy-notice.

4.3.7 Abusive or otherwise inappropriate language has been redacted from published material. Where a representation contained a substantive planning point capable of being understood separately from the inappropriate content, that point was still considered. Content which could not reasonably be processed because it consisted solely of abusive or inappropriate material was not treated as a substantive planning representation.

4.3.8 Names, contact details, and the content of responses themselves have been used to categorise each response into a **respondent category** (see section 5.1 below for more detail), for the purposes of analysis, in line with the Council's Statement of Community Involvement. These categories include residents; businesses; developers, agents and landowners; local interest groups; central and local government departments; prescribed consultation bodies; local community and amenity groups; local service groups; parish and town councils; members of the Local Strategic Partnership; National and County Bodies / Organisations; and neighbouring and other relevant plan-making authorities.

4.3.9 Each response processed has been broken down into individual points, so that each matter raised in a representation can be assigned to a relevant theme, sub-theme, sentiment and, where applicable, location.

4.3.10 **Themes** align with the structure of the consultation document and include consideration of

- the Local Plan in general terms;
- the Local Plan process and planning process;
- the Plan's vision, objectives and spatial strategy;
- Development management policies on design, heritage, housing (including where this may be located in the green belt), economy, culture, infrastructure including transport, and the environment;

- The borough's specific places and proposed growth sites for housing and employment; and
- Arrangements for delivery and monitoring.

4.3.11 Where appropriate, themes are further split into sub-themes (for instance, representations on the matter of housing may relate to affordable housing need or to the matter of housing land supply etc).

4.3.12 For each theme, as appropriate, points made can be classified by **sentiment**, as positive, as neutral or non-sentiment-based observations, as expressing concern, or as expressing opposition to what the Plan is proposing.

4.3.13 Summaries of and responses to representations are then provided, for points made which can be grouped together.

4.3.14 3,904 template responses were received as part of this consultation. Although often submitted by individuals, the responses were based on a template provided by another individual or organisation, and thus largely similar or identical. Where responses were identified as relating to the same template, they were grouped together. Where points made were altered from the template to such an extent that they could not be grouped and processed together, the responses were treated as "non-templates".

5. Summary by Key Themes, Sentiment and Development Locations

5.1 Overview of Responses Received

5.1.1 Figure 1 below displays the distribution of feedback across the overarching themes that emerged in representations responding to all consultation questions. Some representation summaries provided included points relevant to multiple themes, and so may be counted across several categories. The total number of themed representation summaries is therefore greater than the number of questions responded to in the consultation.

5.1.2 Figure 1 shows that the themes most frequently raised in stakeholder feedback were:

- Housing,
- Green Belt/grey belt and
- Vision, Objectives and Spatial Strategy.

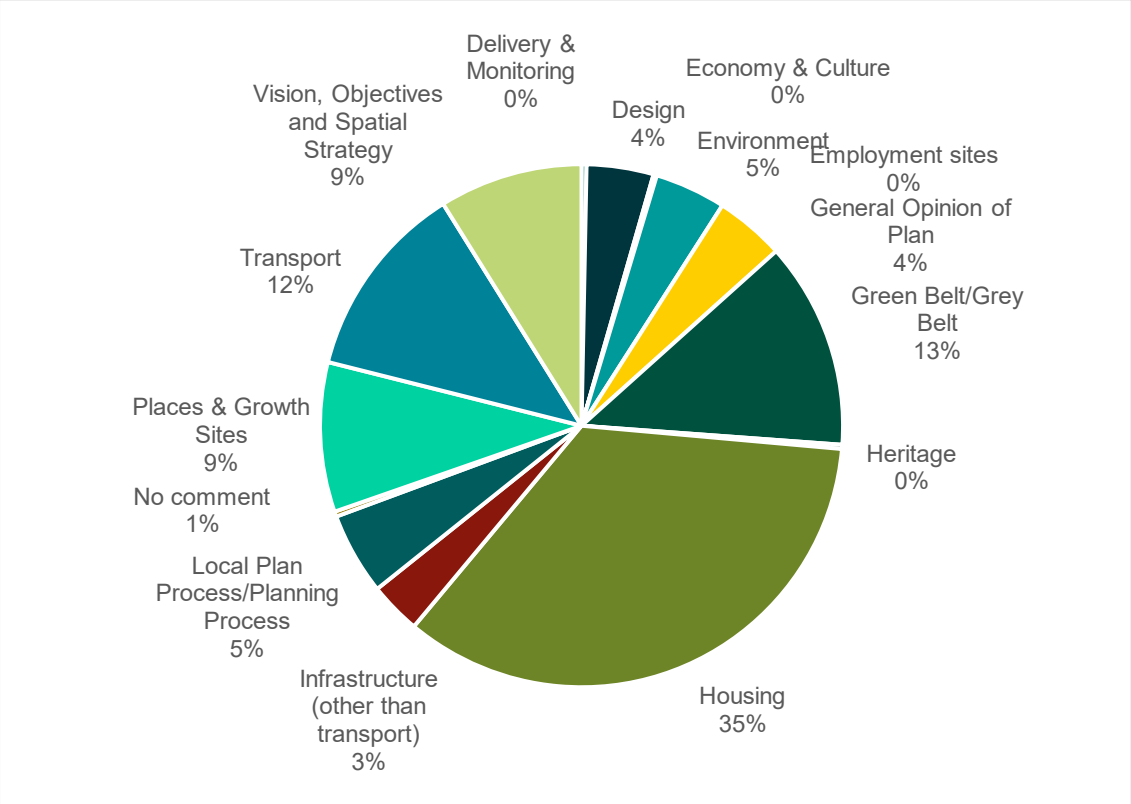

Figure 1: Distribution of feedback across overarching themes

5.1.3 Figure 2 displays the spread of sentiment expressed in representations, with some respondents expressing a range of sentiment within different

aspects of their response. The figure shows that the dominant sentiment evident across stakeholder representations is concern.

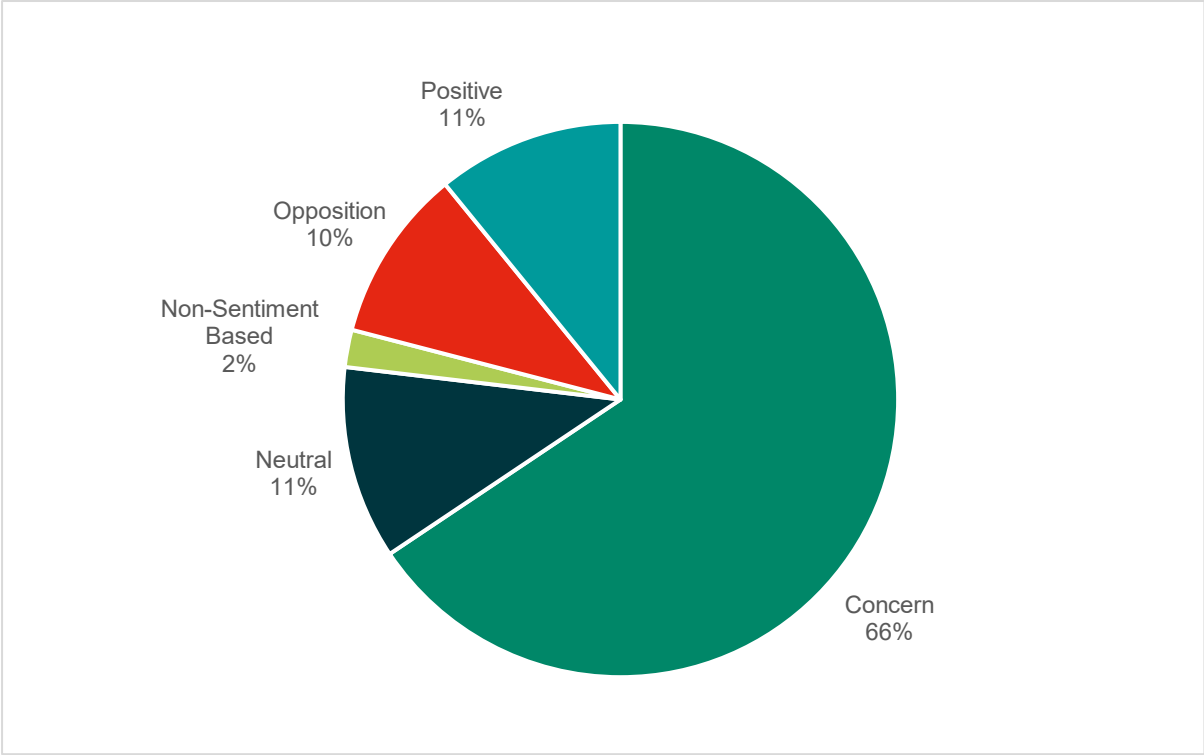

Figure 2: Spread of sentiment across representations

5.1.4 Figure 3 shows the most frequently referenced development locations across the feedback received. The following five site/s were commented on the most frequently in representations:

- HRA SA6 – Home Farm, Radlett;
- HRA SA4 – Land South of Watford Road and West of New Road, Radlett;
- Bowmans Cross;
- HRA SA3 – Land North of Watford Road and East of Kemprow, Radlett; and
- HRA SA7 – Starveacres and land to the west of Starveacres, Radlett.

The ‘General’ comments refer to representations which do not explicitly mention a specific site but do make reference to a location in general terms.

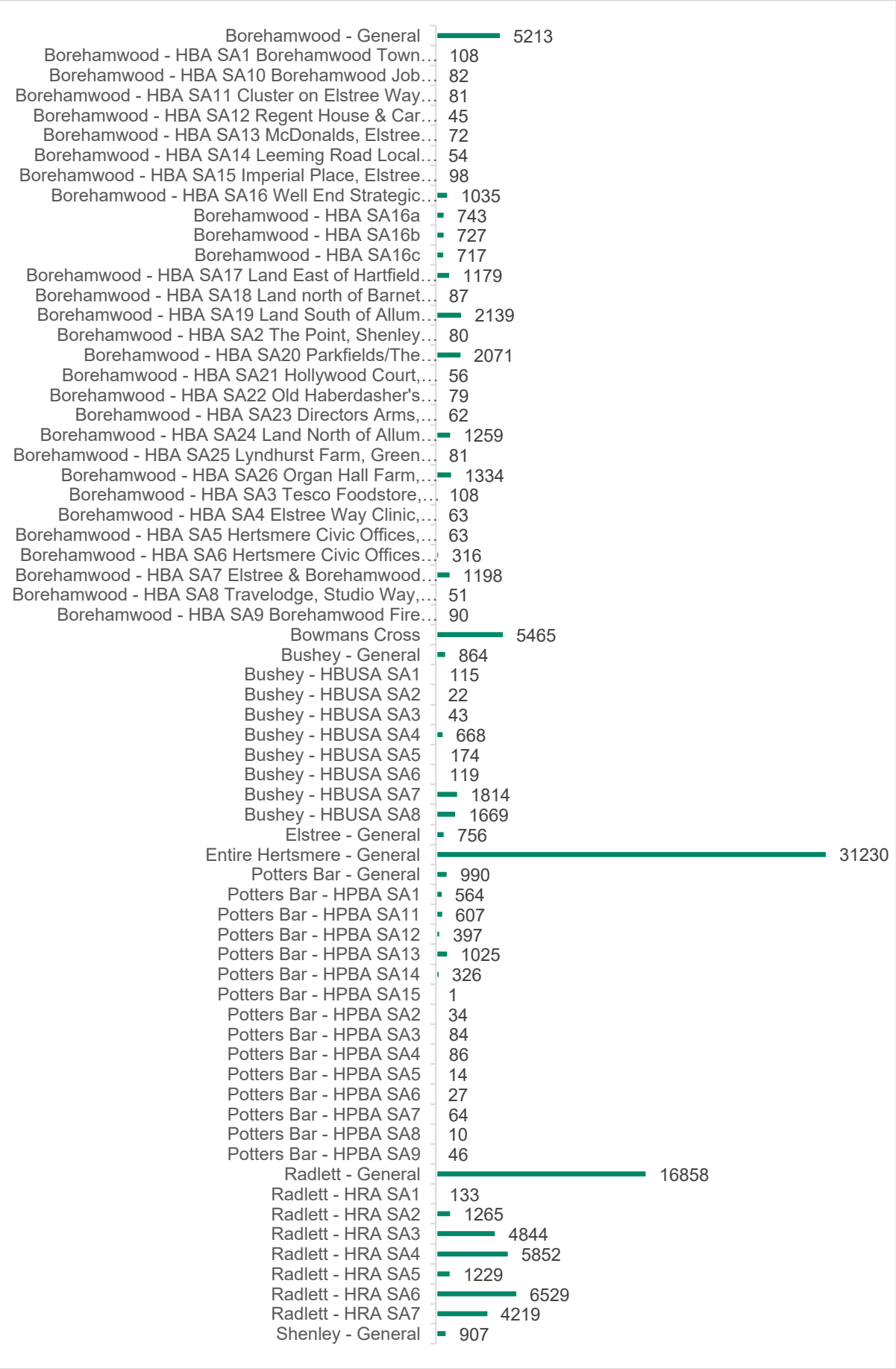

Figure 3: References to development locations

5.2 Key Strategic Themes

5.2.1 The key themes that have emerged from feedback have been summarised in Table 1, with each matter raised in representations considered against overarching themes and assigned to sub-themes where appropriate. HBC has provided broad responses to these key, themed aspects raised, where suitable to comment. Please note that more detailed summaries are provided for each point raised in a representation, together with a Council response, in **Appendix D**.

Table 1: Key themes raised in representations and responses from HBC

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
Overarching theme: Delivery and Monitoring		
Delivery	Representations support stronger housing delivery mechanisms and note the need for timely completion of key infrastructure to support housing delivery. Some oppose penalising applicants for delayed implementation due to other factors such as policy and regulation. There is also interest expressed in how developer contributions will be calculated, with support for use of planning obligations to secure scheme specific developer contributions.	The Regulation 19 Local Plan is supported by a housing trajectory setting out anticipated delivery over the plan period. Policy H1 establishes the housing requirement and requires delivery to be kept under review, while Policy DM7 provides the framework for annual monitoring of housing delivery and Local Plan performance.”.
Monitoring	Representations made recommendations for the Plan’s monitoring policy to include certain indicators, including on housing and the environment.	The Council recognises the importance of robust monitoring to track delivery of all key policies and the Plan’s monitoring framework will include indicators covering key housing and environmental matters.
Overarching theme: Design		
Accessible / inclusive design	Support has been voiced for M4 (2) and M4 (3) accessible and adaptable design requirements in the Local Plan.	HBC supports design that is welcoming and inclusive for all Hertsmere residents, removing disproportionate barriers in relation to housing design and travel. It is HBC's intention to carry these proposed requirements forward into the draft Local Plan, subject to evolving viability considerations.
Building heights	Several respondents raise concerns over the height of proposed developments and	The Regulation 18 feedback illustrated a clear preference for height/density as an alternative to Green Belt release, Local Plan policies and maps on building height will identify appropriate locations for tall buildings,

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	the impact this may have on local character, heritage assets, and groundwater assets. Some feedback suggests identifying broad areas where tall building would be acceptable, rather than setting rigid height parameters for sites. Representations also pointed out that developments exceeding 45.7m will require statutory MOD consultation.	as well as associated definitions and design parameters. This will optimise capacity of suitable, available, and deliverable locations for growth, taking account need for regeneration, capacity of infrastructure, and impact on local character. Inclusion of maximum heights is deemed necessary to safeguard local character and appearance. HBC's aim is to optimise site capacity, particularly of sites located on previously development land and within built up areas, meeting as much development need as possible within settlements and in well serviced locations. Sites located within existing safeguarding areas will be required to consult relevant bodies for development proposals.
Co-location/ mixed-use	Respondents are concerned with the approach towards change of use applications and the promotion of a flexible approach to permissions for change of use.	The Plan will set out clear policies on change of use and mixed-use development, balancing the need for flexibility with protection of existing uses and amenity, in line with the NPPF. Any flexible approach will be based on evidence of need and local circumstances.
Density, capacity and character	Some respondents are concerned that the proposed density of development and infilling could impact upon local character and access to open space. Others supported optimisation of site capacity and meeting housing needs.	Proposals will be required to respect the prevailing character of the local area while effectively and efficiently using limited land supply resources. HBC's aim is to optimise site capacity, particularly on previously developed land and within built up areas, as well as on sites with access to public transport and other infrastructure, aiming to meet as much development need as possible within settlements and in well serviced locations. This is more sustainable, reducing the need to travel and supports the ongoing viability and vitality of settlements and their services. It also minimises the need to release greenfield land for housing. Regarding open space, in line with the NPPF, development is required not to result in the loss of existing open space used for sports, recreation, play, or allotments, unless an assessment clearly shows they are surplus to requirement or the loss can be compensated through new provision. Extensions or alterations to existing dwellings will be expected to make a neutral or positive contribution to the surrounding area.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
Design quality	High-quality design that contributes to local character is favoured for new developments. Other priorities expressed for the design of developments include integration of Secured by Design principles, Active Design principles, and Neighbourhood Plan design codes.	HBC seeks to secure high-quality design for new residential developments in the Borough. It will ensure that all new housing is designed to a high-quality standard, responding to the needs of Hertsmere's resident population. Policies HQD1, HQD2 and HQD3 require development to create safe, inclusive and welcoming places through measures including natural surveillance, appropriate lighting, active frontages and clear relationships between public, communal and private space. Design priorities suggested as part of representations will be considered in the Plan.
Public realm	Concerns are raised around the impact of development on the public realm, highlighting the need for high quality, well connected public spaces.	Local Plan policy requires that development proposals seek to improve the effective functioning and safe use of transport networks and the public realm, including connecting walking and cycling transport infrastructure.
Overarching theme: Economy and Culture		
Delivery	Concerns were raised that the delivery trajectory of proposed employment sites lacks clarity.	The Council has prepared a development trajectory for housing and employment sites. This is based on evidence of market demand, site availability, and infrastructure capacity. The trajectory will be kept under review through annual monitoring, and where necessary, the Council will work with landowners and developers to address any barriers to delivery and respond with flexibility to changing economic circumstances.
Employment land demand/ supply	An array of recommendations were made on this subject, including promoting the provision of more industrial space and of spaces suitable for smaller businesses, expressing support for local film and creative sectors, encouraging more employment land at Bowmans Cross, and requesting greater clarity on requirements for film studio and data centre space.	The Council's policies on employment land are informed by an Economic Study that assesses future employment land needs across different use classes. Conversely, future land supply for economic purposes is considered in the evidence of the Housing and Economic Land Availability Assessment. The Plan will allocate suitable, available and achievable land for employment uses in appropriate locations with good access to the strategic road network, subject to site availability and constraints, including in relation to the environment and infrastructure. The Economic Study considers vacancy rates alongside growth projections and structural changes in the economy. The Plan will provide flexibility to respond to changing demand while protecting viable employment sites. In some cases, vacancies reflect instances where current stock is in need of updating or no longer suitable for modern purposes.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	Some representations also noted there is existing vacant office space, asserting that further office stock is not required.	
Employment land hierarchy / Rural Employment	Feedback notes that Rural Employment Areas are not clear in the plan and queries if there is sufficient support for the rural economy in the Plan, particularly rural diversification.	The Council is committed to supporting a prosperous rural economy in line with NPPF. The Council will seek to provide greater clarity and level of detail in the Regulation 19 Plan on employment matters.
Freight	Concern was raised that the capacity of freight and transport infrastructure may not sufficiently accommodate proposed employment growth.	The Council assesses transport impacts and requirements of proposed employment sites through the Transport Study. Site allocation policies will include requirements for transport assessments and travel plans, and where necessary, require developer contributions towards transport improvements. The Council will work with the Highway Authority and other relevant infrastructure stakeholders to ensure the transport network can appropriately accommodate development.
Sector priorities	Recommendations are made to give greater consideration to higher education, laboratories and scientific facilities as drivers for skills and economic growth, as well as investment in the knowledge-based economy. One response asks for more equestrian space to feature. Concerns are voiced on the impacts of AI on the film industry and the environmental impacts of data centres, also offering limited job creation.	The Council's policies on employment land are informed by an Economic Study that assesses future employment land needs across different uses and use classes, taking into account local specifics and up to date changes and developments where possible.
Town centres	Recommendations propose that there is a need for town centres to be considered not just for housing but continued use of retail,	The Council's approach to town centre development and parking will balance the need to optimise land use for regeneration with maintaining adequate parking to support town centre vitality and commuter

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	employment, parking, and public services, with a need for diverse, quality shops in the borough. Concerns are raised that reduced parking provision in town centres would impact town centre traders.	access, alongside public transport and active travel options. Any reduction in public parking as a result of development proposals will be subject to parking impact assessments and consultation with stakeholders.
Overarching theme: Employment Sites		
General opinion	Mixed opinions are expressed on individual proposed employment sites. Representations emphasised that allocation sites should align with the spatial strategy and NPPF policy.	The Draft Local Plan economic strategy, policies and employment allocations are informed by evidence including the Housing and Economic Development Needs Assessment (HEDNA) and evidence on employment land supply, market demand, and economic trends, in line with national policy and the Local Plan's proposed spatial strategy.
Overarching theme: Environment		
Best and most versatile agricultural land (BMV)	Feeback raises concerns about loss of BMV land and supports developments that avoid BMV.	The Council recognises the importance of protecting BMV for food production. The Plan follows the approach set out in the NPPF, which requires significant development of agricultural land to use areas of poorer quality in preference to higher quality land. This is taken account of in site assessment evidence supporting the Plan. Where development of BMV land is necessary to meet identified needs for housing and employment, this will be justified through evidence, and the Plan will seek to minimise such loss where possible.
Climate change	Concerns are widespread that proposed growth could worsen climate change impacts. Support is noted for several climate change policies, including renewable energy generation, heat network connection, water efficiency targets, significant tree planting and application of circular economy principles, although some representations acknowledge that it can be	The Council is committed to addressing climate change through the Local Plan. As policies are developed, the Council will consider requirements for development to incorporate measures to reduce carbon emissions, manage flood risk through sustainable drainage systems, provide green infrastructure to manage urban cooling, and protect/enhance green spaces, subject to consideration of viability and other relevant constraints. The Plan's climate change policies are designed to ensure development contributes to climate change mitigation and adaptation in accordance with the NPPF.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	difficult to support growth whilst applying climate mitigations. Embodied carbon assessments are costly, so a suggestion is made to only require these on a representative sample of buildings. Representations suggest that the Plan's sustainable design policies could give greater weight to nature-based solutions and could require applicants to explain how environmental and climate interventions have informed the scheme design from the outset.	The Council will ensure, including through its whole plan viability assessment, that policy requirements are proportionate, do not impose unreasonable costs, and are appropriate to the scale and nature of development.
Designated sites	Requests are made for greater evidence of consideration of designated sites and impacts on protected habitats specific to Hertsmere.	The Council will ensure that the Plan includes comprehensive references to designated sites and protected habitats specific to Hertsmere, including Local Wildlife Sites, Local Nature Reserves, and habitats of principal importance. Policies will provide appropriate protection for these sites and require relevant assessments where development may affect them, in accordance with national policy and legislation.
Ecology	Recommendations are made for updates to Policy GI4, including strengthened requirements for Biodiversity Net Gain and enhancement of nature recovery. Development should demonstrate alignment with the Hertfordshire Local Nature Recovery Strategy. Representations state that Ecological Assessments are needed where important habitats or notable species are likely impacted. Long-term monitoring and management are also raised as important considerations.	The Council recognises the value of biodiversity and habitats. The Council will take on board the comments made, particularly by the Environment Agency as a prescribed consultation body, alongside other feedback and considerations, when drafting the Plan's policy relating to ecology and biodiversity, alongside national policy and legislation and relevant evidence, including an Infrastructure Delivery Plan, Green Belt Study, Sustainability Appraisal, Habitats Regulations Assessment, and Strategic Flood Risk Assessment.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	Responses raise concerns about housing development causing loss of habitat and trees, particularly where there are environmental sensitivities.	
Flooding and flood risk	Flood risk is a frequent topic raised, with concerns about loss of flood plains for development increasing flood risk. Responses emphasise the need for protection of Source Protection Zones and groundwater and for maintaining the Regulation 18 Local Plan approach to flood zone classification. A response also suggests Sustainable Urban Drainage requirements. Representations also assert that requirements for Strategic Flood Risk Assessments should be correctly carried out, considering updated climate change allowances. Feedback on Policy GI2 advises specific expectations on buffer zone designation and management, with support noted for buffers 2,3 and 4 of GI2. Detailed feedback is provided on the Water Framework Directive and requirements for assessing developments that affect waterbodies. A standalone water quality policy is recommended, as well as a strategic approach on how development prioritises	The Council will take on board the comments made by the Environment Agency as a statutory consultee, alongside other feedback and considerations, when drafting this policy alongside national policy and legislation and relevant evidence, including evidence from the Hertsmere Strategic Flood Risk Assessment commissioned by the Council.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	different environmental outcomes for watercourses.	
Health impacts	Several recommendations are made for specific health related strategies to be considered in the Plan's Health and Wellbeing chapter. The Council is asked to set out Health Impact Assessment requirements, focusing on developments with significant potential impacts, Air Quality Focus Areas, and health-sensitive uses. Health requirements of a development should also consider the Joint Strategic Needs Assessment and support delivery of health strategies. Specific policy recommendations are made, which include early engagement with the NHS and health partners ahead of the Regulation 19 stage, use of design and assessment tools to demonstrate how developments support healthy places and lives, active travel components to support physical health, safe and inclusive public spaces, sustainable developments that support air quality and health impacts from climate change, access to a healthy food environment, access to the natural environment, and suitable healthcare infrastructure.	The Council is committed to promoting healthy communities through the Local Plan. Policies will require development to support healthy lifestyles through provision of green spaces, active travel infrastructure, access to healthcare and community facilities, and healthy design principles. The Plan's approach is informed by health impact considerations and engagement with public health partners, including the NHS, and will take into account representations made. The Infrastructure Delivery Strategy also provides specific evidence on health infrastructure, underpinning policy development, which is based on consideration of the strategies, plans and evidence produced by relevant partners, including the NHS and County Council, and engagement with these bodies.
Pollution	Pollution related concerns highlight the risk of light pollution, air quality, and historic landfill on certain allocation sites.	The Council welcomes support expressed in representations. The Plan will include policies requiring development to minimise pollution through appropriate design and other measures. The Plan is supported by an Air Quality Assessment and associated monitoring data, which identifies constraints and mitigation

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	Submission of Preliminary Risk Assessments with planning applications is supported.	requirements in relation to pollution. On sites with historic uses that imply contamination, appropriate mitigation, such as land remediation, will be required.
Waste management	Proposed growth must consider capacity to accommodate waste management.	The Council considers waste management capacity through the Infrastructure Delivery Plan and will work with waste management providers to ensure capacity can accommodate growth.
Overarching theme: General opinion of plan		
Concern	Some general objections are voiced about the Local Plan, Spatial Strategy, policies, and proposed allocations.	Objections to the Local Plan are noted but HBC is bound by national policy and legislation, as well as by the results of technical evidence, which directs what the Council is able to propose. The plan-making process has included evidence gathering, strategic options assessment, Sustainability Appraisal, Habitats Regulations Assessment, and Regulation 18 consultation on the Draft Local Plan, and will progress through consideration of representations, preparation of the Regulation 19 Publication version and taking into account of representations on soundness matters, submission to the Planning Inspectorate, examination in public, and adoption. The Council will carefully consider all feedback raising concerns about the plan-making process, including concerns about allocations, methodology, evidence base, consultation approach, assessment of alternatives, legal compliance, procedural matters, or alignment with national policy on cooperation across boundaries and with strategic stakeholders, and will reflect on to the content of the emerging local plan to ensure full compliance with legal and procedural requirements and best practice. The Council remains committed to transparency, rigour, and responsiveness throughout the plan-making process, ensuring that all representations are given due consideration, that the evidence base is comprehensive and robust, and that the Local Plan is prepared in accordance with statutory requirements and capable of being found sound and legally compliant at examination. .
General comment	General comments note that development should be compliant with Neighbourhood Plan provisions.	The Council supports Neighbourhood Plans as an important part of the development plan. Compliance with Neighbourhood Plans, where they form part of the statutory development plan for a place, are already secured through national policy and legislation.
Support	Some general support is given to the Local Plan, Spatial Strategy, policies, and proposed allocations.	The Council welcomes support for the Plan. The Council is committed to preparing a sound, legally compliant, and community-supported Local Plan that meets the development needs of Hertsmere whilst protecting and enhancing the environment, heritage, and quality of life for current and future generations.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
Overarching theme: Green Belt/ grey belt		
Green Belt/ grey belt	The Green Belt and grey belt are notable topics raised frequently in feedback. Some responses acknowledge the need to redesignate and build on some Green Belt land if this helps to meet housing needs, including for affordable homes. Other representations are concerned the proposed approach could risk undermining the spatial strategy and enable cumulative development in the Green Belt. Some representations voice concerns around the approach and conclusions of the Green Belt Assessment. The methodologies employed by neighbouring authorities' assessments are also recommended for consideration to avoid inconsistencies. Some preference is expressed for a brownfield-first approach. There is further concern that the sites close to built-up areas have not been assessed against Green Belt purposes. Some caution is noted around designating grey belt and potential grey belt where it may undermine the NPPF. There are recommendations that the definition and identification of grey belt land must be clearer.	The Council's spatial strategy minimises Green Belt loss through prioritising brownfield land, optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated, in line with national policy, legislation and guidance. Given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is likely necessary. The Local Plan is supported through a Green Belt Assessment. The Plan and evidence follow the approach set out in NPPF and PPG on protecting Green Belt land and will take in account representations when drafting policy and finalising evidence for Regulation 19 stage.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
Overarching theme: Heritage		
Conservation Areas	Feedback notes concerns around potential impact of development on conservation areas and their settings.	The Council recognises conservation areas as important heritage assets and requires development to preserve or enhance their significance, character, and setting, in line with national policy. Policy HE1 (Hertsmere's Historic Environment), HE2 (Designated Heritage Assets) and HE3 (Non-Designated Heritage Assets) state that proposals must respect local scale, design, materials, views, and townscape quality, be supported by Heritage Impact Assessments (HIA) where necessary, and avoid harm unless clearly justified and outweighed by public benefits. Development affecting conservation areas will be carefully assessed in consultation with heritage stakeholders and specialists to ensure high-quality, heritage-sensitive design.
Heritage Impact Assessments	Recommendations are made to complete Heritage Impact Assessment (HIA) for proposed allocations at Regulation 19. This would inform site assessment, selection and capacity testing to justify allocations, and assess the potential effects on heritage assets and inform appropriate design and layout mitigations. Any necessary mitigation and enhancement measures identified should be secured through the site-specific policy wording.	The Council will screen for potential heritage impacts on site allocations, carrying out HIA on all sites where potential impacts are identified. HIA will inform allocation policies on mitigation requirements.
Listed buildings	There is some concern raised about the impact of the Plan on listed buildings and their setting.	The draft Local Plan policies seek to protect listed buildings and their settings by ensuring development conserves and enhances Hertsmere's historic environment. Proposals affecting heritage assets must be supported by a proportionate Heritage Statement and assessed against relevant legislation and policy. Development causing substantial harm to, or loss of, a designated heritage asset will be avoided and only be permitted where it is necessary to deliver substantial public benefits or meets the applicable national policy tests.
Other heritage assets	Consideration should be given to impacts on heritage assets beyond listed buildings and conservation areas, including the historic character of villages.	The draft Local Plan includes policies to minimise the impact of development on non-designated heritage assets and their setting. The Council will support the identification of additional non-designated heritage assets through local listing, neighbourhood planning, conservation area appraisal, development management and other evidence-based processes. Where a proposal would directly or indirectly harm or result in the loss of significance of a non-designated heritage asset, a balanced judgement will be made

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
		having regard to the scale of harm or loss, the significance of the asset and the public benefits of the proposal.
Overarching theme: Housing		
Housing need	General support is given for housing targets and affordable housing provision, although there is mixed feedback on the use of the standard method for determining housing need. Requests are made for suitable delivery across family housing and vulnerable groups, with some opposition to Houses in Multiple Occupation and second homes. There is also opposition to new housing accommodating residents from outside the borough, though others note it could support unmet need in neighbouring authorities. Some respondents oppose payment in lieu instead of onsite affordable housing. Some feedback discusses scheme viability with the affordable housing requirements, with concern for the fact that developers may claim development is unviable and reduce percentage provisions post-consent. Clarity on the definition of 'genuinely affordable housing' is also requested.	HBC's Local Plan, in line with national policy and guidance, has to plan to meet its housing requirement in full to be found legally 'sound' at examination. This is based on identified housing land supply, associated constraints, and the standard method housing need, which in turn is founded on a baseline of local housing stock and affordability of housing. The standard method provided by government must be used to determine the starting point or minimum annual local housing need figure when preparing a local plan. Local Planning Authorities can only adopt an alternative method to assessing housing need if exceptional or specific local circumstances justify this. Housing stock provides a stable and predictable baseline that ensures all areas, as a minimum, are contributing a share to meet the national total need for housing, proportionate to the size of their current housing market. Consideration of affordability is included to ensure homes are built where people wish to live and are able to find work. Housing affordability is considered to ensure homes are built where people want to live. As household numbers naturally grow through demographic change, and as more people wish to make their home in Hertsmere, this is reflected in local house prices and rents and thus affordability. The Plan will emphasise on-site delivery of affordable housing on major sites, unless in exceptional circumstances. A cascade approach would only be used where it is not possible to deliver on-site affordable housing, prioritising off-site delivery on an alternative site, or a final option for a payment in lieu of exceptional circumstances only. The Plan will reflect development viability through its Whole Plan Viability Assessment, identifying what percentage of affordable provision can be supported without endangering delivery of new homes. In line with the NPPF, planning applications will be assumed to be viable with the required percentage of affordable housing provision and it will be up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Where a developer

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
		seeks to alter affordable housing commitments after planning permission is granted, this will have to happen through a viability review, in line with national policy and guidance. Policy at Regulation 19 provides greater clarity on what is meant by genuinely affordable housing in the Hertsmere context, and how it will be the focus for delivery.
Housing supply	Some concerns are raised as on whether quantity of housing takes priority over quality and sustainability, with suggestions to reduce total delivery. Representations query the housing trajectory to meet requirements and the approach to housing land supply. Representations assert that the Council needs to allocate sufficient deliverable sites to meet housing requirements in the early part of the Plan period. The Council's past housing delivery performance is commented on.	HBC seeks to secure high-quality design for new residential development in the Borough. It will ensure that all new housing is designed to a high-quality standard, responding to the needs of Hertsmere's residential population. The Plan's housing trajectory has been prepared using information on delivery provided by promoters and landowners for candidate sites. To provide certainty over the housing trajectory the Council will undertake further engagement with landowners, site promoters and developers during the Regulation 19 publication to provide a robust evidence base for housing supply across the plan period. The draft Local Plan seeks to improve the Council's housing land supply position from the point of adoption to avoid speculative development across Hertsmere. The Council is seeking a stepped housing trajectory in the first five years of the plan period to ensure that housing delivery can be scaled up during this period and the Housing Delivery Test results can be improved, which will contribute to a better housing land supply position for the Borough over the Plan period.
Overarching theme: Infrastructure (other than transport)		
Delivery and funding	Feedback notes that viability assessments should assume developments will provide both land and funding for construction of new infrastructure and highlights that social infrastructure is crucial to be delivered alongside new development. Differing feedback has been received on whether proposed developer contributions	The Draft Local Plan is supported by an Infrastructure Delivery Plan (IDP) that identifies the infrastructure required to support growth, address capacity constraints, and create sustainable communities. Prepared in collaboration with infrastructure providers and stakeholders, the IDP sets out infrastructure needs, costs, delivery timescales, and funding sources. Infrastructure will be delivered through a combination of developer contributions, government funding, local authority investment, and service provider funding. Policy DM2 will provide a framework for securing infrastructure through planning obligations, including phasing and trigger points where necessary, to ensure essential infrastructure is delivered before or alongside development, and Part 4 of the emerging Local Plan sets out infrastructure will be delivered through securing developer contributions, CIL and S106 payments. The Council will work closely with developers and infrastructure providers, monitor delivery and

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	for infrastructure investment are too high or too low. Concern is expressed around the level and timing of infrastructure upgrades required to facilitate development.	funding throughout the plan period, and update the IDP as required to ensure infrastructure remains viable, coordinated, and aligned with development.
General opinion	General view that infrastructure delivery is essential to support growth and housing should not be developed before key infrastructure is in place.	The Draft Local Plan is supported by an Infrastructure Delivery Plan (IDP) that assesses existing infrastructure capacity, identifies the infrastructure needed to support planned growth, and sets out delivery priorities in collaboration with key infrastructure providers and stakeholders. The Regulation 19 Local Plan addresses infrastructure delivery principally through Policy DM2 (Infrastructure Funding and Planning Obligations), Policy SCI1 (Safeguarding and Securing Social and Community Infrastructure), the Infrastructure Delivery Plan and relevant site-allocation policies. Policy DM3 also provides for comprehensive masterplanning and coordinated infrastructure delivery on large or complex sites. The Council will work closely with infrastructure partners, monitor capacity and delivery throughout the plan period, and ensure that infrastructure is delivered in a coordinated and timely manner to support sustainable growth. Phasing is considered as part of the IDP.
Green and blue infrastructure	Green/ blue infrastructure is commented on, with general support for green and blue infrastructure to be treated as environmental constraints, also noting that environmental requirements, such as habitat creation and climate adaptations, should be embedded before layouts are fixed and should be enforced with supporting frameworks and strategies. Support is given for on-site provision rather than off-site contributions, and representations assert that on-site provision should contribute to wider ecological connectivity. Further detailed recommendations are given for Policies	The Council welcomes support for the green infrastructure policies in the Draft Local Plan. The Regulation 19 Local Plan addresses these matters through Chapter 10, Green and Blue Infrastructure, particularly Policies GI1, GI3, GI4, GI6 and GI7, which address the green and blue infrastructure network, the Local Nature Recovery Strategy, biodiversity, urban greening and trees, and open space. The Draft Local Plan recognises that green infrastructure provides multiple benefits including biodiversity enhancement, climate resilience, flood mitigation, and accessible recreation opportunities. The Council is committed to ensuring green infrastructure is embedded within development and that Hertsmere's natural environment is protected and enhanced for current and future generations. Policy GI1 (Hertsmere's Blue and Green Infrastructure) requires development to protect and enhance environmental assets through the provision of high-quality green infrastructure, biodiversity net gain, sustainable drainage systems, and the protection of trees and hedgerows. Major developments must be supported by appropriate ecological, arboricultural, landscape, and green infrastructure strategies, with long-term management secured through planning conditions and legal agreements. The Council will work with developers and environmental partners to ensure these measures

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	GI1, GI2, GI3, and GI4, GI5, and GI6, covering topics such as buffer zones, management arrangements, retention and increase in trees and canopy cover, features to protect, and application of 20% BNG as the policy expectation. Feedback warns that development at high density may put greater pressure on existing green infrastructure.	are effectively delivered and maintained, supporting environmental enhancement across Hertsmere. Viability will also be considered through the whole plan viability assessment, to ensure requirements from development are not onerous.
Social infrastructure	Social infrastructure is widely commented on. Emphasis has been placed on the need for delivery and improvement of social infrastructure alongside development, with no net loss of local services or impacts to existing residents from construction. The next version of the Plan is recommended to identify strategic allocations to deliver social infrastructure needs for the community. Recommendations are made for the provision of sports facilities, community facilities, and healthcare infrastructure and a broadening of Policy SCI3 to cover sport and recreation, and developments should be designed to encourage active movement and that Hertsmere Playing Pitch Strategy Action Plan should be adhered to. Concern has been raised that Policy SCI1 is not effective, with greater flexibility required for redundant sites.	The Draft Local Plan recognises that timely infrastructure delivery is essential to support sustainable development and new communities. Policy SCI1 provides the principal framework for safeguarding and securing social and community infrastructure, supported by Policy SCI2, Policy SCI3, Policy DM2, the Infrastructure Delivery Plan and relevant site-allocation policies. The Council will consider requirements for on-site sports provision for allocations where the Outdoor Sports and Playing Pitch Study (2026) has identified a need for on-site provision and continue to engage with Sports England in relation to open space and sports provision on site allocations. Policy SCI1 (Safeguarding and Securing Social and Community Infrastructure) allows for the disposal of surplus social and community infrastructure sites where there is clear evidence that they are no longer needed or where the disposal forms part of a public sector disposal programme. The Council supports flexibility to enable genuinely redundant sites to be reused for alternative community purposes or to help fund improvements to healthcare services and will consider clarifying associated policy wording. The Council works with Hertfordshire County Council to assess education needs arising from development and secure appropriate contribution. Education contributions are calculated using established methodologies that consider factors such as pupil yield, school capacity, projected demand, and the cost of providing additional school places. The Council is committed to making the best use of infrastructure assets and retaining existing infrastructure assets so they can best contribute to meeting future needs.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	There are also requests for clarity on the methodology used for developer contributions to education and the location of new schools.	
Utilities infrastructure	Feedback states that increased provision of high-speed broadband should be required, as well as concern whether existing utilities infrastructure can accommodate new housing capacity.	The Council recognises that high-quality digital infrastructure including high-speed broadband and full fibre connectivity is essential to support economic growth, enable flexible and home working, facilitate access to services, and ensure that businesses and residents can participate fully in the digital economy. The Council recognises that adequate utilities infrastructure is essential to support new development. The Draft Local Plan has been prepared in consultation with utilities providers to assess existing capacity constraints and infrastructure requirements arising from planned growth, and this engagement informs the Infrastructure Delivery Plan, which identifies necessary infrastructure improvements including water supply reinforcement, wastewater treatment capacity upgrades, and electricity network enhancements.
Overarching theme: Local Plan Process and Planning Process		
Consultation process	Mixed feedback has been received on the consultation process, with some asking for greater transparency and wider publicity to residents. Comments suggest dissatisfaction with the number of consultation processes that residents feel required to respond to.	The Council has considered previous feedback in its current draft Plan. However, the context has changed since earlier versions of the Plan, including changes to national planning policy, housing need, and wider economic and social changes, making a new Plan necessary in line with government requirements. The Council appreciates the time and effort offered by residents in responding to consultation efforts, and wishes to take local views into account, while also having to comply with government requirements regarding plan making and engagement on each version of the Plan published.
Council decision-making	Emphasis is placed on prioritising the wishes of existing residents in decision making on planning applications. Other comments query the experience of planning officers and consideration of the Planning Committee's political affiliations.	The Council wishes to and is obliged to take into account views of existing residents as well as to plan for future needs, which include those of existing as well as future residents. The Council is also obliged by national policy and legislation to plan for identified housing and other needs which will arise during the Plan period. The Council will take residents' and other representations received into account when writing the Regulation 19 version of the Local Plan. However, HBC will still be bound by national policy and legislation, as well as by the results of technical evidence, which limits what the Council is able to propose in its Local Plan. Equally, the Council has a statutory duty to assess and approve or reject planning applications based on material considerations in line with planning policy and legislation, particularly where the Council has struggled in the past to meet its identified needs for housing and/or economic

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
		development. Objections from residents and councillors to a planning application can only lead to a refusal if they are justified through material planning considerations. Where a refusal is deemed unreasonable, applicants can appeal the decision. The Council stands by and is supportive of officers providing their specialist expertise and guidance for plan-making and decision-taking.
Decision-making process	There is both support and concern for how the Local Plan will be used to inform decision making.	The Council makes planning decisions in accordance with the statutory development plan and material considerations, as required by planning legislation. The planning system balances competing interests and must consider national policy, local evidence, and the merits of individual proposals. The Council's approach to decision-making is subject to scrutiny through the planning appeals process and judicial review, ensuring accountability and legal compliance.
Evidence	Support is given to the Infrastructure Delivery Plan. Recommendation is made to update the Plan and the Draft Infrastructure Delivery Plan with separate cost inputs for health infrastructure. A further recommendation is made to include a labour demand model in the Economic Study, where some key considerations are alleged to be missing. Some representations voice concerns that some policies are missing key evidence.	The Council welcomes support for the evidence underpinning the Plan and will carefully consider all representations raising concerns about the adequacy, robustness, methodology, or conclusions of evidence base documents. The Council will review whether any evidence requires updating, additional work, or independent review to ensure it is fit for purpose and supports the Plan's strategy and policies.
Plan-making process	The feedback on the Local Plan revealed both support and significant concerns. Support came from various stakeholders advocating for ongoing engagement in the plan-making process. Objections were raised regarding the legality, transparency, and the plan's conformity with national policy. Responses questioned the plan's soundness, its appropriateness given upcoming local government reorganisation,	The Draft Local Plan has been prepared in accordance with national policy and guidance. As part of preparing the Regulation 19 Publication version of the Local Plan the Council will undertake a review to ensure that all local policies are aligned with national policy, including the National Planning Policy Framework published following the conclusion of this Regulation 18 consultation, to minimise duplication of requirements and standards where relevant and considering the timeframes of the emerging Local Plan. The Council is required to prepare a Local Plan under planning legislation to guide development in the Borough. While decisions and changes regarding local government reorganisation is awaited, the Council must continue to plan for its area until any changes take effect. The Plan will provide an up-to-date policy framework regardless of future administrative changes.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	and whether sufficient progress had been made on key challenges before the Regulation 19 publication. Recommendations emphasised the need for policy alignment with national requirements without duplication.	The Council will take residents' and other stakeholders' representations received into account when writing the Regulation 19 version of the Local Plan. However, HBC will still be bound by national policy and legislation, as well as by the results of technical evidence, which limits what the Council is able to propose in its Local Plan.
Site selection	Some feedback notes that without sight of certain technical evidence, which is still emerging / not published at the time of consultation, stakeholders' abilities to comment on sites are limited. Viability assessment should be used to inform site selection. The needs of specific local groups should be met as part of the site selection process, and this must include assessment of impacts on persons with protected characteristics. Further feedback asks for consideration of cumulative impacts of multiple allocations.	The Council's site selection process assesses all potential development sites through the Housing and Employment Land Availability Assessment (HELAA), Sustainability Appraisal, and technical evidence. Sites are selected based on their suitability, availability, achievability, and performance against sustainability criteria. The Council will consider all representations on site selection and review the evidence to ensure the most appropriate sites are allocated in the Regulation 19 Plan. The need for different housing types and tenures has been considered through the Local Housing Needs Assessment and will be addressed through Local Plan policies. Whole Plan Viability Assessment informs final site selection, alongside other evidence, to ensure sites are available, suitable and achievable. Some evidence is still emerging at the time of Regulation 18 consultation, and further evidence will be published alongside the Regulation 19 publication. Cumulative impacts will be considered by the Plan as it progresses.
Overarching theme: Places and Growth Sites		
Delivery	Affordable housing and mitigation costs should not be compromised to improve viability. Questions are raised on the processes for monitoring future implementation and impact of the Plan. Improved availability of information would help evidence deliverability.	Planning conditions and obligations are required to mitigate the impacts of development and make development acceptable in planning terms. The Council will include a comprehensive monitoring framework with the Local Plan, setting out indicators, targets, and triggers for policy review. An Annual Monitoring Report will track implementation of policies and delivery of allocations, identifying any issues that require corrective action. This approach ensures the

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
		Plan remains effective and responsive to changing circumstances over the plan period, in accordance with national policy requirements.
General opinion	Both general support and opposition are voiced for development on sites considered as candidates for allocation. Support is given for new employment and growth opportunities, whilst objections are due to concerns regarding potential impacts on existing businesses, devaluation of existing housing stock, loss of green spaces, loss of landscape character and trees.	The Draft Local Plan outlined candidate sites proposed for potential allocation that provide the greatest overall benefits by delivering housing, including affordable homes, supporting economic growth, providing necessary infrastructure, protecting environmental assets, and creating high-quality, sustainable communities. The Council will ensure that draft site allocations in the Regulation 19 Local Plan contribute positively to sustainable development and the long-term wellbeing of Hertsmere's current and future residents, taking into account a variety of technical evidence and representations made. Where a development proposal could affect Ministry of Defence (MOD) assets, the local plan will consider the potential impacts and require appropriate mitigation measures.
Omission sites	Sites are identified as suitable and available for allocation in the Plan in the areas of Borehamwood, Bushey, Potters Bar, and Radlett.	The Council has assessed all submitted sites through the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Selection of sites as candidates for allocation is based on suitability, availability, achievability, and conformity with the spatial strategy. The Council will review all representations promoting omission sites and consider whether any should be allocated in the Regulation 19 Plan, informed by updated evidence and the need to meet the housing requirement.
Overarching theme: Transport		
Active Travel (including walking, cycling)	Responses request that development should not impact access to Public Rights of Way (PRoW), and they should be enhanced in line with the HCC Rights of Way Improvement Plan to facilitate active travel. There are some concerns that proposed allocations are unsuitable for pedestrian access and walking routes, and pedestrian and cyclist safety could be at	The Council acknowledges the value of PRoW and access to them. The Plan will have regard to the HCC Rights of Way Improvement Plan (ROWIP) and national policy and guidance on the subject when developing policy. The Council will require development to consider safe routes to schools, shops, public transport and employment in accordance with NPPF paragraph 114 on prioritising pedestrian and cycle movements and creating safe and accessible places.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	risk. Their needs should take greater priority. Representations also highlight that the plan should consider alternative methods of transport for older and disabled persons.	
Buses	Recommendation is made for improved public transport to support growth.	The Council agrees that improved public transport is essential to support sustainable growth. The Plan will require major developments to contribute to public transport improvements, including enhanced or new bus services, new or upgraded bus stops and shelters, and real-time passenger information.
General opinion	Several objections are made in response to the Plan's proposed 'car-lite' approach and related to challenges in existing transport infrastructure supporting growth. Others agree with the 'car-lite' strategy, so long as it is supported by improved active travel and public transport. Several representations supported sustainable travel networks. Requests were made for robust evidence of impacts on the strategic road network and that National Highways should be consulted. Some representations note that developments outside of Hertsmere could also add cross-boundary pressures.	The Council's approach to car-lite development is informed by evidence of site accessibility, public transport provision, and active travel connectivity. The Plan recognises that car-lite approaches are most appropriate in highly accessible urban locations with good public transport links. In rural and semi-rural areas, the Plan will apply parking standards that reflect accessibility levels and local circumstances, in accordance with NPPF, which requires development to provide appropriate opportunities for sustainable transport while recognising that opportunities will vary between urban and rural areas.
Highways	General concerns note that development could worsen traffic, with specific concerns in Hertsmere, and assert that there is a need for new highways capacity to accommodate housing growth, particularly as traffic issues already exist. These include capacity constraints at key junctions and lack of public transport. A response notes	The Plan is informed by transport modelling and a Transport Study to assess the impact of proposed growth on the transport network. The Infrastructure Delivery Plan identifies necessary transport infrastructure improvements to support development. Site allocation policies will include transport mitigation requirements, and developer contributions will be secured to deliver necessary improvements. Development will only be allocated where it can be demonstrated that transport impacts can be adequately mitigated. The Plan also wants to encourage a modal shift towards more sustainable and active modes of

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	that development close to the A4 conflicts with the NPPF.	transport where possible, to combat climate change, improve air quality, and promote healthy communities.
Parking	There is opposition to loss of parking provision, particularly at railway stations. It is unclear how parking reductions would be implemented and what alternatives would be in place for town-centre access and commuter journeys.	The Council's approach to town centre parking will balance the need to optimise land use for regeneration with maintaining adequate parking to support town centre vitality and commuter access. Any reduction in public parking will be subject to parking impact assessments and consultation with stakeholders. The Plan also wants to encourage a modal shift towards more sustainable and active modes of transport where possible, to combat climate change, improve air quality, and promote healthy communities.
Rail	Feedback observes that growth may require improved rail connections, with existing services already under pressure.	The Council acknowledges existing pressure on rail services and the need for capacity and accessibility improvements. While the Council cannot require rail operators to upgrade services or stations, it will work proactively with Network Rail and operators to identify infrastructure needs arising from planned growth. The Infrastructure Delivery Plan will set out rail infrastructure requirements, and the Council will advocate for rail investment through engagement with transport authorities and government.
Overarching theme: Vision, Objectives and Spatial Strategy		
Objectives	A mix of opposition and support is given for the Plan's objectives.	The Council has developed objectives based on evidence of local needs and challenges, community engagement, and national policy requirements. All representations will be considered in finalising the Plan's objectives for the Regulation 19 version.
Spatial Strategy	The spatial strategy and settlement hierarchy are widely commented on, with a range of support and opposition. The status of the Settlement Vision Spatial Strategy is queried. It is also noted that the economic strategy should be consistent with national planning policy. Opposition and concern are largely connected to the scale of development and possible cumulative impacts, particularly in combination with other recent development,	Further work is being undertaken on the Settlement Visions, alongside wider evidence and engagement. These visions will be completed before the Plan is adopted. They will inform the key spatial objectives and policies relevant to specific places in Hertsmere, as well as policies on spatially sensitive matters such as building heights. If it is deemed that further detail is required, beyond what is in the Local Plan, the Council will consider subsequently producing settlement specific design codes or standards which would undergo consultation and independent examination before being adopted as Supplementary Plans. However, sites allocated in the Local Plan may come forward prior to such Supplementary Plans being adopted. The Settlement Hierarchy itself is established and finalised and is not being reconsidered.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	as well as impacts on landscape character. Feedback queries whether the Plan could lead to coalescence of existing settlements. There is an alleged lack of evidence of a sustainable approach and Green Belt impacts are noted. Concerns also note increased pressure on existing infrastructure where existing sites are further developed at scale, although other representations favour making use of previously developed or grey belt land, considering site accessibility and active travel viability.	
Vision	A mix of opposition and support is given for the Plan's vision, with one comment advising a countryside and landscape-led approach rather than growth-led Plan.	The Council welcomes support for the Plan's vision. The Draft Local Plan vision has been developed through community engagement, consultation on issues and options, evidence gathering, and assessment of the borough's development needs, constraints, and opportunities, and seeks to balance the need to provide sufficient housing and employment development to meet identified needs with the protection and enhancement of Hertsmere's environmental assets, Green Belt, heritage, settlement character, and quality of life.

6. Summary of Responses from Consultee Groups

6.1 Stakeholder Groups

6.1.1 Stakeholders were grouped, in line with categories based on the statement of community involvement. These categories include:

- residents;
- businesses;
- developers, agents and landowners;
- central and local government departments; prescribed consultation bodies;
- local community and amenity groups;
- local service groups;
- parish and town councils;
- members of Parliament / local councillors
- national and county bodies / organisations; and
- neighbouring and other relevant plan-making authorities.

6.1.2 Figure 4 shows the breakdown of responses across the stakeholder groups by unique respondent (with template responses removed), with the most responses received from stakeholders categorised as residents. Note that in some cases there were overlaps between categories. A further 3,904 template responses were received from residents, based on templates provided by community organisations and are summarised separately below.

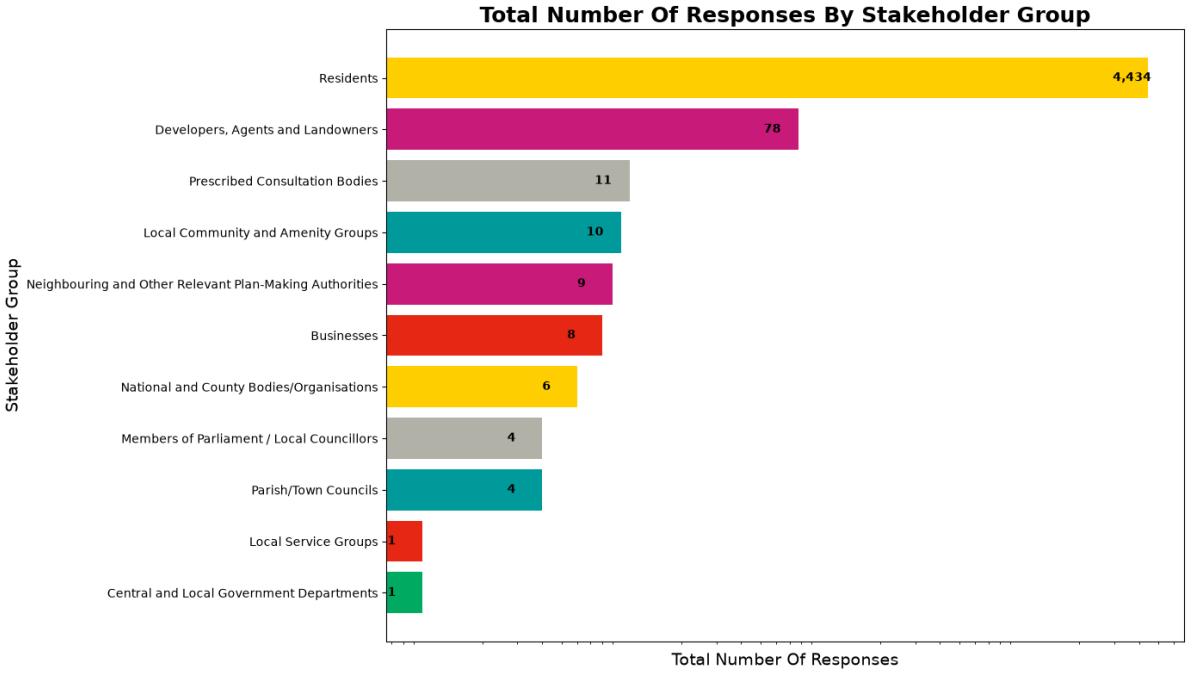

Figure 4. Total Number of Responses by Stakeholder Group

6.1.3 Following sections include summaries of representations made by respondent category. More detail is provided on specific respondent representations, where appropriate.

6.2 Residents

6.2.1 4,434 individual residents provided representations to the Local Plan at Regulation 18 stage.

6.2.2 The key themes and sub-themes on which most resident representations commented were:

- Housing – General opinion/view and housing need
- Green Belt/ grey belt
- Place & Growth Sites – General opinion/view
- Vision, Objectives and Spatial Strategy – Spatial Strategy and
- Transport – Traffic.

6.2.3 Key sentiments expressed by residents on the Local Plan centred on:

- Concern about the housing numbers proposed;
- Concern about the loss of Green Belt and about the methodology used for assessing Green Belt and grey belt land;
- Both support and concern about the candidate sites presented for allocation;
- Concern about the spatial strategy, including about how growth is proposed to be distributed, and concern that the locations selected for growth are not sustainable; and

- Concern about existing traffic in Hertsmere and the impact of future growth.

6.2.4 Many residents chose to respond by copying, and in some cases, adding to or amending one of a number of Template Responses provided by other individuals, or by local community or amenity groups.

6.2.5 In processing the consultation, the Council noted ten main templates which were most frequently utilised, resulting in 3,904 identical or very similar responses in total. These were received via email or hand-written submissions, as shown in the table below.

Table 2: Summary of template responses copied and issued by residents, originating from local community and amenity groups

Template	Summary of comments
Email templates	
Save Hertsmere – General	Comments raise concerns that proposed housing development is not sustainably planned and that the plan's evidence base is insufficient, although support is voiced for housing delivery on the main Bowmans Cross site within the plan period. The template opposes aspects of the approach to securing high-quality design and considers the proposed policy approach to new homes in the countryside and Green Belt too permissive, allegedly risking incremental, cumulative development that undermines the spatial strategy. The representation also objects to the Plan's proposed "car-lite" strategy and reduced parking provision, particularly in rural and semi-rural contexts, questioning deliverability, implementation, and what alternatives would support town-centre vitality and commuter access. The representation questions the alignment of requirements for affordable housing with the local housing needs assessment evidence and suggests that these should be higher, although objecting to the specific percentage requirements proposed for Green Belt sites. The 'Save Hertsmere' template representation also expressed a preference for on-site infrastructure provision over off-site contributions. Meanwhile, the sentiment expressed in the template response was somewhat supportive of the policies in Part 2 of the plan. **Sites mentioned**: Bowmans Cross **Sentiment**: Mostly concern, some support
Save Hertsmere – Radlett	Comments express broad objections to and concerns on aspects of the Local Plan and the sites proposed as candidates for allocation, citing risks to local character, insufficient evidence and issues around soundness, as well as questions on the sustainability and distribution of the spatial strategy. The template representation alleges that certain sites are in an unsuitable location beyond walking distance of key services and rely on a single access point is inadequate for the scale of development, exacerbating congestion. The template is concerned that proposed transport measures will not resolve existing traffic pressures in Hertsmere. The representation raises repeated concerns about existing infrastructure capacity for electricity, water, gas and wastewater, and about flood risk, including loss of functional floodplain. Further concerns were raised on potential impacts to Public Rights of Way. The template opposes building on the Green Belt, with concerns for the Green Belt assessment methodology being used and favour an approach that prioritises brownfield development before releasing Green Belt land. Further questions are raised about the robustness of the evidence base, the housing delivery trajectory, and conformity with national policy. The representation recommends exploring alternatives with stronger connections to the strategic road network, for example, near the Hillfield substation with access to the A41, in Shenley with access to the M25 and

	via Borehamwood to the A1, and land to the west of Theobald Street. Prioritisation of flatter sites would also better enable active travel options. Alongside these objections, the template notes general support for elements of the Plan's strategy. **Sites mentioned:** HRA SA3, HRA SA4, HRA SA5, HRA SA6 **Sentiment**: Mostly concern
Save Hertsmere – Radlett 2	Comments express concern that the spatial strategy should be contested on grounds of scale, in terms of the number of homes, and an absence of a clear, evidence-based sustainable rationale. The template seeks greater clarity on housing targets, requirements, and need, and suggests that the inclusion of windfall sites should allow a reduction in allocations around main settlements. Respondents are concerned about losses of Green Belt land, warning that housing numbers at Bowmans Cross appear underestimated and could result in loss of Radlett's Green Belt, expressing a preference for brownfield development to be prioritised ahead of Green Belt to reduce loss of open spaces. Other concerns raised by the template relate to alleged insufficient plans for infrastructure, flood risk and potential loss of functional floodplain, and reduced car parking. While some representations which made use of this template support growth in the area, others expressed blanket opposition to any development. **Sites mentioned:** HRA SA2, HRA SA3, HRA SA4, HRA SA5, HRA SA6, HRA SA7, Bowmans Cross **Sentiment**: Mostly concern
Response to HBC Local Plan	Comments express broad objections to the sites proposed as candidates for allocation and aspects of the Local Plan, citing risks to local character, insufficient evidence and soundness, and questioning the distribution and sustainability of the spatial strategy. The template argues that certain sites are in an unsustainable location due to lack of proximity to key services and walking access. The reliance on a single vehicular access is allegedly inadequate for the scale of development and will exacerbate congestion, and plan-wide transport measures will not resolve existing traffic pressures, including wider growth in Hertsmere. The template representation raises multiple concerns about existing infrastructure capacity for electricity, water, gas and wastewater, and about flood risk, including loss of functional floodplain. Further concerns were raised about impacts on the Public Rights of Way network. The response opposes building on the Green Belt and queries the Green Belt assessment methodology and conclusions, also expressing a preference for development on brownfield land to be prioritised ahead of Green Belt release. Further questions are raised about the robustness of the evidence base, the housing delivery trajectory, and conformity with national policy. The representation recommended exploring alternatives with stronger connections to the strategic road network, for example, near the Hillfield substation with access to the A41, in Shenley with access to the M25 and via Borehamwood to the A1, and land to the west of Theobald Street. Prioritisation of flatter sites was also recommended to better enable active travel options. Alongside concerns and objections, the template notes general support for elements of the strategy. **Sites mentioned:** HBA SA16, HBA SA19, HBA SA20, HBA SA24, Bowman Cross. **Sentiment**: Mostly concern
Response to Draft Local Plan	Whilst support is expressed for delivering growth on the main sites, comments state that proposed development is not planned sustainably and that the plan's evidence base is insufficient. The template representation queries aspects of the approach to securing high-quality design and considers the policy for new homes in the countryside and Green Belt too permissive, risking incremental, cumulative development that undermines the settlement-focused spatial strategy. The template notes that requirements for affordable housing do not align with the LHNA

	and should be higher, while objecting to the specific percentage requirements proposed for Green Belt sites. On-site infrastructure provision is favoured over off-site contributions. Objections are also raised regarding the Plan's proposed "car-lite" strategy and reduced parking provision, particularly in rural and semi-rural contexts, questioning deliverability, implementation, and what alternatives would support town-centre vitality and commuter access. **Sites mentioned:** HBA SA7, HBA SA17, HBA SA19, HBA SA20, HBA SA26, Bowmans Cross **Sentiment**: Mostly concern
Green Belt Rural Character	Comments express significant objections to the draft Local Plan, citing concerns that it lacks essential evidence to support its policies and proposed allocations. The template representation highlights concern about the capability of existing infrastructure to accommodate growth, particularly in relation to housing supply and traffic congestion in Hertsmere. There is notable opposition to the spatial strategy, which the template representation believes fails to protect the Green Belt and countryside, with recommendations for a brownfield-first approach to development. Several other concerns were raised about the impacts of proposed growth on air quality, pedestrian and cyclist safety, and the potential loss of agricultural land, as well as emphasising the need for greater highways capacity and improved public transport options. Additionally, the representation recommends that the Council adopt a countryside and landscape-led approach, rather than a growth-led one, and express dissatisfaction with the consultation process surrounding the Local Plan. Overall, the representation calls for greater consideration of cumulative impacts and the necessity of protecting local character and habitats from development pressures. **Sites mentioned:** HBPA SA11, HBPA SA12, HBPA SA13, HBPA SA14, HRA SA2, HRA SA3, HRA SA4, HRA SA5, HRA SA6, HRA SA7 **Sentiment**: Mostly concern
Dove Lane HPBA SA14	The response objects to development on sites proposed as candidates for allocation and questions how development would benefit the community. Risks were identified around roads and traffic; vehicular access is deemed to be inadequate for the scale of growth and increased housing is alleged to risk worsening congestion on narrow roads and in Hertsmere. Suitable provision for safe emergency access is highlighted as crucial. The template representation also noted that car dependency would likely be reinforced where insufficient infrastructure accompanies development. Other concerns voiced relate to flood risk, loss of floodplains, and loss of Green Belt land affecting local character, designated sites, and protected habitats in an environmentally sensitive location. An additional aspect raised for consideration is the pedestrian-only railway tunnel. Preference is given for a brownfield-first approach, commenting that the spatial strategy fails to protect the Green Belt and countryside. The response registers a general objection to any development in this area. **Sites mentioned:** HBPA SA13, HBPA SA14 **Sentiment:** Mostly concern
Handwritten paper templates	
Home Farm HRA	Comments reflect broad support for the Local Plan, Spatial Strategy, policies, and proposed allocations, with many endorsements highlighting the importance of delivering affordable housing to meet needs. There are calls to strengthen the housing trajectory by adding more small sites for flexibility, alongside concerns regarding the Council's housing land supply position and the need for higher housing targets to fully meet objectively assessed needs. Additionally, there is support for delivering more homes on Green Belt release sites to maximise the effective use of land and increase affordable housing supply, as well as for self and custom build homes to diversify options. Environmental considerations are also

	prominent in the feedback, with strong support for increasing green infrastructure to enhance habitats and improve biodiversity in Hertsmere, alongside general support for biodiversity net gain in new developments. The template representation emphasises the necessity of high-quality design that respects local character and identity, as well as inclusive design principles. Furthermore, there is a significant focus on ensuring that new and improved social infrastructure is delivered alongside new development, with the representation supporting requirements for sufficient, high-quality community facilities and infrastructure to support growth. The comments indicate general approval for development in the identified area and on the proposed sites, with assertions that the site is suitable and available for allocation to meet the borough's needs, and that it is in a more sustainable location compared to other candidate sites. **Sites mentioned:** HRA SA6 **Sentiment:** Mostly positive
Well End HBA SA16 Template 1	Comments express general objection to the Local Plan, Spatial Strategy, policies, and proposed allocations, citing that the proposed allocation site referenced is not in a sustainable location and lies beyond walking distance of services and facilities. The template representation highlight risks including significant tree loss across Hertsmere, adverse impacts on wildlife due to habitat loss, the loss of best and most versatile agricultural land with implications for food security, the potential coalescence of settlements, and the displacement of equestrian uses, alongside concern that the plan would lead to the loss of existing social infrastructure. **Sites mentioned:** HBA SA16 **Sentiment**: Mostly concern
Well End HBA SA16 Template 2	Comments express significant concern and objection to the Local Plan, Spatial Strategy, policies, and proposed allocations, arguing that the proposed allocation site referenced is not in a sustainable location and is beyond walking distance from essential services and facilities. The template representation expresses worries about the impact of housing development on wildlife due to habitat loss, the loss of best and most versatile agricultural land affecting food security, and the potential coalescence of settlements. Additionally, there are concerns the plan may lead to the loss of equestrian uses and existing social infrastructure. Specific site-related concerns include flood risk, which raises further apprehension about the proposed developments. **Sites mentioned:** HBA SA16 **Sentiment**: Mostly concern

6.3 Businesses

6.3.1 Eight local businesses provided representations on the Local Plan at Regulation 18 stage. This included the detailed responses summarised below.

6.3.2 A response was submitted by **Savills** on behalf of **Aldenham Golf and Country Club**, giving detailed feedback on housing need in the Plan area. In summary, feedback covers the following key points:

- Concern that the current housing policies will not deliver sufficient housing to meet identified needs within Hertsmere and the broader Housing Market Area, including unmet need from London.
- Concern over insufficient clarity on housing targets, housing requirements and housing need, particularly around delivery rates.
- Opposition towards the Council's methodology for calculating housing requirements, particularly considering the updated Standard Method

requirements increasing housing need from 731 to 1,034 dwellings per annum.

- Concern about Hertsmere accommodating more housing, with concern that tying planning consent to delivery timelines will reduce the sites bought forward for development.
- Support for delivery of affordable housing, including the approach that allows for off-site delivery or financial contributions where in-site provision is unviable. housing requirements should be tested against site-specific financial viability appraisals.
- Agreement that smaller sites can meaningfully contribute to housing supply.

6.3.3 **Oakridge Farm Ltd** submitted a response focused on site **HRA SA3, HRA SA4 and HRA SA6**. It raises general concerns about the Plan and its evidence base, and gives detail on impacts to agriculture, landscape character, biodiversity, and Green Belt. In summary, feedback covers the following key points:

- Overall objection to development on site HRA SA3 following previous objections in 2018 and 2021 consultations with concerns about coalescence of settlements, particularly at High Cross hamlet. The respondent is concerned that development is disproportionate and unsustainable and would undermine the local character and identify of Radlett, the function of High Cross and asserts that this site is too remote from Radlett centre for walking access for services and facilities.
- Concerns over loss of best and most versatile agricultural land at these sites, with the SA3 site comprised of 58% grade 2 land and 32% grade 3a land. These concerns are expanded to cover food security and efficient carbon sequestration, supporting climate emergency commitments.
- Concern about evidence supporting the plan, particularly regarding the agricultural framework and regard for previous landscape sensitivity assessments.
- Concern about the impact on listed buildings and their settings, including grade II listed farmhouse at Kemprow Farm, noting previous studies (LUC 2020) identified moderate to high landscape sensitivity to residential development.
- Concern for wildlife and habitat impacts from development around Radlett, with parts of SA3 identified as 'Areas with Potential to become of Particular Importance for Biodiversity' under Hertfordshire's LNRS.
- General opposition to building housing on Green Belt, noting this site should be protected.
- Objection to the classification of Radlett as a Category III Small Town, recommending it remains as Category IV, in line with the Neighbourhood Plan.
- Concern that the plot SA7 is categorised as ‘Safeguarded Land for Housing’ under Policy SADM2 but has failed to come forward and asserting that its deliverability is questionable. Its beneficial location to Radlett is asserted to support the development of HRA SA3.

- Objection to the proposed spatial strategy, which is considered inconsistent with its stated aim of directing growth to sustainable locations and protecting existing settlements, suggesting that more growth should be directed to Bushey and Bowmans Cross.

6.3.4 **The Hertsmere** (a local golf course) submitted a consultation response, giving its perspective on contributing towards housing need whilst maintaining recreational facilities. In summary, feedback covers the following key points:

- In support of The Hertsmere for retaining a golf course on site with sport and recreation facilities supporting the local population, whilst also making a sizable contribution towards the Borough's housing needs.
- Agreement that there is an opportunity for existing golf courses to contribute towards multiple uses within the Council's spatial strategy which can include the delivery of housing, provision of open space, recreation opportunities and biodiversity net gains.

6.3.5 **Graham and Sibbald Chartered Surveyors and Property Consultants** submitted a consultation response giving views on the Green Belt assessment, site HRA SA3 and SA4, the Spatial Strategy, housing policies and cumulative impacts. Their response can be summarised into the following key points:

- Concerns that the assessment underestimates the contribution of land around Radlett to Green Belt purposes and does not adequately consider cumulative impacts.
- Objection to development of sites HRA SA3 and HRA SA4, due to risks of settlement coalescence, loss of Green Belt openness, and harm to countryside character.
- Support for directing growth to the most sustainable settlements but opposes exceptions that would allow development in less sustainable locations.
- Questioning housing exceptions in very small rural settlements as inconsistent with the Plan's sustainability objectives.
- Seeking removal of the site HRA SA4 due to the impacts on agricultural land, landscape buffering, heritage assets, accessibility, and local infrastructure.
- Concern over the cumulative impact of development of HRA SA3, HRA SA4 and HRA SA6 as it is considered likely to expand Radlett, alter local character, increase settlement merging, and undermine Green Belt purposes.

6.3.6 A response on behalf of **Killik & Co Trustees** welcoming a focus on deliverability and strengthening the housing trajectory, although concerns are raised around the approach within housing policies in the Plan. Their submission can be summarised into the following points:

- Concern that the proposed spatial strategy is not suitable for sustainable place-making and growth.

- Support for strengthening the housing trajectory with additional supply to ensure flexibility and appropriate development for the area.
- Concern that Policy H10 needs to provide stronger support for specific site allocations of an appropriate scale and density within the smaller rural settlements and villages, rather than relying on windfall developments.
- Recommendation that sites which feature naturally defensible boundaries should be prioritised, such as existing hedgerow landscape features. This would help to best protect smaller rural settlements and villages from inappropriate levels of growth, and early engagement through the Plan process can ensure the right type of growth for local needs.
- Support for the allocation of the site at Church Lane, Aldenham in contributing to housing delivery.

6.3.7 **Clowes Development UK** submitted a brief response focused on a plot to the **east of Barnet-By-Pass (A1),** summarising the constraints and opportunities of the site. In summary this representation:

- Agrees that there are sufficient local infrastructure and services to support the provision of an employment scheme in this location.
- References some environmental constraints, including allocation of a Local Wildlife Site on part of the site, existing woodland, Flood Zone 2 along the western boundary, and some areas of surface water flooding.
- Mentioned a previously permitted scheme on the site which was refused due to the access proposed from Rowley Lane.

6.4 Local Community Groups and Interest Groups

6.4.1 Representations in this category include feedback from organisations including those summarised below.

6.4.2 Please note that where templates for responses to the Local Plan consultation were provided by local community or interest groups and copied by residents, these have been reflected in our report in the previous section 6.2 above, rather than here.

6.4.3 **Herts & Middlesex Wildlife Trust** (HMWT) submitted a detailed response to the Hertsmere Local Plan Regulation 18 consultation, focusing on the Plan's approach to biodiversity, Local Wildlife Sites, green and blue infrastructure, and nature recovery. In summary, their submission gave the following feedback, which:

- Urged inclusion of all designated sites and Local Wildlife Sites (LWS) on the policies map, with clear boundaries and links to the Local Nature Recovery Strategy (LNRS).
- Noted some allocations overlap or border LWS; recommended integrating LWS into site design, applying buffers, and using Ecological Impact Assessments (EcIA) for all relevant sites.
- Called for stronger protection and creation of priority habitats in Policies GI1 and GI2, with specific reference to chalk streams and ecological networks.

- Recommended Policy GI4 sets more ambitious Biodiversity Net Gain (20%), includes species recovery, and requires swift/bat bricks in new buildings.
- Suggested Policy GI5 support features for priority urban species (e.g., swifts, bats, hedgehogs).
- Supported air and groundwater policies; requested more on soil, noise, and light pollution. Emphasised use of up-to-date ecological data and LNRS.

6.4.4 **British Horse Society** (BHS) Hertfordshire Access Team submitted a detailed response to the Hertsmere Local Plan Regulation 18 consultation, focusing on the Plan's approach to countryside access, equestrian infrastructure, and the rural economy. In summary, their submission gave the following feedback:

- Welcomed the opportunity to comment but expressed concern that the draft Plan fails to adequately recognise the strategic importance of Public Rights of Way, bridleways, and equestrian users within Hertsmere's predominantly rural and Green Belt landscape. Noted that the Plan adopts an urban-centric approach, with insufficient consideration for rural communities, countryside access, equestrian safety, and the rural economy.
- Highlighted an opinion of clear regression from the previous Local Plan, which had explicitly supported non-motorised multi-user access networks (including horse riders) and Greenways. The new Plan removes almost all references to equestrians, bridleways, and countryside connectivity, despite increased development pressures and national policy support for active travel and healthy lifestyles.
- Stressed the economic significance of the equestrian sector in Hertfordshire, with around 21,694 horses contributing an estimated £143 million annually to the local economy. Emphasised the need for explicit policy support for Greenways, bridleway enhancement, equestrian access and safety, and integration of horse riders within sustainable transport and Green Infrastructure planning.
- Found the Plan does not suitably recognise the rural economy, with little meaningful support for agriculture, recreation, rural SMEs and related industries.
- Criticised the Plan for not recognising Rights of Way and bridleways as strategic infrastructure assets, and for treating Green Infrastructure mainly as mitigation for development rather than as a spatial constraint shaping growth. Argued that the Plan risks severing rural communities and undermining health, sustainability, and rural economic resilience.
- Recommended that the Plan should:
  - Include a dedicated rural economy policy to support related industries and jobs for a prosperous rural economy
  - Reinstate explicit policy support for Greenways, bridleways, and multi-user access routes
  - Recognise equestrians as vulnerable road users

  - Strengthen policies protecting Green Belt openness and countryside character
  - Support the rural economy and equestrian sector
  - Require safe multi-user connectivity within new developments
  - Ensure Green Infrastructure functions as a genuine spatial constraint.
- Asserted omissions in policies relating to inclusive access, healthy communities, and sustainable transport, and called for greater recognition of the health and wellbeing benefits of equestrianism, especially for women, older adults, and disabled participants.
- Contended that the Plan currently fails to integrate countryside access, equestrian activity, rural recreation, and the rural economy into its spatial strategy, green infrastructure, and transport framework, and requested amendments to address these issues.

6.4.5 **Bushey and District Footpaths Association** (BADFA) submitted a response to the Regulation 18 consultation, focusing on the draft Local Plan's approach to open space, Green Belt, and Rights of Way. In summary, their submission gave the following feedback:

- Supported regeneration and development of previously used sites in Bushey town centre but opposed expansion into valued open green spaces and excessive reclassification of Green Belt as "grey belt" for development. Stated the draft Plan's housing proposals for Bushey go too far.
- Emphasised the importance of high-quality open space, referencing the NPPF, and strongly urged that areas set aside as open space in planning applications be voluntarily registered as Town or Village Greens for long-term protection.
- Stressed that existing Rights of Way and footpaths should be maintained and improved, with diversions only in exceptional cases. Urged the Council to ensure commitments to enhancing walking and cycling routes are delivered in practice.
- Provided site-specific comments:
  - HBUSA SA4: Opposed development at Harts Farm (recently refused as Green Belt); highlighted ongoing issues with blocked Rights of Way (Bushey 33 and 40).
  - HBUSA SA5: Noted two Rights of Way (Bushey 12 and 21) cross the site.
  - HBUSA SA6: Noted Right of Way (Bushey 50, part of the London Outer Orbital Path) crosses the site.
  - HBUSA SA7: Supported some development on brownfield land but urged legal protection for planned open space (preferably as Village Green) and creation of a new Right of Way from Bushey High Street to Merry Hill Road.

  - HBUSA SA8: Supported creation of a new Right of Way south of Hillfield Brook to supplement Bushey 03, which is narrow and difficult in places.

6.4.6 **Elstree and Borehamwood Green Belt Society** (EBGBS) submitted a comprehensive response to the Regulation 18 consultation, focusing on the draft Local Plan's approach to Green Belt protection, spatial strategy, site allocations, and infrastructure. Their submission can be summarised as EBGBS:

- Welcomed the need for an up-to-date, plan-led Local Plan, but strongly objected to the standard method housing target and the disproportionate allocation of new homes to Borehamwood. Advocated for a capacity-led approach, prioritising urban brownfield and previously developed land, and reducing reliance on Green Belt release.
- Opposed the principle and practice of "provisional grey belt" classification, arguing that land is either Green Belt or not, and that sites with flood risk, heritage constraints, or strategic value should be excluded from development.
- Ranked candidate sites from most acceptable (brownfield and consented sites) to most strongly opposed (undeveloped Green Belt and strategic gap sites). Supported urban brownfield sites (HBA SA1–SA15, SA21, SA23) and reluctantly supported consented Green Belt sites (HBA SA17, SA18, SA25, SA26) but strongly opposed development of Hertsmere Golf Course (HBA SA20), Well End (HBA SA16b, SA16c), and land north/south of Allum Lane (HBA SA24, SA19) due to risks of settlement coalescence, loss of wildlife corridors, flood risk, and traffic impacts.
- Objected to candidate sites within the strategic gap between Radlett, Elstree, and Borehamwood (OGB-042, OGB-043), stating these sites perform a high strategic role in preventing coalescence and must remain protected.
- Called for a mandatory "Strategic Gap Policy" to forbid release of land contributing to physical or visual separation of settlements, and for a sequential hierarchy prioritising urban brownfield and built-on land before any Green Belt release.
- Stressed that no Green Belt allocations are sound or deliverable until critical infrastructure bottlenecks are resolved, including expansion of Maple Lodge Sewage Treatment Works, a "No School, No Homes" phasing policy to address secondary school deficits, and funded mitigation for strategic transport bottlenecks.
- Recommended detailed policy amendments, including higher density requirements for any forced Green Belt release, minimum affordable housing quotas, strict biodiversity net gain delivered on-site, and protection of informal community assets such as Well End fields and Hertsmere Golf Course.
- Objected to premature release of Green Belt for employment use and called for full build-out of existing brownfield and safeguarded employment land before any new allocations.
- Proposed alternative spatial strategies, including accelerated delivery at Bowmans Cross to offset development pressure on fragile Green Belt

gaps, and called for robust cross-boundary cooperation and infrastructure guarantees.

- Requested that future iterations of the Plan include plain English summaries, interactive mapping, and transparent monitoring processes to ensure accessibility and accountability.

6.4.7 **Letchmore Heath Village Trust** (LHVT) submitted a detailed response to the Regulation 18 consultation, focusing on the draft Local Plan's approach to growth in Radlett, Green Belt protection, spatial strategy, candidate site selection, and infrastructure. Their submission can be summarised as follows:

- Noted that Radlett is proposed to accommodate an approximate 94% increase in housing, fundamentally altering its scale and character. This is significantly higher than the percentage increases proposed for other main settlements in Hertsmere, requiring careful scrutiny and meaningful public engagement.
- Criticised the consultation process for offering limited strategic choice and failing to present reasonable alternative spatial strategies for Radlett. LHVT advocated for a more iterative, "long form" consultation process that would allow communities to explore realistic alternatives and site combinations before preferred allocations are selected.
- Proposed an alternative dispersed growth strategy based on a wider range of smaller and medium-sized sites promoted through the Call for Sites process. LHVT argued this approach would better align with the Local Plan's stated objectives of sustainable, walkable communities, incremental growth, and protection of settlement character.
- Raised significant concerns about the Green Belt implications of the preferred strategy, especially the use of "provisionally grey belt" as a classification for candidate sites, arguing that this term lacks statutory definition and transparency, and risks facilitating large-scale Green Belt release without robust justification.
- Supported development of four brownfield and previously consented sites (HRA SA1, SA2, SA5, SA7) in principle but opposed allocation of three principal strategic Green Belt sites (HRA SA3, SA4, SA6), citing sustainability, deliverability, infrastructure limitations, and cumulative traffic impacts.
- Called for a more balanced approach to housing requirements, prioritising brownfield redevelopment, regeneration, underused urban land, and incremental growth before extensive release of undeveloped countryside.
- Criticised the Infrastructure Development Plan for lacking certainty regarding delivery, funding, timing, and capacity. LHVT argued that concentrated development risks severe additional pressure on Radlett's constrained road network, schools, station parking, healthcare, water supply, and wastewater infrastructure.
- Recommended clearer infrastructure phasing, funding mechanisms, cumulative impact assessment, delivery triggers, monitoring arrangements, and safeguards linking later phases of development to demonstrated infrastructure delivery.

- Supported regeneration of Radlett town centre and redevelopment of suitable brownfield land but opposed the overall scale and concentration of strategic Green Belt release as unjustified and unsustainable.
- Suggested that a more ambitious approach at Bowmans Cross could accommodate a greater proportion of long-term housing growth in a planned and sustainable manner, reducing pressure for extensive Green Belt release elsewhere.
- Requested that the Local Plan include a clearer framework for managing cumulative housing growth within Radlett, including monitoring and review mechanisms linked to infrastructure capacity, transport impacts, and speculative or windfall permissions.

6.4.8 **North Mimms District Green Belt Society** (NMDGBS) submitted a focused response addressing the draft Local Plan's approach to Green Belt protection, proposed developments on the northern edge of Potters Bar, the new settlement at Bowmans Green, and cross-boundary impacts, which can be summarised as follows:

- Strong objection to the proposed developments at HPBA SA11 (Land at Mutton Lane North) and HPBA SA13 (Former Potters Bar Golf Course), citing concerns that these would encroach into the Green Belt, significantly narrow the gap between Potters Bar and Brookmans Park/Welham Green, and impose substantial traffic and infrastructure pressures on a rural area. The Society considers these proposals inconsistent with the consultation document's vision for Potters Bar's semi-rural character and notes a lack of consultation with Welwyn Hatfield Borough Council.
- Emphasis on the cumulative impact of developing both HPBA SA11 and SA13, which together would create a large arc of new development around Potters Bar's northern and north-western edge, fundamentally altering the character of the area and affecting communities in the neighbouring borough.
- Rejection of the Green Belt assessment that designates these sites as "grey belt," maintaining that the land is currently open farmland and integral to the area's countryside setting.
- Opposition to the proposed new settlement at Bowmans Green, particularly due to its location on the western border of North Mymms parish. The Society highlights the potential for significant additional traffic and infrastructure pressures on North Mymms and surrounding villages and calls for any such development to be subject to full cooperation between neighbouring local authorities.
- Strong criticism of the Green Belt Assessment's conclusions, which the Society believes would, if implemented, remove Green Belt protection from the majority of Green Belt land within the borough.

6.4.9 **Potters Bar (Special Interest Group) Residents Association** (PBSIGRA) submitted a detailed response focused on the draft Local Plan's approach to Green Belt protection, the scale and distribution of development around Potters Bar, infrastructure, and the consultation process. In summary, their submission gave the following feedback:

- Recognition of the need for an up-to-date Local Plan and the provision of new housing, but objection to the current strategy, which is seen as placing excessive emphasis on housing numbers and employment growth at the expense of environmental protection and community wellbeing.
- Strong concern that the consultation process was difficult for many residents to engage with, due to the complexity and volume of documentation, and the structure of consultation questions, which made it challenging to provide alternative viewpoints or strategic objections.
- Criticism of the Local Plan's lack of recognition of Hertsmere's fundamentally rural character, with insufficient weight given to the countryside's role in biodiversity, recreation, landscape character, food production, climate resilience, public health, tourism, and the identity of local communities.
- Emphasis on the importance of Green Belt land in preventing urban sprawl, safeguarding countryside, preserving openness, and maintaining settlement identity. PBSIGRA does not believe the evidence sufficiently demonstrates the exceptional circumstances required for the scale of Green Belt release proposed and expresses concern about the use of "grey belt" as a concept.
- Advocacy for prioritising brownfield development, regeneration of vacant commercial sites, and urban intensification before considering substantial Green Belt release.
- Objection to the proposed allocations around Potters Bar (HPBA SA11, SA12, SA13, and SA14), which would introduce over 2,600 dwellings onto land that currently forms an important part of Potters Bar's countryside setting. PBSIGRA highlights the contradiction between the plan's stated recognition of the importance of countryside and the scale of proposed development.
- Concern about the cumulative impact of these allocations on Green Belt openness, settlement identity, countryside access, landscape character, biodiversity, infrastructure capacity, and residents' quality of life.
- Insufficient evidence is provided to demonstrate how infrastructure, healthcare, schools, water supply, wastewater systems, and road capacity will keep pace with the scale of proposed growth.
- Call for stronger policies to protect and enhance countryside access, public rights of way, and the Greenways network, as well as greater emphasis on health and wellbeing, the rural economy, food security, and climate resilience.

6.4.10 **The Heath-Ways Residents' Association** provided a short response focused on Green Belt reclassification. Regarding PB002, members of the Association strongly oppose the downgrading of the site from Green Belt to grey belt designation.

6.4.11 **The Radlett Society and Green Belt Association** (RSGBA) submitted a detailed response focused on the draft Local Plan's approach to Green Belt protection, the scale and distribution of development around Radlett, infrastructure, and the consultation process. In summary, their submission gave the following feedback:

- Acceptance that Hertsmere must deliver plans for new homes and that Radlett should make a fair contribution, but strong objection to the proposed 2,900 new homes around Radlett—representing a 94% increase in the settlement—due to lack of supporting infrastructure and the absence of sustainable development proposals.
- Support for the plan's stated spatial objectives for Radlett, including the principle of incremental residential growth, but criticism that most candidate sites represent large-scale urban extensions rather than incremental development, and lack associated economic growth or infrastructure proposals.
- Concern that the plan does not address existing traffic problems in and around Radlett, and that the majority of proposed sites are not within walking distance of the station, shops, or medical facilities, making them unsustainable and likely to increase car dependency.
- Objection to the use of the "standard method" for calculating housing need, arguing that it does not reflect Hertsmere's unique Green Belt constraints, and calling for a locally tailored approach that prioritises brownfield and vacant sites.
- Criticism of the Green Belt assessment and the introduction of "grey belt," which RSGBA believes is not supported by national policy and would result in excessive loss of Green Belt land. The Society calls for a rigorous, evidence-based approach to any boundary changes.
- Concern that the plan underestimates the contribution of the proposed Bowmans Cross settlement and overburdens Radlett's Green Belt to meet housing targets, recommending that Bowmans Cross be counted more fully towards the borough's housing supply.
- Detailed site-by-site comments, supporting limited development on previously developed land (e.g., former petrol station), but objecting to large-scale development on Green Belt and high-quality agricultural land (e.g., Home Farm/Brickfields, North of Watford Road/Kemprow), and advocating for the use of smaller, more sustainable sites.
- Call for ambitious policies on tree and hedgerow planting, support for Aldenham Country Park, and concern over the lack of policies for the positive future of the Green Belt.
- Criticism of the consultation process for being too short and lacking meaningful engagement with local communities, and concern that the plan's candidate site approach increases uncertainty for residents.
- Endorsement of a "brownfield first" approach, greater focus on regeneration, and a borough-wide assessment of agricultural land loss, as well as stronger policies for countryside and public rights of way protection.

6.4.12 **Save Our Shenley** Community Group submitted a detailed response focused on the draft Local Plan's approach to Shenley's sustainability, recent planning decisions, infrastructure, Green Belt policy, and the consultation process. In summary, their submission gave the following feedback:

- Recognition that the Local Plan document states Shenley is not sustainable for development and purports to recommend no development in or around Shenley, but strong objection that recent approvals for over 380 homes in Shenley Village and nearly 600 across the Parish contradict this published spatial strategy. The Group requests that permissions inconsistent with the Local Plan's strategy be withdrawn to ensure policy coherence.
- Concern that planning decisions taken in 2025 and early 2026 were in direct contravention of the Council's own policy documents and the agreed Local Plan, with specific reference to sites identified in Appendix M as not sustainable or suitable for development. The Group calls for these issues to be addressed before the Regulation 19 stage.
- Criticism that the draft plan underestimates or fails to assess the cumulative impacts of development on Shenley, including roads, junctions, public transport, schools, GP surgeries, and utilities. The Group highlights that major allocations such as the Borehamwood Extension and Bowmans Cross extend into Shenley Parish but are not properly represented as such in the plan.
- Objection to the Well End extension, citing unsustainable impacts on traffic, pollution, road safety, and the rural setting, as well as inappropriate encroachment on listed buildings and the potential for further industrial expansion.
- Concern over the absence of suitable public transport proposals, noting that Shenley is left surrounded by car-dependent developments with inadequate bus services, and that planned development will more than double the size of the village without sustainable transport solutions.
- Criticism of the Green Belt and "grey belt" assessment, arguing that land in Shenley identified as "provisionally grey belt" should not be treated as suitable for development without further detailed assessment, and that the plan fails to properly consider rural character, exceptional circumstances, brownfield alternatives, and smaller, sustainable sites.
- Request that the Regulation 19 Local Plan properly recognises the Shenley Neighbourhood Plan and its Design Code, and that future updates are reflected in a dedicated policy, as many aspects of the draft plan conflict with the Neighbourhood Plan

6.4.13 **Boyer** submitted a detailed response on behalf of **the United Synagogue** across a range of topics. It gives support for the need to sustainably meet housing needs with a robust strategy but raises concerns about the spatial strategy and the deliverability of housing in the Plan period. In summary, their submission gave the following feedback:

- Whilst supporting the overall vision for sustainable growth that addresses housing need, the spatial strategy may not be the most effective approach, naming as an example the reliance on strategic allocations to the east of Borehamwood.
- Support for development of grey belt land to the north of Borehamwood. The site HEL359 is found to be suitable to qualify as grey belt, with no overriding ecological, flood risk or heritage constraints but is classified as 'Provisionally grey belt'.

- Support for housing growth in Bushey, and Shenley should also accommodate proportionate growth.
- Disagreement with the deliverability of Bowmans Cross within the plan period, when considering the environmental constraints, proximity to the M25, and infrastructure requirements.
- Concern that under Policy H1 the Plan does not set out how identified housing need will be met over the Plan period.
- Suggest bringing forward additional sites of scale, including small and medium sized sites, deliverable in early years of the Plan due to over-reliance on windfall delivery and very large strategic sites to meet housing needs within the period. Reliance on past delivery trends is questioned due to the 2021 Local Plan being outdated. Sites over 1,000 homes are unlikely to contribute to the 5-year supply.
- Concern that urban sites have existing viable uses and may not come forward in the plan period.
- Support that exceptional circumstances do justify amendments to Green Belt boundaries, with it not being possible to meet housing need with urban sites alone.
- Recommendations are made that:
  - The plan period should instead cover 18 years to meet required housing figures, able to deliver 18,430 homes including a 20% buffer to address poor Housing Delivery test scores.
  - The borough's baseline housing target should be comprised of the national standard method figure and a suitable buffer.

6.4.14 **Moonstone Rescue** submitted a response focused on the impact of development on wildlife and natural habitat in the Borehamwood area. In summary, their submission gave the following feedback:

- Significant concerns are raised on the potential impact of proposed housing development on local wildlife populations, particularly the loss of habitat resulting from construction activity and land use changes. There is risk of severe and long-lasting impacts and harm to protected species, and mitigations cannot always adequately replace established ecosystems. Disturbance can also lead to increases in pest species.
- There are secondary impacts to local landscape character for communities in Well End and Borehamwood.
- Support for the implementation of biodiversity net gain principles within new developments to ensure measurable environmental enhancement.
- Recommendations are made for:
  - Inclusion of swift bricks and bee bricks in new build developments.
  - Incorporation of requirements for wildlife access points in boundary designs.

6.5 Underrepresented Groups

6.5.1 There are some groups and individuals who are less likely to participate in Local Plan consultations, because they may experience barriers to engaging with the Plan in the most common ways that are promoted by the Council.

6.5.2 Based on HBC's previous experience, in Hertsmere this can include some older and younger people, those with a disability, some members of rural and travelling communities, as well as persons from religious and ethnic minorities.

6.5.3 Efforts made by the Council to address common barriers to engagement on this Local Plan consultation at Regulation 18 stage have included making the consultation material available in a variety of ways, as well as offering a mix of ways for people to respond with feedback, online via a bespoke consultation platform hosted by provider Commonplace, via email, by post, or at one of a number of in-person events that were on offer. Specific documents were made available in an accessible printed format on request.

6.5.4 The Council also took reasonable steps to support accessibility throughout the consultation process. Consultation material was made available in alternative formats where requested, including large-print versions and copies printed on coloured paper to assist participants with visual impairments. Whilst engagement activity was not targeted towards particular groups, the consultation was undertaken in line with statutory requirements and the Council's Statement of Community Involvement, ensuring that all members of the community had the opportunity to access information and provide feedback.

6.6 Prescribed Consultation Bodies

We received representations from the following statutory consultees:

Table 3: List of Prescribed Consultation Bodies to have provided feedback

Consultee name	Consultee type
Hertfordshire County Council (HCC) - Growth team	Prescribed Consultation Body, County Council
HCC – As landowner	Prescribed Consultation Body, County Council
Aldenham Parish Council	Prescribed Consultation Body, Parish/Town Council
Shenley Parish Council	Prescribed Consultation Body, Parish/Town Council
South Mimms and Ridge Parish Council	Prescribed Consultation Body, Parish/Town Council
Elstree and Borehamwood Council	Prescribed Consultation Body, Parish/Town Council
London Colney Parish Council	Prescribed Consultation Body, Parish/Town Council

Enfield Council	Prescribed Consultation Body, Neighbouring Authority
Welwyn Hatfield Council	Prescribed Consultation Body, Neighbouring Authority
London Borough of Barnet Council	Prescribed Consultation Body, Neighbouring Authority
London Borough of Harrow Council	Prescribed Consultation Body, Neighbouring Authority
St Albans District Council	Prescribed Consultation Body, Neighbouring Authority
Watford Borough Council	Prescribed Consultation Body, Neighbouring Authority
Natural England	Prescribed Consultation Body
National Grid	Prescribed Consultation Body
Environment Agency	Prescribed Consultation Body
Historic England	Prescribed Consultation Body
Network Rail	Prescribed Consultation Body
Sports England	Prescribed Consultation Body
National Highways	Prescribed Consultation Body
Thames Water	Prescribed Consultation Body
Affinity Water	Prescribed Consultation Body
Department for Education	Prescribed Consultation Body, Central and Local Government Departments
Ministry of Defence - Defence Infrastructure Organisation	Prescribed Consultation Body, Central and Local Government Departments
NHS CEICB	Prescribed Consultation Body, Central and Local Government Departments
NHS Property Services	Prescribed Consultation Body, Central and Local Government Departments

6.7 Parish and Town Councils

6.7.1 Representations were received from the following:

- Aldenham Parish Council
- Shenley Parish Council
- Elstree and Borehamwood Council
- London Colney Parish Council

6.7.2 **Aldenham Parish Council** submitted three documents in their representation, which included a main response document, a transport

technical note appendix, and an appendix “Sandersons Accessibility by Sustainable Travel Modes report for the proposed sites”.

- In summary, Aldenham Parish Council (APC) supports the need for a new Local Plan but objects to the scale and distribution of proposed development in Radlett, the loss of Green Belt, and the lack of supporting infrastructure. APC recommends a revised, infrastructure-led approach prioritising sustainable, accessible, and policy-compliant growth.
- Scale of Development in Radlett: APC objects strongly to the proposed allocation of 2,900 new homes in Radlett, which would increase the number of households by over 90%. This is considered unsustainable and disproportionate compared to other Hertsmere settlements. Radlett lacks the infrastructure, services, and road capacity to support such a dramatic increase.
- Green Belt Loss: APC is alarmed at the scale of Green Belt land proposed for removal, particularly following the Green Belt Assessment, which designates approximately 75% of Hertsmere as ‘grey belt’ or ‘potential grey belt’. APC argues this undermines the fundamental purposes of the Green Belt and is contrary to national policy.
- Traffic and Transport: Technical assessments commissioned by APC show that key junctions in and around Radlett are already operating at or over capacity. The cumulative impact of the proposed developments would lead to severe congestion, increased delays, and queuing, with no clear mitigation strategy.
- Accessibility and Sustainability: Most candidate sites (except HRA SA1 and SA2) are not within the recommended 800m walking distance of Radlett Station. Many sites lack adequate pedestrian, cycling, and public transport links, making them car-dependent and contrary to sustainable travel objectives.
- Housing Numbers and Distribution: APC objects to both the overall housing target for Hertsmere (21,400 homes) and the distribution, which places an excessive burden on Radlett relative to its size and infrastructure.
- Green Belt Assessment Methodology: APC disputes the methodology and conclusions of the Green Belt Assessment, particularly the classification of land around Radlett as ‘grey belt’, and argues for a more robust, policy-compliant approach.
- Prioritise Brownfield and Urban Sites: APC urges the Council to focus on urban regeneration, brownfield, and infill sites, and to protect the Green Belt wherever possible.
- Review Housing Targets: APC recommends that Hertsmere challenge the government’s ‘standard method’ for calculating housing need, and the 20% buffer, given the high proportion of Green Belt and low delivery rates.
- Infrastructure First: Any development must be contingent on the prior delivery of supporting infrastructure, especially highways, schools, health, and public transport.
- Traffic Mitigation: Major junction improvements and robust traffic mitigation are required before further development is considered.

6.7.3 The table below summarises APC's feedback on Candidate Sites:

Table 4: Summary of APC' feedback on candidate sites

Site	APC Position	Key Issues Identified
HRA SA1	Support	Central, accessible, sustainable
HRA SA2	Support (with parking)	Central, accessible, but parking must be sufficient
HRA SA3	Object	Green Belt, high traffic, poor accessibility, coalescence risk
HRA SA4	Object	Green Belt, agricultural loss, poor accessibility, high traffic
HRA SA5	Support	Planning permission granted
HRA SA6	Object	Remote, unsustainable, traffic, Green Belt, no bus service
HRA SA7	Partial Support	Support for Starveacres only; object to land west of Starveacres

6.7.4 **Shenley Parish Council** submitted a single document representation and provided the following summary of their views:

- The draft Regulation 18 Local Plan has been published prematurely and cannot be supported in its current form.
- Housing capacity on paper does not remove delivery risk. That risk has not been adequately assessed.
- Basic evidence is absent, incomplete or inadequate, including infrastructure assessment and need, cumulative impact assessment, viability testing, delivery evidence and draft policy wording.
- Viability must not become a broad mechanism for weakening policy requirements, design quality or good placemaking.
- Weak housing delivery across the borough increases pressure for grey belt release and speculative development everywhere, including during the years before planned Local Plan growth is actually delivered. This interim period is not properly addressed in the assessment work. Shenley Parish already has 422 consented homes, which will place further pressure on local infrastructure.
- Land in Shenley identified as "provisionally grey belt" must not be treated as suitable for development. Further detailed assessment is required, particularly in relation to NPPF footnote 7 constraints.
- The Regulation 19 Local Plan must properly recognise the Shenley Neighbourhood Plan, Design Code and future updates through a dedicated policy.
- Shenley cannot and will not rely on the future Local Plan alone. The Shenley Neighbourhood Plan, evidence base and Design Code need urgent updating.
- Shenley's settlement status is reflected ambiguously across different parts of the evidence base. This needs to be rectified.
- Density assumptions for settlement extensions overall should not be set at such low levels (23dph) across the whole borough without being properly contextualised. They should support better connected, more sustainable and more sociable places and communities.

- The Parish Council would welcome a meeting with the Interim Head of Planning and the Portfolio Holder to discuss our situation and next steps before the end of June. This in light of the pace at which this process is moving.

6.7.5 **Elstree and Borehamwood Town Council**, like Shenley submitted a single document response, summarising that the Town Council:

- recognises the need for an up-to-date Hertsmere Local Plan;
- supports a plan-led approach rather than speculative or appeal-led development;
- accepts that additional housing must be planned for within the national planning framework;
- strongly supports a brownfield-first approach and asks that brownfield land, regeneration opportunities and urban intensification are fully explored before Green Belt release is confirmed;
- raises serious concerns regarding the scale and distribution of proposed Green Belt and grey belt release affecting Elstree and Borehamwood;
- asks that any proposed Green Belt or grey belt release is justified by clear, robust and transparent evidence;
- asks that the identity and separation of existing settlements, including Well End and Elstree Village, are protected wherever possible;
- asks that the cumulative impact of growth on Elstree and Borehamwood is assessed carefully;
- asks that infrastructure is planned, funded and delivered alongside development, not after development has already taken place;
- asks that health, air quality, GP provision, dental provision, school capacity, traffic and public transport are given greater weight;
- asks that wildlife, ecology, trees, hedgerows, drainage and biodiversity are considered cumulatively as well as site-by-site;
- asks that the mental health and wellbeing value of accessible Green Belt and open space is properly recognised;
- asks that the emerging Elstree and Borehamwood Neighbourhood Plan and supporting evidence are taken into account wherever possible;
- asks that affordable housing requirements are reviewed carefully in light of identified local need and viability evidence;
- asks that town centre redevelopment protects local businesses, shops, parking, employment and community services;
- asks that delivery mechanisms remain robust in the context of Local Government Reorganisation; and
- requests continued engagement with Elstree and Borehamwood Town Council as the Local Plan progresses.
- The Town Council reserves the right to make further comments at later stages of the Local Plan process, including at Regulation 19 and in

relation to specific site allocations, infrastructure evidence, policy wording and delivery mechanisms.

6.7.6 **London Colney Parish Council** also provided a brief representation, in which their most critical issue is highlighted as the proposed Bowmans Cross development (HBCA SA1), on which their views are stated as follows:

- The Local Plan will not be reliant upon the delivery of the new settlement to meet local needs *(i.e. housing numbers)* or demonstrate housing supply during this plan period.
- There is agreement that this location is not a sustainable location for new development. Particularly with regard to transport infrastructure.
- Hertsmere BC believe that "it could be made sustainable through the delivery of an appropriate scale and mix of development and supporting infrastructure" without clarifying what this might be.
- Hertsmere BC will be abolished in less than 2 years but wishes to consider the benefits and opportunities that could be secured …. in a wider context of at least thirty years.
- The proposed location spanning both sides of Coursers Road will inevitably lead to coalescence with both Colney Heath and London Colney, irrespective of any immediate proposals for defensible boundaries.
- The proposal identifies high-value environmental assets at risk, including Redwell Wood SSSI, Ancient Woodland, and the Tyttenhanger Stream corridor.
- The settlement is in an area that will suffer significant increases in traffic volumes because of the Strategic Rail Freight Interchange, which is currently under construction.

6.7.7 The Parish Council therefore objects to the site on the following grounds:

- The settlement is not needed to meet the housing needs identified for the plan.
- The settlement is not in a sustainable location.
- In the light of the strained transport infrastructure and the impending traffic increase from the SRFI, the location cannot be made sustainable without prohibitive levels of investment in the surrounding road and transport infrastructure.
- No special circumstances have been established for the loss of green belt and the environment surrounding Redwell Wood SSSI, the Ancient Woodland, and the Tyttenhanger Stream corridor. All of which are an important part of the rural hinterland of London Colney.
- The likely coalescence of any settlement with Colney Heath and London Colney, undermining the distinctive characters of these settlements.
- The long-term nature and wide geographic impact of the proposal make it inappropriate for a plan under development by HBC in its final 24 months.

6.7.8 Should the proposal be brought forward to the regulation 19 plan then the Parish Council consider it essential that a full and detailed analysis of the infrastructure required to make the site sustainable is included with the documentation. In line with policy this should include cumulative impact of development including within the Borough and neighbouring local authority areas. Therefore, the Parish Council deems that this would need to include the Radlett SRFI.

6.8 Hertfordshire County Council

6.8.1 Hertfordshire County Council (HCC) submitted two responses, one in their capacity as the county council and lead authority for matters including education and highways, and one in HCC's capacity as a landowner.

6.8.2 The first was a detailed 132-page representation, combining general comments and more detailed comments from various relevant services within HCC. Below, we provide a summary of key recommendations made by HCC for HBC and their emerging Local Plan by theme. Recommendations were also shared with specialists preparing the Local Plan evidence, where comments are relevant (e.g. the Infrastructure Delivery Plan, Transport Assessment etc), to take into account in more detail.

6.8.3 In summary HCC's representation recommends that HBC:

- Embed health, wellbeing, and sustainability throughout the Local Plan.
- Strengthen transport, education, and community infrastructure policies to support projected growth.
- Safeguard and expand waste, flood, and specialist housing facilities.
- Integrate nature recovery and biodiversity priorities.
- Ensure site-specific policies address connectivity, heritage, and environmental risks.

6.8.4 These recommendations are aimed at helping to deliver a robust, inclusive, and sustainable Local Plan for Hertsmere, aligned with national and local guidance. Below we have listed HCC recommendations to HBC by theme.

6.8.5 On Health & Wellbeing:

- Embed health and wellbeing as a central theme in the Plan's Vision and Strategic Objectives, using local health evidence and the Hertfordshire Healthy and Safe Places Framework.
- Strengthen policies on healthy community infrastructure, ensuring facilities are within walking distance and accessible by active travel/public transport.
- Include health impact assessments consistent with Hertfordshire's Health Impact Assessment Position Statement; refuse planning permission for proposals causing unacceptable harm to public health.
- Add policy controls for hot food takeaways near primary schools, alcohol premises, and age-friendly design.

- Prioritise healthy housing, addressing indoor air quality, thermal comfort, low-carbon/energy-efficient housing, and pollution reduction.
- Incorporate indicators from the Healthy and Safe Places Framework in performance monitoring.

6.8.6 On Transport & Connectivity:

- Develop a borough-wide transport strategy to mitigate impacts of Local Plan development.
- Conduct cumulative testing on highways impact for candidate sites.
- Secure deliverable packages of highways infrastructure in plan policy.
- Reference Hertfordshire Local Transport Plan, Place and Movement Planning Guide, and Developer Infrastructure Contributions Guide.
- Enhance public rights of way and integrate them into relevant policies.
- Prioritise sustainable transport, active travel, and high-quality connections to public transport in site-specific policies.

6.8.7 On Education & Childcare:

- Identify and allocate sites for new secondary schools, especially in the west of the borough.
- Secure land for primary schools in major developments (e.g., Well End Strategic Urban Extension, Bowmans Cross).
- Plan for sufficient childcare settings based on projected demand; ensure flexibility in delivery.
- Include criteria for new children's homes and supported accommodation for vulnerable groups.
- Engage with neighbouring authorities to address cross-area school demand.

6.8.8 On Adult Social Care & Specialist Housing:

- Disperse delivery of older persons' housing across settlements, based on population needs.
- Undertake viability testing for site typologies.
- Incorporate specialist housing (extra care, nursing homes, supported living) in allocations, following locational criteria.
- Set clear affordable housing expectations for housing-with-care schemes.

6.8.9 On Waste Management & Flooding:

- Expand and modernise recycling centres (Potters Bar, Elstree) to meet growth demands.
- Safeguard existing waste management sites; clarify intentions for facilities adjacent to new allocations.
- Require Site Waste Management Plans for all major developments.
- Address flood risk in site allocations, referencing Lead Local Flood Authority recommendations.

6.8.10 On Natural Environment & Biodiversity:

- Integrate the Hertfordshire Local Nature Recovery Strategy (LNRS) into spatial strategy and site allocations.
- Avoid harm to priority biodiversity areas; contribute to habitat creation/restoration.
- Embed nature recovery within strategic allocations and green infrastructure networks.
- Align biodiversity net gain delivery with LNRS priorities.

6.8.11 On Community Infrastructure & Libraries:

- Secure contributions for improvements and modernisation of libraries, especially Oakmere Library (Potters Bar).
- Use new community spaces for youth work and reflect this in policy.
- Monitor and expand youth services to meet demand from growth.

6.8.12 On Fire & Rescue:

- Ensure relocation of fire stations if sites are redeveloped; maintain service delivery.
- Seek planning obligations for fire and rescue services via S106/CIL.
- Design developments for fire safety, including water supply, hydrants, and emergency access.

6.8.13 On Site-Specific Recommendations:

- For each candidate site, ensure high-quality pedestrian/cycling connectivity, enforceable travel plans, and integration with public transport.
- Address heritage, flood, minerals, and waste issues at planning application stage.
- Safeguard and expand recycling centres where necessary.
- Require archaeological assessments for sites with heritage potential.

6.8.14 HCC's second representation, **in its capacity as a landowner**, is a shorter letter focused on HCC's promotion of several sites for residential and mixed-use development, including the following key sites: Elstree Way Clinic, Cheeky Monkeys Nursery & former Library, Borehamwood (HBA SA4); Borehamwood Fire Station, Borehamwood (HBA SA9); and Land South of Watford Road & West of New Road, Radlett (HRA SA4). HCC also promoted other sites not currently included as residential candidate sites.

6.8.15 In summary, HCC's main recommendations urge HBC to be more flexible in its settlement and Green Belt policies, to include more HCC-owned sites for development, and to make practical adjustments to support community infrastructure and sustainable growth. HCC expresses strong support for the inclusion of its key sites and commits to ongoing engagement as the Local Plan progresses.

6.8.16 Key Recommendations by HCC in its capacity as a landowner include:

- Vision & Strategic Objectives: HCC supports the need for an up-to-date Local Plan and agrees it must be demonstrably sound. However, HCC disagrees with the proposed settlement hierarchy, recommending that some development should be included in Category V villages (e.g., Elstree, South Mimms), where HCC owns suitable land.
- Expand Settlement Hierarchy: Allow development in Category V villages (Elstree, South Mimms) on HCC-owned land.
- Green Belt Review: Reconsider sites with weak Green Belt contribution (Edgewarebury Farm, Sunnybank School) for residential allocation.
- Spatial Strategy Adjustments: Include HCC sites in the growth strategy, especially for supported living and emergency services relocation.
- Site-Specific Support: Endorsement of HBA SA4, HBA SA9, and HRA SA4 as residential candidate sites, with practical recommendations for reprovisioning community uses and boundary updates.
- Further Technical Work: Commit to providing additional technical evidence and feasibility studies for promoted sites at later stages.
- More specific recommendations are listed below.
  - On Green Belt Assessment, HCC disagrees with HBC's approach, arguing that some HCC-owned sites (e.g., Edgewarebury Farm, Sunnybank School) make a weak contribution to the Green Belt and should be considered for development.
  - On the subject of Spatial Strategy, HCC does not support the proposed spatial strategy, recommending that development be allowed in Category V villages, especially on sustainable, accessible HCC-owned land. HCC suggests Edgewarebury Farm could provide supported living housing, and Popes Farm could facilitate relocation of Potters Bar Fire Station.
  - Specifically on the Borehamwood Area, HCC voiced their support for the spatial strategy for Borehamwood, especially the identification of the Elstree Way Employment Corridor as a key regeneration area. HCC supports the inclusion of HBA SA4 and HBA SA9 as residential candidate sites.
  - Regarding Potters Bar Area, HCC does not support the approach for Potters Bar, recommending that the former Sunnybank Primary School site (previously developed land in the Green Belt) be included for development. HCC notes that part of this site is already being redeveloped for a SEND school.
  - For Radlett Area, HCC supports the approach for Radlett and the inclusion of HRA SA4 as a residential candidate site, but requests boundary amendments to reflect changes in land use.
- On Candidate Site details, HCC provides detailed comments and supports the inclusion of its sites as residential candidate sites. For Borehamwood Fire Station (HBA SA9), HCC notes the need for reprovision of the fire station, ideally close to the strategic road network. For Radlett (HRA SA4), HCC highlights the need for further technical studies and boundary adjustments.

- In conclusion, HCC welcomes the inclusion of its promoted sites and will provide further information at the Regulation 19 publication stage.

6.9 Neighbouring Local Authorities

6.9.1 Representations were received from the following neighbouring authorities:

- London Boroughs of Enfield, Barnet, and Harrow
- Welwyn Hatfield Council
- St Alban's District Council
- Watford Borough Council and
- Three Rivers District Council

6.9.2 **London Borough of Enfield** (LBE) Council submitted a brief single document representation, focusing particularly on the subjects of green belt, strategic urban extensions, data centres and the modern knowledge economy, sustainable travel and transport, with a focus on cross-boundary development and shared interests, particularly in Potters Bar near the Enfield border. In summary, LBE expresses:

- Support for Hertsmere's initiative to develop an up-to-date Local Plan, especially their commitment to sustainable growth and meeting housing needs, including Gypsy and Traveller Accommodation, within Hertsmere's boundaries.
- Concern that Hertsmere's Green Belt Assessment includes land within Enfield's boundary, requesting further officer-level discussions before conclusions are used for planning.
- Request for more information about the proposed allocation of SA12 Land rear of Park Avenue, Potters Bar, which is near the shared boundary and within the Green Belt.
- Encouragement for Hertsmere to consider higher housing densities for strategic urban extensions, with a focus on design quality.
- A request for Enfield to be kept informed about any new settlements or 'New Towns' near the boundary.
- Welcoming Hertsmere's efforts to plan for the modern knowledge economy, including data centres, and a suggestion for a robust policy to guide appropriate locations and resist speculative proposals.
- Encouragement of further engagement on planning for higher education and scientific facilities.
- Support for sustainable transport initiatives, including public transport, walking, cycling, and car-lite development, to improve air quality and climate outcomes, looking forward to more detailed policies as Hertsmere's plan progresses, especially in light of upcoming national policy changes.
- Commitment to ongoing collaboration with Hertsmere on cross-boundary issues and encouragement of further meetings to discuss key matters, especially the Green Belt.

6.9.3 **London Borough of Barnet's (LBB)** brief single document representation, in summary, is broadly supportive of the HBC Plan but highlights the need for robust cross-boundary cooperation on housing, Green Belt, and especially transport issues. LBB emphasises the importance of evidence-based planning, sustainable transport solutions, and ongoing engagement to ensure that growth in Hertsmere does not negatively impact Barnet's communities, infrastructure, or environment, expressing:

- Support for Hertsmere's plan to deliver at least 16,160 homes, including the commitment to meet its own housing needs in full and avoid reliance on neighbouring authorities.
- Support for minimising Green Belt release by focusing growth within urban areas but stressing the importance of consistent Green Belt assessment methodologies across boundaries and ongoing engagement with partners like the Greater London Authority.
- Requesting further information and engagement regarding housing allocations near LBB's boundary, particularly to monitor and mitigate cross-boundary impacts on transport, infrastructure, and local services.
- Highlighting the need for robust, cross-boundary transport planning, with LBB opposing any increase in strategic road capacity within its area and calling for sustainable travel options to be prioritised.
- Noting the scale of proposed employment allocations near the LBB boundary and requesting further information on transport and labour market impacts, with particular attention to cumulative effects on local and strategic networks.
- Requesting continued engagement and information sharing as key evidence (such as the Transport and Movement Assessment and Car Park Study) becomes available, to ensure that growth in Hertsmere does not negatively impact Barnet's communities or infrastructure.

6.9.4 **London Borough of Harrow** (LBH)'s representation document focused on cross-boundary impacts, housing and employment land strategy, Green Belt considerations, and evidence base clarity. In Summary, LBB expresses:

- Support for HBC's housing and employment objectives but raises concerns about Green Belt releases, evidence base clarity, and cross-boundary impacts.
- Request for ongoing dialogue and detailed justification for candidate site selection and infrastructure planning.
- Broad support for the geographical distribution of new homes but notes uncertainty about the exact plan period.
- Concerns about reliance on Green Belt land release to meet housing targets; any such release must comply with NPPF requirements.
- Concern regarding perceived lack of clarity of evidence base (HELAA 2025, Green Belt Assessment 2026) on planning constraints and the rationale for candidate site selection. Previous assessments (2019) found many sites performed strongly against Green Belt purposes, but the 2026 assessment now identifies some as "Grey belt."

- Request for further clarity on which evidence is used for site selection and justification for site deliverability and developability.
- Highlighting potential impacts on infrastructure, especially increased vehicular movements on major roads (A5, A41) on Green Belt sites near LBH boundary.
- Objection specifically to candidate site HBUSA SA6 (Bushey), which is directly on the boundary and within Green Belt. Previous reviews did not recommend it for development and exceptional circumstances for Green Belt release are not fully evidenced.
- Emphasis on importance of Green Belt for separation between London and Hertsmere and expectation for most adjacent parcels to remain protected unless circumstances change significantly.
- Support for additional employment opportunities near the boundary (including employment site HEM SA04 (Extension to Lismirrane Industrial Park), subject to planning considerations.
- Welcoming continued collaboration with Hertsmere to address strategic cross-boundary matters, seeking further discussion on evidence, exceptional circumstances for Green Belt release, and infrastructure impacts.

6.9.5 **Welwyn Hatfield Borough Council** (WHBC) submitted a brief single document response, focused on the Plan's overall approach and cross-boundary matters, southern Welwyn Hatfield sites and Potters Bar, the new settlement at Bowmans Cross, as well as infrastructure, viability and further technical work, which can be summarised as WHBC:

- Commitment to continued collaborative working with HBC as respective Local Plans progress.
- Recommendation that ongoing engagement should focus on ensuring that all cross-boundary impacts are thoroughly understood and mitigated, and that future growth is planned in a positive, sustainable, and highly coordinated manner.
- Recognition of the critical importance of establishing an up-to-date, plan-led framework that is sound, legally compliant, and capable of managing growth sustainably.
- Welcoming Hertsmere's commitment to meeting its OAN for housing in full and agreement that unmet housing needs have the potential to place pressure on neighbouring areas.
- Support for the principle that strategically significant growth locations must be supported by robust evidence and effective joint working where cross-boundary impacts may arise.
- Welcoming Hertsmere's emphasis on planning for infrastructure delivery, design-led development, and the optimisation of site capacity as part of its emerging spatial strategy.
- On Southern Welwyn Hatfield Sites and Potters Bar, noting Hertsmere's representations regarding sites at the southern periphery of WHBC, specifically HEL 5 (Leggatts Park), HEL 7 (Land at Swanley Bar), and HEL 49 (Land south of Hawkshead Road);

- Acknowledgement that these sites have a strong functional relationship with Potters Bar and recognising that development in these locations, in conjunction with candidate sites HPBA 12, 13 & 14 put forward by Hertsmere, could significantly influence the role, function, and infrastructure networks of the wider Potters Bar area.
- Confirming that the future progression of these sites will remain subject to close engagement with HBC to ensure consistency in scale, design quality, and the delivery of coordinated infrastructure and placemaking.
- Noting HBC's identification of Bowmans Cross as a potential new settlement intended to support long-term growth beyond the current plan period.
- Acknowledging Hertsmere's position that Bowmans Cross may not be required to meet the plan-period housing requirement and is instead a strategic opportunity for growth beyond the plan period.
- Recognising the significant future housing pressures across Hertfordshire and, given WHBC's own longer-term needs from the mid-2030s onwards, offering provisional support in principle for Bowmans Cross forming part of the wider area's long-term housing strategy. This includes the potential for the settlement to contribute to meeting some of the future housing needs of the new combined authority of which WHBC may form part, noting that Bowmans Cross may ultimately fall within a new administrative area which may include what is currently Welwyn Hatfield.
- Conditioning that any such support is strictly subject to the development achieving a scale capable of delivering a viable, self-sustaining settlement with shops, services, education provision and significantly enhanced public, active and sustainable transport infrastructure.
- Noting that Bowmans Cross is not currently a sustainable location for growth but could become one with major investment.
- On Infrastructure, Viability, and Further Technical Work, maintaining that further joint technical assessment is essential to fully grasp the transport, education, and wider infrastructure implications arising from cumulative growth in Hertsmere, particularly at Potters Bar and Bowmans Cross. WHBC welcomes the opportunity for ongoing engagement with HBC and HCC to address these requirements through the Duty to Co-operate framework.

6.9.6 **St Alban's District Council** (SADC) submitted a detailed and technical response, focusing on the need for robust evidence, realistic delivery plans, and meaningful engagement with affected communities. The Council's position on Bowmans Cross is clear: it does not support the allocation in its current form and sees substantial barriers to its deliverability and sustainability. SADC's support for employment land and the creative sector is positive, but contingent on further evidence and regional cooperation. SADC's views can be summarised as:

- Welcomes continued constructive engagement with HBC through the Duty to Cooperate process and looks forward to further meetings as the Local Plan progresses. SADC requests that HBC actively consults with London Colney and Colney Heath residents and Parish Councils, keeping them

and SADC fully informed and engaged, including through public consultation events within St Albans district.

- Confirms it currently has no capacity to meet any of HBC's housing needs due to limited land outside the Green Belt and high housing targets set by the Government's standard method. SADC expects HBC to demonstrate it has fully explored all reasonable options for meeting its own housing need within the Borough, given the Green Belt constraints across South West Hertfordshire.
- Raises significant and longstanding concerns regarding the proposed Bowmans Cross site, citing its poor location with limited access to strategic road and rail networks, employment, and facilities, dependence on road access, with insufficient evidence of how sustainable transport and infrastructure will be delivered, low scores in previous transport and accessibility assessments, reinforcing the need for truly transformational investment in infrastructure, concerns over deliverability, phasing, and the significant constraints posed by ongoing mineral extraction and waste operations and critical importance of maintaining a Green Belt boundary at Coursers Road, with no built development north of this line to ensure separation from Colney Heath.
- Expects a significant proportion of affordable housing nomination rights at Bowmans Cross to be agreed with SADC, reflecting the proximity to St Albans communities. This was previously acknowledged by HBC and should be retained in future versions of the Plan.
- Generally supports proposals to grow employment opportunities in the key Hertfordshire TV and film sector and may be able to support the collective South West Herts need for employment land, subject to further evidence and updates.
- Highlights the need for a comprehensive and realistic infrastructure delivery plan, including major investment in transport (public and active travel), utilities, and community facilities. SADC notes the lack of current evidence on transport impacts and expects significant further work to address existing congestion and ensure sustainable travel options.
- Expresses concern about the scale of Green Belt release at Bowmans Cross, the narrowing of the Green Belt between Colney Heath and the new settlement, and the need for exceptional circumstances to justify such changes. SADC also requests significant tree planting and enhancement of the Watling Chase Community Forest.

6.9.7 **Watford Borough Council (WBC)** submitted a concise response, focusing on the Plan's overall approach and cross-boundary matters, including housing need and capacity, secondary school provision, the candidate site at Bushey Golf and Country Club, and issues of connectivity and sustainable transport. The key points from WBC's response can be summarised as follows:

- Welcomes the opportunity to comment on the Draft Hertsmere Local Plan and recognises the importance of coordinated and sustainable development across Hertfordshire. WBC has previously engaged in the Regulation 18 consultation process and Duty to Cooperate discussions

and looks forward to continuing constructive cross-boundary working as the Plan progresses.

- Acknowledges the challenges local authorities face in meeting the standard method housing need. Notes positively that Hertsmere has identified sufficient candidate sites to meet its housing target in full. WBC confirms that, following a robust assessment of land in Watford, there is no suitable or available capacity within Watford to assist Hertsmere with any future housing shortfall.
- Highlights an identified need for new secondary school provision to serve Watford, Bushey, and Radlett, as previously raised by HCC and the South West Herts Strategic Infrastructure Baseline Study (2024). WBC notes this need does not appear in the draft Plan and requests that, if required, it be considered as part of Hertsmere's development strategy, as there are no suitable sites in Watford for this provision.
- Comments on Candidate Site SA7, located within the Green Belt between Bushey and Oxhey (in Watford borough). WBC welcomes the reduction in the site's size compared to the 2024 plan, as this minimises the risk of coalescence between Bushey and Oxhey. Stresses that preventing coalescence must remain a key consideration for any development on this site.
- Supports references in the draft Plan to maintaining strong relationships between Bushey and Watford, particularly in employment and education. Supports proposals to improve walking, cycling, and public transport between Bushey and Bushey station (in Watford), and suggests further reference to improving walking and cycling accessibility to Watford Town Centre, in line with ambitions in the Watford Local Plan and the Local Cycling and Walking Infrastructure Plan (LCWIP).

6.9.8 **Three Rivers District Council** submitted a response giving general commentary on the plan approach and expressing broad support for policies regarding housing provision and safeguarding of key employment areas. The District Council's response can be summarised as follows:

- Agreement with the requirement for a new Local Plan and strong support towards Hertsmere's efforts to sustainably fulfil its housing needs. Agreement that the test of the plan's soundness finds it is positively prepared, justified, effective and consistent with national policy.
- The Council encourages collaboration on key cross-boundary issues and strategic matters to strengthen the soundness of each area's emerging Local Plan.
- Support for Hertsmere meeting its own employment land requirements and growth of the media and film cluster.
- Support for the focus on sustainable travel networks, including the Hertsmere LCWIP, which is in line with the NPPFs focus on achieving sustainable development.
- Suggest the spatial strategy could be clearer on overall housing numbers.

6.10 Other Prescribed Consultation Bodies

6.10.1 **Natural England** submitted a detailed response addressing the Local Plan's evidence base, legal compliance, and the need for further technical work, with a particular focus on the protection of designated sites, water resources, biodiversity, green and blue infrastructure, and the assessment of potential impacts on sensitive habitats. Their comments also cover site-specific allocations, the Habitats Regulations Assessment, and recommendations for policy strengthening, which can be summarised as follows:

- Welcomes the opportunity to comment and recognises the ambition for a joined-up approach with adjacent authorities. However, Natural England's main concern is that the Plan is not currently supported by sufficient evidence to demonstrate that growth will not adversely affect the integrity of Habitats Sites, particularly through water and recreational pressure. They urge Hertsmere to gather outstanding evidence, update the Habitats Regulations Assessment (HRA) and Sustainability Appraisal, and warn that failure to do so may risk the Plan being found unsound at examination.
- Supports the Plan's vision and strategic objectives, but recommends greater emphasis on the natural environment, including integration of Hertfordshire's Local Nature Recovery Strategy (LNRS), investment in blue and green infrastructure, protection of chalk streams, woodland, biodiversity, and climate resilience.
- The spatial strategy's focus on sustainable growth patterns and urban regeneration is generally supported, subject to robust protection and enhancement of designated sites and wider biodiversity. Recommends strengthening policy wording in line with the Sustainability Appraisal and their advice.
- Welcomes placemaking and inclusive design and encourages integration of green infrastructure and species-friendly features (e.g. nest boxes, permeable barriers for hedgehogs, flower-rich gardens). Major allocations should contribute to LNRS enhancement measures and celebrate local natural history.
- Supportive of urban redevelopment and extensions, Natural England encourages integration of green infrastructure and preservation of Green Belt openness. Policies should seek environmental benefits such as landscape enhancement, habitat creation, and improved access to nature.
- Welcomes environmental impact requirements for employment sites, including Biodiversity Net Gain, Urban Greening, SuDS, and public realm. They recommend emphasis on water efficiency, especially in water-scarce areas and sensitive sites, and integration of high-quality habitats in employment greenspace standards.
- Generally supportive of the Green Infrastructure Network and connecting people with nature. Encourages evidence-based policies, referencing their Green Infrastructure Framework and standards, and recommends participation in the Nature Towns and Cities Accreditation scheme.
- Provides specific advice on major allocations:

  - Bowmans Cross: Working with developers to mitigate impacts on Redwell Wood SSSI, expecting provision of high-quality alternative natural greenspace.
  - Water End Swallow Holes SSSI: Allocations within the Impact Risk Zone require further consultation and mitigation measures.
  - Redwell Wood SSSI: Employment allocations should implement strict water retention standards and consult Natural England.
  - Bentley Priory SSSI/LNR: Employment sites must adhere to water standards and consult Natural England.
  - Chilterns National Landscape: Strategic and criteria-based policies needed to protect and enhance valued landscapes, with reference to relevant Management Plans. Allocations within the Bushey and Radlett area should include requirements for delivery aligned with landscape policies.
- Disagrees with the HRA screening conclusion and requires further assessment, including a Water Cycle Study, to rule out significant impacts on Hoddesdon Park Woods SAC and Lee Valley SPA/Ramsar. They are generally satisfied with the SA approach but recommend updates to reflect HRA findings and address biodiversity, water, and air quality risks.
- Supports dedicated climate policies and recommends reference to their Green Infrastructure Framework for climate resilience. They support air quality improvement requirements, expect strategic flood risk management, and recommend tighter water efficiency standards and phased development to ensure environmental capacity is not exceeded.
- Welcomes bespoke BNG policy and suggests a more ambitious target above the national minimum, provided it is evidence-based. Policies should follow the mitigation hierarchy and use the Statutory Biodiversity Metric for site selection.

6.10.2 **National Grid Electricity Transmission (NGET)** submitted a detailed response, highlighting the need to safeguard existing transmission assets, support for future network reinforcement and expansion (including the Great Grid Upgrade), and the importance of early engagement on development proposals near NGET infrastructure. Their submission also addresses site-specific interactions with proposed allocations, the operational requirements for Abnormal Indivisible Loads (AILs), and the balance between infrastructure needs and environmental designations, which can be summarised as follows:

- Emphasises the importance of safeguarding all existing NGET transmission assets (overhead lines, underground cables, substations) and access routes, ensuring development proposals do not compromise safety, operability, maintenance, or future expansion.
- Requests that the Local Plan supports future reinforcement and expansion of the transmission network, including the Great Grid Upgrade and other strategic infrastructure projects, to facilitate the UK's transition to net zero and the connection of new renewable energy sources.
- Advises that development proposals near NGET assets must demonstrate no adverse impact on safety, maintenance, or network expansion.

Recommends policies require developers to address NGET's design guidance at the masterplanning stage.

- Stresses the need to safeguard access routes for the delivery and removal of large equipment, and to resist development or highway changes that would constrain AIL access unless suitable alternatives are secured.
- Identifies several candidate sites crossed by or adjacent to NGET assets, including Organ Hall Farm, Bushey Hall Golf Course, and others. Requests that Local Plan policies for these sites acknowledge and address the presence of NGET infrastructure.
- Notes that parts of NGET freehold land are included within Local Wildlife Site designations. Requests that policies recognise the operational need for future expansion of NGET assets within their freehold land, balancing ecological value with infrastructure requirements.
- Provides links to technical guidance on development near NGET assets and encourages early engagement with NGET to resolve potential issues. Offers ongoing advice and requests to be included in future consultations.

6.10.3 **The Environment Agency (EA)** submitted a detailed response focused on ensuring the soundness of the Local Plan, with particular emphasis on flood risk, water resources, land contamination, biodiversity, and the safeguarding of waste and water infrastructure. Their submission can be summarised as the follows:

- Expressed that further technical work is required for the Local Plan to be found sound, specifically calling for an updated Strategic Flood Risk Assessment (SFRA), Level 2 SFRAs for sites in the flood plain, and evidence that the sequential and exceptions tests have been carried out for those sites. The EA also requested to review the actual wording of policies to ensure effectiveness and alignment with national policy.
- Welcomed the Plan's intention to minimise and manage flood risk, but highlighted the need for up-to-date flood modelling, freeboard guidance, and the use of higher climate change allowances for major developments. Emphasised that future flood risk, including climate change impacts, must be fully considered in all allocations.
- Recommended that buffer zones along watercourses should be at least 10 metres, designed and managed for biodiversity, and supported by long-term management plans. Supported the de-culverting of watercourses and restoration of natural river channels and requested that water quality be included as a separate policy.
- Highlighted the importance of the Water Framework Directive (WFD) and River Basin Management Plans, recommending that development proposals must not cause deterioration of water bodies and should support the achievement of good ecological status. Requested that WFD Assessments be required for any development affecting water bodies.
- Supported the focus on water efficiency in new developments, recommending that all new residential schemes meet the higher water efficiency standard (110 litres per person per day) and that commercial schemes achieve BREEAM 'excellent' for water. Encouraged policy to

require retrofitting for water efficiency in refurbishments and changes of use.

- Stressed that Sustainable Drainage Systems (SuDS) should be used wherever possible but must not be sited in contaminated ground or where they could mobilise pollutants. Called for SuDS policy wording to ensure no negative impact on groundwater quality and referenced best practice guidance.
- Provided detailed site-specific comments, especially for sites in the flood plain, near water bodies, or on/adjacent to historic landfill. Highlighted the need for robust risk assessments and potential permitting requirements for development on or near waste management facilities, such as Tyttenhanger Landfill and the North London Anaerobic Digestion Facility, recommending substantial buffers and ongoing engagement with the EA.
- Recommended that development proposals in Source Protection Zones (SPZs) be subject to additional constraints, including robust Foundation Works Risk Assessments for piled foundations, and consultation with abstraction licence holders where relevant.

6.10.4 **Historic England** submitted a detailed response focused on the integration of the historic environment into the Hertsmere Local Plan, with particular emphasis on policy wording, site allocations, and the need for robust evidence and Heritage Impact Assessments (HIAs). Their submission can be summarised as follows:

- Welcomed the inclusion of strategic policies for the historic environment, designated heritage assets, and non-designated heritage assets, supporting the Council's positive approach to heritage conservation.
- Stressed the importance of ensuring that all sites proposed for allocation are sufficiently understood and justified in terms of their potential impacts on the historic environment. Reminded the Council of its responsibility to integrate heritage considerations fully into site selection and policy development.
- Highlighted the critical need for Heritage Impact Assessments (HIAs) to be prepared and finalised in advance of Regulation 19, so that site assessment and selection are properly informed, and site-specific criteria for mitigation and enhancement are identified and embedded in allocation policies.
- Recommended that policy wording should reference specific designated heritage assets both on site and nearby, and explicitly include mitigation measures such as landscaping, careful design, maintaining key views, and buffers/setbacks, as identified by HIAs. Suggested that technical terms like "significance" and "setting" be defined in a glossary for clarity
- Provided site-specific comments and recommendations for numerous allocations, including sites adjacent to or containing listed buildings, conservation areas, scheduled monuments, or registered parks and gardens, where development could affect the significance of these assets through changes to their settings.
- Called for HIAs to determine site suitability, inform design and layout, and secure mitigation and enhancement measures through site-specific policy

wording. For sensitive sites, recommended open buffers with rural character and avoidance of urbanising features.

- Emphasised that built development has the potential to affect heritage assets, but substantial scope exists to avoid and mitigate impacts through appropriate policy measures and planning processes. The most effective way to explore mitigation is through detailed HIAs, with recommendations clearly reflected in site-specific policies.

6.10.5 **Sport England** submitted a detailed response focused on green infrastructure, sports facilities, and the policy approach to golf courses, which can be summarised as follows:

- Welcoming the inclusion of policies GI1, GI2, and GI3, recognising that green infrastructure and open space provide major opportunities for physical activity and encompass most outdoor sports facilities. However, Sport England raised concerns about paragraph 9.3.5 relating to policy GI3, which implies that golf courses may be considered for release for development. Sport England emphasised that the Council's approach should be informed by its evidence base in the Playing Pitch Strategy and that decisions on releasing golf courses should be made on a site-by-site basis, not through a generic approach.
- Warning of the risk that landowners and operators may close or run down viable golf courses if a favourable approach to development is perceived. The Playing Pitch Strategy identifies only six operational golf courses in Hertsmere, with demand high and membership levels above national averages. The strategy does not suggest any are unviable or surplus to requirements. Sport England would object at Regulation 19 if a generic approach supporting development on golf courses contradicts the Council's evidence base, as this would not be consistent with paragraph 104 of the NPPF.
- Supporting the proposed content of policy SD1 in principle and requesting that the policy explicitly sets out the role of promoting active travel and utilising green infrastructure to tackle climate change. Sport England's "Uniting the Movement" strategy recognises its contribution to climate change mitigation by influencing how people live and travel.
- For HPBA SA11 Land at Mutton Lane (north), a site of approximately 1,875 dwellings, Sport England requested a policy requirement for on-site provision of sports facilities, as the additional demand cannot be met by improving nearby facilities. An open space, sport, and recreation strategy should be prepared to support development proposals and align with an approved masterplan, providing a strategic framework for future planning applications. This approach is justified by the Council's sports evidence base, emerging policy SCI3, and NPPF paragraph 103.
- For Bowmans Cross New Settlement (approximately 4,000 dwellings in option 1 or 7,500 dwellings in option 2), Sport England requested a policy requirement for both outdoor and indoor formal sports facility provision on-site, especially given limited existing provision nearby. An open space, sport, and recreation strategy should also be prepared to support development proposals and align with an approved masterplan, justified by the Council's sports evidence base, emerging policy SCI3, and NPPF paragraph 103.

6.10.6 **National Highways** provided a brief representation focused on the implications of the Hertsmere Local Plan for the Strategic Road Network (SRN), with particular emphasis on safeguarding network operation, sustainable development, and the importance of ongoing engagement. Their submission can be summarised as follows:

- Emphasised the need for the Local Plan to maintain the safe and efficient operation of the SRN, particularly in relation to the M1 J5 and mainline, M25 J22, M25 J23/A1(M) J1, and the A1 Barnet By-pass to Rowley Lane, all located within Hertsmere.
- Supported the Plan's policies to encourage modal shift and reduce private car use, referencing DfT Circular 01/2022, and encouraged Hertsmere to incorporate measures that reduce traffic generation at source and focus development in sustainable locations.
- Requested early consultation on any proposed improvement works to the SRN and on planning applications for major developments likely to generate significant delivery or construction traffic, as these are most likely to impact the SRN.
- Noted that several residential candidate site allocations (e.g., HPBA SA12 and SA14 near M25 J24; SA4, SA5, SA6, and SA8 near M1 J5) are adjacent to or near the SRN and requested to be consulted on these as they progress to assess full impacts on the network.
- Stressed the importance of a robust evidence base to assess cumulative impacts on the SRN, as required by DfT Circular 01/2022, and welcomed further dialogue as the Plan progresses, including at Regulation 19 stage when more detailed infrastructure assessments will be available.
- Drew attention to their guidance document 'Planning for the Future: A guide to working with National Highways on planning matters' (October 2023) and reiterated their commitment to supporting the preparation of sound local plans that enable sustainable development.

6.10.7 **Thames Water** submitted a detailed response focused on the implications of the Hertsmere Local Plan for water supply and wastewater infrastructure, with particular emphasis on site-specific capacity assessments, policy wording, and the need for phasing to align development with infrastructure delivery. Their submission can be summarised as follows:

- Conducted a high-level RAG (Red-Amber-Green) assessment of potential impacts of draft site allocations on the wastewater network, noting that the position can change as network conditions evolve and details of development scale and connection points are confirmed.
- Highlighted site-specific concerns for HRA SA3 (Land North of Watford Road and East of Kemprow, Radlett), noting that Blackbirds Sewage Treatment Works lies close to the northern boundary of the proposed allocation and that future development would need to consider potential amenity impacts on residents, including noise, vibration, odour, light and flies. Requested that a policy be included in the Local Plan to ensure consistency with paragraph 200 of the National Planning Policy Framework, requiring proposals to demonstrate that amenity of existing residents will not be affected and that existing uses should not have unreasonable restrictions placed on them.

- Recommended that Policy SD7 (Flood Risk) should require all forms of flood risk to be considered, including sewer flooding, as new development has potential to overload existing sewers. Suggested that development may need to be phased to align with network improvements and that the policy should promote use of SuDS following the drainage hierarchy, avoiding discharge of surface water to combined sewer networks.
- Supported the content of Section 10.8.2 and Policy SD8 (Water Supply and Wastewater), noting that where network upgrades are necessary, phasing conditions could be used to ensure occupation of development aligns with delivery of infrastructure to mitigate the risk of sewer surcharging. Recommended that policy wording should explicitly support this approach.
- Emphasised the importance of water efficiency in new development, noting that the area is located in a water-stressed region and that all development should apply the optional standard of 110 litres/person/day. Recommended that conditions should require water efficiency to be calculated using the 'fittings based approach' rather than the calculation method, as data from smart meters indicates actual consumption ranges from 120-179 litres/person/day when the calculation method is used.
- Provided commentary on Policy HQD7 (Building Alterations), noting that basement development connected to the foul sewer network will be at greater risk of sewer flooding from surcharging sewers. Recommended that all basement development should be required to be fitted with a positive pumped device to reduce flooding risk, and that wording to this effect should be included in the policy and supporting text in the submission version of the Local Plan.
- Attached a comprehensive RAG assessment spreadsheet covering all proposed site allocations, with all sites assessed as discharging to Maple Lodge Sewage Treatment Works (with one site to Mogden) and noted that modelling for network upgrades will proceed once sites have planning approval and there is certainty of development coming forward, with upgrades potentially taking 18 months to 3 years to plan and deliver.

6.10.8 **Affinity Water** submitted a detailed response focused on the promotion of two sites for employment-led or mixed-use development, as well as the alignment of their proposals with national and local planning policy. Their submission can be summarised as follows:

- Formally promoted Land at the South West Side of Bushey Mill Lane, WD23 2AB (approx. 28.6 ha) as a candidate employment allocation, highlighting its substantial size, deliverability, and potential to contribute to the Borough's future employment land supply. The site benefits from strong strategic connectivity, proximity to urban areas and labour markets, and is not constrained by statutory ecological or heritage designations. Affinity Water emphasised the site's suitability for employment uses, especially given its location within Flood Zones 2 and 3, which favour "less vulnerable" uses such as employment over residential. They also noted opportunities for green infrastructure, flood mitigation, and renewable energy integration. While the site is within the Green Belt, Affinity Water argued that development could be accommodated with limited harm, supported by robust landscape buffers and high-quality

design. They encouraged the Council to expand its evidence base and reconsider the site for allocation, offering further technical evidence as needed.

- Promoted Land Adjoining Bushey Hall Farm, Berry Grove Lane, Watford, WD23 2AB (approx. 13.8 ha) as a logical and sustainable opportunity for employment-led or mixed-use development. The site comprises two parcels bisected by the A4008, with the northern parcel including previously developed land and the southern parcel comprising open field land. Affinity Water highlighted the site's highly accessible location, adjacency to the Otterspool Way Employment Area, and multiple access opportunities. They referenced the site's previous draft allocation for employment and housing, and the Council's Land Availability Assessment, which found it broadly suitable for development with constraints primarily relating to Green Belt policy. Affinity Water argued that evolving national policy, including "grey belt" concepts, and the Borough's housing land supply shortfall strengthen the case for reconsidering the site for allocation. They offered to provide further technical evidence to support allocation and delivery.
- Emphasised that both sites are not subject to overriding environmental or technical constraints, are capable of supporting a range of employment and mixed-use formats and could be delivered in the short to medium term to support economic growth, job creation, and diversification of the Borough's employment land portfolio. Affinity Water requested ongoing engagement with the Council to explore delivery and masterplanning opportunities, and to ensure the sites are robustly assessed as part of the emerging Local Plan.

6.10.9 **NHS CEICB** submitted a comprehensive response focused on the health infrastructure implications of the Hertsmere Local Plan, with particular emphasis on the need for coordinated planning, developer contributions, and the delivery of new and expanded healthcare facilities to support proposed housing growth. Their submission can be summarised as follows:

- Welcomed the opportunity to comment as the prescribed consultation body responsible for commissioning NHS health services for approximately 3.5 million people across the region, including Hertsmere. Highlighted the publication of their five-year strategy, 'Our Way', which prioritises neighbourhood health, preventative care, and integrated local delivery.
- Reviewed the draft Local Plan and Infrastructure Delivery Plan (IDP) to assess the impact of approximately 21,400 new homes on local healthcare needs and infrastructure. Noted that a new settlement at Bowmans Cross would require significant on-site health mitigation if allocated in the future.
- Stated support for a spatial strategy that focuses growth in sustainable locations (Borehamwood, Potters Bar, Bushey, Radlett) but emphasised the cumulative impact of smaller sites on NHS services and the need for health developer contributions via CIL or Section 106 to mitigate these impacts.
- Requested that the Local Plan include a dedicated chapter on 'A Healthy Community' and explicitly define social and community infrastructure to

include all healthcare services and facilities (GP, community, pharmacy, dentistry, ophthalmology, acute healthcare, ambulance).

- Highlighted that all GP surgeries in the borough are already operating at or over capacity, with limited ability to accept new patients. Provided detailed calculations for the additional primary care space and funding required to support new residents, using standard NHS occupancy and space guidelines.
- Identified the need for significant investment and expansion of primary care infrastructure in response to planned growth in all main settlements.
- Outlined recent and planned investments in local GP estate, including new premises and relocations, and confirmed that developer contributions will be sought to offset forward investment in healthcare infrastructure.

6.10.10 **NHS Property Services (NHSPS)** submitted a detailed response focused on the Plan's approach to health infrastructure, estate management, and sustainable development. Their submission can be summarised as follows:

- Recognition of the critical importance of delivering new and improved healthcare infrastructure to support housing growth, noting that population increases place significant pressure on NHS resources and that new development should make proportionate contributions to healthcare funding.
- Support for planning policies that enable the delivery, modernisation, and protection of essential healthcare infrastructure, recommending early and proactive engagement between the Council and NHS partners to ensure health needs are embedded in the Local Plan and its supporting evidence base.
- Recommendation for a comprehensive policy on healthy places, including requirements for developments to demonstrate how they support healthy lives, address health inequalities, and meet identified local health needs. Suggested cross-referencing health priorities to other relevant policies and inclusion of supporting text detailing general health determinants.
- Request for the Local Plan to recognise health infrastructure as essential infrastructure, with clear mechanisms for securing developer contributions to healthcare provision. Emphasised the need for robust assessment of existing healthcare capacity, identification of mitigation options, and flexibility in how healthcare needs are met (financial contributions, on-site facilities, land, or property).
- Support for the use of Health Impact Assessments (HIA) for major developments, proposals in Air Quality Focus Areas, and health-sensitive uses, recommending the Council set out its own HIA requirements to promote healthy communities.
- Recommendation for the Council to factor healthcare costs into the Local Plan Viability Assessment, ensuring that developer obligations for health infrastructure are appropriately weighted and viable.
- Noted the recent organisational change, with NHS Central East Integrated Care Board (ICB) now responsible for the area, and requested this be reflected in the Local Plan and Infrastructure Delivery Plan.

- Support for policies promoting carbon neutral development, suggesting NHS property could benefit from carbon offset funds to help achieve net zero healthcare provision.
- Recommendation for affordable housing policies to consider the needs of NHS staff, highlighting the importance of affordable accommodation for recruitment and retention of healthcare workers.
- Request for flexibility in the use and disposal of NHS estate, seeking modifications to policies that would otherwise require retention of community facility uses on surplus NHS land, to enable reinvestment in modern healthcare services.

6.10.11 **The Department for Education (DfE)** submitted a detailed focused on the Plan's approach to education infrastructure, developer contributions, and planning for school place provision. Their submission can be summarised as follows:

- Recognition of the significant housing growth anticipated in the borough (1,212 dwellings per annum to 2041), and the resulting pressure this will place on education infrastructure. Emphasised the need for the Local Plan to be 'positively prepared' to meet objectively assessed development needs, including sufficient school places.
- Support for safeguarding land for new early years settings, schools, and post-16 provision, in line with national planning policy. Recommended that the Local Plan also safeguard land for future expansion of new schools where demand indicates this may be necessary.
- Welcomed the recognition in the draft Local Plan of the need for appropriate levels of social and community infrastructure, including education, to support new development.
- Recommended future versions of the Local Plan include:
  - Clear, robust, and evidence-based pupil yield factors for housing growth, broken down by early years, primary, secondary, and post-16 phases.
  - A transparent explanation of how developer contributions for education will be calculated, including pupil yields, available capacity, shortfall in places, and cost per place.
  - Confirmation that cost per pupil place is based on the DfE school place scorecards to ensure contributions are fair and defensible.
- Encouraged the identification and safeguarding of specific sites for new education provision in future plan iterations, based on the latest evidence of need and demand. Stressed the importance of clarifying delivery requirements, minimum site areas, preferred site characteristics, and safeguarding for future expansion.
- Recommended that viability assessment inform site selection and policy requirements, with an initial assumption that applicable developments will provide both land and funding for new schools. Emphasised the need for flexibility in site-specific requirements to reflect changing needs over time.
- Supported the use of Section 106 agreements to secure developer contributions for education, highlighting the advantage of ringfenced

funding for new school, early years, or sixth form places. Requested reference in the Local Plan to the possibility of securing contributions retrospectively where infrastructure is forward funded.

6.10.12 **The Ministry of Defence (MOD) – Defence Infrastructure Organisation (DIO)** submitted a detailed response focused on safeguarding concerns relating to the Regulation 18 Local Plan, which can be summarised as follows:

- Reference to Paragraph 102 of the National Planning Policy Framework (December 2024), which requires planning policies and decisions to take defence requirements into account by ensuring operational sites are not adversely affected by other development in the area.
- Explanation of statutory safeguarding zones, particularly those associated with RAF Northolt, which are triggered by the height of development and the potential for environments that might attract large and/or flocking bird species hazardous to aviation safety. The MOD requests that developers be informed of the statutory requirement to consult MOD when development triggers safeguarding criteria.
- Detailed description of safeguarding concerns, including:
  - Airspace safeguarding to prevent physical obstructions to safe aircraft operation, with statutory consultation required for developments exceeding trigger heights.
  - Birdstrike safeguarding zones (radius 12.87km) around military aerodromes, with consultation required for developments that may create environments attractive to hazardous bird species, such as landscaping schemes or new waterbodies (including Biodiversity Net Gain provision).
- Request for HBC to consider MOD safeguarding requirements when drafting policies related to biodiversity, ecology, and energy infrastructure, noting that some environmental improvements may not be compatible with aviation safety.
- Statement that MOD has no objection in principle to renewable energy development but highlights potential impacts of wind turbines and solar PV on defence technical installations. MOD requests consultation on all wind turbine proposals 11m or greater in height or with a rotor diameter of 2m or greater and recommends that policy makes clear that detrimental impacts on defence assets should result in refusal or conditions on consent.
- Noting of draft policy provisions for Elstree Aerodrome and Heathrow Airport Safeguarding Zones, and request for updates to reflect MOD capability and safeguarding requirements, especially for RAF Northolt.
- Provision of a summary table listing potential housing allocations and employment candidate sites affected by safeguarding zones, specifying trigger heights for statutory consultation and risks related to birdstrike.
- Conclusion that MOD expects all relevant policies and site allocations to be assessed against safeguarding criteria, and requests ongoing engagement to ensure defence capability and operations are not adversely affected by development.

6.10.13 **Network Rail** submitted a brief response to the consultation, focused on the Plan's approach to rail infrastructure, development impacts, and sustainable transport. Their submission can be summarised as follows:

- Recognition of the importance of safeguarding operational railway safety, especially given Hertsmere's inclusion of sections of the East Coast Main Line and Midland Main Line. Emphasised that development near these lines must not impact railway safety and should include suitable mitigations to address impacts on rail infrastructure, supporting growth and increased rail use.
- Support for the Local Plan's references to rail infrastructure in both passenger and freight contexts, particularly in relation to Borehamwood, Radlett, and Potters Bar. Welcomed the Plan's aspirations to shift car journeys to sustainable transport, noting this is positive for passenger and freight rail traffic.
- Recommendation that Transport Assessments for new development must include impacts on rail transport, enabling Network Rail to assess changes in passenger numbers, facility appropriateness, and identify any required improvements.
- Support for sustainable freight policy, highlighting the importance of rail freight in reducing road haulage. Suggested explicit reference to the Radlett Rail Freight Interchange terminal in the Local Plan, given its significance and the UK Government's commitment to 75% rail freight growth by 2050.
- Broad support for policies relating to town centre regeneration and connectivity to railway stations, welcoming further discussion with the Council as plans advance.
- Recommendation for economic policies (EC1–EC8) to reference the economic benefits of rail connections, both passenger and freight, given their strategic importance to Hertsmere's economic needs.
- Noted ongoing route studies (including with HCC) to define future rail requirements and forecast overcrowding. Stressed the importance of understanding how housing targets impact rail capacity as part of this work.

6.10.14 **Hertfordshire Constabulary** noted concern that police and emergency services were not identified within the Regulation 18 social and community infrastructure provisions and requested that blue-light infrastructure be expressly recognised so that the impacts of new development on emergency services can be appropriately addressed.

6.11 National and County Bodies and Organisations

6.11.1 **The Woodland Trust** submitted a detailed response to the Hertsmere Local Plan Regulation 18 consultation, focusing on the Plan's approach to green and blue infrastructure, biodiversity, trees, and urban greening. In summary, their submission gave the following feedback:

- Recommended that Policy GI1 (Green and Blue Infrastructure Network) should:

  - Treat green infrastructure as a network of multifunctional natural assets, explicitly including woodland, trees, hedgerows, watercourses, wetland, semi-natural greenspace, and habitat corridors.
  - Require high-quality, multifunctional green infrastructure designed from the outset, with clear quantitative expectations (e.g., five UK Infrastructure Standard-compliant trees per dwelling for major residential development).
  - Ensure proposals contribute to coherent ecological networks and require applicants to demonstrate how their proposals connect to surrounding habitats.
  - Include enforceable long-term management, funding, and monitoring arrangements for green infrastructure assets.
- Recommended that Policy GI2 (Waterways and Blue Infrastructure) should:
  - Require buffer zones alongside waterways to function as semi-natural habitat, managed for habitat value, and not used as private gardens or incidental open space.
  - Integrate riparian tree planting, wet woodland, and nature-based solutions for sustainable drainage and natural flood management.
  - Protect hydrology, soil conditions, and natural drainage patterns, especially near woodland and wet habitats.
- Recommended that Policy GI3 (Open Space, Recreation and Leisure) should:
  - Distinguish between natural greenspace and general amenity or formal recreational space.
  - Require provision or improvement of accessible natural greenspace, including woodland and semi-natural habitats, with stronger access standards (e.g., accessible woodland of at least two hectares within 500 metres of homes).
- Recommended that Policy GI4 (Biodiversity and Nature Conservation) should:
  - Expressly protect ancient woodland and ancient/veteran trees as irreplaceable habitats, requiring assessment of indirect impacts and refusing development resulting in their loss except in wholly exceptional circumstances.
  - Set a minimum 20% Biodiversity Net Gain (BNG) target and require at least 50 years of management for woodland creation and long-established habitats.
  - Ensure BNG contributes to ecological networks and prioritises on-site delivery.
- Recommended that Policy GI5 (Urban Greening and Trees) should:
  - Prioritise retention of existing trees, require early arboricultural evidence, and protect ancient/veteran/notable trees with stronger buffers.

  - Commit to increasing canopy cover, adopt a size-based replacement approach for tree loss, and support use of the Ancient Tree Inventory.
  - Support local canopy cover targets, the 3-30-300 principle, and use of an Urban Greening Factor for major development.
- Recommended that related sustainable design policies explicitly recognise trees and green infrastructure as essential climate adaptation infrastructure, and that cross-referencing between SD policies and GI1–GI5 would improve coherence.
- Emphasised the need for a robust monitoring framework, including indicators such as canopy cover change, BNG delivery, ancient woodland and veteran trees affected or protected, access to greenspace, and long-term management compliance. Major developments should be required to produce integrated green infrastructure and ecological management plans at the masterplanning stage.

6.11.2 **Haberdashers' Schools** submitted a detailed response focused on the draft Local Plan's approach to educational and sporting facilities, Green Belt policy, and the soundness of the plan, which can be summarised as:

- Support for the overall aims of the Regulation 18 Local Plan, particularly the prioritisation of community infrastructure and recognition of schools as essential facilities. However, the Schools recommend that the plan be amended to provide more specific and proactive support for the development, expansion, and improvement of educational facilities.
- Request for the addition of a dedicated policy or a specific subsection within the proposed community infrastructure policy (SCI2) to ensure that planning decisions give "great weight" to the need to create, expand, or alter educational facilities.
- Support for the draft policy on sports, recreation, and play spaces (SCI3), highlighting the importance of high-quality sports facilities for schools, health, and the wider community. The schools emphasise that well-designed, flexible facilities are vital for academic success and community benefit.
- Request for the extension of the Key Green Belt Site (infill envelope) designation on the Policies Map to include additional areas of the Elstree campus, excluding scheduled monuments and archaeological sites. This would support the schools' ability to maintain and enhance their educational and sporting standards, and to continue their role as a major local employer and community partner.

6.11.3 **Dame Alice Owen's School** submitted a detailed response focused on transport and infrastructure changes affecting the immediate area of the school, which can be summarised as:

- Concern regarding the proposed introduction of a cycle lane and removal of existing parking (alongside the addition of a nearby cark park) outside the school and resulting potential risk to students at school drop-off.
- Concern about proposals for housing growth and whether the impact on school place has been fully and robustly assessed.

- Concern that demand for school places may increase more quickly than infrastructure is delivered, requiring existing schools to absorb growth in student numbers without corresponding expansion or investment.
- Request for further detailed traffic and safety modelling and further evidence / clarification on delivery of additional school capacity alongside housing development.
- Request to engage further with the Council to discuss and ensure that development does not pose a risk to students.

6.11.4 **CPRE Hertfordshire** submitted a comprehensive response focused on the Regulation 18 Local Plan's consultation process, housing targets, Green Belt policy, infrastructure, spatial strategy, candidate sites, and soundness, which can be summarised as:

- Strong criticism of the consultation process, stating that the period for response was inadequate and the Council's website was unnecessarily complex and difficult to use, likely discouraging public participation. CPRE also objected to the absence of draft policy wording, arguing this is not credible for a Regulation 18 consultation and may be challengeable at Examination in Public.
- Objection to the lack of reference to the record-breaking response to the previous Regulation 18 consultation in 2021, and concern that no account has been taken of local opposition, particularly regarding the significance of designated protected land such as Green Belt.
- Strong opposition to proposals for further allocation of Green Belt land for development, noting that over 1,000 hectares are proposed—more than in the 2021 version. CPRE argues the Council should fight for reduced Government housing requirements, as other councils are doing, and that Hertsmere has over-provided potential sites, which is unnecessary and damaging.
- Criticism of the justification for the new settlement at Bowmans Cross, stating the case is not made and most of the allocation is outside the plan period, raising concerns about deliverability.
- Objection to the confusion between 'need' and 'requirement' in the consultation document, arguing this undermines the technical task of applying policy constraints as required by the National Planning Policy Framework (NPPF).
- Concern over the Green Belt Assessment, which suggests most of the Borough's Green Belt could be reclassified as 'grey belt', risking the coalescence of major towns and loss of open countryside.
- Criticism of the spatial strategy, stating it ignores the role and value of open countryside, fails to emphasise a 'brownfield first' approach, and inadequately addresses infrastructure, especially water supply and waste disposal. CPRE argues that the countryside is treated as expendable and that the plan's approach to infrastructure is unspecified and unbalanced.
- Support for regeneration and reuse of previously developed sites in principal town centres, but opposition to expansion into protected green spaces. CPRE does not support the identification of Candidate Sites in

principle, arguing this increases uncertainty and fails to identify which sites are in the Green Belt.

- Support for appendices providing clarity on terminology, strategic policies, and housing supply, but reiteration that the standard method for calculating housing need is inappropriate for Hertsmere and should be replaced with an approach reflecting local conditions

6.11.5 **Savills** submitted a response on behalf of **The Crown Estate (TCE)** on the Plan's overarching approach to housing targets, as well as support for proposed development at plot HRA SA3, Land North of Watford Road and East of Kemprow, Radlett. In summary, TCE's feedback finds:

- Support that the emerging Local Plan will need to meet the borough's needs in full to be found sound at examination, setting a housing target that considers both requirements as set by the standard method and the 20% buffer set by the Housing Delivery Test. They agree with the statement that the 20% buffer will likely apply for five years of the Plan period,
- Support the use of the standard method for calculating housing need, with no exceptional circumstances that would mean it should not apply.
- Supports Radlett as a key location for growth due to its strong transport links existing services and facilities, and proximity to the SEGRO Logistics Park, which is expected to create significant employment and increase local housing demand. Development capacity should be maximised here
- Strong support for Plot HRA SA3 as a candidate site with most of the site under a single ownership, able to be delivered independently or alongside neighbouring landholdings. Support is given for a mixed-use scheme, able to support delivery of many of Radlett's strategic objectives.
- Agree that Plot HRA SA3 is "provisionally grey belt" and heritage impacts can be mitigated through careful design, enabling the site to be treated as grey belt.
- Suggests that HRA SA3 could contribute to housing delivery in the first five years of the plan period, considering the extensive technical work already completed.

6.11.6 Kerry MacDonald responded on behalf of **Hertfordshire Constabulary**, noting concern that police and emergency services are not mentioned under Footnote 29 of Chapter 8 Social and Community Infrastructure Policy SCI1. Request for blue light infrastructure to be included in order to support emergency services and mitigate impacts from new development.

6.11.7 **Bidwells LLP** submitted a response on behalf of the **Diocese of St Albans**, raising concerns about the viability of the spatial assessment, Green Belt assessments and emphasis on the need for a mix of development sizes to ensure delivery of homes in the early stages of the Plan. Their submission can be summarised into the following points:

- Support for the need for housing allocations and maintaining a five-year housing land supply.
- Support for Aldenham Glebe to be prioritised for development early in the plan period to help meet housing needs alongside larger strategic sites. It

was previously identified as draft allocation HEL345 for up to 30 dwellings but has been removed from the updated version of the Plan.

- Concern that the assessment focuses on large parcels and does not properly consider individual sites submitted through the Call for Sites process. Alternatives should be fully considered.
- Objection to the methodology and conclusions of the Green Belt Assessment. Priority should be given to previously developed land and grey belt land before releasing wider Green Belt sites, in line with NPPF paragraph 148.
- Opposition to reliance on urban Brownfield site regeneration and intensification alone to meet housing need. Recommendation made for a broader mix of site sizes and locations, including smaller Green Belt/grey belt releases capable of delivering homes in the short term and Brownfield sites across borough, including sites outside main settlements, should be considered.
- Queries the classification of Aldenham and Round Bush as separate settlements due to close proximity and shared facilities.
- Concerns are raised around the evidence base and site assessments.

6.12 Members of Parliament, Councillors or Local Party Groups

6.12.1 Imagine Places submitted a representation to the Hertsmere Local Plan on behalf of **Councillor Susman, Councillor of Shenley Ward** expressing that the Regulation 18 Draft Local Plan cannot be supported as currently drafted. The representation can be summarised as:

- Considers the Regulation 18 consultation premature and lacking sufficient evidence, rationale, and draft policy wording to enable meaningful public engagement. The process is described as more of a “direction-of-travel” and candidate-sites exercise, with key evidence deferred until Regulation 19, which risks legal compliance and soundness issues.
- While the Plan identifies enough housing capacity on paper, there are serious risks that homes will not be delivered at the required rate, especially as the strategy relies heavily on complex urban regeneration and brownfield sites. This exposes Shenley and other Green Belt villages to continued speculative development pressure, particularly on “grey belt” land, even if a new Local Plan is adopted.
- The evidence base for infrastructure, viability, and delivery is incomplete or missing. Key documents such as the Transport and Movement Assessment and Car Park Study are not yet available. The absence of this evidence means the spatial strategy’s deliverability and sustainability cannot be properly assessed, especially in areas like Shenley already experiencing significant growth and infrastructure strain.
- The Plan’s approach to “grey belt” land is seen as creating a policy vacuum that developers could exploit. The Parish Council objects to any provisional grey belt land around Shenley being treated as suitable for development until robust, updated local evidence is published and

considered. grey belt status should trigger further scrutiny, not automatic development.

- The Regulation 18 draft gives insufficient recognition to the adopted Shenley Neighbourhood Plan (2019–2036) and its Design Code. There is a call for a clear policy hook in the Regulation 19 Plan to ensure the Neighbourhood Plan and Design Code are properly integrated into the borough-wide strategy and used to guide development in Shenley.
- The evidence base classifies Shenley as a Large Village, but this is not clearly reflected in the spatial strategy or density assumptions. There is a disconnect between the settlement hierarchy and the practical application of density and growth in Shenley. The Plan should clarify what modest development is appropriate for Large Villages and justify density assumptions with local evidence.
- Many policy ambitions in the draft Plan are repeatedly qualified by references to viability, deliverability, or future testing, which risks weakening requirements for affordable housing, infrastructure, design quality, and climate resilience. Viability should not become a general mechanism for diluting policy standards.
- Given the scale of recent and consented growth in Shenley (already far exceeding assessed local need), the Parish Council is advised to urgently refresh its Neighbourhood Plan evidence base and Design Code, with financial and technical support from HBC. This is needed to provide robust, locally grounded planning protection and to ensure future growth is plan-led, infrastructure-enabled, and proportionate.
- The Infrastructure Delivery Plan is at an early stage and does not yet address how required infrastructure will be delivered or funded. There are significant concerns about cumulative impacts from already consented development, especially on transport, education, utilities, and community facilities.

6.12.2 The **Hertsmere Conservative Group** submitted a representation to the Local Plan that outlines support for the principle of plan-led growth but highlights fundamental and evidenced objections to the current draft on the grounds of housing quantum, spatial strategy, Green Belt policy, infrastructure planning, affordable housing provisions, and the adequacy of the evidence base provided at this consultation stage. The representation can be summarised as:

- Recognises the need for a robust, up-to-date Local Plan that is sound, legally compliant, and capable of managing growth sustainably. The Group welcomes the Plan’s intention to meet Hertsmere’s housing needs in full and acknowledges the importance of a plan-led approach to avoid speculative development.
- Supports for the principle of delivering new homes, but with a clear preference for prioritising brownfield and previously developed land before considering Green Belt release. The Group calls for careful site selection, with transparent evidence and justification for any proposed Green Belt changes.
- Emphasises protecting the Green Belt, with a recommendation that any release should be minimised and only considered where absolutely

necessary and supported by robust evidence. The Group advocates for the retention of local character and open spaces.

- Highlights the critical importance of planning for infrastructure delivery alongside new development, including transport, healthcare, education, and community facilities. They recommend that infrastructure should be delivered in a timely manner and be sufficient to support planned growth.
- Requests clarity on how infrastructure and affordable housing will be funded and delivered.
- Supports design-led development and the optimisation of site capacity, with a recommendation that new development should respect local character, heritage, and environmental quality.
- Acknowledges the importance of understanding and mitigating cross-boundary impacts, particularly where growth may affect neighbouring areas. They support continued engagement with adjacent authorities to ensure coordinated planning and infrastructure delivery.
- Recognises Bowmans Cross as a potential new settlement for long-term growth. The Group supports the principle of strategic planning for future housing needs, but conditions support on the settlement being viable, self-sustaining, and supported by significant infrastructure investment.

6.12.3 **Councillor Harvey Cohen**, the elected member for **Elstree Ward**, submitted a representation requesting extension of the consultation, reduction of housing targets, removal of unsustainable Green Belt sites, higher affordable housing requirements, and full publication of infrastructure and Green Belt evidence before progressing to the next stage of plan making. The representation can be summarised as:

- Supports the principle of plan-led growth over appeal-led development but raises fundamental objections to the draft Local Plan as presented, citing concerns over housing numbers, spatial strategy, Green Belt policy, site allocations, infrastructure, and the adequacy of the consultation process.
- Strongly criticises the absence of key evidence, particularly the Infrastructure Delivery Plan and full spatial strategy, making it impossible to assess the sustainability or deliverability of proposed allocations. Requests extension of the consultation period until all evidence is published.
- Argues that the housing target is too high, not properly evidenced, and should be reduced to reflect local constraints and new demographic projections and Objects to the disproportionate allocation of growth to Borehamwood and Elstree, which already bear the majority of recent development and face severe infrastructure strain.
- Strongly opposes the current Green Belt-led strategy, noting that 91% of proposed development is on Green Belt land. Calls for independent, site-specific Green Belt assessments before Regulation 19 and for the exclusion (“red-lining”) of sites that perform strongly against Green Belt purposes. Advocates for higher densities (40–50 dph) on any Green Belt releases to minimise land take.
- Objects to the allocation of sites HBA SA19, SA20, and SA24 (Allum Lane/Elstree Corridor), citing sustainability, highways, coalescence,

biodiversity, and flood risk concerns. Opposes Well End sites (HBA SA16a, SA16b, SA16c) for similar reasons, but supports brownfield and urban site allocations, provided existing services are retained during redevelopment.

- Supports the principle of Bowmans Cross as a new settlement but calls for a much higher allocation (at least 2,500 homes within the plan period) to reduce pressure on Borehamwood and Elstree and to enable early infrastructure investment.
- Strongly objects to the proposed 30% affordable housing requirement, calling for a minimum of 50% (predominantly social rented) in line with national policy and local need. Urges the Council to be robust with developers on viability and to publish full viability evidence before Regulation 19.
- Criticises the lack of published infrastructure and transport evidence. Insists that development must be conditional on prior to delivery of key infrastructure (schools, healthcare, transport). Calls for robust climate and carbon reduction policies and for on-site infrastructure delivery as the primary mechanism.
- Challenges the grouping of Elstree Village with larger settlements, arguing that its infrastructure and services cannot support significant growth. Highlights the closure of the primary school and the importance of protecting the Conservation Area and village character.
- Requests that the Local Plan explicitly require consistency with the adopted Elstree and Borehamwood Neighbourhood Plan, especially regarding design, land use, and Green Belt policy.

6.12.4 **Councillor Paul Morris**, as elected member for **Bushey Heath** submitted a representation to the consultation. The representation can be summarised in the following points:

- Large housing allocations threaten the separation between Bushey and nearby settlements, weakening the Green Belt and harming the area's open character.
- High-density or poorly located development risks damaging Bushey's distinct suburban and village identity, including conservation areas and historic neighbourhoods.
- Existing congestion would worsen with new housing unless substantial improvements are made to public transport, walking, and cycling infrastructure—especially at Compass Park, Bushey Country Club, and Kemp Place.
- Local infrastructure is already stretched; without clear provision for additional school places, healthcare, utilities, and community facilities, development is unsustainable.
- Some parts of Bushey lack good public transport, making edge-of-settlement sites car-dependent and conflicting with sustainable planning goals.
- Development could damage open spaces, mature trees, wildlife habitats, important views, and Bushey's landscape setting, arguing against site allocation.

- Known drainage and flooding issues, especially around Little Bushey Lane, have not been properly addressed in the plan.
- Bushey is being asked to accommodate a disproportionate share of housing growth, which existing infrastructure cannot sustain.
- The plan depends on major infrastructure improvements that are currently unfunded or uncertain, making deliverability questionable.
- Residents feel alternatives and objections have not been fully considered; lack of timely information and evidence undermines confidence in the plan.

6.12.5 **Councillor Lynette Sullivan's** response to the Regulation 18 Local Plan consultation, as elected member for **Potters Bar**, strongly objects to the proposed scale and distribution of development in Potters Bar, citing concerns over housing numbers, Green Belt release, site selection methodology. The response can be summarised as:

- Urges HBC to reconsider the scale and direction of the Local Plan, highlighting the need for a more balanced and sustainable approach that protects the Green Belt, respects local communities, and delivers genuinely achievable growth. They emphasise the importance of transparent and accessible consultation, and the need for all relevant evidence to be available to residents and stakeholders throughout the process.
- Expresses strong concerns that the proposed housing numbers are neither credible nor achievable, being driven by centrally imposed methodology rather than local capacity or infrastructure constraints. The councillors question whether the scale of growth proposed for Potters Bar can be delivered without significant harm to the character of the town and the wider borough.
- Strongly opposes the large-scale release of Green Belt land, with the response arguing that exceptional circumstances have not been demonstrated. The councillor objects to the reclassification of Green Belt to "grey belt" and highlights the risks this poses to long-established protections. Specific objections are raised to sites such as Warrengate Farm, the golf course, and other large-scale Green Belt allocations, citing harm to openness, landscape character, and infrastructure.
- Criticises the Local Plan for insufficiently prioritising brownfield development and lacking joined-up strategic thinking regarding town centre regeneration, higher density development in sustainable locations, and opportunities around transport hubs. It is recommended that Green Belt release should only be considered after all brownfield opportunities have been exhausted.
- Raises concerns about the adequacy of infrastructure planning, including healthcare, school places, public transport, road capacity, and utilities. They highlight deficiencies in flood risk evidence and the Sequential Test, and question whether proposed flood mitigation measures are deliverable or effective. The response stresses that development must not outpace infrastructure delivery.

- Considers the proposals to risk fundamentally changing the character of Potters Bar and neighbouring communities, leading to increased congestion, pressure on services, loss of green space, and reduced quality of life. The response calls for the Local Plan to reflect the wishes of existing communities and protect the distinct identity of towns and villages.
- Argues that the consultation process has not been adequate, with documents being difficult to access and interpret, insufficient communication with non-digital residents, and an overly technical and intimidating response process. Concerns are also raised about missing key documents and incomplete evidence, questioning the procedural soundness of the consultation.

6.12.6 **Councillor Lucy Selby's** response to the Regulation 18 Local Plan consultation, as elected member for **Radlett**, supports the principle of positive planning for growth but strongly objects to the scale and distribution of development proposed for Radlett and highlights concerns regarding Green Belt release, infrastructure capacity, site selection methodology, and the risk to Radlett's character and identity. The representation can be summarised as:

- Acknowledges the need for new housing and supports positive planning for growth but urges HBC to revisit the spatial strategy for Radlett to ensure growth is proportionate, infrastructure-led, and consistent with the settlement's character and constraints.
- Objects to the scale and form of proposed growth at Radlett, highlighting that nearly all new homes would be on Green Belt land and that the proposed concentration of approximately 2,900 dwellings is disproportionate to Radlett's role and function.
- Questions why Radlett is allocated a much higher percentage increase than other settlements and why alternative sites, such as HELAA 214, have not been considered.
- Emphasises that infrastructure-first planning has not been demonstrated and notes the absence of a secondary school, limited employment opportunities, and existing congestion and transport constraints. It calls for clear evidence of deliverable supporting infrastructure—such as school capacity, healthcare, funded highway mitigation, and enhanced public transport—before any significant growth is planned.
- Strongly opposes large-scale Green Belt release, arguing that exceptional circumstances have not been demonstrated and that all reasonable alternatives have not been fully examined. It calls for minimising Green Belt loss, prioritising lower-harm and brownfield sites, and ensuring defensible development boundaries.
- Raises concerns that the proposed pattern of growth risks coalescence with neighbouring settlements (Bushey, Watford, Borehamwood, Shenley), erosion of Radlett's distinct village identity, and irreversible loss of Green Belt and open countryside.
- Recommends that if growth is required, it should be reduced and rebalanced towards previously developed land, small urban sites, smaller

contained edge-of-settlement sites, and phased delivery linked to confirmed infrastructure, while avoiding strategic sprawl.

- Supports some central brownfield and urban sites (e.g., Regency House, Railway Cottages) but objects to major Green Belt allocations (e.g., Home Farm, Land North of Watford Road and West of New Road) due to scale, impact on agricultural land, landscape harm, and infrastructure concerns. Some sites (e.g., Starveacres) are supported only if density is reduced.
- Questions the adequacy of the evidence base, the rationale for site selection, and the lack of clarity regarding infrastructure delivery. It requests that the Council revise the Radlett strategy to provide a lower, infrastructure-led, and proportionate level of growth.

6.12.7 Marrons submitted a response on behalf of the Mayor and Burgesses of the London borough of Enfield.

- Support is given to site HPBA SA12 due to efficient land use and contribution to housing delivery targets. This development will incorporate high density residential development, and it is recommended to aim for a figure of 350 - 400 homes. The site is in alignment with the Council's growth strategy and therefore is suitable for housing delivery.
- Support that development of HPBA SA12 will secure new and improved transport infrastructure, including walking and cycling routes. Development near railway stations is encouraged.
- Recommendation is made to bring forward the site east of Southgate Road in years 1-5 of the Local Plan, as it is available, suitable for development as grey belt land, and there are no notable constraints.
- Requests are made for high-quality homes that help meet local needs, including family and affordable housing ranging from 1-4 bed dwellings.

6.13 Developers, Agents and Landowners

Borehamwood Candidate Sites

6.13.1 **HCC** in their capacity as landowner submitted a representation supporting the consideration of **HBA SA4 Elstree Way Clinic, Cheeky Monkeys Nursery and former library** as a residential candidate site. The representation can be summarised as:

- Welcomes the inclusion of the former library and the building currently occupied by the nursery and highlights the clinic, between these two buildings, is owned by the NHS.
- Both HCC buildings are currently occupied with temporary uses, which will need to be relocated somewhere within the Elstree Way Corridor or elsewhere in Borehamwood when the site is redeveloped.
- HCC has participated in recent master planning work for the Elstree Way Corridor and supports the delivery of development in line with the masterplan.

6.13.2 **HCC** in their capacity as landowner submitted a representation supporting the consideration of **HBA SA9 Borehamwood Fire Station** as a residential candidate site. The representation can be summarised as:

- Supports the inclusion of HBA SA9 as a 'residential candidate site'.
- Highlights that for HBA SA9 to be redeveloped the Fire Station would need to be provided on the ground floor of any scheme for the site or within the local area. The county council would work with HBC to identify an alternative site for the Fire Station.
- A site of 0.44 hectares would be required for the provided Fire Station. Other considerations include a location close to the strategic road network in order to aid response times of emergency vehicles.
- Hertfordshire Fire and Rescue Service attendance standards for types of incidents are used to help determine the best location for a Fire Station. For example, for primary fires the attendance standard is set at 10 minutes (on 90% of occasions) for the first fire appliance attending. Further information is set out in HCC's Service Provision and Place-Making Guide 2024.
- Tempsford Green, which is in the ownership of HBC, has previously been considered as a possible site for the Fire Station.

6.13.3 **Network Rail** in their capacity as landowner for **HBA SA7 Elstree and Borehamwood Railway Station** submitted a representation that expressed support for development around and connectivity to the railway station and would welcome the opportunity to discuss matters with the Council in more detail as the plan moves forward.

6.13.4 **Savills**, on behalf of **Glenbrook**, submitted a representation to the Hertsmere Local Plan promoting the maximisation of the development potential of **HBA SA15 Imperial Palace, Elstree Way** and expressed support for the Hertsmere draft Local Plan, especially its focus on brownfield regeneration and sound, plan-led growth. In promoting HBA SA15 Imperial Palace, Savills advocated for a higher housing quantum, policy flexibility and the removal of conflicting employment designations. The representation can be summarised as:

- Broadly support for the Draft Local Plan's positive vision for growth and meeting local needs, including the use of the standard method for calculating housing requirements and the need for an up-to-date, plan-led framework that is sound and legally compliant.
- Strongly support for prioritising sustainable, brownfield sites (such as Imperial Place) for significant housing growth, rather than releasing Green Belt land. Imperial Place is underutilised and well-suited for a mixed-use redevelopment, aligning with national and local policy to optimise urban land.
- Outline that the emerging proposals include demolition of three buildings, erection of new buildings up to 14 storeys, delivering around 555 new homes (significantly above the draft allocation of 221), with a mix of tenures and ground floor retail.
- Request for the site's allocation to reflect the higher capacity and for its removal from the Employment Land Hierarchy to avoid policy conflict. Support for the site as a suitable location for tall buildings and for early delivery within the first five years of the plan period.

- Express support for a pragmatic approach to affordable housing, with requirements tested against site-specific viability. Request for policy flexibility to allow off-site provision or financial contributions if on-site delivery is not viable, particularly given the abnormal costs of brownfield regeneration.
- Are supportive for mixed-use development and ground-floor employment uses, but request clarity on affordable workspace policy and removal of Imperial Place from the Employment Land Hierarchy to align with its residential-led redevelopment.
- Support high-quality, design-led development, inclusive and accessible environments, and alignment with national net zero and sustainability standards. Request for flexibility in policy wording to ensure viability and site-specific responses, including for play space, parking, and building heights.
- Are supportive of policies promoting sustainable transport, Healthy Streets, and integration with public transport. Request for flexibility in parking standards to reflect site-specific circumstances.
- Broadly agree with the Plan's settlement hierarchy, spatial strategy, and approach to Green Belt, with emphasis on maximising urban regeneration opportunities in Borehamwood and Potters Bar.

6.13.5 **Garry Reynolds** submitted a representation to the Hertsmere Local Plan, on behalf of **Meenal Sachdev**, promoting part of **HBA SA18 Land north of Barnet Lane, Borehamwood**. The presentation can be summarised as:

- Views the site as suitable, available and achievable for residential development and represent an excellent opportunity for housing allocation within the emerging plan.
- Believes the sites constitute grey belt land. They sit within the existing Green Belt designation but make a limited contribution to the five Green Belt purposes as defined in the National Planning Policy Framework (NPPF). In line with the Government's December 2024 revisions to the NPPF and the associated grey belt policy framework, such land should be prioritised for release to meet identified housing need, subject to the application of the 'golden rules'.
- Outlines that the sites are capable of delivering approximately 24 new homes (5 on Site A and 19 on Site B), including an appropriate proportion of affordable housing, alongside contributions to infrastructure and public open space.

6.13.6 **HGH Planning** submitted a representation on behalf of **ACRE Bushey Ltd**, on **HBA SA19 Land South of Allum Lane, Elstree**. In summary, the representation found that:

- Agrees the site is in a suitable and available location with access possible from Allum Lane, and a sustainable location considering active travel and public transport access and local services. Support is given for allocation in the Local Plan to help meet housing need.
- Notes the site is largely unconstrained, other than being a Green Belt designated site and some encroachment of surface water flow paths to the east of the site, where housing should not be located. Archaeological

and conservation area designations should not be considered constraints to development.

- Recommends using the 2026 Green Belt Assessment when considering allocations and supports identification of the site as grey belt.
- Elstree Recycling Centre, off Allum Lane, is identified in the LACW Spatial Strategy as being too small to meet future demands. The Plan should consider how additional service capacity can be achieved for this area. Consideration should be given towards a suitable buffer zone between the recycling facility and the HBA SA19 site due to operational noise.

6.13.7 **Vail Williams** submitted a representation on behalf of **Radlett Park Land LLP** to the Hertsmere Local Plan promoting **HBA SA20 The Hertsmere Golf Course** supporting the principle of a sound, plan-led approach to growth in Hertsmere, with particular emphasis on the need for flexibility in Green Belt assessment and site allocation. The representation can be summarised as:

- Supporting the need for an up-to-date, sound, and legally compliant Local Plan, based on the standard method for housing need and a 20% buffer on the five-year housing land supply. It recognises the importance of a positive vision for the Borough, robust evidence, and coordinated growth.
- Requests further clarification on the approach to site selection and outstanding evidence base items, with a recommendation for more explicit Green Belt policy content.
- Agrees with the Council's approach to the Duty to Co-operate and the settlement hierarchy, supporting ongoing engagement to ensure strategic and cross-boundary issues are addressed, and infrastructure needs are met.
- Does not fully agree with the Council's Green Belt assessment, arguing that some parcels are too broad and that more 'grey belt' land could be identified. The response proposes a smaller parcel at the southern end of HBA SA20 for residential development (250–350 homes), while retaining the golf course to the north. It argues that this southern parcel, when considered in isolation, makes a weaker contribution to Green Belt purposes and should be considered for allocation.
- Proposes a masterplan that retains a thriving golf and leisure facility (with an extension to the north into agricultural land) and delivers a surplus parcel to the south for 250–350 homes. The site is described as suitable, available, and deliverable within the plan period, with good accessibility and potential for a holistic approach to development alongside adjacent sites. The proposal seeks to align with the settlement pattern and maintain significant open space and recreational use.
- Supports focusing growth around existing settlements with access to services and public transport, and agrees with the Council's approach to infrastructure capacity. No alternative spatial strategy is proposed, but a lower dwelling number for SA20 is suggested compared to the draft plan.
- Supports the Council's approach to green and blue infrastructure, particularly the flexible use of golf courses for multiple purposes (housing,

recreation, biodiversity). It highlights The Hertsmere as an example of co-locating complementary uses for community benefit.

- Recommends that the Local Plan should consider a more flexible and nuanced approach to Green Belt release and site allocation, specifically supporting the allocation of the southern parcel of HBA SA20 for residential development while retaining the golf course. The response welcomes ongoing engagement and offers to provide further technical evidence as the plan evolves.

6.13.8 **Lichfield's** submitted a representation to the Hertsmere Local Plan on behalf of behalf of **City & Docklands Management Ltd** and **Old Haberdasher's Sports Ground Ltd** promoting **HBA SA22 Old Haberdasher's Sports Ground** supporting the allocation of the site for a higher-density residential development, with replacement sports facilities provided at Land West of Watling Street. The representation can be summarised as:

- Supports the principle of a plan-led approach to sustainable growth and the need for robust evidence to underpin site allocations.
- Highlight the importance of optimising housing delivery in sustainable locations and ensuring the Local Plan is sound and legally compliant, in line with the National Planning Policy Framework (NPPF).
- Supports a housing strategy that meets need in full and advises that the site can deliver homes in the first 5 years, helping address housing supply shortfalls and reduce reliance on larger strategic allocations.
- Supports the inclusion of HBA SA22 as a candidate site for residential development, noting its sustainable location within the Borehamwood settlement boundary and its lack of significant constraints and requests that the indicative capacity be increased to 200 homes (from 95), to optimise density in line with NPPF guidance.
- Proposes that replacement sports pitches and facilities for Old Haberdashers be provided at Land West of Watling Street, Aldenham, as a direct donor site to enable residential development at Croxdale Road. The Watling Street site is described as suitable for sport and leisure use, with a masterplan for three/four pitches and a new clubhouse and is considered appropriate development in the Green Belt. The proposal is designed to minimise landscape and heritage impacts, and to deliver biodiversity net gain.
- Objects to continued protection of the sports pitches under Policy SADM34 as they are privately owned and not publicly accessible.
- Considers both sites to be available and deliverable within the first five years of the plan period and highlights the importance of coordinated delivery, with planning applications for both sites to be submitted in tandem. It also notes that the relocation of sports facilities will provide improved provision for the community and strengthen links with Haberdashers' Aske's School.
- Recommends that HBA SA22 be allocated for up to 200 homes, with the delivery of replacement sports facilities at Watling Street secured as part of the allocation.

- Welcomes further engagement with the Council to ensure the Local Plan is robust, deliverable, and meets the Borough's housing and infrastructure needs.

6.13.9 **HGH Planning** submitted a representation to the Hertsmere Local Plan on behalf of **The South Medburn Trust, Jennifer Nissen & Caroline Taylor** and also separately on behalf of **Haberdashers' School**, promoting **HBA SA24 Land North of Allum Lane and East of Watling Street**. The representation can be summarised as:

- Supports Hertsmere's plan-led approach to meeting housing needs in full, consistent with the NPPF. It agrees that exceptional circumstances exist to review Green Belt land and advocates for the release of land performing poorly against Green Belt purposes ("grey belt") in sustainable locations.
- Supports the identification of HBA SA24 as a candidate site for housing development, highlighting its "grey belt" credentials and suitability for release. The site is in single ownership, available, and deliverable, with an outline planning application submitted for 136 homes (proposed to increase to 150). The site is considered capable of accommodating up to 198 dwellings, subject to site-specific constraints.
- Argues that development would not fundamentally undermine Green Belt purposes and is not inappropriate under NPPF Paragraph 155.
- Considers that the site's location aligns with the draft Plan's spatial strategy, focusing growth in Borehamwood, the Borough's principal settlement and supports comprehensive planning and design-led development, as required by the emerging Local Plan.
- Recommends the allocation of Land North of Allum Lane (HBA SA24) for residential development, confirming its suitability, availability, and deliverability.
- Objects to Green Belt Assessment methodology, particularly how land around Radlett has been assessed and concerns that cumulative impacts have not been properly considered.
- Supports the settlement hierarchy and the exclusion of smaller Category VI and VII settlements from significant development due to poor sustainability and reliance on private cars.
- Recommends that HRA SA4 (Land South of Watford Road and West of New Road, Radlett) should be removed from the Plan as it would result in loss of agricultural land, Green Belt harm, heritage impacts and increased settlement coalescence.
- Concerns that HRA SA4 is not a sustainable location due to distance from services and Radlett Station, leading to car dependency and pressure on local infrastructure.
- Welcomes ongoing engagement with HBC and stakeholders to refine policy and demonstrate the site's contribution to meeting housing and affordable housing needs.

6.13.10 **Warner Planning** submitted a representation to the Hertsmere Local Plan on behalf of **Griggs (Options) Ltd** ("The Developer") and **Highmoon Developments Ltd** ("the Landowner") promoting **HBA SA26 Organ Hall**

Farm, Theobald Street for allocation in the Local Plan. The representation can be summarised as:

- Welcomes continued dialogue to refine proposals and ensure Organ Hall Farm contributes positively to the Plan's objectives.
- Strongly support the Council's plan-led approach to meeting housing needs in full, recognising the acute housing requirement in the Borough and the need for a robust, deliverable spatial strategy.
- Welcomes and supports the inclusion of Organ Hall Farm as a candidate allocation (HBA SA26), confirming its deliverability and developability, evidenced by outline planning permission (22/2149/OUT) and a current reserved matters application.
- Requests that the site's allocation be amended to reflect an increased capacity of up to 160 dwellings (from 110), in line with the emerging masterplan and policy objectives to optimise site delivery.
- Supports the release of Organ Hall Farm from the Green Belt, citing the Council's previous finding of "Very Special Circumstances" at the outline permission stage, including acute housing need, provision of affordable housing, a new medical centre, biodiversity improvements, public open space, and economic benefits.
- Argues that the site is "grey belt" and its release is justified, proportionate, and consistent with national policy.
- Requests that Organ Hall Farm be included as a deliverable site in Years 1–5 of the housing trajectory, reflecting its advanced planning status and ability to strengthen the five-year housing land supply at adoption.
- Emphasises that every additional home from a consented and deliverable site reduces pressure on less certain allocations.
- Supports Policy HBA1 and the spatial strategy focusing growth at Borehamwood, the Borough's most sustainable settlement.
- Confirms no unresolved technical or environmental constraints, with all issues addressed through the planning process.
- Highlights the site's accessibility, sustainable location, and capacity for public open space, biodiversity enhancements, and sustainable transport infrastructure.

6.13.11 **Woolf Bond Planning** submitted a response on behalf of **Grigg (Options) Ltd** and **Wrotham Park Settled Estates** promoting the allocation of **HBA SA16 Well End Strategic Urban Extension** that supports the Hertsmere Local Plan's approach to sustainable growth and robust plan-making, with recommendations in relation to housing targets, site allocations and planning policy. The representation can be summarised as follows:

- Recommended that the housing requirement be set at a consistent 975 dwellings per annum throughout the plan period (2025–2044), ensuring alignment with national policy and providing for sufficient housing to meet both local and any unmet needs from neighbouring authorities.
- Recognises the importance of retaining the allocation of the Well End Urban Extension (HBA SA16), with policy wording that allows for

individual applications to come forward on separate land parcels, subject to appropriate permeability and comprehensive masterplanning.

- Supports the inclusion of land east of Cowley Hill and land north of Rowley Lane, Borehamwood, as housing allocations within the Well End Strategic Urban Extension, noting their suitability, deliverability, and capacity to provide much-needed homes and supporting infrastructure.
- Endorses Hertsmere's evidence-led approach, including technical studies on flood risk, landscape, transport, and ecology, and confirmation that ongoing technical work and dialogue with prescribed consultation bodies will ensure deliverability and address any constraints.
- Welcomes the opportunity to work collaboratively with the Council to refine policy wording and masterplan proposals, aiming for a robust Local Plan that delivers sustainable growth and a high-quality, well-connected community.
- Recognises that the proposed sites can contribute to accelerated housing delivery in the early years of the plan period, with confidence in their suitability, availability, and achievability.
- Supports the transformation of privately owned land into publicly accessible green space, promoting healthy and active lifestyles, and the creation of strategic landscape buffers to enhance the settlement edge and wider Green Belt.
- Committed to continued collaborative working and technical assessment to ensure the Local Plan is sound, legally compliant, and capable of managing growth sustainably.

6.13.12 **Borehamwood Homes Ltd** submitted a response giving feedback on candidate site HBA **SA13 McDonalds, Shenley Road**, and general feedback on Policy H7. Their submission can be summarised into the following points:

- Recommendation that the site at Nat West House, 225 Shenley Road, Borehamwood which borders SA13 is also allocated as a site.
- Support for Policy H7 to include a policy dealing with 'Housing with Shared Facilities / Homes in Multiple Occupation", though it needs to distinguish between large scale 'Purpose Built Communal Living' schemes and smaller Houses of Multiple Occupation. These two types of communal living can meet different housing needs.
- Co-living schemes can make a valuable contribution towards housing targets and should be encouraged throughout Hertsmere in suitable locations and criteria.

<u>Bushey Candidate Sites</u>

6.13.13 **Twenty5 Planning** submitted a response on behalf of **Redrow Homes Ltd**, promoting the allocation of **HBUSA SA4 Land at Little Bushey Lane (east),** for residential development. The representation can be summarised as follows:

- Supports the allocation of HBUSA SA4 for up to 280 dwellings (overall capacity could be higher taking account of the additional parcel of land to the north), including 50% affordable housing, a community/mobility hub,

public open space, and associated infrastructure, in accordance with national and local policy requirements.

- Recognises the site's location within the Green Belt and notes that the site meets the definition of 'grey belt' as set out in the Planning Practice Guidance and is compliant with paragraph 155 of the NPPF and the 'Golden Rules'. The development is not considered inappropriate in the Green Belt, and any harm is outweighed by the scheme's benefits.
- Endorses the Council's evidence-led approach, including independent scrutiny of flood risk and drainage documentation, confirming compliance with national and local policies following amendments and extensive consultation.
- Highlights the acute local need for both market and affordable homes, with the scheme delivering up to 140 affordable units, exceeding policy requirements and addressing significant under-delivery in the borough.
- Supports the provision of substantial public open space, upgrades to Public Rights of Way, and a community hub, enhancing accessibility, sustainability, and community cohesion.
- Acknowledges landscape harm arising from the change in character but considers mitigation and retention of green infrastructure as positive improvements over previous schemes.
- Welcomes ongoing technical work and dialogue with prescribed consultation bodies, including Highways, Ecology, and Environmental Health, to ensure deliverability and address constraints.
- Confirms that the adverse impacts do not significantly and demonstrably outweigh the benefits, and that the 'tilted balance' applies, supporting the grant of planning permission.
- Supports the proposed strategic transport policies.
- Requests clarity on potential policy related to the Elstree Aerodrome and implications for residential developments within the Bushey area.
- Encourages the Council to engage with relevant landowners and developers of proposed site allocations on detailed policy wording and site requirements ahead of Regulation 19 publication stage.
- Recommends a review of policy to ensure that is in line with national policy / does not duplicate national policy requirements, including in relation to energy and water efficiency standards and flood risk assessment.

6.13.14 **Montagu Evans** submitted a response on behalf of **Latimer Development Limited, Hill Residential Limited** and **MCF Trading Limited**, promoting the allocation of **HBUSA SA5 Land rear of Farm Way (north)** for a large-scale, mixed-use urban extension. The representation can be summarised as follows:

- Supports the allocation of HBUSA SA5 for up to 802 dwellings (including affordable and self/custom build homes), a 70-bed care home, land for a two-form entry primary school, flexible non-residential uses, and extensive public parkland, in line with national and local policy requirements.

- Highlights the site's 'grey belt' status and argues that its release would not fundamentally undermine Green Belt purposes, referencing both Council and independent Green Belt assessments.
- Notes that the site is subject to a live hybrid planning application (ref. 25/0972/FULEI), which demonstrates deliverability and includes detailed technical assessments.
- Requests that the allocation boundary be amended to align with the planning application, ensuring the Community Park is included and protected in perpetuity, and that a defensible Green Belt boundary is established.
- Supports the Council's evidence-led approach but recommends refinements to the evidence base (including the Green Belt Assessment) to reflect the site's weak contribution to Green Belt purposes and to address inconsistencies in the assessment of Bushey as a single settlement.
- Welcomes the identification of HBUSA SA5 as a sustainable urban extension, noting its proximity to services, single ownership, and capacity to deliver 200 homes in the first five years, contributing immediately to the borough's five-year housing land supply.
- Endorses the inclusion of land for a primary school, extensive public open space, and community infrastructure, which will benefit both new and existing residents.
- Stresses the importance of Green Belt release (specifically grey belt) to meet objectively assessed housing needs, given the limited brownfield land in Bushey and the borough.

6.13.15 **Quod** submitted a response on behalf of **Trulocom**, supporting the identification **of HBUSA SA6 Land at Elstree Road (south)** as a candidate allocation for a major, age-friendly, intergenerational community. The representation can be summarised as follows:

- Strongly supports the allocation of the site for a comprehensive, mixed-use development including approximately 1,085 homes (including 468 affordable homes and specialist older persons accommodation), a 130-bed care home, a purpose-built Neighbourhood Health and Diagnostics Centre, and a range of community, leisure, and open space uses, in line with national and local policy objectives.
- Notes the site's status as 'grey belt' (previously developed land with no strong Green Belt function), referencing both Council and independent Green Belt assessments, and argues that its release is consistent with national policy prioritising brownfield and grey belt land for development.
- References the live outline planning application (Ref: 24/0692/OUTEI) for an exemplar intergenerational community, which is progressing positively through the planning system, with amendments forthcoming to increase affordable housing and respond to consultee feedback.
- Supports the Council's intention to meet full housing needs (with a 20% buffer), and argues that sites like HBUSA SA6, which are technically tested and deliverable in the short term, should be prioritised over less advanced or more constrained sites.

- Requests that the site's HELAA assessment be updated to reflect its grey belt status and deliverability, and that the site is formally allocated in the Regulation 19 Plan to ensure a robust and flexible housing land supply.
- Emphasises the innovative, holistic approach to integrating housing, health, and community infrastructure, with the Neighbourhood Health Centre aligning with the Government's Neighbourhood Health Framework and addressing local healthcare needs.
- Recommends that the Local Plan includes clear policy support for the delivery of health infrastructure, and specifically allocates HBUSA SA6 for this purpose, to ensure alignment between housing growth and community facilities.

6.13.16 **HGH** submitted a response on behalf of **Griggs Homes** and **Hill Residential** supporting the draft allocation of **HBUSA SA7 Bushey Golf and Country Club** as a candidate site for up to 250 residential dwellings and non-residential floorspace, as an urban extension to Bushey. The representation can be summarised as follows:

- Strongly supports the site's inclusion as a candidate allocation, highlighting its suitability, availability, and achievability for development within 5–10 years, and its potential to protect higher-performing Green Belt sites elsewhere in the Borough.
- Confirms the site is in single ownership, available now, and free from legal, ownership, or financial impediments. No technical or environmental constraints have been identified that would prevent development.
- Proposes a masterplan with up to 250 homes, a food store, community centre, boxing club, MPAA Academy, local nursery, and extensive publicly accessible open parkland, with built development focused to the north-east, fronting High Street.
- Endorses the Council's approach to meeting housing needs in full, in line with national policy, and argues that Bushey (a Tier II settlement) is well-placed for sustainable growth, with strong public transport links and local amenities.
- Notes the site's "grey belt" status (as assessed by AECOM), supporting its prioritisation for development over higher-performing Green Belt sites, and requests the Green Belt assessment be updated to reflect this.
- Disputes the Council's heritage assessment, arguing that any harm to heritage assets would be "less than substantial" and can be mitigated, with further independent heritage evidence to be submitted.
- Commits to delivering 50% affordable housing, a new country park, and enhanced community and ecological infrastructure, in line with the NPPF's "Golden Rules" for sustainable development.
- Emphasises the site's sustainable location, strong connectivity, and the benefits of integrating new and existing communities through high-quality public realm and active travel links.

6.13.17 **HGH** submitted a response on behalf of **Veladail Leisure Ltd and Griggs (Options) Ltd** endorsing the draft allocation of **HBUSA SA8 Bushey Hall Golf Course** as a candidate site for residential development. The representation can be summarised as follows:

- Supports the site's inclusion and advocates increasing the allocation from 350 to 550 dwellings, utilising the full site ownership boundary (42 hectares), to optimise land use and protect higher-performing Green Belt sites elsewhere in the Borough.
- Confirms the site is in single ownership, available now, and free from legal, ownership, or financial impediments. Planning permission (ref: 24/1022/OUT) has been granted for 350 homes and community, healthcare, and well-being facilities, with detailed approval for residential layout and access.
- Technical evidence (transport, green belt, flood risk, ecology, trees, heritage, contamination) demonstrates the site is suitable, available, and achievable for development. No technical or environmental constraints have been identified that would prevent delivery of up to 550 homes.
- The site is classified as "grey belt" in the AECOM Green Belt Assessment and NPPF (2024), supporting its prioritisation for development over higher-performing Green Belt sites. The representation requests the allocation be updated to reflect this.
- The site is sustainably located, with strong connectivity to Bushey and Watford, public transport links, and access to local amenities. The approved access strategy (Bushey Mill Lane and Bushey Hall Drive) is robust and can accommodate additional growth.
- The development will retain and enhance significant blocks of woodland, mature trees, and landscaped areas, providing extensive publicly accessible open space for new and existing communities.
- The site will deliver a mix of market and affordable housing, supporting Hertsmere's acute housing need (current supply at 0.98 years, sixth worst in England).
- Requests HBUSA SA8 be confirmed as a full housing-led allocation for 550 dwellings in the Regulation 19 Local Plan, to help address the Borough's housing shortfall and ensure a robust, deliverable supply of homes and community facilities.

6.13.18 **DLP Planning Ltd** submitted a response on behalf **of Senior Living (Elstree) Ltd**, on **HBA SA18 Land North of Barnet Lane, Borehamwood**. The response shares support for a more flexible Local Plan that enables sustainable development, particularly to deliver specialist older persons accommodation. Their submission can be summarised into the following points:

- Support for site HBA SA18to be allocated for development, and suitable for specialist older persons housing. There is a significant unmet need for extra care housing.
- Disagrees with the current settlement hierarchy and classification of Elstree, considering it inconsistent with the evidence on accessibility and services.
- Opposition to the spatial strategy, which concentrates growth in Borehamwood and Potters Bar and limits development in settlements such as Elstree. The respondent supports a more flexible, criteria-based approach.

- Suggestion that Policy H1 should better recognise the Borough's housing shortfall, particularly the need for specialist older persons accommodation.
- Support for Policy H5 in principle, but consider it too restrictive as it focuses provision in Borehamwood and Potters Bar. Requests are made for Borough-wide opportunities and specific delivery targets.
- Support for designating Parcel EL-003 as Grey belt land to accommodate development, voicing support for grey belt sites helping meet housing needs.
- Support for the proposed 20% housing buffer.

6.13.19 **DPP Planning Ltd** submitted a response on behalf of **Aldenham Estates**, covering concerns of reliance on large sites and insufficiently flexibility to meet housing needs across the Borough. The submission can be summarised into the following points:

- Objection to the overall Spatial Strategy, particularly the concentration of growth in the four main settlements and a proposed new settlement. The respondent’s view is that a wider distribution of development should be considered across smaller settlements. Smaller sites can be delivered at pace compared to strategic allocations.
- Concern that large villages and villages, particularly Elstree, have been excluded from meaningful growth opportunities despite evidence showing they have reasonable accessibility and local services. Also support for allocating more sites overall to create a contingency buffer and improve housing delivery performance.
- Strong objection to the application of the settlement hierarchy for Elstree which should be a Category IV Large Village.
- Support for releasing appropriate Green Belt/grey belt land to provide a broader and more resilient housing supply. Draft Policy H10 should prioritise grey belt land in the manner set out by NPPF paragraph 148.
- Concern that several allocated sites across Borehamwood and Potters Bar (HPBA SA1, SA3, SA8, SA13) may not be realistically deliverable because they contain existing operational uses.
- Support for allocating an omitted site at Land east of Aldenham Road, north of the A411, Elstree, capable of delivering around 60 dwellings. The site is referenced in relation to HEL602 (Aldenham Estate).
- Land east of Aldenham Road, north of the A411, Elstree site is available, suitable, adjacent to existing development and should be included in the Plan.
- Highlights potential impacts on the setting of Aldenham Park (Grade II Registered Park and Garden) requiring heritage assessment and mitigation.
- Requests for a more positive delivery-focused approach and greater clarity on how housing targets will be achieved.
- Concern that the Council's evidence base does not justify the proposed growth strategy, housing requirement, housing trajectory, or assumptions about site delivery.

6.13.20 **Garden Rock Holdings Ltd** submitted a response relating to the Borehamwood area, in particular burial space provision. The submission can be summarised into the following points:

- Concern that existing cemeteries are full or nearing maximum capacity, with on provision made for future cemetery requirements in the Plan. The boroughs have statutory duties to provide and maintain adequate space.
- Request is made for inclusion of space for a cemetery at the former A1 Shooting Grounds site near Borehamwood, east of the Barnet By-Pass. Permission has twice previously been granted, and a new cemetery application is expected.
- Advises that though the area covering the former A1 Shooting Grounds site is proposed to be within designated Green Belt, the site contains buildings, roads and numerous large earth bunds to contain lead pellets.

Potters Bar Candidate Sites

6.13.21 **Baker Parry** submitted a response on behalf of **Chase New Homes** supporting the draft allocation of **the HPBA SA2 Canada Life Site** for residential-led mixed-use redevelopment. The representation can be summarised as follows:

- Supports the allocation of the Canada Life Site as a ‘candidate site’ for comprehensive mixed-use redevelopment, comprising main-town employment centre uses at ground and lower levels and residential above, with vertical intensification.
- The site (1.81 ha) is in Potters Bar Town Centre, currently comprising office, commercial, and residential uses, and is considered highly sustainable for urban regeneration and housing delivery.
- Chase New Homes has an interest in the land, and the site is available, suitable, and achievable for residential development within five years, meeting the NPPF definition of ‘deliverable’.
- Pre-application discussions with the LPA and stakeholders have been ongoing since June 2025, including Design Review Panel presentations and public consultation.
- Supports the Local Plan’s spatial strategy, particularly the focus on urban regeneration of brownfield sites in Potters Bar and agrees that this approach is sustainable and aligned with national policy.
- Endorses the indicative capacity of 369 dwellings and the ambition for the site to contribute to town centre regeneration, with flexibility for a mix of compatible commercial and residential uses.
- Requests that the site allocation wording allows flexibility for retention or conversion of existing buildings (such as Maple House and Canada Life Place) where this supports policy objectives (e.g., embodied carbon) and does not prejudice wider site delivery.
- Supports a design-led approach to building heights and density, with the site identified as suitable for tall buildings and higher densities (200–250 dph), in line with the NPPF and the Council’s HELAA.

- Notes that the site cannot accommodate all open space requirements on-site due to its size and location, and supports off-site contributions where appropriate, given proximity to existing parks and play spaces.
- Recommends that infrastructure improvements (e.g., walking and cycling routes) should be delivered comprehensively by the Council or via CIL funding, rather than piecemeal by individual sites.
- Supports the Council's intention to meet Local Housing Need in full, with a supply 'headroom' above the requirement to address past under-delivery and affordable housing needs.
- Requests clarity and viability testing for affordable housing, CIL, and s106 contributions to ensure deliverability.

6.13.22 **CDS Planning** submitted a response **confirming HPBA SA4 Potters Bar Railway Station Car Park, Darkes Lane** availability and deliverability for development. The representation can be summarised as follows:

- Confirms that the Potters Bar Railway Station Car Park site is available and deliverable for development, supporting its allocation in the Local Plan.
- Notes that, following recent discussions with Network Rail, the site cannot accommodate a building taller than four storeys.
- Development of the site was allowed at appeal after a lengthy planning process, demonstrating its suitability and achievability.
- The applicant and landowner intend to submit revised plans for a smaller building, delivering approximately 26 apartments plus commercial space.

6.13.23 **Marrons** submitted a response on behalf of **the Mayor and Burgesses of the London Borough of Enfield** supporting the allocation of the **HPBA SA12 Land rear of Park Avenue** for residential development. The representation can be summarised as follows:

- Supports the preparation of the new Local Plan and recommends that HPBA SA12 is identified as a housing allocation in the Regulation 19 Local Plan, in line with the NPPF's approach to delivering new homes on grey belt land in sustainable locations close to railway stations.
- The site (approx. 17.7 ha) is located to the south of Potters Bar, north of the M25, and is well-related to the settlement edge, with strong physical boundaries and good access to local facilities, schools, and public transport.
- Proposes a high-quality, landscape-led residential scheme of around 350–400 new homes (exceeding the Council's indicative capacity of 260 dwellings), with a mix of 1–4 bed dwellings including apartments and family houses, and 50% affordable housing to meet local needs and "golden rules" for Green Belt release.
- The site is not in agricultural use and is considered "grey belt" with limited constraints; it is available, suitable, and achievable for development, and can be delivered in the first five years of the plan period.

- Access issues have been resolved through the acquisition of 127 Park Avenue, allowing for a new road with cycle lanes and footways; technical work confirms highways and flood risk matters are addressed.
- The masterplan includes new connections, walking and cycling routes, significant landscape buffers, retention of existing trees, and provision for biodiversity net gain and open space.
- Supports the Local Plan's spatial strategy, the focus on urban extensions, and the use of average densities that would allow for a higher quantum of development (closer to 400 dwellings).
- Suggests the site can deliver new local infrastructure and open space, and is well-placed to support healthy, active lifestyles and sustainable travel.
- Recommends the site's allocation is increased to 350–400 homes, and that it is brought forward for development in years 1–5 of the plan period.

6.13.24 **CDS Planning** provided a brief response focused on **HPBA SA4** Potters Bar Railway Station Car Park, Darkes Lane. In summary:

- The site, whilst available and deliverable for development, cannot fulfil a building taller than four storeys in accordance with recent discussions with Network Rail. Plans will be submitted for a smaller building delivering circa 26 apartments and commercial space.

Radlett Candidate Sites

6.13.25 **HGH** submitted a response on behalf of **TLC Group** supporting the draft allocation **of HRA SA1 Regency House, Land at 205 Watling Street** for residential development. The representation can be summarised as follows:

- Endorses the site's inclusion as a candidate for housing, highlighting its status as a vacant, previously developed urban plot in central Radlett, adjacent to retail, services, and excellent transport links.
- Confirms the site is in single ownership (TLC Group), available now, and free from legal or ownership impediments.
- Notes the site is the last plot within the adopted SADM Policy SADM42 (ref TC2) yet to be redeveloped; previous planning permission (May 2019) for a commercial-led scheme has been implemented through demolition and site clearance.
- Technical evidence confirms suitability: ground contamination risks have been addressed through prior demolition and excavation, with any residual remediation to be completed during foundation works. Heritage and edge constraints (adjacent Conservation Area and railway) can be mitigated through high-quality design and acoustic measures.
- Advocates for residential-led redevelopment, citing acute housing need in Hertsmere (current supply at 0.98 years, sixth lowest in England).
- Argues the indicative capacity of 20 units is a significant under-optimisation of this highly sustainable urban site. Proposes vertical intensification to deliver around 110 units, aligning with NPPF guidance to maximise brownfield land and reduce reliance on Green Belt sites.

- Suggests the site can accommodate high-density development while respecting heritage constraints and the extant permission parameters, contributing substantially to early housing delivery in the plan period.
- Requests explicit policy support for Purpose-Built Shared Living (PBSL/Co-living) as an acceptable residential use, to diversify housing mix and meet needs of young professionals, key workers, and single-person households.
- Emphasises co-living schemes would contribute directly to housing targets and supply, referencing London Plan Policy H16 as a benchmark.

6.13.26 **Carter Jonas** submitted a response on behalf of **Cemex UK Properties Limited** supporting the draft allocation of **HRA SA3 Land North of Watford Road and East of Kemprow** for residential development. The representation can be summarised as follows:

- Supports the production of a new Local Plan and the allocation of land around Radlett for residential growth, highlighting the need for an up-to-date plan to deliver sustainable growth and meet national housing targets.
- Confirms the site (6.1ha of managed farmland) is in single ownership (Cemex), available for development, and identified as “grey belt” land with no ecological or landscape significance.
- The site is sustainably located with access to rail, road, and bus infrastructure, adjacent to other proposed allocations, and within walking distance of Radlett town centre and local schools.
- Technical and design studies commissioned by Cemex confirm the site is deliverable and capable of early development in the plan period. No technical delivery constraints have been identified.
- Supports the Local Plan’s spatial strategy to direct growth to the west of Radlett, but requests clarity to avoid piecemeal expansion and ensure prompt delivery of allocations.
- The Sustainability Appraisal (SA) identifies the site as capable of delivering a minimum of 972 homes, with potential for a primary school and wider infrastructure benefits. Cemex argues the site is deliverable independently of adjacent allocations and should not be constrained by other sites.
- Supports the strategic vision for Radlett’s growth and the classification of Radlett as a key settlement, suggesting future development could elevate it to a Tier II settlement.
- Endorses the approach to Green Belt and “grey belt” development, noting the site’s proximity to heritage assets can be addressed through sensitive design.
- Supports draft policies on high-quality design, parking, and biodiversity net gain, aligning with national guidance and local needs.
- Advocates for maximising delivery opportunities from draft allocations to address severe local housing need and affordability challenges (average house prices at 11.92 times median salary).

- Requests the allocation be confirmed in the Regulation 19 Local Plan, with flexibility to deliver a diverse housing mix and significant affordable housing in a sustainable location.

6.13.27 **HCC** as a landowner submitted a response supporting the draft allocation of **HRA SA4 Land South of Watford Road and West of New Road** for residential development. The representation can be summarised as follows:

- Welcomes and supports the inclusion of HRA SA4 as a 'residential candidate site' in the Local Plan, confirming the site is in public ownership (HCC).
- Notes the site is currently in agricultural use and not undeveloped, and highlights that the site size has been reduced due to expansion of the Battlers Green Farm shopping area and adjacent event space.
- Requests amendments to the site boundary to exclude land now included within the expanded shopping area and event space.
- Confirms feasibility work was undertaken in 2022/2023, including planning feasibility, preliminary ecological assessment, flood risk and drainage appraisals, high-level transport appraisal, combined services plan, tree survey and constraints, and facilities plan, all submitted in support of the site's consideration.
- Advises that archaeology, heritage, and updated tree surveys will need to be undertaken as part of future site assessments.
- States that the indicative development capacity of the site should be determined by updated feasibility work.

6.13.28 **Planning Potential** submitted a response on behalf of **Mac Mic Strategic Land Limited, Brace Industries Limited, Home Farm Land (Radlett) Limited, and Affinity Water Limited** supporting the draft allocation of **HRA SA6 Home Farm** for strategic urban extension and mixed-use development. The representation can be summarised as follows:

- Supports the inclusion of Home Farm, Radlett as a Candidate Site under HRA SA6, confirming the consortium's strategic interest and site control.
- The site (approx. 42.44 ha) is located to the southwest of Radlett, within the Green Belt, but is provisionally classified as "grey belt" by the Hertsmere Green Belt Assessment.
- The site is sustainably located, adjacent to Radlett's settlement edge, with strong transport links (rail, road, and bus), proximity to local services, schools, and community facilities.
- Technical evidence submitted includes planning feasibility, ecological, flood risk, drainage, transport, arboricultural, and landscape assessments. The site is considered suitable, available, and achievable, with no legal or ownership impediments.
- The proposed development is based on Garden Suburb principles, providing a framework for high-quality, healthy, and sustainable new neighbourhoods, including a mix of homes, affordable housing, self-build plots, a primary school, community hub, and employment uses.

- Public consultation has been undertaken, including events, a dedicated website, and engagement with local stakeholders. Pre-application discussions are ongoing with HBC and HCC Highways.
- The site is anticipated to deliver up to 1,040 dwellings, with phased delivery expected within the next five years. The consortium is progressing an outline planning application.
- The representation argues that brownfield land alone is insufficient to meet local housing need, and Green Belt release is necessary. Radlett is identified as a highly sustainable settlement capable of supporting strategic growth and infrastructure investment.
- The submission supports the Local Plan's spatial strategy but recommends a more balanced approach that positively embraces growth opportunities at Radlett and maximises the role of candidate sites.
- Supports draft policies on high-quality design, housing delivery, transport, and biodiversity net gain, with emphasis on optimising capacity without compromising design quality or local character.
- Technical constraints (flood risk, heritage, landscape, access) are acknowledged but considered capable of mitigation. The site is available now and deliverable, with strong market interest and viability.

Bowmans Cross Candidate Sites

6.13.29 **David Lock Associates** submitted a detailed representation to the Hertsmere Local Plan on behalf of **Urban and Civic**, providing detailed comments on policies within the draft Plan as well as submitting supporting evidence in promotion **of HBCA SA1 Land at Bowmans Cross, Courser's Road, Ridge**. Their submission on planning policy can be summarised into the following points:

- Urban & Civic are committed to supporting HBC's strategic objectives for sustainable development and net zero by 2050, with a market-leading sustainability strategy deployed at Bowmans Cross to deliver positive societal and environmental benefits, including much-needed private and affordable homes.
- Recommended that policy standards for sustainability, design, and carbon reduction must be viability-tested in accordance with national guidance (NPPF Paragraph 63), and that flexibility is provided for technical and commercial constraints, especially regarding BREEAM and LETI standards for smaller buildings and challenging requirements.
- Recognised the importance of location and design in responding to the climate emergency, with emphasis on sustainable, walkable, and cycle-friendly development that reduces car use and carbon emissions, and the role of well-designed new settlements (such as Bowmans Cross) in enhancing climate resilience through green infrastructure.
- Supported Hertsmere's approach to green infrastructure, biodiversity, urban greening, and water efficiency, with suggestions to identify delivery opportunities, set realistic targets, and allow flexibility for different site contexts and urban situations.
- Endorsement of the principle that new development should consider and minimise both regulated and unregulated energy emissions, but

recommendation that targets focus on regulated energy only, as developers cannot influence unregulated energy use. Support for a local carbon offsetting fund, subject to robust delivery frameworks, reasonable costs, and opportunities for on-site offsets.

- Welcomes Hertsmere's commitment to high sustainability standards but requesting that requirements for embodied carbon assessments be proportional to application stage and complexity, and that assessments be limited to representative samples to ensure deliverability and practicality.
- Supported the strategic objective to increase renewable energy delivery and consider heat networks, but recommending that policies emphasise consideration rather than prioritisation, and recognise the positive contribution of on-site renewable generation to national grid resilience.
- Supported water efficiency targets and circular economy principles, with recognition of practical challenges in achieving net zero waste and requests for policy flexibility.
- Highlighted the need for ongoing engagement and technical assessment to ensure sound, deliverable policies that align with national standards and guidance.

6.13.30 **Apcar Smith Planning** submitted feedback on behalf of **Cobstar Ltd** focused on **Bowmans Cross**, as well as feedback on Policies H2, H4 and H10 and concerns about the timeframes for housing delivery and reliance on large strategic sites. Their submission can be summarised into the following points:

- Opposition to growth around Bushey where it could lead to coalescence with Watford and conflict with Green Belt objectives. There are complexities flagged around multiple land ownerships, infrastructure requirements, and viability.
- Strong support for Policy H10, viewing it as an important mechanism to boost housing delivery in the early years of the Local Plan, though could be clearer on the requirement for sites to be delivered in a "timely manner", including whether this means within 5 years or 10 years.
- Support for both Policy H4 and Policy H10 as necessary measures to help address the Borough's housing shortage and improve housing delivery.
- Concern that the majority of proposed housing allocations will not come forward until more than ten years into the plan period, with only 291 dwellings expected to be delivered within the first five years. The delivery trajectory is unrealistic and unlikely to address immediate housing needs.
- Support for more smaller and deliverable sites to come forward in the short term.
- Concern about heavy reliance on Green Belt sites, with over 83% of proposed dwellings on Green Belt land. Some proposed urban extensions involve Green Belt land previously considered to perform strongly for Green Belt purposes.
- There are inconsistencies in Policy H2 around Green Belt site promotion.
- Objection to concentrating growth around the four main settlements of Borehamwood, Potters Bar, Bushey and Radlett, where smaller,

deliverable settlements should also contribute towards housing growth and can come forward sooner

Employment Candidate Sites

6.13.31 **Lawson Planning Partnership Ltd** submitted a representation on behalf of **Orbital Data Centres Ltd** supporting the allocation of **HEM SA01 Land Southeast of Junction 24 (M25), north of the Ridgeway** for strategic employment use, specifically for a data centre development. The key points are:

- Supports the proposed employment land allocation of HEM SA01 and requests its retention and progression in the next stage of the Local Plan, aligning with the parallel allocation in the London Borough of Enfield (LBE) Local Plan (Policy RUR.04), to enable a coordinated cross-boundary data centre development.
- The site (approx. 11.65 ha) is located north of the Ridgeway and adjacent to the M25, with about half the area within Hertsmere. Orbital Data Centres Ltd has acquired the site and intends to deliver a large-scale, phased data centre scheme, with an estimated floorspace of around 60,000 sqm, subject to further design and planning.
- The proposal includes data centre buildings, offices, storage, associated plant, substations, security facilities, new access, parking, landscaping, biodiversity enhancements, and supporting infrastructure. The site is well-located for power, fibre connectivity, and water, and can be delivered quickly after planning permission.
- The representation highlights the national significance of data centres, recently classified as Critical National Infrastructure (CNI), and notes the urgent need for additional capacity to support the UK's digital economy.
- Technical work undertaken includes landscape and visual impact assessment, ecological surveys, agricultural land classification (confirming the site is not best and most versatile land), ground investigations, and UXO risk assessment, all demonstrating the site's suitability and low environmental constraints.
- Further technical studies on transport, flood risk, drainage, utilities, and heritage are underway, with a joint Planning Performance Agreement (PPA) in progress with both Hertsmere and LBE. The intention is to submit a single outline or hybrid planning application for the whole site later this year.
- The submission references the Council's evidence base, including the HEELA and Green Belt Assessment, which support the site's suitability, availability, and achievability for employment use, subject to Green Belt release.
- The agent requests that the Local Plan's supporting text is updated to reflect the cross-boundary nature of the allocation and the coordinated approach with LBE, ensuring policy consistency and comprehensive development.

6.13.32 **David Lock Associates** submitted a representation on behalf of **Equinix**, promoting **HEM SA02 Land East of South Mimms Service Station** that supports the allocation of the Hertfordshire Data Centre Campus as a key employment site. The representation also made comments on the plan-led

approach, cross boundary matters and strategic employment and infrastructure needs. The representation can be summarised as follows:

- Expressed support for HBC's positive engagement with neighbouring authorities, aligning with the Duty to Cooperate and strategic planning across Southwest Herts and outer London. Welcomes recognition of data centre needs as a strategic issue and looks forward to continued collaboration as the Local Plan progresses.
- Supports the establishment of an up-to-date, plan-led framework that is sound, legally compliant, and capable of managing growth sustainably. Endorses the inclusion of data centre development within the spatial strategy and employment land supply, noting the importance of robust evidence and effective joint working for strategically significant growth locations.
- Strongly supports the allocation of the Hertfordshire Data Centre Campus (HEM SA02) as an employment commitment, based on extant planning permission. Welcomes the site's inclusion in the Borough's committed employment land supply and its identification as a Strategic Level Employment Site under emerging Policy EC5, serving needs beyond Hertsmere.
- Committed to coming forward with condition and reserved matters applications to deliver the site.
- Endorses the ambition of sustainability policies in the draft Plan, advocating for high standards of carbon reduction and sustainable energy strategies, including Power Purchase Agreements (PPAs). Supports the circular economy approach and alignment with Equinix's Net-Zero Carbon Reduction Plan and Global Sustainability guidelines. Highlights Equinix's leadership in sustainability and commitment to BREEAM and other certifications.
- Highlights the need for further evidence base documents (Carbon Assessment, CIL Review, Local Area Energy Plan, Landscape Impacts Assessment, Settlement Visions Spatial Strategy).
- Expresses gratitude for the opportunity to participate in the consultation, broadly supports the emerging evidence base, and requests continued opportunities for input as new evidence is published. Offers contact for further queries and confirms commitment to collaborative working with HBC and stakeholders.

6.13.33 Lichfield's submitted a response on behalf of **Legal and General Investment Management** supporting the allocation of **HEM SA03 Borehamwood Industrial Area Extension** as a key employment site, the representation can be summarised in the following key points:

- Supports allocation HEM SA03 (Borehamwood Industrial Area Extension), including Sky Studios Elstree (SSE) and Sky Studios Elstree North (SSEN), as a key employment site.
- States HEM SA03 is essential to meet identified employment needs, particularly for the film and television sector, and supports Borehamwood's role as Hertsmere's main employment hub.

- Highlights that existing employment areas, including Elstree Way, have limited capacity, making expansion through HEM SA03 necessary.
- Strongly supports retaining HEM SA03 through the Local Plan process to avoid constraining future economic growth and investment.

6.13.34 **HGH** submitted representations on behalf of **Nolan Brothers Properties Ltd** supporting the allocation of **HEM SA05 Land Northeast of Elton Way** for employment use, specifically for B8 (storage and distribution) floorspace. The key points are:

- Supports the Council's proposed allocation of HEM SA05 for approximately 45,000 sqm of B8 employment floorspace, reflecting the site's sustainable location and capacity.
- Confirms the site is "deliverable" in accordance with the NPPF, with outline permissions already secured (LPA Refs: 23/1035/OUTEI and 24/1283/OUTEI) and reserved matters submitted (LPA Ref: 26/0204/REM), demonstrating immediate availability and a strong prospect of early delivery.
- Technical deliverability is evidenced by committee reports for the permissions, confirming the site can accommodate the proposed floorspace and that there are no known technical barriers to delivery.
- The Green Belt Assessment 2026 identifies HEM SA05 as "provisionally grey belt" within Parcel OGB-037, with no contribution to sprawl or historic setting and only a moderate contribution to merging. HGH argues the site is clearly "grey belt," fully enclosed by the M1 and A41, and requests its formal removal from the Green Belt in the Submission Local Plan.
- Strongly supports the Council's proposal to designate the Tylers Way cluster (including HEM SA05) as a "Main Employment Area" under Policy EC2, recognising its role as a strategic economic hub and "last mile" logistics location.
- Recommends redrawing the Green Belt boundary to follow the permanent physical barriers of the M1 and A41, aligning policy with the area's established employment use and removing any provisional status.
- Requests that site-specific and area-wide policies provide sufficient flexibility to support the operational requirements of modern logistics, ensuring HEM SA05 can fulfil its role as a primary logistics hub.

6.13.35 **Savills** submitted representations on behalf of **Ark Estates 5 LTD** supporting the allocation of **HEM SA06 The Mercure Hotel and Land to East** for employment use, specifically for data centre development. The key points are:

- Strongly supports the proposed allocation of HEM SA06 as an employment site and its designation as a Main Employment Area under Policy EC2, recognising the site's established planning position and suitability for employment-led redevelopment, particularly for a data centre campus.
- Confirms that a full planning application (ref: 25/1781/FUL) for a data centre campus has been submitted and validated, following extensive pre-application engagement with the Council and stakeholders. The proposed

development includes data centre buildings, energy/power/water infrastructure, access, landscaping, and associated works.

- Highlights the site's strategic location within the Tylers Way employment cluster, with access to power, fibre connectivity, and the scale required for a modern data centre, contributing to meeting acute regional and national data centre needs.
- Requests that the allocation wording is refined to explicitly support data centre uses, reflecting both the Council's evidence base and the site's current promotion, and to avoid ambiguity that could constrain delivery.
- Objects to the continued Green Belt designation of the site alongside its allocation, arguing this creates policy inconsistency and uncertainty. Requests the site is removed from the Green Belt to provide clarity and align with the treatment of other allocations.
- Recommends removing or making flexible the indicative floorspace figure (currently 30,000 sqm), as it is based on historic consents and does not reflect the operational requirements of data centres, which differ from traditional B8 uses.
- Supports the overall direction of employment policies (EC1, EC2, EC3, EC10), but requests that requirements for affordable workspace and design standards are applied flexibly to reflect the specific operational and security needs of data centres.
- Supports the emphasis on training and digital skills, recommending obligations are tailored to the nature of data centre employment.
- Recommends the introduction of a dedicated data centre policy or expanded supporting text to provide clear guidance for such proposals, given their strategic importance and unique requirements.

6.13.36 **Boyer** submitted feedback on behalf of **Miller Homes**. Their submission can be summarised into the following points:

- Objection to the Plan period, finding it to be too short and inconsistent with NPPF requirements. The Plan should instead cover an 18-year period.
- Support applying a 20% buffer to housing supply requirements due to Hertsmere's low Housing Delivery Test (HDT) performance. Applying a 20% buffer over an 18-year period would increase the requirement to around 18,430 homes.
- Objection to the Council's housing requirement methodology, suggesting the Council should plan for a higher overall housing figure.
- The response notes that plot numbers, HELAA references, site allocations, and candidate site references are not provided.

6.13.37 **Forge Bio GP Ltd** submitted a response focused on the approach to employment sites and housing targets. The feedback includes the following points:

- Agrees that the housing target should include the Standard Method plus a 20% buffer, advising that the overall requirement across the 16-year plan period should be approximately 17,170 homes.

- If housing targets are not based on the Standard Method plus the 20% buffer, the Draft Plan would not comply with NPPF Paragraph 36 and could be considered unsound.
- Recommends that the approach to protecting employment sites should follow the current Local Plan, where protection of commercial/business uses applies only to Class E(g)(I) office uses.
- The response states Policy EC9 should include a clear test for the loss of non-designated employment sites. This strengthening of the Policy would make it more justifiable and effective.

Omission Sites

6.13.38 A total of 40 representations were made to the consultation by promoters, landowners and agents promoting sites that were omitted from the list of candidate sites. Numerous omission sites were promoted across the borough, particularly in Bushey, Radlett, Borehamwood, Shenley and South Mimms, with landowners arguing these sites are sustainable, deliverable and should be allocated within the Local Plan.

6.13.39 A list of omission sites, with site addresses and the site promoter, is set out in the table below.

Table 5. List of Omission Sites submitted to the consultation

Site Address	Consultee Name
The Imperial, Old Orleans, Elton Way, Bushey, Watford, WD	CDS Planning
Land at Oxhey Lane (HELAA - CFS-2025-165)	Statement Planning
Patchetts Cottage, Hillfield Lane, Patchetts Green	CHS Planning
Land south of White Park, Elstree Hill	DLP Planning Ltd
Town Farm, South Mimms	DPP Planning
Land south of Merry Hill Road and West of Robinson Crescent	HGH Consulting
Land at Dagger Lane, Bushey	HGH Consulting
Land West of Watling Street, Radlett	Neame Sutton Limited
Land to the east of Barnet By-Pass (A1), Hertfordshire, EN5 3HW	Pegasus Group
Land North of Little Bushey Lane, Bushey	Savills
Land North of Sailsbury Hall	Savills
Land west of Barnet Road and east of Baker Street, to the South of Potters Bar	Woolf Bond Planning
Land to the west of Kimptons Mead, Potters Bar	Woolf Bond Planning
Land west of Porters Park Drive, Shenley	Woolf Bond Planning
Land at Hill Farm, Radlett	Warner Planning
Wheatsheaf Farm, Well End Road, Borehamwood	Warner Planning
Land at Shenley Grange East, Shenley	Warner Planning
Land at Radlett Lane, Shenley	Boyer Planning
Land North of Stapleton Road, Borehamwood	Boyer Planning
Land off Stables End, Palomino Place, Patchetts Green, Aldenham, WD25 8EU	Warner Planning

Land Formerly Part of Earl & Cross Keys Farm (North & South), South Mimms	Boyer Planning
Land off Blanche Lane, South Mimms, EN6 3NZ	Warner Planning
Land North of Watford Road and West of Oakridge Avenue, Radlett	Warner Planning
Tyler's Farm (Plot 1 & 2), Bushey	Boyer Planning
Land adjacent to Watersplash Mews, Theobald Street, Borehamwood WD6 4DG	Warner Planning
Land at Shenley Grange West, 43 London Road, Shenley WD7 9ER	Warner Planning
Land Adjacent to and to the rear of 52 Harris Lane, Shenley WD7 9EG	Warner Planning
Land Adjacent to the Former Wyevale Garden Centre, Dancers Hill Road, Bentley Heath EN5 4RR	Warner Planning
Land at Caldecote Farm, North of Elstree Road, Bushey Heath	Warner Planning
Rectory Farm and land to the south of Rectory Farm. Shenley	Savills
LAND AT CHURCH LANE, ALDENHAM	Stantec
land at Aldenham Golf & Country Club, WD25 8NN	Savills
Land at Aldenham Road, north of A411, Elstree	DPP Planning
Land at Harper Green, Harper Lane, Radlett	Pegasus Group
Land south of Potters Bar	Pegasus Group
Land South of Harper Lane Industrial Estate and Harper House	Derek Paul Bromley
Land at Blanche Lane, South Mimms, Hertfordshire, EN6 3LD	Newmark
Land at the South West Side of Bushey Mill Lane, WD23 2AB	LSH
Shenleybury House, Black Lion Hill, Shenley	HGH Consulting
Land Adjoining Bushey Hall Farm, Berry Grove Lane, Watford, WD23 2AB	LSH

6.13.40 The key issues raised by the promoters of omissions sites can be summarised as the following:

- Strong support for meeting housing needs in full, with many respondents arguing the Standard Method should be treated as a minimum and supplemented by buffers, additional allocations and flexibility to address Hertsmere's housing under-delivery and reported housing land supply shortfall.
- Widespread calls for greater release of grey belt land, with many developers supporting the Council's grey belt methodology and promoting specific grey belt or provisionally grey belt sites for housing and employment development.
- Concerns that the spatial strategy relies too heavily on large strategic allocations, regeneration and windfalls, with repeated requests for more small and medium-sized sites that could be delivered earlier and provide flexibility in maintaining housing supply.
- Employment land promoters argued that the Plan underestimates future employment and logistics needs, seeking additional employment allocations, particularly for B8/logistics uses in locations close to the strategic road network.

- Many respondents supported affordable housing delivery but sought viability flexibility, including review mechanisms, cascade approaches and reduced obligations where policy requirements could affect scheme viability.
- Several developers objected to emerging development management, climate change and green infrastructure policies, arguing requirements relating to carbon reduction, urban greening, biodiversity, water efficiency, heat networks and Health Impact Assessments are overly prescriptive or exceed national policy requirements.
- There was strong support for prioritising brownfield and previously developed land, although many respondents argued opportunities outside the main settlements and additional Green Belt/grey belt releases should also be considered.
- A number of representations challenged the evidence base and site assessment process, including Green Belt classifications, housing and employment capacity assumptions, infrastructure evidence, deliverability assessments and treatment of committed developments.
- Many respondents requested amendments to the Local Plan process and policy framework, including extending the plan period, improving policy clarity, updating evidence, producing clearer maps and ensuring greater flexibility to respond to future housing and employment needs.

6.13.41 The representations from the promoters of omission sites have been considered when developing Council's spatial strategy and housing strategy, have been assessed through the site selection process and been considered in the assessment of reasonable alternatives within the sustainability appraisal.

Conclusion

6.14 Summary of Outcomes

6.14.1 The Regulation 18 consultation provides an important opportunity for the Council to test early Local Plan options before moving towards a more detailed Regulation 19 draft. The consultation is used to gather views on the emerging spatial strategy, potential site options and policy direction, while also identifying matters that require further evidence, clarification or refinement.

6.14.2 Many points made in Regulation 18 consultation representations are helping to shape the Regulation 19 draft Plan as it is being prepared.

6.14.3 On some matters, despite recognising that many consultees are concerned or opposed to what the Plan is proposing, options for the Local Plan are limited. The primary factor in this is that national government requires all councils to plan to meet identified needs for housing and economic growth. This is also necessary to ensure that current and future residents have access to suitable homes and employment opportunities in sustainable locations that meet the needs of future households and businesses.

6.14.4 The Local Plan will help to shape where development takes place but must be backed up by evidence that allocated sites are suitable, available and likely to be economically viable. These parameters are explored in the Local Plan evidence base.

6.14.5 As only a limited number of sites meet these criteria, and the housing and employment needs identified for Hertsmere are significant, the Council has limited choice on where future growth can be accommodated.

6.14.6 However, there are choices to be made on which sites to proceed with and how, as well as to determine which areas are more or less sustainable for growth.

6.14.7 Without a Plan to make these choices, development will be located and shaped primarily based on where it makes most commercial sense for landowners and agents to bring forward development. While this is also important, the benefits for the whole borough, its residents and businesses, can be improved if growth is coordinated, and aligned with broader priorities.

6.15 How Consultation is Influencing the Plan

6.15.1 The following process ensured that all points made in the consultation representations on the Regulation 18 Local Plan and its evidence were taken into account when drafting and revising the Regulation 19 Local Plan and its evolving evidence:

- All points raised in the consultation were tagged, grouped and summarised as part of the consultation processing.
- All representations were summarised by stakeholder type, and in more detail, by individual stakeholder in the case of statutory consultees.

- Both types of summaries were provided to, and taken into account by, the Hertsmere Local Plan team through interim, draft and final versions of this Consultation Statement during the drafting of the Regulation 19 version of the Plan. This enabled issues raised through consultation to be considered as early as possible and allowed Plan preparation to be expedited.
- Responses to the summarised points were first drafted and then provided to and edited by the Hertsmere Local Plan team, to show that points made were taken into account wherever possible, within the confines of national planning policy, guidance and legislation.
- Representation summaries, and where relevant, full responses (e.g. for infrastructure providers and other key stakeholders) were shared with all the consultants producing the evidence base supporting the Regulation 18 and 19 versions of the Local Plan, who contributed to responses made to each point raised, as well as taking points made into account where relevant to finalising their respective studies.
- Finally, a consultant team undertook a peer review of the Regulation 18 Plan. The reviewers were integrated into the representation-processing work so that relevant issues raised through consultation could inform their review of the emerging Regulation 19 policies. Interim, draft and final peer-review findings were provided to the Hertsmere Local Plan team and taken into account as the Regulation 19 Plan was prepared and revised, with a particular focus on soundness.

6.16 Next Steps

6.16.1 This statement shows how HBC has engaged with stakeholders during the Regulation 18 Consultation on the Local Plan. It summarises representations in line with key themes, who responded, a summary of what they said, how the Council responds to the points made, and how the Regulation 19 Plan is likely to evolve in response to representations made.

6.16.2 The next steps are for the Council to work on the Regulation 19 draft of the Local Plan, including proposed allocations and policies, considering the feedback from the Regulation 18 consultation as well as all relevant emerging and evolving evidence.

6.16.3 A Regulation 19 draft will then be published alongside further evidence for representations on legal compliance and soundness. After this, the Plan will be submitted to the Secretary of State for Examination in Public. Once the Plan has been found sound by the appointed Inspector, which will be explored in hearing sessions themed in line with key matters explored by the Plan, the Plan will be adopted by the Council and become part of the statutory development plan, against which future planning applications are evaluated, granted or rejected.

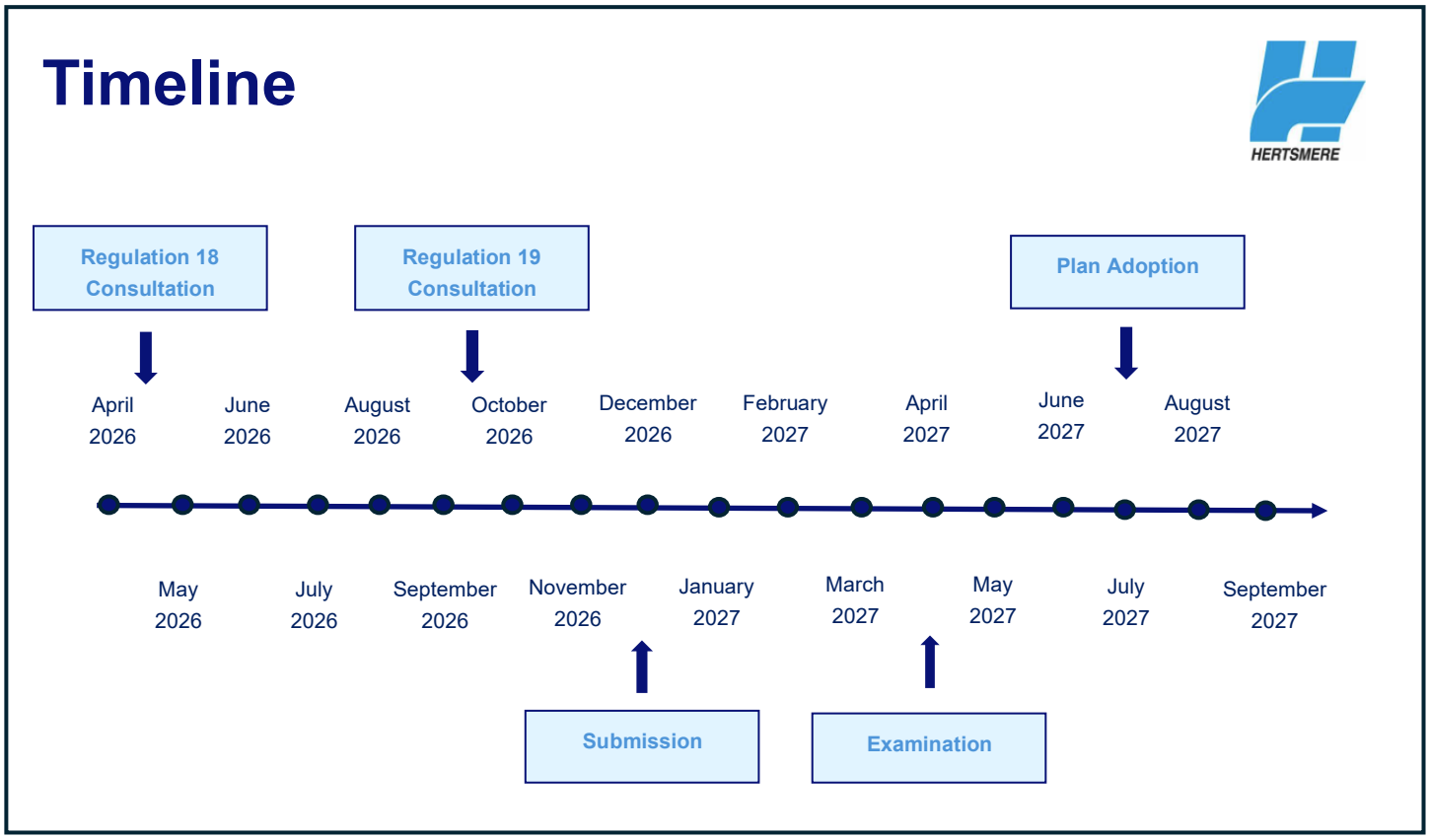

Figure 5. Timeline of next stages for the draft Local Plan

Appendix A – Press Releases, Social Media Posts, adverts and other promotions of the consultation

A.1 Local Plan Branding

The following branding materials were developed for use throughout the Regulation 18 consultation period to provide a clear and consistent visual identity for the emerging Local Plan.

Figure 6. Banner displaying the Hertsmere Local Plan branding used across the website, social media, and promotional materials

A.2 Consultation Event Promotion Materials

A programme of public information events was promoted throughout the consultation period. Promotional material provided details of event dates, venues, times and opportunities to engage with officers.

Figure 7. Poster promoting the consultation and public information event

Our public consultation on a new Local Plan for Hertsmere has been launched. We are accepting feedback via our consultation platform until Friday 29 May.

Find out more:
www.hertsmere.gov.uk/newlocalplan

Have your say:
www.hertsmerelocalplan.commonplace.is/

Email: local.plan@hertsmere.gov.uk

Figure 8. Double-sided postcard promoting the consultation

A.3 E-Newsletters and Bulletin Communications

Regular communications were issued through Council newsletters and stakeholder bulletins to raise awareness of the consultation and provide updates regarding opportunities to participate.

A.4 Social Media Campaign

Social media formed a key component of the consultation communications strategy, helping to raise awareness of consultation events and encourage participation. Guidance was also provided via social media on how to provide consultation feedback, demonstrated with a video. The video can be viewed at: www.youtube.com/watch?v=kVrpYT2uW4k&t=1s

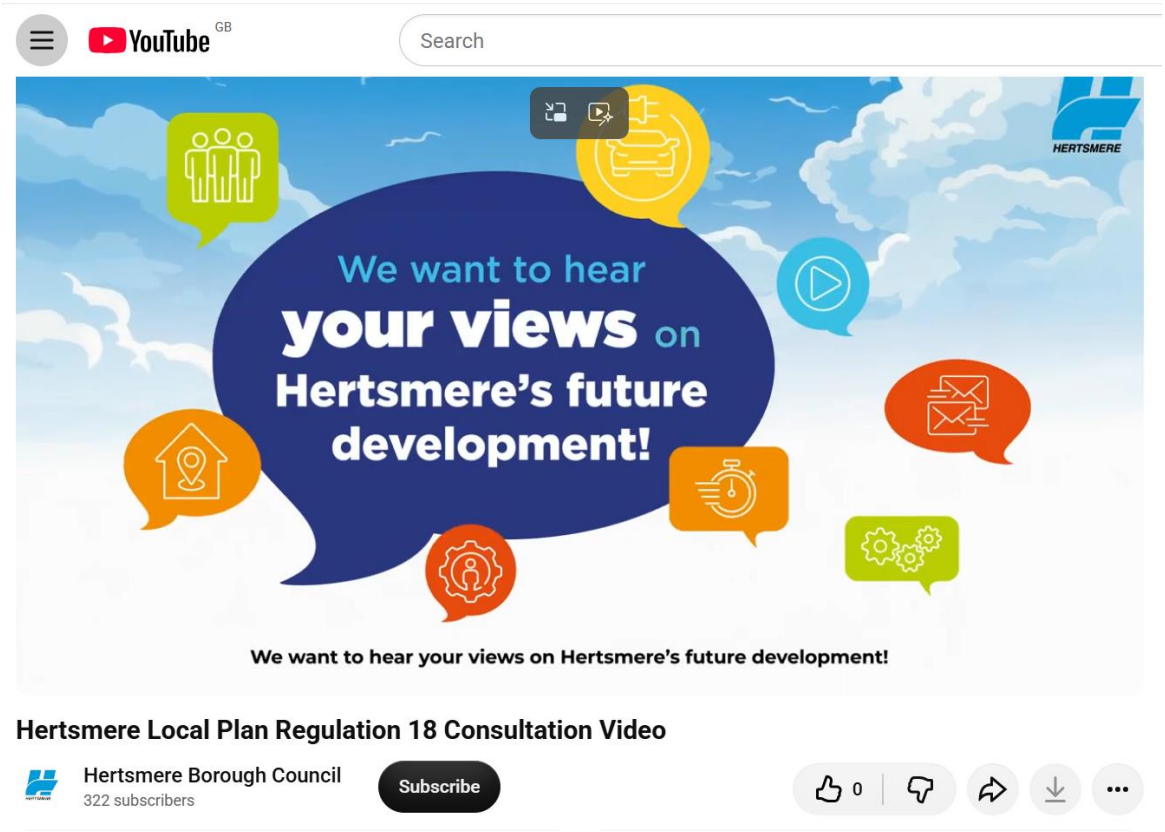

Figure 9. Still image of the explainer video for providing consultation feedback

A.5 Press Releases

Press releases were issued at the launch and close of consultation in order to keep the public informed on the process and how they could get involved.

Hertsmere Borough Council Publishes Local Plan Consultation Document

07 April 2026

Hertsmere Borough Council has published its Local Plan Consultation Document setting out how future development across the borough could be managed and assessed, ahead of a formal public consultation.

The publication of these documents marks the next stage in the Local Plan process. It includes a long list of 'candidate' sites that could form part of the council's response to the Government's updated housing requirements. This stage of the process, known as a 'Regulation 18' consultation, is designed to enable residents to provide views on the suitability of those sites prior to a final list of sites being produced. The consultation is also an opportunity for local people to provide feedback on the spatial strategy and planning policies which will underpin the new plan.

The Local Plan process gives the council the ability to take control of how development comes forward across Hertsmere, identifying the most appropriate locations and ensuring that new homes are delivered alongside the infrastructure local communities need, including schools, healthcare, transport and green spaces.

Government planning policy requires all councils to plan for a set number of new homes, with targets determined at a national level rather than locally. While the council does not determine the overall level of development in Hertsmere, the Local Plan can determine where and how that development is delivered.

Without an up-to-date Local Plan, development would be more likely to come forward through speculative applications and the appeals process, reducing the community's ability to influence where and how development comes forward.

The proposals published today have been informed by a borough-wide spatial strategy, which looks at how growth can be distributed in a coordinated way.

No decisions have yet been made about where development will take place. The publication of these documents is an opportunity for residents, businesses and community groups to review the proposals and to respond in the upcoming consultation.

We are required through government planning policy to plan for new homes. The Local Plan process is how we take control of where that development happens and ensure it is supported by the infrastructure our communities need.

Without a Local Plan, development will still come forward, but in a way that is less coordinated and with less opportunity for communities to influence the outcome.

This process is about making sure that, as a borough, we are planning positively for the future, and that development is delivered in a way that works for Hertsmere.

The council will shortly be launching a formal public consultation, giving residents and stakeholders the opportunity to have their say on the proposals. The consultation will include in-person events, an online engagement platform, and deposit locations for hard copies of the draft Local Plan to enable residents to submit questions and feedback.

Consultation feedback will help inform the further development of the Local Plan, ahead of subsequent public consultation and an independent examination.

The documents can be viewed at the agenda listings for Cabinet and Extraordinary Full Council on Wednesday, 15 April - Monthly meetings calendar - April 2026.

Figure 10. Press Release – 7th April 2026

Hertsmere Borough Council has launched a public consultation on a new local plan for the borough

16 April 2026

Hertsmere Borough Council has launched a public consultation on a new local plan for the borough, following a vote from Councillors at a meeting of the Full Council yesterday evening. Feedback is being welcomed until Friday 29 May.

The six-week 'Regulation 18' consultation provides residents, businesses and interested parties with the opportunity to share their views on the council's early ideas for the future development of Hertsmere.

The decision to progress to public consultation on the plan is an important step in securing certainty, investment and coordinated growth for Hertsmere, and will help to protect the borough from speculative development and appeal-led growth.

The new plan will set out how Hertsmere can grow in a green, sustainable and equitable way, with benefits for all those who live and work in the borough. As a key planning document, it will indicate how and where new development can come forward, from homes and employment space to schools, health services, and new green space.

Government policy requires every local council to maintain an up-to-date local plan, which provides the framework for planning decisions in its area. A local plan can allocate sites for development and set policies that guide how new development is delivered, while protecting the fabric of the local area. As Hertsmere's current local plan was passed in 2012, it is no longer considered up to date.

The proposals have been informed by a borough-wide spatial strategy, which looks at how growth can be distributed in a coordinated way. The consultation is an opportunity for local people to provide feedback on this spatial strategy, as well as the planning policies which will be used to determine planning applications in the future.

The consultation features a long list of candidate sites to be assessed as potentially making a contribution to the area's housing needs. Nothing has been decided, and the consultation is the single best opportunity for local people to have their say on how they want to see the borough develop.

Without an up-to-date local plan, development would be more likely to come forward through speculative applications and the appeals process, reducing the community's ability to influence where and how development comes forward.

The Regulation 18 consultation will feature seven public information events across the borough.

In person events are scheduled for 2:30pm to 8:00pm at the following dates and venues:-

- Monday 27 April: South Mimms Village Hall, South Mimms, EN6 3PD
- Wednesday 29 April: Borehamwood Civic Centre, Borehamwood, WD6 1WA
- Thursday 30 April: Radlett Centre, Radlett, WD7 8HL
- Wednesday 6 May: The Manor Elstree, Elstree, WD6 3RE
- Monday 11 May: Shenley Chapel, Shenley, WD7 9EZ
- Monday 18 May: Wyllyotts Theatre, Potters Bar, EN6 2HZ
- Tuesday 19 May: St James's Church House, Rectory Lane, Bushey, WD23 1BD

Find out more at the new Local Plan web-page: Draft Local Plan 2026: A new sustainable Local Plan for Hertsmere - Hertsmere Borough Council

The six-week consultation will run until Friday 29 May.

The consultation document can be viewed, and feedback provided, at https://hertsmerelocalplan.commonplace.is/

Figure 11. Press Release – 16th April 2026

Appendix B – Consultation Material from In-Person Events

Figure 12. Image of the public information event at Borehamwood Civic Centre

Figure 13. Image of an event attendee viewing consultation materials at The Manor Elstree

Figure 14. Image of an event attendee viewing consultation materials at The Manor Elstree

Appendix C - Hertsmere Local Plan Regulation 18 Consultation – Summary of Key Information

(as published by HBC as part of Regulation 18 consultation)

What is this document about

The Regulation 18 draft and consultation represented an early formal stage in preparing the new Hertsmere Local Plan. A Local Plan sets out how the borough will grow over time. It identifies where new homes, jobs, infrastructure and services should be located. It also includes policies that will be used to decide planning applications. This consultation gave people the opportunity to comment on the overall approach before a more detailed version of the plan is prepared. It is important that the document is read as a whole. The plan is based on a joined-up strategy rather than individual decisions taken in isolation.

Why a Local Plan is needed

Every council is required to prepare a Local Plan. A key part of this is meeting the borough's housing requirement. This is the number of homes that need to be planned for over the plan period. The plan must show how this requirement will be met in full. Without an up to date Local Plan, it becomes much harder to manage development. Planning decisions are more likely to be made on a case by case basis, with less local control over where growth takes place. Having a clear and up to date plan allows the Council to take a planned approach to growth and infrastructure.

What the plan is trying to achieve

The Local Plan sets out a spatial strategy. This explains where development should go and why. The strategy focuses on making best use of existing towns and settlements, directing growth to locations with access to infrastructure, and supporting regeneration where possible. The plan is supported by a set of planning policies. These are used to guide development and assess planning applications. Each policy explains what it is trying to achieve and how it will be delivered. Questions are included throughout the document to invite feedback on both the strategy and the policies. The Plan also aims to improves town centres, creating places which offer a range of leisure, working and public realm opportunities through urban design and master planning.

Where growth is proposed

The plan directs most growth to Hertsmere's main settlements. These are Borehamwood, Potters Bar, Bushey and Radlett. These locations are considered the most sustainable. They already have existing services, transport links and infrastructure which can be improved to support additional development. The plan also explores the potential for a new settlement in the north of the borough. This could provide a way to deliver a larger amount of development in a planned and coordinated way, including infrastructure from the outset.

Candidate sites for development

The document includes a list of candidate sites. These are locations that could potentially be developed. Each site is supported by information on the type of development that could take place, the mix of uses, an indicative scale of development, and when the site could come forward. Including a wide range of sites is important. The Local Plan must demonstrate that there is enough suitable land available to meet the borough's needs.

Taking account of previous feedback

This is not the first time that Hertsmere have shared a Regulation 18 version of the plan, and earlier consultations have already taken place. The Council has considered this feedback in preparing the current document. However, the context has changed since earlier versions of the plan. This includes changes to national planning policy, an increase in housing need, and wider economic and social changes. Despite these changes, a number of consistent themes have emerged from previous feedback. These include the importance of protecting the Green Belt where possible, focusing growth in existing towns, protecting green spaces and the natural environment, ensuring infrastructure is provided alongside development, and achieving high quality design. These themes continue to influence the emerging plan.

This stage of consultation

This is a Regulation 18 consultation. This is an early stage in the plan making process. At this stage, the Council is seeking views on the overall strategy, the approach to growth, and the range of potential development sites. People are encouraged to consider how different elements of the plan fit together. Comments on individual sites should take into account the wider strategy and the need to meet housing requirements in full. All responses will be reviewed and used to inform the next version of the plan.

What happens next

Following Regulation 18, the Plan is refined and the proposed submission Local Plan is published under Regulation 19 for representations on legal compliance and soundness. Following Regulation 19, the Plan is submitted for independent examination. During examination, an independent Planning Inspector assesses whether the Plan has been prepared in accordance with the relevant legal and procedural requirements and whether it is sound. Subject to the examination process and any necessary main modifications, the Council may then adopt the Plan.

What makes a plan sound

To be approved, the Local Plan must meet four tests of soundness. These are set out in the National Planning Framework.

1. Positively prepared: The plan must meet the borough's needs, including housing.

2. Justified: The strategy must be based on evidence and be the most appropriate option.

3. Effective: the plan must be deliverable over time.

4. Consistent with national policy: the plan must follow national planning guidance.

If a plan does not meet these tests, it will be rejected by the Inspector. This may result in the plan being withdrawn and redone. This can lead to delays and reduced

control over development which can leave settlements vulnerable to unmanaged development.

Why the plan needs to move forward now

Preparing the Local Plan is a priority. This reflects changes in national planning policy, increased housing requirements, and wider changes affecting local government. Progressing the plan now helps ensure that future development is planned in a coordinated and sustainable way.

How the plan is organised

The Local Plan is structured to guide the reader through the strategy and supporting policies. It includes a borough wide spatial strategy, planning policies that apply across the area, policies for individual towns and places, and site allocations. These elements work together to deliver the overall vision for the borough.

Early chapters of the plan

The opening chapters of the plan will provide background and context. This includes how the planning system works, how the plan has been prepared, how to use the document, and the role of different types of policy. They will also describe Hertsmere today and consider how it may change in the future.

How to respond to this consultation

The Council is inviting comments on all parts of the document. You can respond by

- answering the questions set out throughout the document
- providing comments on specific policies or sites
- sharing views on the overall strategy

It is helpful to explain your reasons clearly and, where possible, suggest alternatives. Responses should consider the plan as a whole. This includes the need to meet housing requirements, provide infrastructure, and plan for growth in a coordinated way. All responses received will be reviewed carefully and will help shape the next stage of the Local Plan.

Overall message

This document sets out the foundations of the new Local Plan. It explains why growth needs to be planned, how much development is required, where development could take place, and how people can take part in shaping the plan. The aim is to plan positively for the future of Hertsmere, while balancing the need for new development and regeneration with the protection of the borough’s character and environment.

Appendix D – Consultation Summaries and Responses

Theme	Sub-Theme / Issue	Summary	*Response*
Delivery & Monitoring	Delivery	Support / need for stronger housing delivery mechanisms	*To ensure housing delivery, HBC's key focus is on developing a robust housing trajectory and five-year housing land supply with realistic assumptions on delivery of the housing requirement over the plan period. At a later point in the plan making process, HBC are looking to develop a topic paper to set out associated assumptions, including any planned housing delivery interventions to accompany the Council's Housing Delivery Action Plan. This may include measures such as time limited consents, and the consideration of past delivery performance as a material matter for renewals of planning permissions.*
Delivery & Monitoring	Delivery	Opposition to proposed approach to penalise applicants where consented proposals have not been implemented in accordance with agreed milestones, as this fails to acknowledge that housing delivery can be delayed by other factors (e.g. policy, regulatory and macro-economic factors) and is not justified or effective in accordance with paragraph 36 b) and c) of the NPPF.	*The Council recognises that housing delivery can be affected by factors beyond developer control, including policy changes, regulatory requirements, and economic conditions. The Plan will balance the need to incentivise timely delivery with recognition of external constraints. Any delivery mechanisms will be justified through evidence and tested for effectiveness in accordance with the provisions of the NPPF (including paragraphs 35 and 36), ensuring they are positively prepared, justified, effective and consistent with national policy.*
Delivery & Monitoring	Delivery	Supportive for more triggers and thresholds in policy to ensure the timely delivery of infrastructure alongside housing to meet the needs of new communities and maintain existing services	*The Council supports the principle of linking infrastructure delivery to housing development to ensure new communities have access to necessary services and existing services are not overburdened. The Plan will set out requirements for infrastructure delivery through allocation policies and a comprehensive Infrastructure Delivery Plan, secured through planning conditions and Section 106 obligations where appropriate.*
Delivery & Monitoring	Delivery	Recommendation for Hertsmere to utilise Completion Notices under Section 94 of the Town and Country Planning Act 1990 for stalled sites to incentivise development and prevent land banking.	*The Council notes the suggestion to use Completion Notices under Section 94 of the Town and Country Planning Act 1990. While this is a statutory power available to the Council, its use would be considered on a case-by-case basis where sites have stalled without justifiable reasons. The Plan focuses on developing a robust housing trajectory and delivery mechanisms that encourage rather than penalise development, while maintaining flexibility to address non-delivery where necessary.*
Delivery & Monitoring	Delivery	Recommendation for Hertsmere to use Grampian conditions and Section 106 obligations to ensure housing delivery is stalled until key infrastructure milestones are met.	*The Council acknowledges the recommendation to use Grampian conditions and Section 106 obligations to ensure infrastructure is delivered alongside housing. The Plan will set out infrastructure requirements through allocation policies and the Infrastructure Delivery Plan. Planning obligations and conditions will be used where necessary to secure timely delivery of infrastructure in accordance with national policy and guidance, ensuring development is supported by adequate services and facilities.*

Theme	Sub-Theme / Issue	Summary	*Response*
Delivery & Monitoring	Delivery	Concern that the Council lacks resourcing capacity to work effectively with stakeholders to deliver the Local Plan.	*The Council recognises that effective plan delivery requires adequate resources, skilled staff, robust governance arrangements, and proactive engagement with infrastructure providers, developers, statutory consultees, and communities to coordinate development, secure necessary infrastructure, and monitor implementation. The Council is committed to ensuring that adequate resources and capacity are in place to deliver the Local Plan effectively, including maintaining appropriately skilled planning and infrastructure teams, establishing effective governance and partnership arrangements with Hertfordshire County Council and other key delivery partners, utilising planning performance agreements and developer contributions where appropriate to resource complex applications, and monitoring plan delivery through the Authority Monitoring Report to identify issues and respond proactively.*
Delivery & Monitoring	Delivery	Concern that sufficient consideration has not been given to long-term custodianship and stewardship	*The Council recognises the importance of long-term custodianship and stewardship in new developments and will seek to ensure that where necessary, for types of land uses that require ongoing management and maintenance, this is secured through appropriate management plans, planning obligations and conditions at the planning application stage.*
Delivery & Monitoring	Monitoring	Recommendation that the Plan's monitoring policy should include indicators for monitoring of ancient woodland affected by allocations, ancient/veteran trees recorded and protected, canopy cover change, trees lost and replaced, BNG delivery, LNRS priority delivery, access to natural greenspace, green infrastructure delivery and long-term management compliance or similar indicators so that delivery against policies related to these matters can be tested over time.	The Regulation 19 Local Plan includes a monitoring framework under Policy DM7. Environmental indicators include designated biodiversity sites, Biodiversity Net Gain, urban greening and recreational and open-space provision.
Delivery & Monitoring	Monitoring	Monitoring should include up to date monitoring of housing land supply.	*A five-year housing land supply report is published annually by HBC and sets out the up-to-date deliverable housing land supply position for the borough.*
Design	Accessible design	Supports the requirements for M4 (2) and M4 (3) requirements in the Local Plan.	*The Council welcomes support for accessible and adaptable housing. Policy HQD2 of the Regulation 19 Local Plan requires at least 10 per cent of new dwellings to meet Building Regulation M4(3), with the remaining dwellings meeting M4(2).*
Design	Accessible design	Concern that plan has not adequately considered alternative methods of transport for the elderly, especially those with ill health or disabilities, such as dedicated bus services or disabled parking within development proposals.	*The Council recognises the importance of ensuring development is accessible for elderly residents and those with disabilities or health conditions. The Plan will include policies requiring major developments to consider accessibility by different transport modes, including provision for dedicated bus services, accessible public transport connections, and appropriate disabled parking provision. This aligns with the NPPF requirement to create inclusive places that are safe, healthy and pleasant for all users.*

Theme	Sub-Theme / Issue	Summary	*Response*
Design	Building heights	Concern over height of development proposed, including impact on local character and/or heritage assets	*Same as response to "Concern over density of development proposed, including impact on local character". In addition: The Local Plan will include maps that identify the most appropriate locations for new tall buildings. This will take account of the spatial strategy's approach towards urban regeneration; the availability of sites; the capacity of infrastructure networks; accessibility to sustainable travel networks; and the ability for the surrounding townscape to accommodate this form of intensification in terms of impact on its character and appearance.*
Design	Building heights	Concern over proposed approach to building heights / tall buildings	*Local Plan policies on building height will identify appropriate locations for tall buildings, as well as associated definitions and design parameters. The purpose is to optimise capacity of suitable, available, and deliverable locations for growth, taking account of need for regeneration, capacity of infrastructure, and impact on local character.*
Design	Building heights	Support for proposed approach to building heights / tall buildings	*Same as response to "Concern over proposed approach to building heights / tall buildings"*
Design	Building heights	For development sites where deep piled foundations are proposed a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are understood and mitigated.	*The Regulation 19 Local Plan protects groundwater through Policies GI5 and SD9, including Source Protection Zones, and requires proportionate assessment and mitigation where development could adversely affect groundwater or ground conditions.*
Design	Building heights	Policy on building heights should not impose rigid height parameters for sites, but identify broad areas where tall buildings would be acceptable	*Local Plan policies on building height are intended to identify appropriate locations as well as set associated design parameters including maximum heights. Inclusion of maximum heights is deemed necessary to safeguard local character and appearance.*
Design	Building heights	Development of or exceeding 45.7m in height above ground level will trigger statutory consultation requirement with the MOD.	*Sites located within existing safeguarding areas for active airfields and commercial airports will be required to consult the relevant body for any development proposals. This will be set out in a safeguarding areas policy.*
Design	Character	Concern over impact of development on local character	*Local Plan design policies will require development proposals to respect local character while using land supply resources effectively and efficiently to accommodate growth required to address identified need for new homes and jobs.*
Design	Co-location/mixed-use	Concern over the approach taken to change of use applications and promotion of a more flexible approach to permissions for change of use, allowing residential uses in industrial areas, and vice versa.	*The Plan will set out clear policies on change of use and mixed-use development, balancing the need for flexibility with protection of employment land and residential amenity. In line with the NPPF, policies will support appropriate mixed-use development while ensuring industrial areas remain viable for employment uses and residential areas maintain acceptable living conditions. Any flexible approach will be based on evidence of need and local circumstances.*

Theme	Sub-Theme / Issue	Summary	*Response*
Design	Density/Capacity	Concern over density of development proposed, including impact on local character	*Proposals will be expected to respect the prevailing character of the local area while using limited land supply resources as effectively and efficiently as possible. HBC's aim is to optimise site capacity, particularly of sites located on previously development land and within built up areas, as well as sites with access to public transport and other infrastructure. The aim is to meet as much development need as possible within settlements and in well serviced locations. This is more sustainable, reducing the need to travel and supports the ongoing viability and vitality of settlements and their services. It also aims to minimise the need to release high-quality greenfield land for housing.*
Design	Density/Capacity	Support for proposed approach to optimising site capacity	*Same as response to "Concern over density of development proposed, including impact on local character"*
Design	Density/Capacity	Concern over densification through infill, including impact on local character and/or loss of green/ open space	*Same as response to "Concern over density of development proposed, including impact on local character". In addition:* *In line with the National Planning Policy Framework, development should not result in the loss of existing open space used for sports, recreation, play, or allotments, unless an assessment clearly shows they are surplus to requirement or the loss can be compensated through new provision.* *Extensions or alterations to existing dwellings will be expected to make a neutral or positive contribution to the surrounding area, and overbearing development will be resisted.*
Design	Density/Capacity	Concern over lack of density of development proposed, and resultant lower delivery of housing to meet need	*Same as response to "Concern over density of development proposed, including impact on local character"*
Design	Design Quality	Support for promotion of high-quality design in new development	*HBC seeks to secure high-quality design for new residential developments in the Borough. It will ensure that all new housing is designed to a high-quality standard, responding to the needs of Hertsmere's resident population.*
Design	Design Quality	Concern for/ opposition to proposed development approach due to potential to increase opportunities for crime where Secured by Design principles are not adequately integrated into the scheme	*Policies HQD1, HQD2 and HQD3 require development to create safe, inclusive and welcoming places through measures including natural surveillance, appropriate lighting, active frontages and clear relationships between public, communal and private space.*
Design	Design Quality	Concern for/ opposition to proposed approach to high-quality design of new development	*Same as response to "Support for promotion of high-quality design in new development"*

Theme	Sub-Theme / Issue	Summary	*Response*
Design	Design Quality	Concern over volume house builders delivering homes on large sites which lack design quality and will not contribute to the character of Hertsmere	*The Council seeks to secure high-quality design for all new residential development in the Borough, regardless of site size or developer. The Plan will include robust design policies, supported by design codes where appropriate, to ensure all development contributes positively to local character. Design quality will be secured through pre-application engagement, design review panels where appropriate, and robust use of planning conditions and obligations.*
Design	Design Quality	Support for the use of design tools/mechanisms to secure high-quality design, such as design codes in Neighbourhood Plans, design review panels and design-led masterplanning, robust use of conditions and obligations, and ongoing monitoring of design and public-realm.	*The Council welcomes support for design tools and mechanisms to secure high-quality design. The Plan will promote the use of design codes in Neighbourhood Plans, design-led masterplanning for larger sites, and design review panels for major or sensitive schemes. Conditions and obligations will be used to secure design commitments, and monitoring arrangements will track delivery of design quality and public realm improvements.*
Design	Design Quality	Concern about past record / success of applying design codes and securing high-quality design	*The Council is committed to learning from past experience and strengthening design policy delivery. The Plan includes robust design policies that will be supported by updated design guidance, enhanced pre-application engagement, and where appropriate, design review processes. The Council will work with applicants and the community to ensure high-quality design outcomes are achieved in practice, backed by effective monitoring and enforcement.*
Design	Design Quality	Recommendation that development should be designed to encourage physical activity. Policy HQD1 should expect developments to consider how Active Design principles referenced in the Social and Community Infrastructure chapter (paragraph 8.3.9) of the plan would help ensure that design that supports physical activity is embedded.	*The Council recognises the importance of design that supports active, healthy lifestyles. Policy HQD1 will be strengthened to require development to consider how Active Design principles support physical activity. This includes designing streets and spaces that encourage walking and cycling, providing accessible green spaces and play areas, and creating connected routes to local facilities, in line with NPPF paragraph 96 and Sport England's Uniting the Movement Strategy.*
Design	Design Quality	Recommendation for Policies HQD2 and HQD3 to consider how Active Design principles relating to ‘activity for all’, ‘providing connected active travel routes’, ‘a network of multi-functional open spaces’ and ‘high-quality streets and spaces’ could be applied, to align with Sport England’s Uniting the Movement Strategy and NPPF (para. 96).	*The Council welcomes the recommendation to integrate Active Design principles into design policies. Policies HQD2 and HQD3 will be reviewed to ensure they address 'activity for all', provide connected active travel routes, support a network of multi-functional open spaces, and promote high-quality streets and spaces. This aligns with the NPPF's emphasis on healthy, inclusive communities and Sport England's strategic priorities.*
Design	Design Quality	Support for high-quality design that respects local character and identity.	*The Council welcomes support expressed for and seeks to secure high-quality design for all new residential development in the Borough through its Local Plan. The Plan will include robust design policies, supported by design codes where appropriate, to ensure all development contributes positively to local character. Design quality will be secured through pre-application engagement, design review panels where appropriate, and robust use of planning conditions and obligations.*

Theme	Sub-Theme / Issue	Summary	*Response*
Design	Design Quality	Support for integrating natural/green spaces into design, with a focus on Local Nature Recover Strategy (LNRS) enhancement measures.	*The Council recognises that integrating high-quality green infrastructure and nature-based solutions into development is essential to deliver biodiversity net gain, support climate change adaptation and mitigation, improve health and well-being, enhance landscape character, and contribute to nature recovery networks. The proposed Policy GI3 (Local Nature Recovery Strategy) will require development to contribute to nature recovery priorities identified in the Hertfordshire LNRS. Furthermore, the proposed Policy GI1 (Hertsmere's Green and Blue Infrastructure) would require development to protect, enhance, and extend green infrastructure networks, and to integrate multifunctional green and blue infrastructure. The Council is committed to ensuring that development integrates accessible, high-quality natural and green spaces designed to support LNRS enhancement measures including habitat creation and restoration, ecological connectivity, priority species and habitats, and climate resilience, delivering measurable environmental improvements and supporting nature recovery across Hertsmere.*
Design	Inclusive Design	Concern over / opposition to promotion of inclusive and welcoming design	*Inclusive and welcoming scheme design contributes to delivering inclusive, accessible, welcoming and secure environments in Hertsmere, addressing disproportionate barriers.*
Design	Inclusive Design	Support for promotion of inclusive and welcoming design	*Same as response to "Concern over / opposition to promotion of inclusive and welcoming design"*
Design	Public Realm	Concern over impact of development on public realm	*Local Plan policy requires that development proposals should seek to improve (and must not adversely impact on the effective functioning and safe use of the Borough's transport network and public realm, including connecting walking and cycling transport infrastructure.*
Design	Public Realm	Need for / support for delivery of high quality and well-connected public spaces	*Same as response to "Concern over impact of development on public realm"*
Design	Design Quality	Concern that development will negatively impact the character and heritage of the area	*The Council recognises that new development must be sympathetic to local character, history, and the surrounding built and natural environment, and that heritage assets, must be conserved and enhanced in a manner appropriate to their significance. The Regulation 19 Local Plan's overarching spatial strategy is set out principally through Policy HBF1 (Delivering a Better Future for Hertsmere), supported by the strategic policies contained throughout Parts 1 and 2 of the Plan, requiring high-quality design that respects and enhances local character, distinctiveness, and sense of place, on the conservation and enhancement of heritage assets (Policy HE1-HE34) requiring development to sustain and enhance the significance of heritage assets and their settings, and on landscape character (GI1) requiring development to respect landscape character and visual amenity. The Council will carefully consider all representations raising concerns about impacts on character and heritage and ensure that site allocation policies include robust design requirements and mitigation measures to protect and enhance character and heritage. The Regulation 19 Publication version of the Local Plan will include only those allocations that can be delivered without unacceptable harm to the character and heritage of Hertsmere's settlements, landscapes, and historic environment.*

Theme	Sub-Theme / Issue	Summary	*Response*
Economy & Culture	Commuting	Concerns about impact of proposed employment growth on local infrastructure from workers who are not also residents	*The Council recognises that employment growth will generate demand for infrastructure from workers who may not be local residents. The Plan will address this through the Infrastructure Delivery Plan, identifying capacity issues and mitigation requirements for transport, utilities, and social infrastructure. Appropriate developer contributions will be secured to ensure employment development is supported by necessary infrastructure improvements.*
Economy & Culture	Delivery	Concerns around how realistic the indicated delivery trajectory of proposed employment site(s) is	*The Council has prepared a development trajectory for housing and employment sites, based on evidence of market demand, site availability, and infrastructure capacity. The trajectory will be kept under review through annual monitoring, and where necessary, the Council will work with landowners and developers to address any barriers to delivery. The Plan includes flexibility to respond to changing economic circumstances while meeting identified employment needs.*
Economy & Culture	Employment land demand/supply	Recommendation to explore higher levels of growth at Bowmans Cross to deliver more employment land.	*The Council will determine the appropriate scale of development at Bowmans Cross based on evidence of employment land need, site capacity, infrastructure constraints, and environmental impacts. The Plan balances the need to meet employment land requirements with ensuring development is deliverable and sustainable. Any changes to proposed levels of growth would need to be justified through updated evidence and viability testing.*
Economy & Culture	Employment land demand/supply	Need for more industrial space.	*The Council recognises the need for industrial and warehousing space to support economic growth and employment. The Plan is informed by an Economic Study that assesses future employment land needs across different use classes. The Plan will allocate land for industrial uses in appropriate locations with good access to the strategic road network, subject to site availability and constraints, including in relation to environmental and infrastructure.*
Economy & Culture	Employment land demand/supply	Lots of empty offices in the Borough (suggesting there is no demand for more office stock).	*The Council acknowledges current vacancy rates in office stock. However, planning for employment land must take a long-term view over the plan period and allow for economic cycles and changing market conditions. The Economic Study considers vacancy rates alongside growth projections and structural changes in the economy. The Plan will provide flexibility to respond to changing demand while protecting viable employment sites. In some cases, vacancies reflect instances where current stock is in need of updating or no longer suitable for modern purposes.*
Economy & Culture	Employment land demand/supply	Approach to employment land is not consistent with National Policy	*The Council's approach to employment land is based on evidence of economic need and follows the methodology set out in national Planning Practice Guidance. The Plan will allocate sufficient employment land to meet identified needs, support a prosperous rural economy, and allow for flexibility to respond to changing circumstances, in full accordance with NPPF Chapter 6 on building a strong, competitive economy.*
Economy & Culture	Employment land demand/supply	Support for the local film, television and creative sectors	*The Council welcomes support for Hertsmere's important film, television and creative sectors. The Plan recognises these sectors as key strengths of the local economy and will include policies that support their continued growth, including protecting existing studio facilities, supporting appropriate expansion where this can be accommodated sustainably and supporting the development of their supply chain.*

Theme	Sub-Theme / Issue	Summary	*Response*
Economy & Culture	Employment land demand/supply	Concern that further clarity needs to be provided for the quantum of film studio and data centre floorspace that is required across the Plan Period.	*The Council will provide clear evidence of the quantum of film studio and data centre floorspace required over the plan period in the Economic Study and supporting evidence base. This will inform employment land allocations and ensure the Plan provides sufficient land in appropriate locations to meet identified needs in these specialist sectors.*
Economy & Culture	Employment land demand/supply	Need for more accommodation for smaller businesses.	*The Council recognises the importance of providing accommodation for smaller businesses and start-ups. The Plan will include policies that support the provision of flexible employment space, including small business units and co-working spaces, particularly in town centres and mixed-use schemes. This supports economic diversity and provides opportunities for business growth in line with NPPF requirements.*
Economy & Culture	Employment land demand/supply	Concern over potential job losses and increased journey times from the loss of supermarkets in Borehamwood.	*The Council recognises the importance of protecting retail employment and convenient access to shops and services. The Plan will include policies on town centre uses and loss of retail facilities, requiring evidence that they are genuinely surplus to requirements before allowing alternative uses. Any loss would need to be justified and, where appropriate, mitigated through replacement provision or contributions to sustainable transport improvements. For clarity, the candidate sites in question have all sought the re-provision of existing food and retail uses on site.*
Economy & Culture	Employment land hierarchy	Rural Employment Areas are not clear in the plan.	*The Council will ensure the Plan clearly identifies and defines Rural Employment Areas on the Policies Map, supported by policy criteria that protect and support rural employment uses. This will provide clarity for decision-making and support a prosperous rural economy in accordance with NPPF paragraph 88.*
Economy & Culture	Freight	Concerns about capacity of freight infrastructure to accommodate proposed employment growth	*The Council recognises that employment growth, particularly in industrial and logistics sectors, can generate significant freight movements. The Plan will address freight infrastructure capacity through the Transport Study and Infrastructure Delivery Plan, identifying mitigation requirements and working with the Highway Authority and National Highways to ensure the transport network can safely accommodate forecast freight traffic.*
Economy & Culture	Rural employment	There is not sufficient support for the rural economy and in particular rural diversification.	*The Council is committed to supporting a prosperous rural economy in line with NPPF Chapter 6. The Plan will include policies that support appropriate rural economic development, including farm diversification, rural tourism, equestrian businesses, and conversion of rural buildings for employment or community uses, subject to environmental and amenity safeguards.*
Economy & Culture	Sector priorities	Equestrian uses need to feature more heavily in the Plan	*The Council recognises that equestrian uses are an important part of Hertsmere's rural economy and character. The Plan will include supportive policies for equestrian development where this is compatible with Green Belt purposes, environmental protection, and residential amenity, in line with national policy on supporting a prosperous rural economy.*

Theme	Sub-Theme / Issue	Summary	*Response*
Economy & Culture	Sector priorities	Investment should be focused on the knowledge-based economy.	*The Council recognises the importance of the knowledge-based economy as a driver of economic growth. The Plan will support development that provides modern, high-quality employment space suitable for knowledge-based sectors, including offices, research and development facilities, and flexible workspaces. This will be balanced with provision for other employment sectors to ensure a diverse and resilient local economy.*
Economy & Culture	Sector priorities	Recommendation for the Council to have greater regard to planning for higher education, laboratories and scientific facilities as potential drivers for skills as well as economic growth	*The Council recognises that higher education, laboratories and scientific facilities can drive skills development and economic growth. The Plan will support proposals for such facilities where they meet identified needs and can be accommodated sustainably, in line with NPPF requirements to support innovation and the knowledge-based economy.*
Economy & Culture	Sector priorities	Concern for the declining film industry and the impacts of AI.	*The Council notes opinions about structural changes in the film industry. The Plan takes a long-term view of employment land needs and will provide flexibility to allow economic sectors to adapt to technological change. Policies will support the film and creative sectors while allowing for evolution of uses and business models over the plan period.*
Economy & Culture	Sector priorities	Concern over the environmental impacts of data centres and their lack of employment opportunities once constructed.	*The Regulation 19 Local Plan identifies a need for up to 10.8 hectares of land for data centres. Proposals are addressed through the employment, digital connectivity, sustainable design and environmental policies of the Plan, together with relevant site-allocation requirements.*
Economy & Culture	Sector priorities	Concern over lack of support for construction sector	*The Council recognises the important role of the construction sector in the local economy. The Local Plan will include strategic policies on economic development and employment land requiring the retention and intensification of existing employment sites and supporting the delivery of new high-quality employment development, including through employment site allocations. This will help ensure the retention, provision and emplacement of employment sites, premises, and infrastructure suitable for construction sector businesses. Major development proposals will also be required to demonstrate support for local employment, skills, and supply chains, for example through measures including employment and skills plans and local procurement of materials and services where practicable and competitive.*
Economy & Culture	Town centres	Need to recognise changes in shopping patterns, in particular the increase in internet shopping.	*The Council recognises that shopping patterns have changed significantly, with growth in online shopping affecting high street retail. The Plan responds to these changes by promoting diverse town centre uses, supporting meanwhile uses, and focusing retail policies on maintaining town centre vitality and viability rather than solely protecting retail floorspace. This flexible approach is consistent with NPPF Chapter 7.*
Economy & Culture	Town centres	Need for more diversity in the range and quality of shops in the Borough.	*The Council shares the aspiration for diverse, quality retail provision. The Plan will support town centre regeneration and encourage a mix of uses including independent retailers, cafes, restaurants, cultural and community facilities. Planning policies will create the framework for vibrant town centres, while market forces and business decisions will determine the specific mix of occupiers.*

Theme	Sub-Theme / Issue	Summary	*Response*
Economy & Culture	Town centres	Concern that the reduction in car parking within town centres through the development of car parks will impact traders in the town centre.	*The Council recognises that town centre car parking supports access for shoppers and traders. Any reduction in car parking provision will be balanced against the need to optimise development potential, improve sustainable transport access, and regenerate town centres. The Plan will require transport assessments to demonstrate that development proposals maintain adequate parking provision while prioritising sustainable travel modes, in line with NPPF paragraph 109.*
Economy & Culture	Town centres	Recommends that town centre sites are not just considered on housing numbers but also the continued use of retail, employment, parking, public services and community infrastructure.	*The Council agrees that town centre development should deliver a balance of uses that support vitality and viability. Site allocation policies for town centre sites will set out requirements for mixed-use development including retail, employment, community facilities, and appropriate parking provision, alongside housing. This approach aligns with NPPF Chapter 7 on ensuring the vitality of town centres.*
Economy & Culture	Training	N/A	*N/A*
Economy & Culture	Sector priorities	Recommendation that the plan makes more reference to rail as a mode of passenger and freight transport, and that it draws on the economic benefits rail connections can bring	The proposed Spatial Strategy considers the Borough's existing infrastructure networks, including access to rail (alongside settlement hierarchy and capacity to accommodate growth). It envisages that most growth, specifically during the first five-years of the plan period will be distributed to the Borough's two higher order settlements of Borehamwood and Potters Bar, making use of sustainable transport connections, including rail, in order to draw on economic benefits and support growth. Policy TR1 (Sustainable Transport and Movement) will be a strategic policy that sets out the Local Plan's overarching approach towards securing transport networks that support successful and sustainable place-making. It will focus upon locating future growth within places that already have good access to travel networks; making the most efficient use of land supply at those locations and will require that development proposals should seek to improve and must not adversely impact on the effective functioning and safe use of the Borough's transport network and public realm. The Council is aware that Hertsmere benefits from strong rail connectivity and will ensure that Policy TR1 and other related policies appropriately recognise and leverage Hertsmere's strategic rail connectivity as a key asset supporting sustainable growth, economic prosperity, low-carbon transport, and high-quality, accessible, and inclusive communities.
Economy & Culture	Employment land demand/supply	The plan should identify specific sites in Potters Bar for larger-format retail and commercial leisure, including hotel and sports/entertainment provision that is currently absent and to reduce the need for residents to travel to Borehamwood, St Albans and London	*The Council has prepared a Retail and Town Centres Study as part of the evidence base for the Draft Local Plan, which assesses the capacity and need for additional retail and leisure floorspace across the borough's centres, evaluates the health and vitality of town centres, and provides recommendations for town centre policies and site allocations to support their future vitality, viability and role in serving local communities. The Council will review representations received during Regulation 18 consultation alongside the retail and town centres evidence base to identify if any further allocation is required to meet needs.*

Theme	Sub-Theme / Issue	Summary	*Response*
Employment sites	Freight	Concerns about capacity of transport infrastructure to accommodate commuting to proposed employment sites	*The Council has assessed transport impacts of proposed employment sites through the Transport Study. Site allocation policies will include requirements for transport assessments and travel plans, and where necessary, developer contributions towards highway improvements and public transport enhancements to mitigate impacts. The Council will work with the Highway Authority to ensure the transport network can accommodate development without unacceptable impacts on safety or congestion.*
Employment sites	General opinion/view	General concern about proposed employment site(s)	*The Council has assessed all proposed employment sites through the Housing and Employment Land Availability Assessment, Economic Study, Sustainability Appraisal, and site-specific technical assessments. Site selection is based on evidence of employment land need, accessibility, environmental constraints, and deliverability. All concerns raised will be considered in finalising site allocations for the Regulation 19 Plan.*
Employment sites	General opinion/view	General support for proposed employment site(s)	*The Council welcomes support for proposed employment site allocations, which are informed by evidence of employment land need and will contribute to the Borough's economic growth and job creation.*
Employment sites	General opinion/view	Support for a policy approach that is consistent with the NPPF policy on data centres and seeks to identify appropriate locations for data centres in the Local Plan	*The Council will provide clear evidence of the quantum of data centre floorspace required over the plan period in the Economic Study and supporting evidence base. This will inform employment land allocations and ensure the Plan provides sufficient land in appropriate locations to meet identified needs in these specialist sectors.*
Employment sites	General opinion/view	Concern that employment sites do not appear to align with the spatial strategy	*The Council's spatial strategy seeks to deliver employment land in sustainable locations that support economic growth while minimising environmental impacts. Employment site allocations are informed by the Economic Study, Transport Study, and evidence of site deliverability. The Plan balances employment land provision with the need to direct development to accessible locations in accordance with the NPPF.*
Environment	Best and most versatile agricultural land (BMV)	Concerns over the loss of best and most versatile agricultural land and its impact on food security	*The Council recognises the importance of protecting best and most versatile agricultural land for food production. The Plan follows the approach set out in NPPF paragraph 180, which requires significant development of agricultural land to use areas of poorer quality (Grades 3b, 4 and 5) in preference to higher quality land. Where development of BMV land is necessary to meet identified needs, this will be justified through evidence, and the Plan will seek to minimise such loss where possible.*
Environment	Best and most versatile agricultural land (BMV)	Support for development proposals that avoid best and most versatile agricultural land (BMV)	*The Council welcomes support for protecting BMV agricultural land. The Plan prioritises development on previously developed land and lower quality agricultural land where possible, consistent with national policy on conserving and enhancing the natural environment.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Climate change	Concerns about the impact of proposed growth on air quality due to increased traffic volumes	*The Council recognises that development can impact air quality through increased traffic generation. The Plan is supported by an Air Quality Assessment that identifies constraints and mitigation requirements. Development will be required to incorporate measures to minimise air pollution, including sustainable transport provision, electric vehicle charging infrastructure, travel plans, and green infrastructure. Development affecting Air Quality Management Areas will require air quality assessments to demonstrate no unacceptable impacts on human health.*
Environment	Climate change	Concerns about the impact of proposed growth in terms of causing or worsening climate change effects, including more flooding due to removing permeable green spaces, urban heat island effect due to densification etc	*The Council is committed to addressing climate change through the Local Plan. Policies will require development to incorporate measures to reduce carbon emissions, manage flood risk through sustainable drainage systems, provide green infrastructure to manage urban cooling, and protect/enhance green spaces. The Plan's climate change policies are designed to ensure development contributes to climate change mitigation and adaptation in accordance with NPPF Chapter 14.*
Environment	Climate change	General opposition to / concern about development due to perceived difficulty in supporting growth with climate mitigation in practice	*The Council acknowledges concerns about achieving climate change mitigation alongside growth. The Plan includes robust climate change policies requiring sustainable design, renewable energy generation, sustainable drainage, and green infrastructure. These requirements are informed by viability testing to ensure they can be delivered in practice. The Council will monitor policy effectiveness and take corrective action where necessary to ensure climate objectives are achieved.*
Environment	Climate change	Concern about proposed energy standards for new development going beyond those required in Building Regulations, contrary to draft NPPF 2025 policy PM13	*The Council will ensure that energy efficiency requirements in the Local Plan are consistent with national policy and Building Regulations. The Plan will be reviewed to align with the final version of the NPPF 2025 and will not set energy efficiency standards that exceed Building Regulations requirements unless justified by local circumstances and supported by evidence, in accordance with national policy.*
Environment	Climate change	Support for proposed climate change policies	*The Council welcomes support for the Plan's climate change policies, which seek to deliver sustainable development that minimises carbon emissions, manages flood risk, and enhances resilience to climate change.*
Environment	Climate change	Recommendation that policies on sustainable development recognise importance of location and design of new development	*The Council agrees that location and design are fundamental to delivering sustainable development. The Plan's spatial strategy prioritises development in accessible locations served by sustainable transport, and design policies require high-quality, energy-efficient design that responds to local context. This approach is consistent with the NPPF's definition of sustainable development.*
Environment	Climate change	Concern over LETI standards in policy SD2 for sustainable design, as setting very high (Passivhaus) standard which could impact viability and should be tested; as potentially not possible to implement due to commercial or technical constraints, which should be recognised in policy; and as contradicting First Homes Standard in SD4.	*The Council has tested the policies in the Local Plan through viability assessment work and will publish a Whole Plan and CIL Viability Assessment at Regulation 19 stage. Policy SD2 sets out a criteria-based approach that recognises site specific circumstances and requires sustainable design measures to be implemented where viable and appropriate, acknowledging that commercial or technical constraints may apply. The policy supports national policy on First Homes and does not conflict with the requirements in Policy SD4.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Climate change	Recommendation that BREEAM is excluded from policy SD2 for buildings under 1,000m2 (not 500m2 as suggested) and that applicants be allowed to present an alternative approach where practical and viable.	*Policy SD2 includes flexibility for applicants to demonstrate alternative approaches where this can be justified on viability or practical grounds through the submission of supporting evidence.*
Environment	Climate change	Recommendation to include direct reference to Natural England's Green Infrastructure Framework in Policy SD1, as well as to add recognition of role Green Infrastructure has in strengthening climate change resilience to climate change chapter. Policies should further set out appropriate nature-based solutions for climate mitigation and adaptation, such as woodland or wetland creation or peatland restoration.	*The Council recognises the crucial role that green infrastructure plays in mitigating and adapting to climate change and will seek to make reference to useful tools that can aid applicants in complying with Policy SD1. Through the policy applicants will be required to outline how proposals seek to strengthen climate resilience in Hertsmere through the preparation of a sustainability statement. While not all natural-base mitigation, such as peat land restoration, will be relevant to Hertsmere, the Council will seek to outline the relevant habitat restoration which will be the most effective across the Borough.*
Environment	Climate change	To avoid duplication with national policy, policy SD3 should focus solely on encouraging overheating measures in green and public open spaces and refer to Part O of Building Regulations as the mechanism for addressing overheating in all buildings.	*The Council recognises that overheating in buildings is addressed through Part O of the Building Regulations 2010 (as amended) and that planning policies should avoid duplicating requirements set out in other regulatory regimes. The Council will consider whether Policy SD3 should be refocused to emphasise site-wide measures including green infrastructure, urban greening, tree planting, water features, and design of public open spaces to provide cooling and shading, whilst clearly referencing Part O of the Building Regulations as the mechanism for addressing overheating within buildings*
Environment	Climate change	Concern over requirement for embodied carbon assessments, due to their cost, and recommendation that policy should only require assessment for a 'representative sample of the buildings' and only where proportionate to stage and complexity of the application.	*The Council recognises that reducing embodied carbon from construction materials and processes is essential to achieving net zero carbon emissions and that embodied carbon assessments provide valuable evidence to inform material choices and construction methods but also acknowledges the need to ensure that policy requirements are proportionate, do not impose unreasonable costs, and are appropriate to the scale and nature of development. The Council will ensure that a proportionate approach is taken and will consider the request to amend the policy wording to clarify this.*
Environment	Climate change	Support for requirement for new development to contribute to generation of renewable energy and use of heat networks	*The Council welcomes support for renewable energy generation and heat networks. Policy SD6 will promote low-carbon heating solutions including heat networks where viable, and renewable energy generation on development sites to reduce reliance on grid electricity and contribute to achieving net zero carbon emissions.*
Environment	Climate change	Recommendation that emphasis of policy SD6 is changed from 'prioritising' heat networks to the 'consideration' of such systems where 'practical and viable and where they would result in lower carbon emissions than use of individual heat pumps.	*The Council will review the wording of Policy SD6 to ensure it provides appropriate flexibility, requiring consideration of heat networks where practical and viable, while recognising that individual heat pumps may be more appropriate in some circumstances. The policies are informed by evidence of technical feasibility, viability, and carbon emissions performance.*
Environment	Climate change	Recommendation for the Plan to recognise the significant positive contribution that new development can make to providing balance and resilience to the national grid through the generation of renewable energy on site and resulting reduction in quantum of power required from the national grid.	*The Council recognises that on-site renewable energy generation can contribute to grid resilience and reduce pressure on the national grid infrastructure. The Plan will include policies encouraging renewable energy generation on development sites where technically feasible and viable, contributing to both local energy security and national decarbonisation objectives.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Climate change	Support for 110 litres per person per day water efficiency target	*The Council welcomes support for the 110 litres per person per day water efficiency standard, which will help conserve water resources in a water-stressed area, consistent with national policy and Building Regulations optional standards.*
Environment	Climate change	Support for circular economy principles	*The Council welcomes support for circular economy principles. The Plan will include policies promoting resource efficiency, waste minimisation, and circular economy approaches in development, supporting the transition to a more sustainable, low-carbon economy.*
Environment	Climate change	Support for Policy SD4, carbon neutral development and financial contributions where on-site carbon mitigation requirements cannot be met.	*The Council welcomes support for Policy SD4 on achieving carbon neutral development. Where on-site measures cannot fully achieve carbon neutrality, financial contributions will be secured to fund off-site carbon reduction projects, ensuring all development contributes to achieving net zero carbon emissions.*
Environment	Climate change	Recommendation that suitable flexibility is incorporated into this policy to recognise the challenges to achieving a net-zero waste target, on the basis that there are some construction waste streams that cannot be recycled.	*The Council recognises that achieving net-zero construction waste may not be feasible for all waste streams. It is considered that the policy provides an appropriate framework for reducing construction waste and supporting circular economy principles, whilst allowing for site-specific circumstances and technical feasibility. No modification is proposed.*
Environment	Climate change	Suggestion of adding a reference to the designated Watling Chase Community Forest and requirement for the provision of significant tree planting to policy, in light of the Climate Emergency.	*The Council will consider adding reference to Watling Chase Community Forest in climate change and green infrastructure policies, recognising its role in carbon sequestration, biodiversity, and climate change adaptation. Policies will promote tree planting as part of green infrastructure provision to contribute to the Community Forest and support climate change mitigation.*
Environment	Climate change	Recommendation to strengthen wording of Policy SD8 to provide greater clarity on requirements for water efficiency standards and addition of requirement for commercial development to meet BREEAM 'excellent' rating for water efficiency.	*The Council will review Policy SD8 to provide clearer requirements for water efficiency standards for residential and non-residential development. The requirement for commercial development to meet BREEAM 'excellent' rating for water efficiency will be considered, subject to viability testing and alignment with national standards.*
Environment	Climate change	Recommendation for addition to policy to require water efficiency standards in any refurbishments and / or changes of use in existing building stock.	*The Council recognises the importance of improving water efficiency in existing buildings. The Plan will consider including requirements for water efficiency measures in refurbishment and change of use proposals, where reasonable and proportionate, to contribute to overall water conservation objectives.*
Environment	Climate change	Recommendation for Policy SD2 and SD4 to be updated to reflect the contribution that water efficiency can make to reducing carbon and Co2 emissions.	*The Council will review Policies SD2 and SD4 to explicitly recognise the contribution of water efficiency to reducing carbon emissions through reduced energy consumption for water heating and treatment. This will provide a more integrated approach to sustainability and climate change mitigation.*
Environment	Climate change	Recommendation that sustainable design statement policy should require applicants to explain how tree retention, green infrastructure, urban greening and ecological networks have informed scheme design from outset.	*The Council agrees that environmental assets should inform design from the outset. Sustainable Design Statement requirements will be strengthened to require applicants to demonstrate how tree retention, green infrastructure, urban greening, and ecological networks have shaped scheme layout, design, and landscaping, ensuring these matters are embedded in the design process rather than added retrospectively.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Climate change	Expectation for the Plan to address water quality impacts and flood risk management in Policy SD7, in line with NPPF, with reference to River Basin Management Plan. Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.	*The Council agrees that the Plan should address water quality impacts and flood risk management in line with national policy. The regulation 19 draft Local Plan will seek to provide clarity on how the applicants will be expected to reduce flood risk through implementing the measures set out in River Basin Management Plans and linking flood risk management to GI and SDS policy.*
Environment	Climate change	Recommendation of inclusion of environmental capacity as factor when assessing proposal in Policy SD8; stronger wording around mitigation prior to availability of adequate capacity and/or infrastructure; requirements for improvements to be in place before first occupation; and reference to the Shared Standards for Water Efficiency in Local Plans.	*The Council agrees that environmental capacity should be a factor when assessing proposals and mitigation measures are key to ensuring that adequate infrastructure capacity is available to deal with new development. The Council will review the policy wording and take into consideration the recommendations. The Council consider that appropriately worded conditions on planning permissions are determined by the decision maker and should be made on a case-by-case basis.*
Environment	Climate change	Recommendation that the Plan's sustainable design policies should support its GI policies by giving greater weight to canopy cover, sustainable drainage, natural flood management, urban cooling and nature-based solutions.	*The Council will ensure that sustainable design policies are fully integrated with green infrastructure policies, giving appropriate weight to canopy cover, sustainable drainage, natural flood management, urban cooling, and nature-based solutions. This integrated approach will ensure development delivers multiple environmental benefits and contributes to climate change adaptation and mitigation.*
Environment	Designated Sites	Concern about the lack of reference to designated sites and particular protected habitats that are specific to Hertsmere.	*The Council will ensure that the Plan includes comprehensive references to designated sites and protected habitats specific to Hertsmere, including Local Wildlife Sites, Local Nature Reserves, and habitats of principal importance. Policies will provide clear protection for these sites and require appropriate assessments where development may affect them, in accordance with national policy and biodiversity legislation.*
Environment	Designated Sites	Request for increased level of evidence for the sites located within or adjacent to designated sites (local/national)	*The Council will ensure that site allocations located within or adjacent to designated sites are supported by appropriate ecological assessments and evidence demonstrating that development can be accommodated without unacceptable harm to designated features. Site-specific policies will include mitigation requirements informed by this evidence, in accordance with the mitigation hierarchy.*
Environment	Designated Sites	Concern about methodology and conclusions of Habitats Regulation Assessment (HRA)	*The HRA for the Draft Local Plan has been prepared by independent ecological consultants using established methodology and in consultation with Natural England as the statutory nature conservation body, assessing potential impacts including atmospheric pollution, recreational disturbance, water quality and quantity, and urbanisation effects on European sites within and beyond the borough boundary. The Council welcomes constructive feedback on the HRA methodology and conclusions, will carefully consider all representations received during the Regulation 18 consultation, and will work with Natural England and ecological specialists to address any issues identified, ensuring that the HRA is robust, appropriately evidenced, and demonstrates that the Local Plan will not adversely affect the integrity of European protected sites across Hertsmere and the wider area.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Designated Sites	Support for certain conclusions of the Habitats Regulation Assessment (HRA)	*The HRA for the Draft Local Plan has been prepared by independent ecological consultants using established methodology and in consultation with Natural England as the statutory nature conservation body, assessing potential impacts including atmospheric pollution, recreational disturbance, water quality and quantity, and urbanisation effects on European sites, and concluding that with appropriate mitigation measures embedded within Local Plan policies, the plan will not adversely affect the integrity of European protected sites. The Council is pleased that certain HRA conclusions are supported and is committed to implementing the mitigation measures identified in the HRA, monitoring their effectiveness, and working with Natural England and other partners to ensure the protection and enhancement of European protected sites across Hertsmere and the wider area.*
Environment	Designated Sites	General support for the methodology and approach to the Sustainability Appraisal	*The SA for the Draft Local Plan has been prepared iteratively throughout plan preparation by independent consultants, assessing the Draft Local Plan policies and site allocations against a comprehensive framework of sustainability objectives covering topics including climate change, biodiversity, landscape, heritage, housing, economy, health, transport, water, and resources, and identifying recommendations to strengthen the plan's sustainability performance. The Council is pleased with the support for the SA methodology and approach and is committed to taking account of the SA findings and recommendations to ensure that the Local Plan delivers sustainable development, maximises positive social, economic, and environmental outcomes, and minimises adverse effects across Hertsmere.*
Environment	Designated Sites	Recommendation that the Sustainability Appraisal should be reviewed to ensure a more robust assessment	*The SA for the Draft Local Plan has been prepared iteratively by independent consultants throughout plan preparation, assessing policies and site allocations against a comprehensive framework of sustainability objectives, but the Council welcomes constructive feedback on the methodology, scope, assumptions, and conclusions. The Council will carefully consider all representations received during the Regulation 18 consultation regarding the SA, review whether additional assessment work or clarification is required to ensure robustness, work with SA consultants and statutory consultees including the Environment Agency, Natural England, and Historic England to address any identified deficiencies.*
Environment	Designated Sites	Further consultation required with Natural England to assess impacts of allocated sites on designated site(s)	*The Council recognises that consultation with Natural England as the statutory nature conservation body is essential to ensure that allocated sites and Local Plan policies adequately protect designated sites. The Council has consulted Natural England throughout preparation of the Draft Local Plan including and is committed to continuing this engagement to ensure that the Local Plan adequately protects the integrity of designated sites across Hertsmere and the wider area.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Designated Sites	Recommendation to take into account the Management Plan for the Chilterns National Landscape and to consult the Conservation Board	*The Council recognises that the Chilterns National Landscape (formerly Area of Outstanding Natural Beauty) is a nationally designated landscape of the highest quality whose conservation and enhancement is a statutory duty under Section 85 of the Countryside and Rights of Way Act 2000. Proposed policies requires development to conserve and enhance landscape character including the special qualities of the Chilterns National Landscape, and the Draft Local Plan has been informed by the Landscape Character Assessment and engagement with the Chilterns Conservation Board. The Council is committed to continuing consultation with the Chilterns Conservation Board, taking full account of the Chilterns National Landscape Management Plan in plan preparation and development management decisions, ensuring that allocated sites and policies protect and enhance the natural beauty, special qualities, and setting of the National Landscape, and working in partnership to deliver the objectives of the Management Plan across Hertsmere.*
Environment	Designated Sites	Recommendation to include strategic policies to protect and enhance valued landscapes, including the Chilterns National Landscape	*The Council recognises that the Chilterns National Landscape (formerly Area of Outstanding Natural Beauty) is a nationally designated landscape of the highest quality whose conservation and enhancement is a statutory duty under Section 85 of the Countryside and Rights of Way Act 2000. Proposed policies requires development to conserve and enhance landscape character including the natural beauty and special qualities of the Chilterns National Landscape, be informed by the Landscape Character Assessment, respond positively to landscape sensitivity, protect key views and skylines, and incorporate landscape enhancement measures, and proposed Policy HQD1 (Delivering High-Quality Design in Hertsmere) requires high-quality design that responds to local character and landscape setting. The Council considers that these proposed policies provide a strategic framework for protecting and enhancing valued landscapes including the Chilterns National Landscape, but will consider whether additional policy wording or supporting text should be included to strengthen landscape protection*
Environment	Designated Sites	Recommendation that allocations should include requirement for delivery aligned with landscape policies to avoid significant impacts on protected landscapes	*The Council recognises that site allocations must be informed by robust landscape evidence and include appropriate requirements to ensure that development conserves and enhances landscape character, protects the natural beauty and special qualities of the Chilterns National Landscape and other valued landscapes, and avoids significant adverse landscape impacts. Policies requires development to conserve and enhance landscape character including the Chilterns National Landscape, and candidate site policies include site-specific requirements informed by the Landscape Character Assessment, Sustainability Appraisal, and consultation with the Chilterns Conservation Board and other stakeholders. The Council will review site allocation policies to ensure that they include sufficiently detailed and robust requirements for landscape-sensitive design, layout, building heights, screening, mitigation planting, protection of key views, and integration with landscape character, explicitly referencing alignment with landscape policies*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Designated Sites	Recommendation that where a Local Wildlife Site falls within the boundary of a development site or nearby, appropriate mitigation should be put in place (including appropriate buffers / incorporation as part of the landscape design).	*The Draft Local Plan includes proposed policies on biodiversity and ecological networks (Policy NE7) requiring development to protect, enhance, and restore biodiversity including through safeguarding designated sites including Local Wildlife Sites, and protected habitats and species, applying the mitigation hierarchy to avoid, mitigate, and compensate for biodiversity impacts. The Council will consider whether site allocations incorporating or adjacent to Local Wildlife Sites should include specific policy requirements for appropriate mitigation, including incorporation of buffer zones.*
Environment	Designated Sites	Recommendation that for all allocations posing potential risk to designated sites (e.g. Redwell Wood SSSI), such as Bowmans cross, policy should include requirements around delivery of sufficient alternative natural greenspace to help mitigate adverse impacts. High-quality natural greenspace should also be provided to offer a valuable alternative for recreational activities such as dog walking.	The Council recognise the importance of protecting designated sites from recreational pressures and other impacts of nearly development and will consider requirements for alternative natural greenspace to be secured within site allocation policies, in line with the Habitats Regulations 2021. The Council have assessed the likely impacts of the level of housing growth proposed in the draft Local Plan through a Habitat Regulations Assessment, which will be published alongside the Regulation 19 draft Local Plan.
Environment	Ecology	General concern about the impact of housing development on trees across Hertsmere and the number of trees that will be lost.	*The Council recognises the value of trees for biodiversity, climate regulation, and amenity. Policy GI5 will require development to retain existing trees wherever possible, with robust justification required for any losses. Tree loss will be compensated through replacement planting that reflects the size and value of trees lost, and the Council will monitor canopy cover change to ensure net gains are achieved over the plan period.*
Environment	Ecology	General support for biodiversity net gain in development	*The Council welcomes support for biodiversity net gain, which is now a legislative requirement under the Environment Act 2021. The Plan will include policies requiring at least 10% biodiversity net gain for all development, with gains maintained for at least 30 years, in accordance with national regulations.*
Environment	Ecology	Concern for the impact of housing development on wildlife due to the loss of habitats	*The Council recognises that development can result in habitat loss. The Plan will require ecological assessments for development proposals likely to affect important habitats or protected species, and will apply the mitigation hierarchy requiring avoidance, mitigation, and compensation for habitat loss. Biodiversity net gain requirements will ensure development delivers overall gains for nature.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Ecology	Requests for swift bricks to be utilised at a ratio of 1:1 in new build developments	*Policy GI6 supports species-sensitive urban greening and states that integral swift and bat bricks should be incorporated within new buildings at a ratio of one brick per dwelling."*
Environment	Ecology	Recommendation that biodiversity net gain must take place close to the implicated site rather than elsewhere in the borough.	*The Council supports the principle of delivering biodiversity net gain on-site or as close as possible to the development site, to ensure local communities benefit from habitat enhancements and to support local ecological networks. Policy GI4 will include a spatial hierarchy for biodiversity net gain delivery, prioritising on-site provision, then off-site provision within the local area, with off-site provision elsewhere in the Borough only where this is not feasible.*
Environment	Ecology	General concern that the site is environmentally sensitive.	*The Council will ensure that all site allocations are supported by appropriate environmental assessments identifying constraints and mitigation requirements. Where sites are environmentally sensitive, allocation policies will include specific requirements to protect sensitive features and deliver appropriate mitigation and enhancement measures, in accordance with national policy on the natural environment.*
Environment	Ecology	HBA SA18 Land north of Barnet Lane development should 'Enhance, expand and link up existing ponds to other ponds or ecologically rich habitats.' in line with the Hertfordshire LNRS.	*The Council will ensure that site-specific policies for allocations with ecological features such as ponds include requirements to enhance, expand, and connect these features to wider ecological networks, informed by the Local Nature Recovery Strategy (LNRS). This will support habitat connectivity and contribute to nature recovery priorities identified in the LNRS. The Council has taken these comments into account in preparing the Regulation 19 Local Plan. Policies GI3 (Local Nature Recovery Strategy) and GI4 (Protecting and Enhancing Biodiversity, Habitats and Ecological Networks) provide a strategic approach to nature recovery, habitats, ecological networks and species. Policy GI4 requires proportionate ecological survey and assessment where protected species or habitats may be present, applies the mitigation hierarchy, requires relevant development to secure 20% Biodiversity Net Gain and requires BNG to be integrated into the design-led approach from the earliest stages and delivered on-site wherever possible. The location and type of BNG is also informed by the Hertfordshire Local Nature Recovery Strategy, with support given to measures that align with identified priorities and mapped opportunities. The policy requires development to consider impacts on notable species and the potential for species recovery and enables appropriate management plans to be secured. Policy GI5 also addresses light pollution, including impacts on wildlife, habitats and ecologically sensitive areas.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Ecology	Policy GI4 should be updated to include the following recommendations: 1. strengthened to include more emphasis on delivering enhancement and supporting nature recovery 2. strengthened to read 'must' and further clarify that Biodiversity Net Gain (BNG) must be included in early design stages to avoid ambiguity and ensure this is delivered in practice 3. Where Biodiversity Gain Sites are used, they should be located close to the development 4. BNG units should deliver gains that are significant at a local or landscape scale. Habitat enhancements should be designed to provide significant contributions to nature recovery in line with the latest Local Nature Recovery Strategy (LNRS). 5. Where proposals involve the creation of significant natural areas and habitats which are integral to development, they should be accompanied by a long-term management and monitoring plan, which must be approved by the Local Planning Authority 6. Requirement that proposals likely to impact on important habitat or notable species will need to submit an Ecological Assessment 7. Development proposals must demonstrate how they have had regard to the relevant LNRS priorities, including identifying and, where appropriate, delivering opportunities for habitat creation, enhancement and nature-based solutions 8. Proposals must avoid compromising the delivery of identified LNRS priorities and opportunities, unless it can be clearly demonstrated that there are no reasonable alternative options and any harm is appropriately avoided, mitigated or compensated. Additional points: - All development proposals must consider potential impacts upon notable species (including protected, priority (of principle importance under the Natural Environment and Rural Communities Act) or those which are suffering significant declines). Where adverse impacts can be quantified, they must be compensated for. - Development should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and	

Theme	Sub-Theme / Issue	Summary	*Response*
		recovery of priority species - Mitigating light impacts - Development involving or adjacent watercourses, ecological corridors and major developments must ensure that an informed assessment of potential Artificial Light at Night (ALAN) impact on wildlife is made and that ALAN is kept to the minimum level required to ensure health and safety. Where areas are identified as important to be kept dark for wildlife, lighting must be avoided.	

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Ecology	Recommendation to include a dedicated Local Nature Recover Strategy (LNRS) policy to identify key measures to be included within developments and green space / environmental projects	The Draft Local Plan includes proposed Policy GI4 (Protecting and Enhancing Biodiversity, Habitats and Ecological Networks). This is intended as a strategic policy to set out the Council's approach towards promoting and securing conservation, restoration and management of habitats as well as the protection of species, working alongside the LNRS as part of a strategic approach to nature conservation and to deliver Biodiversity Net Gain within the Borough. This policy seeks to meet objectives set out in the LNRS, including by setting out the approach towards proposals that could have wider impacts on biodiversity.
Environment	Flooding/Flood Risk	General opposition to / concern about development due to perceived difficulty in supporting growth with flood risk infrastructure in practice	*The Council is committed to ensuring all development is safe from flooding and does not increase flood risk elsewhere, in accordance with NPPF Chapter 18. The Plan is supported by a Strategic Flood Risk Assessment that identifies flood constraints and mitigation requirements. Site allocation policies include requirements for site-specific flood risk assessments, sustainable drainage systems, and flood mitigation measures.*
Environment	Flooding/Flood Risk	General concern about flood risk and/or flooding and the removal of land in the flood plain causing increased flooding.	*The Council applies the sequential approach to flood risk as required by the NPPF, directing development to areas of lowest flood risk where possible. Where development is necessary in areas at risk of flooding, it will be subject to the sequential and exception tests and must incorporate appropriate mitigation measures including sustainable drainage systems, flood-resistant design, and flood compensation (where appropriate). Development will not be permitted where it would significantly increase flood risk elsewhere.*
Environment	Flooding/Flood Risk	Site Specific concern about flood risk	*The Council will ensure that site-specific flood risk concerns are addressed through t site-specific flood risk assessments. Site allocation policies will include requirements for flood mitigation measures informed by detailed assessment. Development will only proceed where it can be demonstrated to be safe for its lifetime, taking account of climate change, without increasing flood risk elsewhere.*
Environment	Flooding/Flood Risk	Site requires level 2 SFRA and evidence that the sequential and exceptions tests have been carried out	*The Council will ensure that a Level 2 Strategic Flood Risk Assessment is completed where required to inform site allocations. Sites at risk of flooding will be subject to the sequential test, and where appropriate, the exception test, in accordance with NPPF Chapter 18 and national Planning Practice Guidance on flood risk and coastal change.*
Environment	Flooding/Flood Risk	Site lies in Source Protection Zone 1	*The Council will follow the guidelines set out by the National Planning Policy Framework and the Environment Agency in its further consideration of this site, taking into account the outputs of any emerging Flood Risk Assessment.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Flooding/Flood Risk	Support for the protection of SPZs; recommendation that groundwater is also protected from contamination in all areas; and reference to the EA's Approach to Groundwater Protection, which outlines a number of position statements for development within a Source Protection Zone (SPZ) where the EA would object in principle.	*The Council welcomes support from the Environment Agency for its approach and will continue to take into account Environment Agency advice in its further preparation of the Local Plan.*
Environment	Flooding/Flood Risk	Recommendation that mitigation should be included for a site allocation as a requirement in the allocation policy.	*The Council will continue to take into account Environment Agency advice in its further preparation of the Local Plan, including emerging allocation policy.*
Environment	Flooding/Flood Risk	Significant existing infrastructure capacity issues need addressing before new development is delivered.	*The Council is committed to ensuring all development is safe from flooding and does not increase flood risk elsewhere, in accordance with NPPF Chapter 18. The Plan is supported by a Strategic Flood Risk Assessment that identifies flood constraints and mitigation requirements, as well as by a comprehensive Infrastructure Delivery Plan (IDP), which has been prepared in collaboration with key infrastructure providers to identify existing capacity constraints and the infrastructure improvements necessary to support planned growth across the borough, relating to a wide range of infrastructure. The infrastructure requirements identified in the Local Plan evidence base reflect a realistic assessment of what is needed to ensure that new development does not place unacceptable pressure on existing services and facilities, including consideration of existing capacity issues. The Council is committed to working proactively with infrastructure providers, developers, and funding bodies to ensure that infrastructure delivery is properly coordinated and phased alongside development and will continue to monitor infrastructure capacity and delivery throughout the plan period to respond to changing circumstances and ensure that growth is supported by the infrastructure necessary to create successful, sustainable communities across Hertsmere. Site allocation policies will further include requirements for site-specific flood risk assessments and flood mitigation measures. Development will only be allocated where it can be demonstrated to be safe and deliverable.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Flooding/Flood Risk	On Policy GI2: - Bullet 1 should be strengthened with more detail and specific expectations for developers on how buffer zones should be designed and managed. e.g. they • should be at least 10m as standard, in line with definition of a riparian zone in Statutory BNG metric, although there may be instances where a smaller buffer is agreed; • should be designed and managed for the benefit of ecology and biodiversity; and • must include a long term landscape and ecological management plan, which includes the management of invasive non-native species (INNS). - Support for Policy GI2 bullet 2, with recommendation that it should read 'investigate and maximise opportunities to enhance or restore river channels and their riparian zones, flood flow pathways, floodplains and other natural flood management features with the objective of returning them to their natural state wherever possible.' - Support for Policy GI2 bullet 3, with recommendation to include a specific reference to de-culverting watercourses where feasible. - Support for Policy GI2 bullet point 4, with suggested re-wording of 'Incorporate measures to enhance the amenity, recreational and historic value of water spaces, including enhancing public access to these spaces. Where access to a watercourse is proposed the development must include appropriate zoning to establish areas for people and areas for wildlife as agreed by the Environment Agency'.	*The Council has taken these comments into account in preparing the Regulation 19 Local Plan. Policy GI2 (Hertsmere's Watercourses and Blue Infrastructure) requires an undeveloped buffer of at least 10 metres alongside watercourses, designed and managed for the benefit of ecology and biodiversity and supported by long-term landscape and ecological management arrangements. The policy also requires opportunities to enhance or restore river channels, riparian zones, floodplains and natural flood management features to be maximised, supports de-culverting where feasible, and requires development to enhance the ecological, amenity, recreational and historic value of water spaces. Where public access to a watercourse is proposed, appropriate zoning between areas for people and wildlife is required.*
Environment	Flooding/Flood Risk	Recommended change of reference in paragraph 9.2.3 to the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 instead of the now out of date European Water Framework Directive 2000; clarification within either Policy or Supporting Text that WFD is implemented through River Basin Management Plans (RBMPs); and addition of requirement in Policy that WFD Assessment is carried out for any development which may impact a waterbody, both surface water and groundwater.	*The Council has taken these comments into account in preparing the Regulation 19 Local Plan. Policy GI5 (Protection from Environmental Pollution) requires development to have regard to the objectives of the Thames River Basin Management Plan and not result in deterioration of water bodies or prevent the attainment of good status or potential. The supporting text confirms that the Water Framework Directive is implemented through River Basin Management Plans, refers to the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, and sets out the role and scope of Water Framework Directive Assessments in considering potential impacts on surface water and groundwater.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Flooding/Flood Risk	Recommendation for a standalone water quality policy that: 1. Defines what a watercourse is, 2. Promotes opportunities for de-culverting of watercourses to be actively pursued. 3. Ensures buildings must not introduce permanent overshading to the watercourse. 4. Prioritises flood mitigation which restores and works with natural processes and favours Natural Flood Management techniques (NFM).	*The Council has considered this recommendation. Rather than introducing a standalone water-quality policy, the Regulation 19 Local Plan addresses these matters through Policies GI2 and GI5. Policy GI2 defines watercourses for the purposes of the policy, supports de-culverting, prevents new buildings from permanently overshading watercourses and gives preference to flood mitigation measures that restore and work with natural processes, including Natural Flood Management. Policy GI5 provides the wider policy framework for protecting surface water and groundwater from pollution.*
Environment	Flooding/Flood Risk	Recommendation for the Plan to set out a strategic approach on how development should prioritise different environmental outcomes for watercourses in different locations, informed by the Thames River Basin Management Plan (TRBMP) and the Local Nature Recovery Strategy (LNRS). This could include highlighting areas within the Borough where particular watercourses should focus on delivering specific functions, e.g. natural flood management, strengthening wildlife corridors, supporting priority habitats and species, or improving water quality.	*The Council has taken these comments into account in preparing the Regulation 19 Local Plan. Policies GI2, GI3 and GI5 provide a coordinated approach to watercourses, nature recovery and water quality. Policy GI2 requires development to respond to the environmental and ecological functions of blue infrastructure, safeguard Local Nature Recovery Strategy priority areas, protect and enhance chalk streams, and maximise opportunities to restore river channels, riparian zones, floodplains and natural flood management features. Policy GI3 provides the strategic relationship with the Hertfordshire Local Nature Recovery Strategy, while Policy GI5 requires development to have regard to the Thames River Basin Management Plan and protect the status of surface water and groundwater.*
Environment	Flooding/Flood Risk	Concern that stilts and voids are being promoted as flood plain storage compensation in the minimising and management of flood risk, contrary to other Hertfordshire and North London policy approaches, favouring use of under-croft car parks as a form of water storage.	*Proposed Policy SD7 (Minimising and Managing Flood Risk) requires development to avoid areas at risk of flooding, demonstrate that it will be safe over its lifetime, not increase flood risk elsewhere, incorporate appropriate flood risk management measures including Sustainable Drainage Systems (SuDS), and where development is located within the fluvial floodplain provide level-for-level compensatory floodplain storage. The Council will consider whether policy wording or supporting text should clarify the acceptability and design requirements for different forms of compensatory floodplain storage informed by engagement with the Environment Agency and the Lead Local Flood Authority (Hertfordshire County Council), promoting effective and sustainable flood risk management solutions across Hertsmere.*
Environment	Flooding/Flood Risk	Recommendation to maintain the policy approach set out in the previous Regulation 18 Local Plan, which classified land within 20m of a main river as flood zone 3, in the absence of Main Rivers modelling for Hertsmere.	The Draft Local Plan has been informed by the Level 1 and Level 2 Strategic Flood Risk Assessment, which assess flood risk from all sources including fluvial (river) flooding, and proposed Policy sd7 (Minimising and Managing Flood Risk) requires development to avoid areas at risk of flooding and apply the sequential and exception tests where necessary. The Council will review whether the policy should include explicit precautionary requirements for development near main rivers where detailed hydraulic modelling is not available, such as classifying land within a specified distance (for example 20 metres) of a main river as higher flood risk, working with the Environment Agency and the Lead Local Flood Authority (Hertfordshire County Council) to ensure that the approach is appropriate, evidence-based, and provides effective protection from fluvial flood risk across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Flooding/Flood Risk	Recommendation for the Plan to use updated climate change allowances (updated since the preparation of the SFRA) so that developments can take account of future flood risk with climate change impacts in the design process.	Proposed Policy SD7 (Minimising and Managing Flood Risk) requires development to demonstrate that it will be safe over its lifetime taking account of climate change, and site-specific flood risk assessments must use the latest Environment Agency climate change allowances for peak river flows and peak rainfall intensity. The Council will review the Strategic Flood Risk Assessment evidence base and policy wording to ensure that reference is made to the most up-to-date climate change allowances published by the Environment Agency.
Environment	Flooding/Flood Risk	Recommendation of added / amended wording for Policy EC3 to stipulate SUDS requirement for all developments; to require that SUDS should not negatively impact ground water quality; and to require that in all cases the SUDs train should provide sufficient water quality treatment in line with the land use of the drainage catchment and sensitivity of the receiving groundwater body. Further recommendation that appropriate guidance should be referenced in the support text to clarify best practice in relation to SUDS.	Proposed Policy SD8 requires all major development to incorporate SuDS designed to manage surface water run-off, reduce flood risk, improve water quality, and deliver biodiversity benefits, but the Council will consider whether additional policy wording or supporting text should explicitly require that SuDS must protect groundwater quality, provide appropriate water quality treatment through the SuDS treatment train based on development land use and groundwater sensitivity, and reference best practice guidance
Environment	Health Impacts	Concerns about the impact of proposed housing growth on noise, dust and light pollution	*The Council recognises that development can increase light pollution, affecting wildlife, dark skies, and residential amenity. The Plan will include policies requiring development to minimise light pollution through appropriate lighting design, limiting upward light spill, and using motion sensors and timers. This aligns with NPPF paragraph 191 on limiting the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation.*
Environment	Health Impacts	General concern about the impacts of housing development on the health / wellbeing of residents	*The Council is committed to promoting healthy communities through the Local Plan. Policies will require development to support healthy lifestyles through provision of green spaces, active travel infrastructure, access to healthcare and community facilities, and healthy design principles. The Plan's approach is informed by health impact considerations and engagement with public health partners.*
Environment	Health Impacts	Concerns of the impact of development on residents' mental health	*The Council recognises that the built environment can affect mental health and wellbeing. The Plan will promote design that supports mental health through provision of accessible green spaces, opportunities for social interaction, safe and attractive public realm, and connections to nature. This approach aligns with NPPF paragraph 96 on promoting healthy, inclusive communities.*
Environment	Health Impacts	Support for requirement for Health Impact Assessment to focus on major developments with potential for significant health impacts; proposals located within an Air Quality Focus Area; and relevant health-sensitive uses such as hot-food takeaways, betting shops, education facilities, health and social care facilities, leisure and community facilities and publicly accessible open space.	*The Council welcomes support for requiring Health Impact Assessments for major developments and health-sensitive uses. This approach will ensure health impacts are identified and mitigated through the planning process, supporting the delivery of healthy places and reducing health inequalities.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Health Impacts	The Council should set out its own HIA requirement to help implement its strategic objective on healthy communities.	*The Council will include clear policy requirements for Health Impact Assessments, setting out when they are required, what they should address, and how they will inform planning decisions. This will provide certainty for applicants and ensure health considerations are systematically addressed through the planning process.*
Environment	Health Impacts	Recommendation that the Plan's Health and Wellbeing chapter should consider key data and findings of the Council's emerging Playing Pitch Strategy and Built Facilities Strategy and of the Hertfordshire Growth Board's new Healthy and Safe Places Framework	*The Council will ensure that the Health and Wellbeing chapter is informed by the Playing Pitch Strategy, Built Facilities Strategy, and Hertfordshire Growth Board's Healthy and Safe Places Framework. This will ensure a comprehensive, evidence-based approach to promoting health and wellbeing through the planning system.*
Environment	Health Impacts	Recommendation to include a comprehensive policy on healthy places in the Plan, and for Council to engage with NHS on this ahead of the Regulation 19 stage.	*The Council recognises that planning policies and decisions should support healthy, inclusive, and safe communities. The Draft Local Plan addresses health and wellbeing through multiple proposed policies including Policy HQD1 (Delivering High-Quality Design in Hertsmere), which requires high-quality, inclusive design; Policy GI1 (Hertsmere's Green and Blue Infrastructure) which require accessible green and blue infrastructure; Policy TR1 (Sustainable Transport and Movement), which prioritises walking and cycling; and policies on housing, community facilities, air quality, and climate change. The Regulation 19 Local Plan addresses health and wellbeing as a cross-cutting matter through its design, green infrastructure, sustainable transport, community infrastructure and environmental policies. Policy DM6 also requires a Health Impact Assessment for specified forms of development.*
Environment	Health Impacts	Concern about the impacts of development on unstable ground and its impact on human health and safety	*The Council recognises that development must be safe and suitable for its intended use, and that development on unstable or contaminated land must incorporate appropriate investigation, remediation, and mitigation measures to protect public health and safety. Proposed Policy SD9 (Ground Conditions) requires development on land that is known or suspected to be contaminated or unstable to be supported by appropriate site investigation, risk assessment, and remediation strategy to ensure that the site is suitable for its proposed use and does not pose unacceptable risks to human health, controlled waters, or the environment, and to incorporate appropriate mitigation measures including ground stabilisation where necessary. The Council is committed to ensuring that all development proposals on potentially unstable land are subject to robust assessment in consultation with the Council's Environmental Health team, the Environment Agency, the Coal Authority (where applicable), and other relevant bodies, and that appropriate conditions are imposed to secure investigation, remediation, and verification to protect human health and safety across Hertsmere.*
Environment	Health Impacts	Recommendation that specific policy requirements to build for healthy places should include the following, which are priorities for the health system and clearly cross-referenced to other policies with appropriate level of further details in the Supporting Text. We encourage the Council to add/ supplement other general health determinants: All developments should demonstrate how they support healthy places and lives, addressing physical and mental health	*The Council recognises that planning policies and decisions should support healthy, inclusive, and safe communities. The Draft Local Plan addresses health and wellbeing through multiple proposed policies, including Policy HQD1 (Delivering High-Quality Design in Hertsmere), Policy HQD2 (Inclusive and Welcoming Design), Policy HQD3 (Public Realm and Connecting Places) which ensure high quality design is delivered in new developments to promote healthy places, Policy SD1 (Responding to the Climate Emergency) which seeks ensure the green and open spaces are protected and enhanced, Policy GI1 (Hertsmere's Green and Blue Infrastructure) which require accessible green and blue infrastructure and Policy TR1 (Sustainable Transport and Movement), which prioritises walking and cycling; and policies on housing, community facilities, air quality, and climate change. The Council will consider whether a standalone comprehensive 'Healthy Places' policy should be included to bring together health and wellbeing considerations in a clearer and more coordinated framework, informed by engagement with the NHS Hertfordshire and other relevant stakeholders.*

Theme	Sub-Theme / Issue	Summary	*Response*
		impacts and help to reduce health inequalities through the planning system. In doing so, they should demonstrate how they meet identified local health needs and support delivery of local health, wellbeing and estate infrastructure strategies. 1. Optimise early and proactive engagement with the director of public health, NHS and health system partners in support of delivering local health needs and priorities. 2. Utilise appropriate design tools and formal assessments to demonstrate how developments enable and support healthy lives across general health determinants. 3. Provide opportunities for people to improve physical activity through active travel modes that ensure developments are well connected to employment, health and leisure facilities and public transport. 4. Encourage safe, secure and public spaces and places that promote community cohesion and optimise inclusive access for the general population and specific groups. 5. Promote sustainable developments that consider the health impact of climate change and help deliver local objectives for net zero and improved air quality. 6. Provide access to a healthy food environment, including managing appropriate locations of food and drink uses, and making space for food growing opportunities (allotments and/or providing sufficient garden space). 7. Make provision for key worker affordable housing, in particular NHS workers, where there is identified local housing need. 8. Provide sufficient opportunities for access to and contact with the natural environment in all developments including community facilities. 9. Deliver improved or new healthcare infrastructure with good accessibility in neighbourhoods of high deprivation or town centre locations.	
Environment	Pollution	Concerns about the impact of proposed growth on light pollution	*The Council recognises that development can generate light pollution that impacts residential amenity, wildlife, and dark skies. The Plan will include policies requiring development to minimise light pollution through appropriate lighting design, including use of directional lighting, timers, and lower intensity lighting where appropriate. This aligns with NPPF paragraph 193 on limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Pollution	Concerns around air quality in the Borough, both in terms of its impact on human health and in terms of its impact on habitats and protected species	*The Council takes air quality seriously given its impacts on health and biodiversity. The Plan is supported by an Air Quality Assessment that identifies constraints and mitigation requirements. Development will be required to incorporate measures to minimise air pollution, including sustainable transport provision, electric vehicle charging infrastructure, and green infrastructure. Development affecting designated sites will require air quality assessments to demonstrate no adverse impacts on habitats and species.*
Environment	Pollution	Site contains historic landfill	*The Council notes the presence of historic landfill on the site. Site allocation policies will require appropriate ground contamination assessments and remediation strategies to be submitted with planning applications, in accordance with NPPF paragraph 189 on ensuring sites are suitable for their proposed use, taking account of ground conditions and land instability.*
Environment	Pollution	HBCA SA1 Bowmans Cross is predominantly located on Tyttenhanger Landfill. This has not been returned to agricultural use, with large areas active for quarrying mineral and landfill for the disposal of waste, so must be regarded as a Waste Management Facility. Based on the current planning permission, the quarry is unlikely to exhaust mineral reserves before the end of 2032 with restoration planned at the earliest for 2035. For the development to go ahead within the timeframe of the Local Plan it may be technically feasible to enable the phased release of land through amendments to the environmental permit and land engineering to introduce physical separation of the waste mass. This could release phases of land for redevelopment but may be financially prohibitive.	*Policy HBCA SA1 acknowledges the site's complex constraints and requires phased delivery coordinated with completion of mineral extraction and landfill operations, comprehensive ground investigation, contamination and landfill gas risk assessment, appropriate remediation, and liaison with the Environment Agency, Hertfordshire County Council as minerals and waste planning authority, and site operators. The Council will carefully consider all representations regarding the site's deliverability, technical feasibility, phasing, and viability, and will continue engagement with landowners, operators, the Environment Agency, and Hertfordshire County Council to ensure that the allocation is realistic, deliverable within the plan period, and appropriately addresses all technical, environmental, and viability constraints.*
Environment	Pollution	HBCA SA1 Bowmans Cross is located on Tyttenhanger Quarry (North of Coursers Road). The Environment Agency continue to regulate this closed and restored, but still permitted, landfill. Any physical disturbance, including changes to the land use will impact the risk this site poses and will require a variation before they can be implemented. This site may be compatible with a proposed change of use. However, all arisings from the development would remain controlled waste and need to be sent off site for recovery or disposal. The Environment Agency are also aware of a potential waste activity which has occurred/is occurring to the east of the proposed development, which is currently under investigation. This may require the removal or disturbance of waste from site which could impact the Bowmans Cross	*Policy HBCA SA1 requires comprehensive ground investigation, contamination and landfill gas risk assessment, appropriate remediation, management of controlled waste in accordance with environmental regulations, and close liaison with the Environment Agency throughout the planning and development process. The Council is committed to working closely with the Environment Agency, site promoters, and other relevant bodies to ensure that all environmental permit requirements, controlled waste management obligations, and environmental risks including those arising from adjacent sites are fully addressed, and that development proceeds only when it is safe, technically feasible, environmentally acceptable, and compliant with all regulatory requirements across the site.*

Theme	Sub-Theme / Issue	Summary	*Response*
		development and pose risk to air quality, noise, change surface drainage, or the hydrogeological setting.	
Environment	Pollution	HBCA SA1 Bowmans Cross is located close to the North London Anaerobic Digestion Facility. Due to potential safety risks to human health from the operation of the plant and amenity impacts this site will experience due to air quality and odour where emergency releases of gasses are necessary, a substantial buffer of at least 100m should be placed around the site.	*HBCA SA1 requires development to be informed by air quality, odour, and health impact assessments, and to incorporate appropriate design, layout, landscaping, and mitigation measures to protect residential amenity. The Council will work closely with the Environment Agency, the Council's Environmental Health team, site promoters, and operators of the North London Anaerobic Digestion Facility to determine appropriate buffer distances based on site-specific risk assessment, odour modelling, and emergency scenario analysis, and will amend the site allocation policy if necessary to specify minimum buffer distances or other safeguarding requirements to ensure that development does not result in unacceptable risks to public health, safety, or amenity. The Regulation 19 Local Plan recognises the existing waste and industrial uses affecting Bowmans Cross. The allocation and Plan-wide policies require pollution, health, amenity and ground-condition impacts to be assessed and addressed through the design and masterplanning of development.*
Environment	Pollution	Support for the requirement of submission of Preliminary Risk Assessments with planning applications.	*The Council welcomes support for requiring Preliminary Risk Assessments. This ensures that potential contamination risks are identified early and appropriately addressed, protecting human health and the environment in accordance with national policy.*
Environment	Pollution	HRA SA3 Land North of Watford Road and East of Kemprow, Radlett is located close to Blackbird Sewage Treatment Works. Therefore, any development must manage amenity impacts. Thames Water recommend inclusion of a Local Plan policy (per NPPF para 200) to protect residents and avoid restricting existing uses.	*Policy HRA SA3 requires development to be informed by odour assessment in consultation with Thames Water and the Council's Environmental Health team, and to incorporate appropriate design, layout, landscaping, and mitigation measures to protect residential amenity. The relevant Regulation 19 allocation requires developers to work with the Council and Thames Water to identify appropriate design-focused avoidance or mitigation measures in relation to the neighbouring Blackbirds Farm Sewage Works.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Pollution	Request that air quality and traffic impacts on designated sites should be assessed and mitigation should be proposed to minimise the impact, through the SA and HRA of the Plan. One of the main issues which should be considered is the increased nitrogen emissions as a result of increased traffic generated from development. Impacts on designated sites, local sites and the natural environment can be assessed using the 200m distance criterion and local air quality modelling where required.	*The Council acknowledges the impacts that increased traffic generated from new development can have on the natural environment and is assessing the impacts of the spatial strategy through an SA and HRA of the draft Local Plan, which will be published at Regulation 19. The Council will consider relevant mitigation identified to reduce Likely Significant Effects from new development for inclusion in the Plan.*
Environment	Waste management	Concerns about the ability to accommodate proposed growth in terms of waste management	*The Council has assessed waste management capacity through the Infrastructure Delivery Plan. Development will be required to incorporate adequate waste storage and collection facilities, and the Council will work with waste management providers to ensure capacity can accommodate growth. Policies will promote circular economy principles and waste minimisation in accordance with NPPF paragraph 194 on planning for waste management.*
Environment	Ecology	Support for site due to no significant impacts on ecology	*The Council recognises that ecological and biodiversity considerations are critical in site allocation and development management decisions, and that development must protect and enhance biodiversity and geodiversity. The Draft Local Plan includes proposed policies requiring development to protect and enhance biodiversity (Policy GI4), deliver biodiversity net gain of at least 10 per cent, protect designated sites and priority habitats, safeguard protected and priority species, incorporate ecological enhancements, and contribute to ecological networks and the Nature Recovery Network, with the site allocation process informed by ecological surveys, Habitats Regulations Assessment, ecological impact assessments, and consultation with Natural England and the local nature partnership to assess ecological constraints and opportunities. The Council will ensure that the Regulation 19 Publication version of the Local Plan includes only those site allocations that can be delivered without unacceptable ecological impacts and that contribute positively to biodiversity conservation, enhancement, and net gain in accordance with national policy and environmental legislation.*

Theme	Sub-Theme / Issue	Summary	*Response*
Environment	Ecology	Concern over ability to deliver BNG	*The Council recognises that development proposals must demonstrate measurable biodiversity net gain, with a mandatory minimum 10 per cent gain required under the Environment Act 2021 and associated regulations. The Draft Local Plan includes proposed policies requiring all development to achieve biodiversity net gain of at least 10 per cent calculated using the statutory biodiversity metric (Policy GI4), prioritising on-site delivery through incorporation of native planting, green roofs and walls, sustainable drainage features, wildlife corridors, habitat creation and enhancement, and retention and enhancement of existing habitats and ecological features, with off-site provision or payments to strategic biodiversity projects permitted where on-site delivery is demonstrated to be unviable or insufficient, and with BNG secured and monitored through planning conditions and obligations for a minimum 30-year period. The Council will engage with Natural England, the local nature partnership, ecology specialists, developers, and landowners to identify opportunities for on-site and off-site BNG delivery including strategic habitat creation sites and biodiversity offsetting schemes. The Regulation 19 Publication version of the Local Plan will includes robust, clear, and deliverable BNG policy supported by evidence and guidance to ensure that development delivers meaningful, measurable, and lasting biodiversity gains that contribute to nature recovery, ecological resilience, and environmental enhancement across Hertsmere in accordance with national policy and environmental legislation.*
Environment	Ecology	Recommendation that policy should make direct reference to enhancing and restoring chalk stream habitats	*The Draft Local Plan includes policies on biodiversity and ecological networks (Policy GI4), water environment and quality (Policy GI2), and sustainable drainage (Policy SD8) which require development to protect and enhance biodiversity including priority habitats, watercourses, and aquatic ecosystems. The Council will consider this recommendation in the context of these policies.*
General Opinion of Plan	Concern/objection	General concern about / objection to the Local Plan, Spatial Strategy, policies and proposed allocations	*The Council has prepared the Local Plan in accordance with national policy and based on robust evidence. All representations received will be carefully considered in preparing the Regulation 19 version of the Plan. The Plan seeks to balance meeting identified development needs with protecting the environment, heritage and residential amenity, in line with the NPPF's requirements for sustainable development.*
General Opinion of Plan	Concern/objection	Concern about the Local Plan for not being sufficiently specific to local considerations	*The Council is developing Settlement Visions to provide locally specific policy guidance for each main settlement. These will be informed by community engagement and will address local character, infrastructure needs and design requirements. Site allocation policies will include site-specific requirements tailored to local circumstances.*
General Opinion of Plan	Concern/objection	General concern about how the impacts of data centre development have been accounted for in the plan.	*The Regulation 19 Local Plan identifies a need for up to 10.8 hectares of land for data centres. Proposals are addressed through the employment, digital connectivity, sustainable design and environmental policies of the Plan, together with relevant site-allocation requirements.*

Theme	Sub-Theme / Issue	Summary	*Response*
General Opinion of Plan	General Comment	Promotion of the requirement for development to be compliant with Neighbourhood Plan provisions, including through use of planning conditions, obligations and monitoring	*The Council supports Neighbourhood Plans as an important part of the development plan. Compliance with Neighbourhood Plans, where they form part of the statutory development plan for a place, are secured through national policy and legislation.*
General Opinion of Plan	General Comment	General opinion or comment on the plan	*The Council welcomes all feedback on the Plan. All representations received will be carefully considered in preparing the Regulation 19 version of the Local Plan.*
General Opinion of Plan	General Comment	Recommendation that the following technical terms used in the context of heritage are included in a Plan glossary: Significance, setting, listed buildings, conservation areas, scheduled monuments, registered parks and gardens, and designated and non-designated heritage assets.	*The Council agrees that a comprehensive glossary is important for accessibility and clarity. The Regulation 19 Plan will include a glossary defining key technical terms including those relating to heritage assets, to assist readers in understanding policy requirements.*
General Opinion of Plan	General Comment	Request for reference within policy or supporting text to explain that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth, to help demonstrate that the plan is positively prepared and deliverable.	*The relevant Regulation 19 allocation requires developers to work with the Council and Thames Water to identify appropriate design-focused avoidance or mitigation measures in relation to the neighbouring Blackbirds Farm Sewage Works.*
General Opinion of Plan	Support	General support for the Local Plan, Spatial Strategy, policies and proposed allocations	*The Council welcomes support for the Local Plan, Spatial Strategy, policies and proposed allocations.*
General Opinion of Plan	Support	Support for Historic Environment policies	*The Council welcomes support for the Plan's Historic Environment policies, which seek to conserve and enhance the Borough's heritage assets in accordance with the NPPF.*
General Opinion of Plan	General Comment	Recommendation that local plan should make clear Local Nature Recovery Strategies are to inform appropriate development and contribute to nature recovery as opposed to restricting them.	The Council will ensure that the Local Plan includes positive policy wording that presents the Hertfordshire Local Nature Recovery Strategy as an evidence base and strategic framework that informs and enables appropriate, well-designed, and nature-positive development, guides strategic delivery of biodiversity net gain and green infrastructure towards priority locations and habitats that contribute to landscape-scale nature recovery and ecological connectivity, supports developers, landowners, and planning decision-makers in identifying opportunities to align development and land management with nature recovery objectives, and ensures that the planning system contributes positively to achieving local and national commitments for biodiversity recovery, climate resilience, and environmental improvement whilst facilitating sustainable development that meets community needs and supports economic prosperity across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
General Opinion of Plan	General Comment	Recommendation to allow for sufficient flexibility in policy wording on site allocation policies to accommodate changes in circumstances	The Council will look to ensure that the Local Plan will includes clearly written site allocation policies that provide certainty to developers, landowners, infrastructure providers, and communities about the Council's expectations and requirements. The policies will set out clear strategic principles, development quanta, infrastructure requirements, and environmental safeguards necessary to deliver sustainable, high-quality development, but will also incorporate appropriate sufficient flexibility to accommodate detailed technical findings, viability considerations, design innovation, and changing circumstances that may emerge during detailed design and planning application stages
Green Belt/grey belt	Green Belt/grey belt	General acknowledgement that building on the Green Belt may be necessary to meet housing need	*The Council acknowledges that, given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is necessary to deliver sustainable development. The Plan follows the approach set out in the NPPF, prioritising brownfield land and optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated.*
Green Belt/grey belt	Green Belt/grey belt	Support for delivering more housing on land proposed for Green Belt release, to make more effective use of the release / of this land and deliver more affordable homes	*The Council seeks to optimise the use of land proposed for Green Belt release to maximise housing delivery, including affordable homes, while respecting site constraints and local character. Site capacities will be informed by masterplanning, design analysis and infrastructure capacity.*
Green Belt/grey belt	Green Belt/grey belt	Concern that the proposed approach to new homes in the countryside/ Green Belt is too loose and will risk undermining the settlement-focused spatial strategy / risk incremental and cumulative development in the countryside and Green Belt.	*The Council's spatial strategy focuses development in settlements to support infrastructure, services and sustainable transport. Policies on development in the countryside and Green Belt will be tightly drawn to prevent inappropriate development and incremental harm to Green Belt purposes, in accordance with NPPF Chapter 13. Only development consistent with Green Belt purposes or meeting specific rural needs will be permitted outside settlement boundaries.*
Green Belt/grey belt	Green Belt/grey belt	Opposition to the proposed requirements for the percentage of affordable housing on Green Belt sites.	*The Plan's affordable housing requirements on Green Belt sites are based on evidence of need in our Housing Needs Assessment and of viability testing through the Whole Plan Viability Assessment, as well as the requirements of the NPPF.* grey belt *development will need to follow the Golden Rules, including on affordable housing.*
Green Belt/grey belt	Green Belt/grey belt	General concern / opposition to building housing on the Green Belt as it is contrary to national policy and should be protected	*The Council's spatial strategy seeks to minimise Green Belt loss through prioritising brownfield land, optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated. However, given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is necessary. The Plan follows the approach set out in NPPF Chapter 13 on protecting Green Belt land.*

Theme	Sub-Theme / Issue	Summary	*Response*
Green Belt/grey belt	Green Belt/grey belt	Preference for building on land outside of the Green Belt at higher densities	*The Council's spatial strategy seeks to minimise Green Belt loss through prioritising brownfield land, optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated. However, given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is necessary. The amount of brownfield land which has been put forward for development, and which is deemed to be available, suitable and achievable for development is insufficient to meet identified need for housing and employment land, even if densities are optimised. The Plan follows the approach set out in NPPF on protecting Green Belt land and optimising densities.*
Green Belt/grey belt	Green Belt/grey belt	Preference for a brownfield first approach to development and PDL before developing on the Green Belt	*The Plan follows the approach set out in the NPPF, prioritising brownfield and previously developed land and optimising development densities and only releasing Green Belt where insufficient other development land can be found that is available, suitable, and achievable for development and where exceptional circumstances can be demonstrated.*
Green Belt/grey belt	Green Belt/grey belt	Concern on / opposition to Green Belt assessment methodology and/or conclusions	*The Hertsmere Green Belt Assessment is an independent study which follows the approach set out in the NPPF and the latest Planning Practice Guidance. The study evaluates the existing Green Belt across Hertsmere and as required by the NPPF, seeks to identify potential* grey belt.
Green Belt/grey belt	Green Belt/grey belt	Concern on / opposition to building on the Green Belt due to threat to green space / open space for residents	*The Hertsmere Green Belt Assessment follows the approach set out in the NPPF and latest Planning Practice Guidance. Not all Green Belt is green space or providing open space which can be used by residents. The Green Belt Assessment judges whether any of the areas and assets listed in NPPF footnote 7 would provide a strong reason for refusing or restricting development on the assessment area. The features in Footnote 7 of the NPPF relate to biodiversity, local green space, irreplaceable habitats, historic environment, and flood risk. Presence of some Local Green Space on a parcel of Green Belt Land being assessed is deemed to potentially provide a strong reason for refusing or restricting development with possibility of mitigation. Where a parcel of Green Belt land being assessed is entirely Local Green Space, this potentially provides a strong reason for refusing or restricting development with little or no possibility of mitigation. The other assets and features in footnote 7 are evaluated similarly.*
Green Belt/grey belt	Green Belt/grey belt	Concern on / opposition to building on the Green Belt due to threat to habitats	*The Hertsmere Green Belt Assessment follows the approach set out in the NPPF and latest Planning Practice Guidance. Not all Green Belt is providing valuable habitat. The Green Belt Assessment judges whether any of the areas and assets listed in NPPF footnote 7 would provide a strong reason for refusing or restricting development on the assessment area. The features in Footnote 7 of the NPPF relate to biodiversity, local green space, irreplaceable habitats, historic environment, and flood risk. Presence of or adjacency to irreplaceable habitats on a parcel of Green Belt Land being assessed is deemed to potentially provide a strong reason for refusing or restricting development with possibility of mitigation. Where a parcel of Green Belt land being assessed has extensive or total presence of irreplaceable habitats, this potentially provides a strong reason for refusing or restricting development with little or no possibility of mitigation. The other assets and features in footnote 7 are evaluated similarly.*

Theme	Sub-Theme / Issue	Summary	*Response*
Green Belt/grey belt	**Green Belt**/grey belt	Concern that the approach taken to designating 'Grey belt' and 'Potential Grey belt' in the Green Belt Assessment would fundamentally undermine the purpose (taken together) of the remaining Green Belt, contrary to the NPPF and WMS (2024).	*The Hertsmere Green Belt Assessment is an independent study which follows the approach set out in the NPPF and the latest Planning Practice Guidance. The study evaluates the existing Green Belt across Hertsmere and as required by the NPPF, seeks to identify potential grey belt. The Assessment contains a dedicated section which identifies if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan. This part of the Assessment also clearly identifies areas that are identified to be fundamentally important to the Green Belt across the area of the plan as a whole area.*
Green Belt/grey belt	**Green Belt**/grey belt	Opposition to Borehamwood being categorised as the only 'large built-up area' in the Green Belt Assessment as this is contrary to aim of Government, the settlement hierarchy and the position established in two appeals that Radlett should be consider a 'large built-up area' due to its population size.	*The Hertsmere Green Belt Assessment is an independent study which follows the approach set out in the NPPF and the latest Planning Practice Guidance. There are no set definitions of large built-up area (LBUA) in the NPPF or Planning Policy Guidance, leaving the way open for different interpretations.* *It should be noted that some Green Belt Assessments are using a population threshold of 75,000 (Radlett's population is around 10,000) and some planners contend that London is the only LBUA in the Metropolitan Green Belt. The Hertsmere GBA uses a more considered approach based on the existing settlement hierarchy, making the judgement that only the tier 1 settlement should be a LBUA. This approach was accepted by the neighbouring authorities.*
Green Belt/grey belt	**Green Belt**/grey belt	Opposition to the approach to defining 'large built-up area' in the Green Belt Assessment and view that Potters Bar, Radlett and Bushey should also be defined as a 'large built-up area'.	*The Hertsmere Green Belt Assessment is an independent study which follows the approach set out in the NPPF and the latest Planning Practice Guidance. There are no set definitions of large built-up area (LBUA) in the NPPF or Planning Policy Guidance, leaving the way open for different interpretations.* *It should be noted that some Green Belt Assessments are using a population threshold of 75,000 (Radlett's population is around 10,000) and some planners contend that London is the only LBUA in the Metropolitan Green Belt. The Hertsmere GBA uses a more considered approach based on the existing settlement hierarchy, making the judgement that only the tier 1 settlement should be a LBUA. This approach was accepted by the neighbouring authorities.*
Green Belt/grey belt	**Green Belt**/grey belt	Concern that all sites adjoining or close to the built-up areas of Potters Bar, Bushey and Radlett, as well as Borehamwood, have not been assessed against purpose a) of the Green Belt purposes.	*There are no set definitions of large built-up area (LBUA) in the NPPF or Planning Policy Guidance. The existing settlement hierarchy has been used to define which settlements are LBUAs. Paragraph 2.4.7 specifies that purpose A has been applied to Borehamwood, Watford and Greater London, the other settlements are towns or villages.*
Green Belt/grey belt	**Green Belt**/grey belt	Concern that the narrow definition of 'near to' in the Green Belt Assessment has undermined the assessment of the contribution that land parcels make to purpose a)	*The Hertsmere Green Belt Assessment is an independent study which follows the approach set out in the NPPF and the latest Planning Practice Guidance. There are no set definitions of 'near to' in the NPPF or Planning Policy Guidance, leaving the way open for different interpretations.* *The definition that has been applied in the Green Belt Assessment is outlined in paragraph 2.4.6 of the report and the Council consider this definition consistent with other Green Belt Assessments. This approach has been accepted by the neighbouring authorities.*

Theme	Sub-Theme / Issue	Summary	*Response*
Green Belt/grey belt	**Green Belt**/grey belt	Concern that the acceptance of the conclusions of neighbouring plan areas Green Belt Assessments has significantly impacted the conclusions of the Hertsmere Green Belt Assessment, as neighbouring assessments were conducted before December 2024 and therefore cannot have been derived from an analysis that took in the new concept of Grey belt and/or the new Government approach to Green Belt	*The Hertsmere GBA has been undertaken using the up-to-date policy and guidance.*
Green Belt/grey belt	**Green Belt**/grey belt	Opposition to the conclusion of the Green Belt Assessment in asserting that the land north of Bushey Heath and Bushey is not contributing strongly to purpose a)	*The Green Belt Assessment uses the illustrative features in the PPG to assess all purposes and applies these to the relevant settlements.*
Green Belt/grey belt	**Green Belt**/grey belt	Concern over the conclusion of the Green Belt Assessment regarding the contribution that land around Radlett makes to purpose b) and that most of the land to the south and west of Radlett would also meet this purpose strongly in preventing coalescence between Radlett and Bushey/Bushey Heath and North Bushey.	*The Green Belt Assessment uses the illustrative features in the PPG to assess all purposes. For purpose B south and west of Radlett, it has been judged that there would be no loss of visual separation between towns for the settlements in question.*
Green Belt/grey belt	**Green Belt**/grey belt	Opposition to the approach in the Green Belt Assessment to assessing the contribution to purpose b) as this is too narrow and contrary to national policy and guidance as it relegates ideas of visual separation and perceived separation to secondary considerations.	*The Council agrees that the existence of villages between towns is a consideration for purpose B, although there is no dispute that the merging of towns and villages in their own right is not a consideration for purpose B. The Council also agrees that perceived separation is a consideration in purpose B. Both considerations have been taken into account within the purpose B assessment, and this is outlined in the methodology contained within section 2.5 of the Green Belt Assessment.*
Green Belt/grey belt	**Green Belt**/grey belt	Opposition to the conclusions of the Green Belt Assessment shown in Figure 3.5 in terms of the land shown as grey belt to the north west, north and east of Radlett.	*This land is assessed as grey belt according to the application of the Government's definition.*
Green Belt/grey belt	**Green Belt**/grey belt	Opposition to the definition of 'provisional grey belt' and the description of land shown on Figure 3.3 as 'Potentially provides a strong reason for refusing or restricting development with possibility of mitigation'	*The term provisional grey belt is used when an NPPF footnote 7 constraint is present or adjacent, but where it is impossible to judge whether that would provide a strong reason for refusing or restricting development in advance of their being a development proposal to judge against.*
Green Belt/grey belt	**Green Belt**/grey belt	Support for Green Belt assessment methodology / conclusions	*The Council welcomes support for the Hertsmere Green Belt assessment.*
Green Belt/grey belt	**Green Belt**/grey belt	Support for Green Belt release in this area	*The Council welcomes support for its approach. The Council acknowledges that, given the extent of Green Belt designation in Hertsmere and the development needs, particularly housing need, to be met, some Green Belt release is necessary to deliver sustainable development. The Plan follows the approach set out in the NPPF, prioritising brownfield land and optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated.*

Theme	Sub-Theme / Issue	Summary	*Response*
Green Belt/grey belt	**Green Belt**/grey belt	General concern that more sites are proposed in the Green Belt than on brownfield.	*The Plan seeks to minimise Green Belt loss through prioritising brownfield land, optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated. However, given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is necessary. The amount of brownfield land which has been put forward for development, and which is deemed to be available, suitable and achievable for development is insufficient to meet identified need for housing and employment land, even if densities are optimised. Therefore, Green Belt land has been proposed to be released to meet remaining need, where possible in line with the approach as set out in the NPPF and Planning Practice Guidance.*
Green Belt/grey belt	**Green Belt**/grey belt	General concern about the release of Green Belt.	*The Council's spatial strategy seeks to minimise Green Belt loss through prioritising brownfield land, optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated. However, given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is necessary. The Plan follows the approach set out in NPPF Chapter 13 on protecting Green Belt land.*
Green Belt/grey belt	**Green Belt**/grey belt	Recommendation for the methodology of the Green Belt Assessment to take into consideration the methodology of neighbouring authorities' assessments, to avoid inconsistencies where land parcels relate closely to neighbouring Green Belts.	*It was necessary for the Hertsmere Green Belt Assessment to consider small amounts of land outside Hertsmere's boundary as assessment areas need to be drawn to the next physical boundary. This is not attempting to define Enfield's position on Green Belt /grey belt and there is no suggestion that London Borough of Enfield Council should use Hertsmere's evidence base for their own Local Plan. Hertsmere Borough Council will continue to seek discussions on potential sites near to the shared boundary as a part of maintaining effective cooperation on both authorities' Local Plans.*
Green Belt/grey belt	**Green Belt**/grey belt	Concern about the release of Green Belt for the development of large-scale solar and energy infrastructure.	*The draft Local Plan does not propose the release of Green Belt land for the development of large scale solar and energy infrastructure. The release of Green Belt land for this type of development would be for the determination of a planning application, which would be determined in accordance with the development plan. The draft Local Plan will set the framework for the determination planning applications for energy infrastructure in Policy SD6: Energy Infrastructure.*
Green Belt/grey belt	**Green Belt**/grey belt	Concern over the way that the GBA conclusions have been applied to site selection.	*A stage 2 Green Belt Assessment has been undertaken to contribute towards the site selection process. Green Belt considerations have been weighed against other constraints and opportunities when considering a site for allocation in the draft Local Plan.*
Green Belt/grey belt	**Green Belt**/grey belt	Recommendation for an exemption to Policy H10 for sites that constitute previously developed land and/or grey belt as defined by the NPPF; benefit from an extant planning consent; are on the Brownfield Land Register; and/or are allocated in the development plan	*The Council acknowledges that there will be some exemptions to requirements of H10, however this purpose of the policy is to allow small scale housing development that contribute towards meeting the Borough's local housing needs. National policy exemptions such as land identified as grey belt through the determination process (which constitutes previously developed land and land with extant planning permission) will still apply for applications made to develop sites in the Green Belt.*
Green Belt/grey belt	**Green Belt**/grey belt	Site should be classified as full grey belt rather than provisional	*Provisional grey belt is where there is a footnote 7 constraint present or adjacent that could possibly be addressed in the design process, to be judged when proposals are submitted.*

Theme	Sub-Theme / Issue	Summary	*Response*
Green Belt/grey belt	**Green Belt**/grey belt	Suggestion that green belt land should be maintained and cannot qualify as grey belt	*The Draft Local Plan has undertaken a comprehensive Green Belt Assessment to evaluate the contribution that different Green Belt parcels make to the five Green Belt purposes, to identify areas of land that make weaker contributions and may be suitable for release to meet development needs where exceptional circumstances exist, and to inform decisions on whether any Green Belt land meets the emerging definition of grey belt and could be prioritised for development in accordance with the NPPF . The Council will review the evidence base including the Green Belt Assessment to ensure that any proposed Green Belt releases are fully justified by exceptional circumstances, make the weakest contribution to Green Belt purposes, represent the most sustainable options for meeting development needs, and minimise harm to the overall extent and integrity of the Green Belt. The Council will ensure that the Regulation 19 Publication version of the Local Plan demonstrates a robust and justified approach to Green Belt that protects land serving important Green Belt functions whilst making necessary provision for development needs where exceptional circumstances exist and in accordance with national policy.*
Green Belt/grey belt	**Green Belt**/grey belt	Concern that designation of grey belt land is not consistent with national policy and should not be allowed	*The Draft Local Plan has undertaken a comprehensive Green Belt Assessment to evaluate the contribution that different Green Belt parcels make to the five Green Belt purposes, to identify areas of land that make weaker contributions and may be suitable for release to meet development needs where exceptional circumstances exist, and to inform decisions on whether any Green Belt land meets the emerging definition of grey belt and could be prioritised for development in accordance with the NPPF . The Council will review the evidence base including the Green Belt Assessment to ensure that any proposed Green Belt releases are fully justified by exceptional circumstances, make the weakest contribution to Green Belt purposes, represent the most sustainable options for meeting development needs, and minimise harm to the overall extent and integrity of the Green Belt. The Council will ensure that the Regulation 19 Publication version of the Local Plan demonstrates a robust and justified approach to Green Belt that protects land serving important Green Belt functions whilst making necessary provision for development needs where exceptional circumstances exist and in accordance with national policy.*
Green Belt/grey belt	**Green Belt**/grey belt	Support for alternative means to meet housing need following examination of available brownfield sites to prevent loss of green belt land	*The Council recognises that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs. The Council has undertaken a comprehensive Housing and Economic Land Availability Assessment (HELAA) to identify all available, suitable, and achievable sites including brownfield land, underutilised urban sites, and sites within existing settlements, has prioritised the allocation of such sites to meet housing need, has explored opportunities to increase housing density, optimise site capacity, support residential conversions and changes of use, and promote urban regeneration, and has only considered Green Belt release where exceptional circumstances exist due to the inability of brownfield and urban sites alone to meet the objectively assessed housing need calculated using the Government's standard method.*

Theme	Sub-Theme / Issue	Summary	*Response*
Green Belt/grey belt	**Green Belt**/grey belt	Preference for building on 'grey belt' land rather than open countryside / farmed land	*Local Plan policies and allocations are based on national policy and guidance on green belt and grey belt and support building on green belt land only under specific conditions. The Green Belt Assessment supporting the Local Plan seeks to identify grey built and assess the appropriateness of development on it. Where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. Appropriateness for development will be considered in the round against other evidence. For green belt land not considered as grey belt, national protection of green belt land remains.*
Heritage	Conservation Areas	Concern over the impact of development on conservation areas and their setting	*The Council recognises that conservation areas are designated heritage assets of special architectural or historic interest, and that development must conserve and enhance the significance of conservation areas and their settings, avoid harm to heritage significance, and ensure that proposals are sympathetic to local character, scale, materials, and townscape quality, in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Policies HE1 (Hertsmere's Historic Environment), HE2 (Designated Heritage Assets) and HE3 (Non-Designated Heritage Assets) require development to conserve and where possible enhance the significance of heritage assets including conservation areas and their settings, be informed by Heritage Impact Assessments where appropriate, respect the character, appearance, scale, massing, materials, and details of the conservation area, preserve or enhance key views, streetscape, and landscape setting, and avoid harm to heritage significance unless clear and convincing justification is provided and public benefits outweigh the harm. The Council is committed to ensuring that all development proposals affecting conservation areas or their settings are subject to careful assessment in consultation with the Council's Conservation Officer and Historic England where appropriate, that site allocations and policies appropriately address heritage impacts, and that high-quality, heritage-sensitive design is secured to preserve and enhance the special character and appearance of Hertsmere's conservation areas.*
Heritage	Heritage Impact Assessments	Recommendation that HIAs for proposed allocations should be completed for Regulation 19 to inform site assessment, selection and site capacity testing, to provide justification for proposed allocations, and to identify any site-specific criteria required for allocation policies	*The Draft Local Plan candidate site policies identify where Heritage Impact Assessments or archaeological assessments will be required at the planning application stage and include site-specific requirements to conserve and enhance heritage assets and their settings. The Council will engage with Historic England, the Council's Conservation Officer, and other heritage stakeholders to determine which allocations would benefit from Heritage Impact Assessments prior to Regulation 19, ensure that the evidence base robustly justifies the proposed allocations, and incorporate appropriate heritage protection and enhancement requirements into site allocation policies to safeguard Hertsmere's heritage assets.*
Heritage	Heritage Impact Assessments	Site requires a Heritage Impact Assessment (HIA) to assess the potential effects of development on the significance of heritage assets and to inform appropriate mitigation through the design and layout of the site. Any necessary mitigation and enhancement measures identified should be secured through the site-specific policy wording.	The Council will screen for potential heritage impacts on site allocations, carrying out HIA on all sites where potential impacts are identified. HIA will inform allocation policies on mitigation requirements.

Theme	Sub-Theme / Issue	Summary	*Response*
Heritage	Listed buildings	Concern over the impact of development on listed buildings and their setting	*The Plan seeks to minimise the impact of development on listed buildings and their setting. Planning policies within the Local Plan will conserve and enhance Hertsmere's historic environment and ensure that proposals for development that affects a heritage asset or its setting will be supported by a proportionate Heritage Statement and proposals will be assessed in accordance with legislation, national policy and the development plan, having regard to the significance of the asset and the scale of any harm or lose. Substantial harm to, or total loss of significance of, a designated heritage asset will not be supported unless the harm or loss is necessary to achieve substantial public benefits that outweigh it, or the relevant tests in national policy are met.*
Heritage	Other heritage assets	Concern over the impact of development on heritage assets other than listed buildings and conservation areas	*The Plan seeks to minimise the impact of development on non-designated heritage assets and their setting. The Council will support the identification of additional non-designated heritage assets through local listing, neighbourhood planning, conservation area appraisal, development management and other evidence-based processes. Where a proposal would directly or indirectly harm or result in the loss of significance of a non-designated heritage asset, a balanced judgement will be made having regard to the scale of harm or loss, the significance of the asset and the public benefits of the proposal.*
Heritage	Other heritage assets	Recommendation that the village of Elstree is protected to prevent harming the historic character.	*The Draft Local Plan includes proposed policies on the historic environment Policies HE1 (Hertsmere's Historic Environment), HE2 (Designated Heritage Assets) and HE3 (Non-Designated Heritage Assets) require development to sustain and enhance the significance of heritage assets and their settings and preserve and enhance the character and appearance of conservation areas including Elstree Conservation Area. Site allocations within or adjacent to Elstree will be required to demonstrate through Heritage Impact Assessments and conservation area appraisals that development would preserve or enhance the special character, appearance, and historic significance of the village. The Council will ensure that the Regulation 19 Publication version of the Local Plan includes policies and site allocation requirements that provide strong protection for Elstree's historic character, conservation area, listed buildings, locally listed buildings, archaeological heritage, and distinctive village identity, ensuring that development in and around Elstree is sensitively designed and appropriately scaled to conserve and enhance the village's special heritage significance and character.*
Housing	Housing need	Concern over lack of clarity over housing targets, housing requirements and housing need	*The Plan will seek to clarify the definition of housing targets, housing requirement and housing need. The housing requirement is the number of homes to be delivered each year by the Local Plan, and the housing need is the minimum number of homes needed in an area and is calculated using the Standard Method. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations in line with the Planning Practice Guidance.*

Theme	Sub-Theme / Issue	Summary	*Response*
Housing	Housing need	Concern that affordable housing is not affordable in reality.	The Council is aware that it is still the case that not everyone is able to access affordable housing that is affordable and within their means. The Plan will define what is meant by genuinely affordable housing in the Hertsmere context, and how it will be the focus for delivery. In the Hertsmere context, "genuinely affordable housing" means housing that is available at social rent levels. All other housing products below market levels, whether for sale or rent, are defined as intermediate housing and should not be conflated with genuinely affordable housing.
Housing	General opinion / view	Concern that Hertsmere cannot accommodate more housing.	The Council recognises that it has a statutory duty under the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework to plan positively to meet objectively assessed housing needs. The Draft Local Plan housing requirement is based on the standard method calculation which takes account of projected household growth and affordability pressures. The Council has undertaken a comprehensive Housing and Economic Land Availability Assessment (HELAA) to identify all available, suitable, and achievable sites, explored opportunities to maximise housing delivery on brownfield land, underutilised urban sites, sites within existing settlements, and through increased densities and optimisation of site capacity. Hertsmere, will ensure that allocated sites are supported by adequate infrastructure, services, and environmental mitigation to accommodate growth sustainably, and will ensure that the Regulation 19 Publication version of the Local Plan is supported by robust evidence demonstrating that the housing requirement is based on the appropriate methodology, that the spatial strategy and site allocations represent the most sustainable and appropriate approach to meeting housing needs having considered reasonable alternatives, and that development can be delivered in a manner that is consistent with environmental, heritage, infrastructure, and community objectives and contributes to creating sustainable, inclusive, and well-designed communities across Hertsmere.
Housing	General opinion / view	Support for the housing policies within the Plan	The Council welcomes support for the housing policies within the draft Local Plan.
Housing	Housing need	Objection to acceptance of payment in lieu instead of onsite delivery of affordable housing	The Plan will emphasise on on-site delivery of affordable housing on major sites, unless exceptional circumstances are demonstrated. The alternative, of offering a cascade approach would only be used where it is not possible to deliver on-site affordable housing, prioritising off-site delivery on an alternative site, or a final option for a payment in lieu of exceptional circumstances only.
Housing	Housing need	Agreement that the standard method is the starting point for calculating housing need	*The Standard Method is the starting point for calculating the Council's housing requirement as required by NPPF and Planning Practice Guidance. The Council has used the Standard Method to calculate its housing need and this is set out in the Hertsmere LHNA Update 2025.*

Theme	Sub-Theme / Issue	Summary	*Response*
Housing	Housing need	Concern on / opposition to the results of government's standard method for determining housing need	*The Government's Standard method is the first step in calculating the housing requirement for the Plan. The Council has set out how the housing need for the Hertsmere Local Plan has been calculated in the Hertsmere LHNA Update (2025). The housing requirement for the Plan will be set out in Chapter 3 of the draft Local Plan. The housing requirement has been calculated to ensure that the Local Plan seeks to meet all of the Borough's local housing needs, in line with the requirements of the National Planning Policy Framework.*
Housing	Housing need	Support for a higher housing target / requirements to meet OAN in full	*The Council welcomes support for higher housing targets that meet the Borough's Objectively Assessed Need (OAN) in full.*
Housing	Housing need	Support for delivery of affordable housing to meet need	*The Council welcomes support for the delivery of affordable housing to meet local needs.*
Housing	Housing need	Concern regarding developers claiming that their scheme is not sufficiently financially viable and thus cannot deliver agreed percentage of affordable housing after consent has been granted, seeking penalties for developers or Compulsory Purchase of sites in such circumstances.	The Plan will reflect development viability through its Whole Plan Viability Assessment, identifying what percentage of affordable provision can be supported without endangering delivery of new homes. In line with the NPPF, where our policies have set out the contributions expected from development, planning applications that comply with them will be assumed to be viable and it will be up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Where a developer seeks to alter affordable housing commitments after planning permission is granted, this will have to happen through a viability review, in line with national policy and guidance. Penalties are not part of this nationally agreed process, as it is important to ensure sites remain deliverable if circumstances change. In line with the NPPF and the Planning and Compulsory Purchase Act, HBC as a local authority can use compulsory purchase powers, where appropriate and where this can help to bring more land forward for meeting development needs and/or secure better development outcomes but needs to be mindful of the financial implications.
Housing	Housing need	Local housing needs of specific groups to be explored in housing need evidence should include consideration of housing need of local key workers (e.g. NHS staff)	*The South West Hertfordshire Local Housing Needs Assessment 2024 assesses the needs of essential works (as defined in Annex 2 of the NPPF) which identifies that 17.7% of Hertsmere's residents are essential workers. It identifies that on the basis of incomes essential local workers could be a potential target for affordable home ownership products. The affordable housing policy within the draft Local Plan will set out a requirement to for the split of affordable housing between social tent, affordable rent and affordable home ownership. This will seek to meet the needs of essential works (including NHS staff) across Hertsmere.*

Theme	Sub-Theme / Issue	Summary	*Response*
Housing	Housing need	Concern over affordable housing requirements affecting viability	*The affordable housing requirements recommended in the Hertsmere LHNA Update 2025 are subject to viability testing by the Whole Plan Viability Assessment, which identifies what percentage of affordable housing provision on new development sites can be supporting without impacting the viability of housing developments.*
Housing	Housing need	Affordable housing requirement is not justified when compared with the evidence in the LHNA and should be higher	*The affordable housing requirement in the draft Local Plan has been determined through consideration of affordable housing need within Hertsmere, which is set out in the Hertsmere LHNA Update 2025, and the results of the Whole Plan Viability Assessment 2026.*
Housing	Housing need	Recommendation that, in accordance with the NPPF, identifying and addressing the health requirements of existing and new development should be based on identified needs in the joint strategic needs assessment and support delivery of relevant health strategies, such as the health and wellbeing board's joint local health and wellbeing strategy and the integrated care board's infrastructure plan.	*HCC is responsible for public health functions and are currently identifying a new suite of Joint Strategic Needs Assessments for Hertfordshire. The Infrastructure Delivery Plan supporting the Local Plan has been informed by ongoing engagement with HCC and the Integrated Care Board and will identify health infrastructure requirements based on the JSNA, Joint Local Health and Wellbeing Strategy and the ICB's infrastructure plan.*
Housing	Housing need	Concern over the cost / affordability of housing	*The SW Herts LHNA 2024 assesses affordability, with the AECOM LHNA Update 2025 providing more detail on the affordability of affordable rented tenures and the cost of housing to rent and purchase in the sub areas*
Housing	Housing need	Support for delivery of family housing to meet need	*The Council welcomes support for the delivery of family housing to meet needs. The SW Herts LHNA 2024 models the mix of housing for Hertsmere over the plan period. This supports the delivery of family-sized housing, with 96% of market housing recommended as 2+ bedroom, 82% of affordable home ownership properties as 2+ bedroom, and 77% of general needs affordable rented housing.*
Housing	Housing need	Support for delivery of downsizer / rightsizer housing to meet need	*The Council welcomes support for the delivery of downsizer/rightsizer housing.*
Housing	Housing need	Support for Traveller accommodation to meet need	*The Council welcomes support for the delivery of gypsy and traveller accommodation to meet the identified needs of the traveller community. The identified need for gypsy and travellers is outlined in the Hertsmere Gypsy and Traveller Accommodation Assessment (GTAA) 2026. Which Identified a need for 132 gypsies and traveller pitches across the plan period.*

Theme	Sub-Theme / Issue	Summary	*Response*
Housing	Housing need	Recommendation for supporting text of Policy H1 to state that the standard method is the starting point for calculating the Council's housing need, to ensure that the Local Plan is positively prepared and capable of meeting identified needs in full, and to indicate how this will be achieved.	*The Government's Standard method is the first step in calculating the housing requirement for the Plan. The Council has set out how the housing need for the Hertsmere Local Plan has been calculated in the Hertsmere LHNA Update (2025). The housing requirement for the Plan will be set out in Chapter 3 of the draft Local Plan. The housing requirement has been calculated to ensure that the Local Plan seeks to meet all of the Borough's local housing needs, in line with the requirements of the National Planning Policy Framework.*
Housing	Housing need	Concern on / opposition to provision of Traveller accommodation	*The Council has a statutory duty under the Housing Act 1985 to meet the accommodation needs of gypsies and travellers in their area and must maintain a delivery supply of sites for pitches. The Council will set out in the draft Local Plan how they intend to meet the needs of gypsies and travellers identified in the GTAA 2026.*
Housing	Housing need	Concern on / opposition to the provision of affordable / social housing	*The Council has a statutory duty to meet the needs of local area, and this includes the need for affordable homes and social housing. The Plan proposes to deliver a 80% social rent and 20% affordable home ownership split of affordable housing to meet the needs identified in the LHNA Update 2025.*
Housing	Housing need	Concern on / opposition to the provision of Houses in Multiple Occupation (HMOs)	*Households eligible only for the 'shared accommodation' rate of Local Housing Allowance (generally single person households aged under 35) are likely to have limited options in the rental market, with Houses in Multiple Occupation (HMOs) an important option for often younger, single, low income households.* *As of December 2025, the HMO Register for Hertsmere recorded 174 licensed HMOs, with over half of these (57.5%, or 100 properties) located in Potters Bar. A further 55 (31.6%) were located in Borehamwood, with 12 (6.9%) in Bushey, 4 (2.3%). This kind of geographical spread is not unusual due to access to services and generally larger private rented sectors in larger settlements. This relates only to licensed HMOs with 5 or more bedrooms. There is likely to be a further, often larger, stock of smaller non-licensed HMOs, which it is not within the scope of this study to explore the scale of. The Council may wish to explore this further if it is a key concern, including the scale, geographical concentration, impacts, and potential management options.* *Numerous market segments might be expected to live in HMOs, including university students, young professionals (often with pre-existing relationships), independent working individuals (contracted separately with the landlord), benefit-funded individuals, vulnerable people using HMOs as a transitional arrangement or placement, and asylum seekers living in HMOs on a temporary or long-term basis. As* *there is no university in Hertsmere it is likely that students are a limited group using HMOs in the borough, with the other client groups likely all represented within the occupancy mix.*

Theme	Sub-Theme / Issue	Summary	*Response*
Housing	Housing need	Concern that new housing should be for existing residents of the Borough and not be provided to accommodate overspill / immigration from elsewhere	HBC's Local Plan, in line with national policy and guidance, has to plan to meet its housing requirement. A local authority's housing requirement is based on identified housing land supply and the standard method housing need, which in turn is founded on a baseline of local housing stock and affordability of housing. Housing affordability is taken into account to ensure homes are built where people want to live. People may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford. People who are allowed to reside in the UK are free to rent or buy a home where they choose. As household numbers naturally grow through demographic change, and as more people wish to make their home in Hertsmere, this is reflected in local house prices and rents and thus affordability.
Housing	Housing need	Support for seeking to meet the needs of vulnerable residents	*The need for housing for vulnerable residents is outlined in the South West Hertfordshire Local Housing Needs Assessment 2024 and policies within the draft Local Plan will seek to meet this need through the provision of accommodation for older people and supported and specialised accommodation.*
Housing	Housing need	Concern over underoccupied / empty / second homes	*The Council acknowledges the concerns about empty and second homes, based on the 2021 Census as an estimate, there were 2,243 empty dwellings in Hertsmere. This equates to 5.0% of the housing stock at the time, as compared to the rate across Hertfordshire (4.2%), and 6.0% nationally. The Council does not consider this issue to be a matter than needs to be addressed by this Local Plan but if the percentage of second/empty homes was to increase across the plan period then this would be an issue for the next Local Plan.*
Housing	Housing need	Council should consider increasing housing requirement to help deliver unmet need arising from neighbouring authorities	*Through duty to cooperate discussions, the Council has not been made aware of any unmet needs arising for neighbouring authorities. The Council understands that neighbouring authorities are seeking to meet their local housing needs through their respective local plans.*
Housing	Housing need	Concern on / opposition to HBC's approach to setting a housing requirement	HBC's Local Plan, in line with national policy and guidance, has to plan to meet its housing requirement, to be found legally ‘sound’ at examination. The requirement is based on identified housing land supply, associated constraints, and the standard method housing need, which in turn is founded on a baseline of local housing stock and affordability of housing. Housing stock provides a stable and predictable baseline that ensures all areas, as a minimum, are contributing a share to meet the national total need for housing, proportionate to the size of their current housing market. Consideration of affordability is included to ensure homes are built where people wish to live and are able to find work.
Housing	Housing need	Support for a higher housing requirement to provide a larger supply buffer as contingency to ensure that need is met	*The housing requirement for the Local Plan includes a 20% buffer as required by paragraph 73(b) of the NPPF, due to the results of the Housing Delivery Test. This national policy mechanism has been applied to ensure that sufficient housing is delivered in the first 5 years of the plan period to meet local housing needs.*
Housing	Housing need	Further clarity requested on the definition of 'genuinely affordable housing'.	Policy at Regulation 19 defines what is meant by genuinely affordable housing in the Hertsmere context, and how it will be the focus for delivery.

Theme	Sub-Theme / Issue	Summary	*Response*
Housing	Housing need	Concern that the Plan does not provide sufficient evidence that HBC has explored all reasonable options for meeting housing need within the Borough	*The Interim Sustainability Appraisal (2026) defines the growth scenarios and tests different spatial options for delivering housing growth across the Borough. The results of the assessment have been considered in conjunction with the result of the Green Belt Assessment (2026) and Settlement Hierarchy and Services Paper (2026) to determine the most appropriate spatial strategy for the draft Local Plan.*
Housing	Housing supply	Opposition to the approach taken to small housing sites in the Plan, seeming to trade a higher quantum/density of housing over design quality and sustainability.	*The Council will maximise the opportunities for housing from small urban sites in line with the Spatial Strategy and to ensure a mix of development sites in its housing supply. Design and sustainability policies within the Plan will ensure that high quality and sustainability is maximised and that housing delivery does not compromise design quality. Appropriate densities will be secured in line with the requirements of the NPPF to ensure the effective use of land.*
Housing	Housing supply	Recommendation for mechanism to be put in place for additional sites to be supported if housing delivery position in the Borough changes in future, to ensure that housing need can be met, as long as sites are consistent with the plan's spatial vision and strategy.	*The Council does not deem it necessary to include such a mechanism in the Local Plan, as the Council is seeking to meet its annual housing requirement, as outlined in the housing trajectory and to maintain a positive housing land support position for the duration of the plan period, in line with national policy, guidance and legislation.*
Housing	Housing supply	Recommendation that Policy H2 is amended to provide flexibility to allow windfall and grey belt sites to come forward where they can demonstrably satisfy national policy and the contributions they make to the identified housing land supply. It is essential that the Council deliver a spatial strategy with sufficient flexibility to ensure that this policy is implemented effectively.	*The Council deems its existing spatial strategy to be sufficiently flexible and comprehensive to meet identified needs. Furthermore, additional provisions already exist within the National Planning Policy Framework to approve development proposals that accord with both an up to date development plan and the decision-making policies in the Framework, in line with the presumption in favour of sustainable development.*
Housing	Housing supply	Concerns around how realistic the indicated delivery trajectory of proposed housing development is	*The Plan's housing trajectory has been prepared using information on delivery provided by promoters and land owners for candidate sites. To provide certainty over the housing trajectory the Council will undertake further engagement which landowners, site promoters and developers during the Regulation 19 publication period to provide a robust evidence base for housing supply across the plan period.*
Housing	Housing supply	Concern around past Council performance in delivering housing creating need for higher current housing requirement	*The Council's delivery of housing over the past 3 years has contributed to the calculation of the housing requirement for the Plan. The results of the Housing Delivery Test have resulted in a 20% buffer being added to the first 3 years of the plan to ensure that sufficient housing is delivered to meet local housing needs. The Council is seeking a stepped housing trajectory in the first 5 years of the plan period to ensure that housing delivery can be scaled up during this period.*
Housing	Housing supply	Support for strengthening the housing trajectory with an additional supply of small sites to ensure flexibility	*The Council is seeking to meet the requirements of paragraph 73 of the NPPF for 10% of the Plan's housing requirement to be delivered on sites no larger than one hectare. The Council is proposing a regeneration focused Spatial Strategy to ensure a sufficient supply of deliverable sites across the plan period.*

Theme	Sub-Theme / Issue	Summary	*Response*
Housing	Housing supply	Concerns around the general sustainability of proposed housing development	*The Regulation 19 Local Plan will propose design requirements for new housing development to require a high-quality standard to meet the diverse needs of Hertsmere's residents. Sustainability policies will set sustainability requirements to respond to the climate and ecological emergency, reduce water and energy consumption and promote sustainable construction practices.*
Housing	Housing supply	Concern for Council's housing land supply position	*The draft Local Plan seeks to improve the Council's housing land supply position from the point of adoption to avoid speculative development across Hertsmere. The Council is seeking a stepped housing trajectory in the first 5 years of the plan period to ensure that housing delivery can be scaled up during this period and the Housing Delivery Test results can be improved, which will contribute to a better housing land supply position for the Borough.*
Housing	Housing supply	Concern for/opposition to the approach within the housing policies of the Plan	*The draft Local Plan provides a positive framework for the delivery of much needed housing across Hertsmere while protecting the historic and natural environment. The Council is seeking to deliver a range of development sites across the Borough to meet local housing needs as well as securing a high quality of design from new housing developments. The housing policies within the Local Plan aim to deliver a range of housing types to meet the needs of all the Borough's residents, including the needs of older people, supported and specialist accommodation, gypsy and travellers, self and custom-build housing and affordable homes.*
Housing	Housing supply	The inclusion of windfall sites in the plan provides an opportunity to reduce sites in and around main settlements.	*The draft Local Plan allocates a sufficient number of new housing sites to meet local housing needs. While the Council recognises that housing can be delivered through windfall development, historically windfall development has contributed a very modest amount towards housing delivery. The Council is therefore not seeking to rely on windfall sites to meet its housing requirement.*
Housing	Housing supply	General concern that the housing numbers proposed at Bowmans Cross have been under-estimated and that this will cause the loss of Radlett's Green Belt to deliver homes to meet need.	*The Council is seeking to determine an appropriate number of homes to be delivered at Bowmans Cross through engagement with the land promoter, statutory bodies and Council officers in line with the draft Local Plan's Spatial Strategy. The Regulation 19 draft Local Plan will identify the number of homes to be delivered at Bowmans Cross within the plan period, however the delivery of the new settlement will extend beyond the plan period and the delivery of later phases of the development will be a consideration for the next Local Plan.*
Housing	Housing supply	Recommendation for Hertsmere to reduce the housing requirement to around 11,260 across the borough, and to 4,755 in Borehamwood.	*The Council have developed the draft Local Plan 'housing requirement and Spatial Strategy taking into consideration a range of technical evidence and considers the housing requirement, the distribution of housing and the Spatial Strategy to be effective, justified and consistent with national policy. The proposed number of homes at Borehamwood is consistent with the Spatial Strategy and settlement hierarchy and has been informed by the Settlement Hierarchy and Services Paper (2026).*
Housing	Housing supply	Supportive of the delivery of self and custom build homes	*The Council welcomes support for the delivery of self and custom-build housing.*

Theme	Sub-Theme / Issue	Summary	*Response*
Housing	Housing supply	Recommendation that Regulation 19 Plan should include similar text to 2021 Regulation 18 consultation in relation to nomination rights for SADC and to acknowledge that the proportion of nomination rights for SADC agreed in due course will be significant.	*Nominations rights for affordable housing are primarily treated as part of the local authority's Housing Strategy, rather than a matter governed directly by the Local Plan. Councils seeking to nominate tenants to affordable housing in another local authority area follow established procedures grounded in statutory guidance, local allocation schemes, and formal agreements with Registered Providers (RPs). Cross-borough nominations are often formalised through policies or London-wide frameworks (e.g., London Affordable Housing Nominations Policy) and should be in line with the Hertsmere Housing Allocations Policy (2025).*
Housing	Housing supply	Concern that if the Council does not allocate sufficient deliverable sites to meet the housing requirement in the early part of the plan period there is a risk that the housing delivery test will be failed and the presumption in favour of sustainable development (para 11d) will still be engaged.	*The draft Local Plan seeks to improve the Council's housing land supply position from the point of adoption to avoid speculative development across Hertsmere. The Council is seeking a stepped housing trajectory in the first 5 years of the plan period to ensure that housing delivery can be scaled up during this period and the Housing Delivery Test results can be improved, which will contribute to a better housing land supply position for the Borough.*
Housing	Housing supply	Concern over how the Council have calculated their housing land supply and housing trajectory to meet the housing requirement stated in the Plan.	*The Plan's housing trajectory has been prepared using information on delivery provided by promoters and land owners for candidate sites. To provide certainty over the housing trajectory the Council will undertake further engagement which landowners, site promoters and developers during the Regulation 19 consultation to provide a robust evidence base for housing supply across the plan period.*
Housing	Housing supply	Recommendation for Policy H4 to allow viability to be considered in specific circumstances, so that the policy remains effective and development can still come forward, and to allow for a cascade mechanism to be included in any S106 agreement.	*The National Planning Policy Framework sufficiently outlines provisions as regards scheme specific viability assessments.*
Housing	Housing supply	Objection to policy H10 on basis that the additional Green Belt policy is not necessary or justified and risks duplicating national policy requirements. This is inconsistent with the Government's intention to streamline local plans and avoid unnecessary repetition of national policy.	*The Council will take this recommendation into account, alongside the new National Planning Policy Framework published in its final version after the conclusion of this Regulation 18 consultation, alongside consideration of other policies within the Plan for which the national policy and / or legislative context may have recently changed.*
Housing	Housing need	Support for higher housing capacity on specific site.	*The Council welcomes support for higher housing capacities on specific sites. The Local Plan will allocate sites for housing development to help support meeting the Borough's housing needs, with capacities based on comprehensive site assessments, including consideration of site constraints and achievable densities informed by local character, design principles, sustainable development objectives, and viability considerations. The Council will consider evidence submitted for specific sites at Regulation 18 to assess whether policy should be updated to indicate the potential for higher housing numbers, whilst still ensuring the delivery of sustainable, well-designed development that meets policy requirements.*

Theme	Sub-Theme / Issue	Summary	*Response*
Housing	Housing supply	Support for housing supply target method	*The Regulation 19 Local Plan housing requirement is based on the Government's standard method as set out in national planning guidance. The method uses existing housing stock as its baseline and applies an affordability adjustment. The Regulation 19 Local Plan sets a housing requirement of 975 dwellings per annum and identifies housing supply through the Housing and Employment Land Availability Assessment, site allocations and housing trajectory. Strategic cross-boundary matters continue to be addressed through ongoing cooperation with neighbouring authorities.*
Housing	Housing need	Neighbouring authority does not have capacity to assist HBC in meeting any shortfall identified	*The Council confirm that the Draft Local Plan spatial strategy has been developed on the basis that Hertsmere's housing needs will be met in full within the borough through sustainable development that balances meeting objectively assessed housing needs with appropriate protection for environmental assets including the Green Belt. The Council will continue to engage constructively with neighbouring authorities on cross-boundary strategic matters.*
Infrastructure (other than transport)	Delivery / Funding	Concerns that proposed developer contributions to support infrastructure investment are too high / would threaten viability	The Draft Local Plan has been subject to comprehensive viability testing through a Whole Plan Viability Assessment, which demonstrates that the policy requirements and infrastructure contributions can be delivered whilst maintaining development viability across the borough. This approach accords with the National Planning Policy Framework (NPPF) 2024. The infrastructure requirements identified in the Infrastructure Delivery Plan are necessary to ensure sustainable development and properly support new communities, with contributions directly related to the impacts of development and necessary to make proposals acceptable in planning terms. The Council recognises that site-specific circumstances may affect viability and will work constructively with applicants where genuine viability issues are demonstrated, whilst maintaining the expectation that policy requirements should be met wherever possible. The Council remains committed to monitoring plan implementation and will consider evidence through the plan review process if requirements are genuinely preventing viable development from coming forward.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Delivery / Funding	In accordance with PPG, viability assessments should make initial assumptions that applicable developments will provide both land and funding for the construction of new infrastructure.	The Draft Local Plan's approach fully reflects this principle, with the Whole Plan Viability Assessment testing development typologies on the basis that necessary infrastructure will be delivered through a combination of on-site provision and financial contributions secured via Section 106 planning obligations and the Community Infrastructure Levy. The policy framework, including site-specific allocations, will clearly set out infrastructure requirements expected from development, providing certainty for applicants whilst ensuring that growth is supported by the necessary physical, social, and green infrastructure identified in the Infrastructure Delivery Plan. The Council will continue to work proactively with developers and infrastructure providers to ensure that infrastructure delivery is appropriately phased and integrated with development delivery, creating sustainable communities across Hertsmere.
Infrastructure (other than transport)	Delivery / Funding	Recommendation that the Local Plan should include a specific section setting out the process to determine the appropriate form of developer contributions to health infrastructure.	The Draft Local Plan establishes the proposed overall framework for infrastructure delivery through proposed Policy DM2 (Infrastructure Funding and Planning Obligations) and SCI1, which sets out how development would be required to provide or contribute towards necessary infrastructure, including healthcare facilities, in accordance with the National Planning Policy Framework (NPPF) 2024. The Infrastructure Delivery Plan (IDP) supporting the Draft Local Plan has been prepared in collaboration with the Integrated Care Board and identifies healthcare infrastructure requirements arising from planned growth, including the need for expanded or new primary care facilities in specific locations. The process for determining the appropriate form and level of contributions to health infrastructure is guided by the IDP evidence and will be secured through Section 106 planning obligations on a site-specific basis. The Council will continue to work closely with the NHS and Integrated Care Board throughout the planning application process to ensure that health infrastructure requirements are properly assessed and that appropriate contributions are secured to meet the needs of growing communities.
Infrastructure (other than transport)	Delivery / Funding	Recommendation that the Council engage with the relevant Integrated Care Board (ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure.	The Council has worked collaboratively with the ICB during the preparation of the Draft Local Plan to identify healthcare capacity constraints and infrastructure requirements, and this engagement will continue throughout the plan-making process to ensure that the evidence base remains robust and up to date. The Council recognises the importance of providing clarity on the process for determining the appropriate form of developer contributions towards healthcare infrastructure, including the methodology for calculating impacts and the circumstances in which on-site provision, off-site improvements, or financial contributions would be appropriate. The Council will work with the ICB to review and strengthen the IDP where appropriate, to include more detailed information on healthcare infrastructure requirements and the approach to securing contributions through Section 106 planning obligations.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Delivery / Funding	Concerns that proposed developer contributions to support infrastructure investment are too low and would not be sufficient to deliver the infrastructure required to support proposed growth	The Draft Local Plan is supported by a comprehensive Infrastructure Delivery Plan (IDP), which has been prepared in collaboration with key infrastructure providers including Hertfordshire County Council, the Integrated Care Board, utility companies, and other stakeholders to identify the full range of infrastructure requirements arising from planned development, assess costs, establish delivery timescales, and identify funding sources. Developer contributions secured through Section 106 planning obligations and the Community Infrastructure Levy represent a significant but not the sole source of infrastructure funding, with other sources including central government funding programmes, local authority capital programmes, and investment by statutory undertakers and service providers also contributing to delivery. The level of contributions sought from development has been carefully calibrated through the Whole Plan Viability Assessment to ensure that requirements are realistic and achievable whilst maintaining development viability, in accordance with the National Planning Policy Framework (NPPF) 2024. The Council is committed to working proactively with infrastructure providers and developers to maximise funding opportunities, prioritise critical infrastructure, and ensure efficient delivery, and will continue to monitor infrastructure delivery and funding through the plan period, updating the IDP as necessary to respond to changing circumstances and ensure that growth is properly supported by the infrastructure necessary to create sustainable, thriving communities across Hertsmere.
Infrastructure (other than transport)	Delivery / Funding	Importance of ensuring new and improved social infrastructure is delivered by (and alongside) new development.	The Draft Local Plan establishes a proposed comprehensive framework for infrastructure delivery through proposed Policy DM2 (Infrastructure Funding and Planning Obligations) and SCI1, which requires development to provide or contribute towards necessary social infrastructure including education facilities, healthcare provision, community facilities, sports and recreation facilities, and public open space, in accordance with the National Planning Policy Framework (NPPF) 2024. The Infrastructure Delivery Plan (IDP) identifies specific social infrastructure requirements arising from planned growth and establishes delivery timescales to ensure that infrastructure is provided in phase with development to meet the needs of growing communities. The policy framework enables the Council to secure infrastructure delivery through planning conditions and Section 106 planning obligations, which can require both on-site provision and financial contributions, as well as phasing mechanisms to ensure that infrastructure is delivered at appropriate trigger points during the development process. Site-specific allocations include requirements for social infrastructure provision tailored to local needs and development scale, and the Council will work proactively with developers, infrastructure providers, and local communities throughout the planning application and development management process to ensure that social infrastructure is properly planned, funded, and delivered in a timely manner to support the creation of cohesive, well-served communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Delivery / Funding	Concern over level of infrastructure upgrades required to facilitate development	The Draft Local Plan is supported by a comprehensive Infrastructure Delivery Plan (IDP), which has been prepared in collaboration with key infrastructure providers to identify existing capacity constraints and the infrastructure improvements necessary to support planned growth across the borough. The infrastructure requirements identified in the IDP reflect a realistic assessment of what is needed to ensure that new development does not place unacceptable pressure on existing services and facilities, and that new and existing communities benefit from adequate infrastructure provision. The costs of necessary infrastructure upgrades will be met through a combination of developer contributions secured via Section 106 planning obligations and the Community Infrastructure Levy, central government funding programmes, local authority investment, and funding from statutory undertakers and utility companies. The Council is committed to working proactively with infrastructure providers, developers, and funding bodies to ensure that infrastructure delivery is properly coordinated and phased alongside development and will continue to monitor infrastructure capacity and delivery throughout the plan period to respond to changing circumstances and ensure that growth is supported by the infrastructure necessary.
Infrastructure (other than transport)	Delivery / Funding	Concern over timing of infrastructure upgrades required to facilitate development	The Draft Local Plan recognises that the timely delivery of infrastructure is critical to ensuring that development is sustainable and that new communities are properly supported from occupation. The Infrastructure Delivery Plan (IDP) identifies not only the infrastructure requirements arising from planned growth but also establishes indicative delivery timescales and phasing to ensure that provision is aligned with development delivery. Proposed Policy DM2 and SCI1 (Infrastructure Funding and Planning Obligations) sets out the proposed framework for securing infrastructure through Section 106 planning obligations, which can include phasing requirements and trigger points to ensure that critical infrastructure is delivered at appropriate stages during the development process, in accordance with the National Planning Policy Framework (NPPF) 2024. Site-specific allocations include requirements for infrastructure provision, and the Council will work proactively with developers, infrastructure providers, and statutory bodies throughout the planning application and development management process to agree appropriate phasing mechanisms that ensure infrastructure is delivered in advance of, or alongside, the development it serves.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	General opinion/view	General concern that existing infrastructure cannot support growth.	The Draft Local Plan has been prepared with a comprehensive understanding of existing infrastructure constraints and future requirements through the Infrastructure Delivery Plan (IDP), which has been developed in collaboration with key infrastructure providers including Hertfordshire County Council, the Integrated Care Board, utility companies, and other statutory bodies to assess current capacity across all infrastructure types and identify the improvements necessary to accommodate planned development. The Council recognises that existing infrastructure in some areas is operating at or near capacity, which is precisely why the Draft Local Plan includes robust policies to ensure that development provides or contributes towards the infrastructure improvements required to make growth sustainable, in accordance with the National Planning Policy Framework (NPPF) 2024. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the proposed framework for securing necessary infrastructure through developer contributions via Section 106 planning obligations and the Community Infrastructure Levy, ensuring that development meets its infrastructure obligations and does not place unacceptable pressure on existing services and facilities. The IDP identifies specific infrastructure projects required to support growth, including transport improvements, education facility expansions, healthcare provision enhancements, utilities upgrades, and green infrastructure delivery, with funding secured through a combination of developer contributions, government funding programmes, and investment by infrastructure providers. The Council is committed to ongoing monitoring of infrastructure capacity and delivery throughout the plan period, working proactively with partners to ensure that infrastructure provision keeps pace with development.
Infrastructure (other than transport)	Delivery / Funding	Recommendation that site specific obligations, including infrastructure requirements, should be consistent with national policy	The Council will ensure that infrastructure requirements and other planning obligations in the Plan are clearly justified by evidence, proportionate to the scale and impacts of the proposed development, necessary to mitigate specific impacts or deliver essential infrastructure arising from the development, and consistent with the tests in national policy and legislation, including the Community Infrastructure Levy (CIL) Regulations.
Infrastructure (other than transport)	General opinion/view	General support for infrastructure delivery to support growth	The Draft Local Plan recognises that timely provision of high-quality infrastructure is fundamental to creating sustainable, thriving communities. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes a comprehensive framework for securing necessary infrastructure including transport, utilities, education, healthcare, and green infrastructure, in accordance with the National Planning Policy Framework (NPPF) 2024. The Infrastructure Delivery Plan (IDP) identifies specific requirements, delivery timescales, and funding mechanisms including developer contributions via Section 106 obligations and the Community Infrastructure Levy, alongside government funding and investment by infrastructure providers. The Council is committed to working collaboratively with developers, infrastructure providers, and stakeholders to ensure infrastructure is delivered in coordination with development and will continue to monitor delivery and update the IDP to ensure growth is supported by the infrastructure necessary to deliver sustainable, inclusive communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	General opinion/view	Promotion of on-site infrastructure provision over off-site contributions	Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes that development should provide necessary infrastructure on-site where this is feasible and effective in meeting identified needs, in accordance with the National Planning Policy Framework (NPPF) 2024. Site-specific allocation policies include requirements for on-site infrastructure provision tailored to the scale and nature of development, and the Council will work proactively with developers to maximise on-site delivery wherever viable and practical. Off-site contributions will be sought where on-site provision is not feasible, where strategic infrastructure upgrades serving wider areas are required, or where pooling contributions from multiple developments enables more effective infrastructure delivery.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that environmental requirements on sites should be embedded before layouts are fixed and should be secured through enforceable mechanisms, such as an integrated green infrastructure strategy, ecological management plan, and arboricultural management framework.	Proposed Policy GI4 (Protecting and Enhancing Biodiversity, Habitats and Ecological Networks) require development to incorporate high-quality green infrastructure, deliver measurable biodiversity net gain in accordance with the Environment Act 2021, protect existing environmental assets including trees and hedgerows, and integrate sustainable drainage systems. Site-specific allocation policies require major developments to submit integrated green infrastructure strategies, ecological management plans, arboricultural impact assessments and management frameworks, and landscape strategies as part of planning applications, with long-term management and maintenance secured through planning conditions and Section 106 planning obligations. The Council will work proactively with developers and environmental partners to ensure requirements are robustly secured and effectively delivered, supporting the Draft Local Plan's commitment to environmental protection and enhancement across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Promotion of on-site infrastructure provision relating to climate change adaptation and mitigation over off-site contributions.	Proposed Policy SD1, SD2 and SD7, requires development to incorporate measures to reduce carbon emissions, enhance energy efficiency, integrate renewable and low-carbon energy generation, and incorporate nature-based solutions including sustainable drainage systems, green roofs, and tree planting. Site-specific allocation policies also require on-site delivery of green infrastructure, sustainable drainage, and biodiversity enhancement. The Council will work proactively with developers to maximise on-site delivery of climate infrastructure, ensuring development contributes to Hertsmere's transition to a low-carbon, climate-resilient future.
Infrastructure (other than transport)	Green/blue infrastructure	Support for an increase in green infrastructure to increase habitats across the borough and improve biodiversity in Hertsmere	The Council welcomes this support for increasing green infrastructure to enhance habitats and improve biodiversity across the borough. Policies GI1, Green and Blue Infrastructure Network, GI3, Local Nature Recovery Strategy, GI4, Biodiversity, Habitats and Ecological Networks, GI6, Urban Greening, Trees and Landscaping, and GI7, Open Space set out requirements for development to deliver measurable biodiversity net gain in accordance with the Environment Act 2021, protect and enhance existing habitats and wildlife corridors, and integrate high-quality green infrastructure that creates new habitats and strengthens ecological connectivity. The Council is committed to working collaboratively with developers, environmental partners, and local communities to deliver a borough-wide ecological network that supports thriving wildlife populations, enhances landscape character, and provides accessible, high-quality green spaces for all residents across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Green/blue infrastructure	Support for green infrastructure policies in the plan	The Council welcomes support for the green infrastructure policies in the Draft Local Plan. Proposed policies GI1, Green and Blue Infrastructure Network, GI3, Local Nature Recovery Strategy, GI4, Biodiversity, Habitats and Ecological Networks and supporting policies establish a comprehensive framework for protecting, enhancing, and expanding green infrastructure, requiring development to deliver biodiversity net gain, integrate high-quality green spaces, and create connected ecological networks. The Draft Local Plan recognises that green infrastructure provides multiple benefits including biodiversity enhancement, climate resilience, flood mitigation, and accessible recreation opportunities. The Council is committed to ensuring green infrastructure is embedded within development and that Hertsmere's natural environment is protected and enhanced for current and future generations.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that wording of Policy GI3 is amended as it currently implies that golf courses may be considered for release for development. This should be informed by the emerging evidence base and in particular the Playing Pitch Strategy, which current identifies a high demand for golf courses and would indicate that none of the golf courses in the borough are surplus to requirement.	The Council recognises the important recreational, health and wellbeing, biodiversity, and landscape value that golf courses provide, and notes the evidence in the Playing Pitch Strategy which identifies high demand for golf provision across Hertsmere. Proposed Policy GI3 is intended to protect sports and recreation facilities in accordance with the National Planning Policy Framework (NPPF) 2024. The policy framework ensures that golf courses and other sports facilities are safeguarded unless compelling evidence demonstrates they are genuinely surplus to requirements, taking account of current and future demand identified in the Playing Pitch Strategy. The Council is committed to protecting valuable sports and recreation facilities that contribute to healthy, active communities and the borough's green infrastructure network across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Objection to the Plan if at Regulation 19 a generic approach is taken to development of golf courses and is contrary to the findings in the Council's evidence base, as inconsistent with paragraph 104 of the NPPF.	Proposed Policy SCI3 (delivering Sports, Recreation and Play Spaces) and Policy GI3 (Open Spaces) align with the National Planning Policy Framework (NPPF) 2024 which requires robust evidence that facilities are surplus to requirements based on an up-to-date assessment of need before development is permitted. The Council's Playing Pitch Strategy identifies high demand for golf provision across Hertsmere, and this evidence will inform the application of policy to ensure golf courses are protected unless credible, site-specific evidence demonstrates they are genuinely surplus to requirements. Each proposal affecting sports and recreation facilities will be assessed on its individual merits against policy criteria and relevant evidence, and the Council is committed to protecting valuable sports and recreation facilities that contribute to healthy, active communities and the borough's green infrastructure network in accordance with national policy and the Draft Local Plan evidence base.
Infrastructure (other than transport)	Green/blue infrastructure	Concern that green infrastructure is treated as mitigation rather than as a strategic constraint that shapes the location and scale of growth.	Green infrastructure, biodiversity networks, landscape character, and environmental assets have been considered strategically throughout the plan-making process as fundamental constraints and opportunities that shape the location, scale, form, and design of development. Site allocations and policies will provide for the protection, enhancement, and expansion of multifunctional green infrastructure networks that support biodiversity, climate resilience, health and wellbeing, place-making, and sustainable communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI1 should include stronger quantitative requirements, including for five UK Infrastructure Standard-compliant trees per dwelling for major residential development and five such trees per 1,000 square metres of non-residential floorspace where appropriate and deliverable, and should cross-refer to GI5 and make clear that the amount, quality and long-term functionality of green infrastructure are matters of policy, not optional enhancements.	The Council recognises the importance of establishing clear, measurable standards to ensure development delivers high-quality green infrastructure. Proposed Policy GI1 requires development to incorporate appropriate green infrastructure including tree planting, and the Council will consider whether additional quantitative standards would provide beneficial clarity and ensure consistent delivery across the borough, recognising that site-specific constraints may affect achievability in some locations. The Council notes the recommendation for cross-referencing proposed Policy GI5 (Biodiversity Net Gain) and will review whether policy wording could be strengthened to clarify that provision of appropriate amounts and quality of green infrastructure is a policy requirement.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI1 should be strengthened to require applicants to demonstrate how their proposal connects to surrounding habitats and green spaces, and how any on-site provision contributes to wider ecological connectivity rather than functioning as isolated landscape pockets.	The Council recognises the importance of creating a coherent, borough-wide ecological network rather than isolated landscape pockets, ensuring that green infrastructure delivers maximum biodiversity value and supports wildlife movement and habitat resilience. Proposed Policy GI1 already requires development to incorporate green infrastructure that enhances ecological connectivity, and proposed Policy GI4 (Protecting and Enhancing Biodiversity, Habitats and Ecological Networks) requires proposals to deliver measurable biodiversity net gain, which inherently encourages connected habitat creation. The Council will consider whether additional policy wording would provide beneficial clarity by explicitly requiring applicants to demonstrate through ecological assessments and green infrastructure strategies how on-site provision connects to and enhances surrounding habitats, wildlife corridors, and the wider ecological network.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI1 should state that green infrastructure assets must be subject to enforceable management arrangements, including maintenance responsibilities, funding mechanisms and monitoring where appropriate.	The Council recognises that effective long-term management, maintenance, and monitoring are essential to ensure green infrastructure delivers intended benefits including biodiversity enhancement, climate resilience, and community wellbeing. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) already provides the framework for securing long-term management through Section 106 planning obligations and planning conditions. The Council will consider whether additional policy wording explicitly requiring management plans setting out maintenance responsibilities, funding mechanisms, and monitoring arrangements would provide beneficial clarity. The Council is committed to working with developers to secure effective long-term stewardship of green infrastructure assets, ensuring they continue to deliver environmental, social, and climate benefits for communities across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI1 should reference Natural England's Green Infrastructure Framework with an ambition to integrate GI standards, in particular the Green Infrastructure Strategy Standard	Proposed Policy G1 will already require development to protect, enhance and extend green infrastructure networks, including contributing to improved accessibility, connectivity, quality, and multifunctionality of green infrastructure. The Council will consider this recommendation and where appropriate aim for alignment with the principles of Natural England's Green Infrastructure Framework and relevant standards.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that the Council take part in the Nature Towns and Cities Accreditation scheme	The Council is committed to nature recovery, climate action, and sustainable development, as can be seen through the emerging policies for the Local Plan, including strategic policies on biodiversity and ecological infrastructure, green infrastructure and climate change. The Council consider the scheme in the context of its existing corporate duties, priorities and strategies.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI2 should be amended to make clear that buffer zones alongside waterways must function as semi-natural habitat and must not be treated as private gardens, incidental open space, roads, parking, or left-over drainage margins.	Proposed Policy GI2 will already require appropriate protection and enhancement of watercourses and associated buffer zones, and the Council will consider whether additional policy wording would provide beneficial clarity regarding the design, function, and management of buffer zones.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI2 should explicitly recognise the role of riparian trees, wet woodland and other tree-led nature-based solutions to support the integration of tree planting with sustainable drainage and natural flood management.	The Council recognises that tree planting alongside watercourses provides multiple benefits including flood risk reduction, water quality improvement, biodiversity enhancement, and climate resilience. Proposed Policy GI2 already requires protection and enhancement of watercourses and associated green infrastructure, and the Council will consider whether additional policy wording would provide beneficial clarity by explicitly recognising riparian tree planting and wet woodland as integral components of sustainable drainage and natural flood management.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI2 should state that proposals must protect hydrology, soil conditions and natural drainage patterns, especially where nearby woodland, wet habitats or veteran trees may be affected.	Proposed Policy GI1, Green and Blue Infrastructure Network, GI3, Local Nature Recovery Strategy, GI4, Biodiversity, Habitats and Ecological Networks, GI6, Urban Greening, Trees and Landscaping, and GI7, Open Space require sustainable drainage systems that respect natural drainage patterns. The Council will consider whether additional policy wording would provide beneficial clarity by explicitly requiring assessment and protection of existing hydrology, soil conditions, and drainage patterns.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI2 should include requirements to deliver Local Nature Recovery Strategy (LNRS) measures	Policy GI2 will require that development proposals identify and respond positively to the unique attributes of waterways, including investigating and maximising opportunities to enhance or restore river channels, flood flow pathways, floodplains and other natural flood management features and incorporating measures to enhance the ecological, amenity, recreational and historic value of water spaces. The Council will review whether it would be beneficial to explicitly reference a requirement to deliver LNRS measures in the policy. Note that the Draft Local Plan also already includes proposed Policy GI4 (Protecting and Enhancing Biodiversity, Habitats and Ecological Networks). This is intended as a strategic policy that will set out the Council's approach towards promoting and securing conservation, restoration and management of habitats as well as the protection of species, working alongside the LNRS as part of a strategic approach to nature conservation and to deliver Biodiversity Net Gain within the Borough. Therefore, this policy may be more appropriate as the vehicle to seek to meet objectives set out in the LNRS, including by setting out the approach towards proposals that could have wider impacts on biodiversity.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI3 should do more to distinguish between natural greenspace and general amenity or formal recreational space, and should require prior identification of existing trees, hedgerows, woodland edges, notable trees and habitat networks so that these assets shape the design and management approach.	Policies GI1, Green and Blue Infrastructure Network, GI3, Local Nature Recovery Strategy, GI4, Biodiversity, Habitats and Ecological Networks, GI6, Urban Greening, Trees and Landscaping, and GI7, Open Space require protection of existing environmental assets, and the Council will consider whether additional policy wording in Policy GI3 would provide beneficial clarity by distinguishing natural greenspace from formal recreational provision in open space requirements.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI3 should be informed by a larger GBI study	At Regulation 19 stage Policy GI3 and GI4 will be informed by an up-to-date Green and Blue Infrastructure Study for the borough, as well as an Open Space Assessment, both of which are currently under preparation.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation to include an Accessible Greenspace Standard within the plan	The Local Plan will be supported by an up-to-date Open Space Assessment, Outdoor Sports and Playing Pitch Study and Green and Blue Infrastructure Strategy for the borough, all of which will inform updated local open space standards for new developments to ensure that open space provision is accessible, high-quality, multifunctional, well-maintained, and meets the needs of all ages and abilities. The local standards will also be informed by recognised national open space standards. The Council will consider, in line with this evidence, whether to include a specific Accessible Greenspace Standard as part of policy and guidance.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Green Infrastructure should be planned strategically and consider local capacity and typology	The Local Plan will be supported by a borough level Green and Blue Infrastructure Strategy and an Open Space Assessment, as well as other environmental evidence and an Infrastructure Delivery Plan, which collectively will assess existing green infrastructure provision by type, quantity, quality, accessibility, distribution, and functionality, identify strategic green infrastructure networks, ecological corridors, and priority enhancement areas, assess deficiencies in provision against local standards and community needs, and identify opportunities for green infrastructure enhancement, creation, and improved connectivity and multifunctionality at a strategic level.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that consideration needs to be given to ensuring quality of design and future management of sites. Measures to enhance / improve greenspace quality could be included in the Infrastructure Delivery Plan	The Local Plan will include strategic policies on design quality requiring development to achieve high-quality design that responds to local character, creates attractive and distinctive places, and incorporates high-quality public realm, landscaping, and green infrastructure, as well as policies requiring protection, enhancement, and provision of multifunctional, accessible, high-quality open space. Future management will be secured through developer contributions as set out in policy and in the Infrastructure Delivery Plan.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that the Plan should ensure that new development contributes to the delivery of the government's target that every household is located within 15 minutes of good quality green infrastructure, as outlined in the Environmental Improvement Plan 2023	The Local Plan will be supported by an up-to-date Open Space Assessment, Outdoor Sports and Playing Pitch Study and Green and Blue Infrastructure Strategy for the borough, all of which will inform updated local open space standards for new developments to ensure that open space provision is accessible, high-quality, multifunctional, well-maintained, and meets the needs of all ages and abilities. The local standards will also be informed by recognised national open space standards.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI4 should clearly distinguish between irreplaceable habitats, general biodiversity enhancement and biodiversity net gain, and include a specific criterion stating that development resulting in the loss or deterioration of ancient woodland, ancient trees or veteran trees will be refused unless wholly exceptional reasons exist and a suitable compensation strategy is secured, while making clear that compensation is not a substitute for avoiding harm.	Proposed Policy GI4 (Protecting and Enhancing Biodiversity, Habitats and Ecological Networks) provides protection for irreplaceable habitats and biodiversity assets, and establishes the framework for biodiversity net gain in accordance with the Environment Act 2021. The Council will consider whether additional policy wording would provide beneficial clarity by including a specific criterion that development resulting in loss or deterioration of ancient woodland, ancient trees, or veteran trees will be refused unless wholly exceptional reasons exist and a suitable compensation strategy is secured. The Council is committed to protecting irreplaceable habitats and ensuring that development delivers measurable biodiversity enhancement across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI4 should be amended to establish 20% BNG as the policy expectation, or at minimum state that the Council will seek to exceed the statutory minimum where justified, and state that proposals involving woodland creation, strategic habitat corridors or other long-term habitats will be expected to secure longer management periods. The policy should also require BNG to be designed in line with the Local Nature Recovery Strategy.	Policies GI1, Green and Blue Infrastructure Network, GI3, Local Nature Recovery Strategy, GI4, Biodiversity, Habitats and Ecological Networks, GI6, Urban Greening, Trees and Landscaping, and GI7, Open Space require development to deliver measurable BNG in line with statutory requirements, with a minimum of 20% net gain as established by the Environment Act 2021. The Council will consider whether setting a higher policy expectation, or stating that the Council will seek to exceed the statutory minimum where justified by site circumstances and viability, would provide beneficial ambition whilst recognising that viability considerations may affect achievability on some sites. The Council acknowledges that proposals involving woodland creation, strategic habitat corridors, or other long-term habitats require management periods beyond the statutory 30-year minimum to deliver meaningful ecological benefits and will consider strengthening policy wording to require extended management periods where appropriate. The Council agrees that BNG should be designed in alignment with the Local Nature Recovery Strategy to ensure strategic, landscape-scale biodiversity enhancement that contributes to coherent ecological networks across Hertsmere and the wider area.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI5 should state explicitly that development proposals must retain existing trees wherever possible and must demonstrate why any losses are unavoidable; require a more complete arboricultural evidence base; should recognise ancient and veteran trees as irreplaceable habitats; should protect notable trees as part of the future veteran resource; require applicants to identify such trees early; and encourage surveys to check and update the Ancient Tree Inventory.	Policies GI1, Green and Blue Infrastructure Network, GI3, Local Nature Recovery Strategy, GI4, Biodiversity, Habitats and Ecological Networks, GI6, Urban Greening, Trees and Landscaping, and GI7, Open Space requires development to protect existing trees and provide arboricultural assessments, and the Council will consider whether additional policy wording would provide beneficial clarity by explicitly requiring applicants to retain existing trees wherever possible and demonstrate why any losses are unavoidable. The Council supports requiring comprehensive arboricultural evidence including surveys identifying ancient, veteran, and notable trees at the earliest design stages to ensure these assets shape development layouts and encourages applicants to undertake surveys that can contribute to updating the Ancient Tree Inventory. The Council is committed to ensuring robust tree protection and retention.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI5 should require a net increase in canopy cover, prioritise planting in areas of low canopy and poor access to nature, include a commitment to monitor canopy change over the plan period, consider adding a requirement for major schemes to meet a minimum Urban Greening Factor, make clear that replacement planting must reflect the size and value of the trees lost and must not be used to justify avoidable removal of mature, ancient or veteran trees.	Proposed Policy GI6 would require tree retention and replacement planting, and the Council will consider whether additional policy wording would provide beneficial clarity by requiring development to achieve a net increase in canopy cover, prioritising tree planting in areas identified as having low canopy cover or poor access to nature and committing to monitor canopy change over the plan period to track progress. The Council will also consider introducing a requirement for major schemes to meet a minimum Urban Greening Factor and strengthening policy wording to make clear that replacement planting must reflect the size, age, and ecological value of trees lost. The Council is committed to expanding and protecting tree canopy cover to support healthy, climate-resilient communities across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Opposition to the use of the Urban Green Factor in Policy GI5 as it does not take into account site specific factors.	Proposed Policy GI6 requires development to incorporate appropriate green infrastructure including tree planting and landscaping, with the aim of delivering biodiversity enhancement, climate resilience, and accessible green space. The Council notes that the Urban Greening Factor can provide a transparent, measurable framework for assessing the quantum and quality of green infrastructure provision but acknowledges that flexibility may be required to respond to site-specific circumstances, constraints, and design opportunities. The policy framework allows for site-specific considerations to be taken into account in the assessment of planning applications, ensuring that green infrastructure requirements are appropriately tailored whilst maintaining robust standards for environmental quality. The Council will keep this matter under review to ensure that policy requirements deliver high-quality green infrastructure outcomes whilst remaining deliverable and responsive to site-specific context across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Support for inclusion of Urban Greening Factor in Policy GI5	The Council welcomes support for the use of an Urban Greening Factor. Policy GI6 (Urban Greening, Trees and Landscaping) requires qualifying major development to seek to achieve the applicable Urban Greening Factor.
Infrastructure (other than transport)	Green/blue infrastructure	Objection to Policy GI4 setting out a 10% biodiversity net gain to be delivered on all sites as it is a legislative requirement.	The Council recognises that the Environment Act 2021 establishes a mandatory minimum 20% BNG requirement for most development, and that this is a statutory requirement that applies regardless of local plan policy. However, the Council considers it appropriate to include the BNG requirement within Policy GI4 to provide clarity and transparency for applicants, decision-makers, and communities about the environmental standards expected in Hertsmere, to confirm the Council's commitment to delivering biodiversity enhancement, and to provide a policy framework that can set local expectations including the potential to exceed the statutory minimum where appropriate and deliverable. The inclusion of BNG within local plan policy ensures that biodiversity enhancement is embedded within the broader policy framework for environmental protection and green infrastructure delivery and provides a basis for the Council to encourage higher standards where site circumstances and viability allow, supporting the Draft Local Plan's objectives for environmental protection and enhancement across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Green/blue infrastructure	Objection to Policy GI6 because no substantive evidence has been received to support the need for allotments.	The Council's evidence base includes an assessment of open space provision across the borough, which identifies existing and future requirements for different types of open space including allotments, taking account of population growth and community needs. Proposed Policy GI8 (Communal Gardens and Food Growing) would seek to protect existing allotment provision and require new provision where justified by evidence of need, recognising the health, wellbeing, food-growing, community cohesion, and biodiversity benefits that allotments provide.
Infrastructure (other than transport)	Green/blue infrastructure	Concern about the pressure that development at higher densities will put on the existing open space, recreational areas and parks.	The Council recognises the importance of ensuring that development provides adequate open space and recreational facilities to meet the needs of new and existing communities. The Draft Local Plan includes proposed Policy GI1 (Hertsmere's Green and Blue Infrastructure) and proposed Policy GI7 (Open), which would protect existing provision and require new development to deliver open space in accordance with evidence-based standards set out in the Open Space Assessment. Where on-site provision is not feasible or sufficient, Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) enables the Council to secure financial contributions through Section 106 planning obligations to enhance existing open spaces, parks, and recreational facilities to accommodate increased use. Higher density development is supported by Policy HQD1 (Delivering High-Quality Design in Hertsmere), which requires high-quality design that incorporates accessible green space, and the Council is committed to ensuring that development delivers sufficient open space provision, whether on-site or through enhancement of existing facilities, to support the health, wellbeing, and recreational needs of growing communities across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation for using the natural history of the area to celebrate local character, through highlighting the natural environment and providing high-quality greenspace	The Council recognises that Hertsmere's distinctive landscape character, biodiversity, and natural heritage contribute significantly to local identity and sense of place, and that development should respond positively to and enhance these characteristics. Proposed Policy HQD1 (Delivering High-Quality Design in Hertsmere) would require development to respond to local distinctiveness and landscape character, and proposed Policy GI1 (Hertsmere's Green and Blue Infrastructure) would require high-quality green infrastructure that enhances biodiversity and provides accessible green space for communities. The Council supports development that celebrates and enhances Hertsmere's natural heritage through interpretive features, native planting that reflects local ecology and landscape character, retention and enhancement of historic landscape features, and provision of high-quality greenspaces that connect people with nature and local natural history. The Council is committed to ensuring that development strengthens local character by integrating the borough's distinctive natural environment into design, creating places that are rooted in their landscape context and provide opportunities for residents and visitors to experience and enjoy Hertsmere's natural heritage.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Social Infrastructure	Recommendation that the plan would be strengthened by the inclusion of a clearer explanation of how education contributions will be calculated based on the pupil yields generated by developments, available capacity, resulting shortfall in places, and cost per place applied to derive expected contributions.	The Council recognises the importance of transparency in setting out infrastructure requirements and how planning obligations will be calculated to ensure that development delivers necessary infrastructure including education facilities. Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing infrastructure delivery through Section 106 planning obligations and other mechanisms, including education provision. The Council works in partnership with Hertfordshire County Council as the local education authority to assess education capacity and requirements arising from development, and contributions are calculated using established methodologies based on pupil yield multipliers for different dwelling types and sizes, assessed capacity at existing schools, projected shortfall in places, and the County Council's cost per place for new school provision or expansion. The Council will consider whether additional detail explaining the methodology for calculating education contributions would provide beneficial clarity and transparency within the Draft Local Plan or supporting documents, ensuring that applicants, decision-makers, and communities understand how contributions are derived and applied to deliver necessary education infrastructure across Hertsmere.
Infrastructure (other than transport)	Social Infrastructure	Recommendation that the Plan / its evidence should confirm that the cost per pupil place is based on the DfE school place scorecards. This will help to ensure that the education contributions required are considered fair, consistent and defensible.	Education contributions in Hertsmere are calculated in partnership with Hertfordshire County Council as the local education authority, which uses cost multipliers informed by the DfE school place scorecards and other relevant guidance to ensure that costs per pupil place reflect current building costs and educational standards. Policy SCI1 provides the framework for securing education and other social infrastructure generated by development, having regard to the latest Infrastructure Delivery Plan and the plans, strategies and requirements of infrastructure providers, including Hertfordshire County Council.
Infrastructure (other than transport)	Social Infrastructure	Support for the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development, consistent with Regulation 122 of the CIL Regulations.	The Council welcomes this support for the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development. The Council works in partnership with Hertfordshire County Council as the local education authority to assess education needs arising from development and to ensure that contributions are compliant with Regulation 122 and proportionate to the impacts of each development. The Council is committed to using planning obligations to secure necessary education infrastructure that supports sustainable communities and ensures that development delivers the facilities and services required by new and existing residents across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Social infrastructure	Provision needs to be made for burial space (providing for the different needs of different parts of the local community)	The Council recognises that adequate burial and cremation facilities are an important community infrastructure requirement that must be planned for to meet current and future needs, including the diverse cultural and religious requirements of Hertsmere's communities. The Draft Local Plan's proposed infrastructure policies, including Policy DM2 (Infrastructure Funding and Planning Obligations), provide a framework for planning and delivering necessary community infrastructure, and the Council will work with relevant stakeholders to assess current and projected burial capacity across the borough and identify requirements for new or extended burial provision over the plan period.
Infrastructure (other than transport)	Social infrastructure	Local Plan should provide greater certainty about the location and delivery of new schools.	The Council recognises the importance of ensuring that adequate education infrastructure is planned and delivered to support new development and meet the needs of growing communities. The Council works in partnership with Hertfordshire County Council as the local education authority to assess education capacity and requirements arising from planned growth, and proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing necessary infrastructure delivery including education provision. The Draft Local Plan allocates strategic sites where new or expanded school provision may be required, and site-specific policies identify infrastructure requirements including education facilities where these have been identified through capacity assessments. The Council will consider whether additional detail regarding the location, timing, and delivery mechanisms for new schools should be included within the Draft Local Plan or supporting Infrastructure Delivery Plan to provide greater certainty and transparency for applicants, decision-makers, and communities about how education needs arising from planned growth will be met across Hertsmere.
Infrastructure (other than transport)	Social infrastructure	Importance of ensuring new and improved social infrastructure is delivered by (and alongside) new development.	The Council recognises that sustainable development requires timely delivery of necessary infrastructure to support new and existing communities. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing infrastructure delivery through Section 106 planning obligations, conditions, and other mechanisms, ensuring that development contributes appropriately to the infrastructure required to make it acceptable in planning terms. The Draft Local Plan's site allocations include specific infrastructure requirements identified through ongoing engagement with infrastructure providers, and the Infrastructure Delivery Plan identifies the type, scale, cost, and timing of infrastructure needed to support planned growth. The Council works closely with infrastructure providers including Hertfordshire County Council, health commissioners, utility companies, and National Highways to coordinate delivery and ensure that infrastructure is provided at the right time to support sustainable communities. The Council is committed to ensuring that social infrastructure is planned, funded, and delivered effectively alongside development to create healthy, inclusive, and well-connected communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Social infrastructure	General opposition to / concern about development due to perceived difficulty in supporting growth with social infrastructure in practice	The Council recognises that infrastructure delivery is fundamental to sustainable development and that communities need confidence that new development will be supported by necessary facilities and services including schools, healthcare, transport, open spaces, and community facilities. The Draft Local Plan has been prepared alongside an Infrastructure Delivery Plan that assesses the infrastructure requirements arising from proposed development, identifies capacity constraints, and sets out how and when necessary, infrastructure will be delivered in partnership with infrastructure providers including Hertfordshire County Council, health commissioners, utility companies, and transport authorities. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) provides the framework for securing developer contributions through Section 106 planning obligations to fund and deliver required infrastructure, ensuring that development mitigates its impacts and provides necessary facilities. The Council is committed to working proactively with infrastructure providers and developers to coordinate delivery, phasing development appropriately where necessary to align with infrastructure provision, and monitoring implementation to ensure that infrastructure is delivered alongside growth to support sustainable, well-serviced communities across Hertsmere.
Infrastructure (other than transport)	Social infrastructure	Concern that the plan would lead to a loss of existing social infrastructure	The Council recognises the importance of protecting existing community facilities including schools, healthcare facilities, community centres, sports and recreation facilities, and other social infrastructure that serve local communities. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) and related policies, including proposed Policy GI7 (Open Space), provide protection for existing social infrastructure and community facilities, and require evidence that facilities are genuinely surplus to requirements, are no longer viable, or can be appropriately replaced before permission is granted for alternative uses. The Draft Local Plan seeks to plan positively for new social infrastructure to support growth whilst safeguarding existing provision that continues to serve community needs, ensuring that development enhances rather than diminishes the range and quality of facilities available to residents. The Council is committed to protecting valued social infrastructure and will resist proposals that would result in the loss of facilities unless robust evidence demonstrates that they are no longer needed or that equivalent or improved provision will be made available, ensuring that communities across Hertsmere retain access to essential services and facilities.
Infrastructure (other than transport)	Social infrastructure	The next iteration of the Local Plan should identify strategic allocations that can deliver the social infrastructure needs of the community, based on the identified need and demand in the Infrastructure Delivery Plan (April 2026). Such site allocations and associated safeguarding policies should also seek to clarify requirements for delivery of new social infrastructure, including delivery timescales, minimum site area required, and any preferred site characteristics.	The Draft Local Plan includes strategic site allocations where specific infrastructure requirements have been identified through engagement with infrastructure providers, and proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing delivery. The Council is committed to proactive planning for social infrastructure to ensure that land is safeguarded and facilities are delivered at the right time and in the right locations to meet the needs of growing communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Social infrastructure	Recommendation that the requirement for developer contributions towards social infrastructure are confirmed at planning application stage for large sites.	The Council recognises the importance of establishing clear infrastructure requirements and financial contributions early in the planning process to provide certainty for applicants, infrastructure providers, and communities, and to ensure that necessary facilities are planned and delivered effectively. For large strategic sites, the Council engages with applicants and infrastructure providers at pre-application stage to identify likely infrastructure requirements and contributions, providing early clarity and enabling effective masterplanning and phasing. The Council is committed to ensuring that infrastructure requirements and developer contributions are clearly established and confirmed at planning application stage, particularly for major and strategic sites, enabling timely delivery of necessary social infrastructure including schools, healthcare facilities, community centres, and transport improvements to support sustainable development across Hertsmere.
Infrastructure (other than transport)	Social infrastructure	Recommendation for health infrastructure to be recognised within the definition of essential infrastructure in the Local Plan, with expectation that development proposals will make provision to meet cost of healthcare infrastructure made necessary by development.	The Council recognises that healthcare facilities are fundamental to sustainable communities and that new development generates additional demand for primary care, community health services, and hospital capacity that must be planned for and funded appropriately. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing infrastructure delivery including healthcare provision, and the Council works in partnership with Integrated Care Boards and NHS England to assess healthcare capacity and requirements arising from planned growth. The Council will consider whether explicitly recognising health infrastructure within the definition of essential infrastructure in the Draft Local Plan would provide beneficial clarity and reinforce the expectation that development proposals will contribute appropriately towards healthcare facilities The Council is committed to ensuring that healthcare infrastructure is planned, funded, and delivered effectively to support healthy communities and meet the needs of new and existing residents across Hertsmere.
Infrastructure (other than transport)	Social infrastructure	Recommendation for Local Plan to consider significant cumulative impact of smaller housing developments and associated need for mitigation through social infrastructure provision.	The Council recognises that while individual small-scale developments may have limited impacts, the cumulative effect of multiple smaller sites can place significant pressure on existing infrastructure including schools, healthcare facilities, transport networks, open spaces, and community services. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) provides the framework for securing developer contributions from developments of all scales where they generate demonstrable impacts on infrastructure capacity, and the Council works with infrastructure providers to assess cumulative needs arising from planned growth including smaller windfall sites. The Council will consider whether the Draft Local Plan or supporting evidence should provide greater clarity on how cumulative impacts of smaller developments will be assessed and mitigated.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Social Infrastructure	Plan will result in loss of equestrian uses.	The Council recognises that equestrian facilities and land contribute to the rural economy, provide recreational opportunities, support rural character, and form part of the borough's diverse land use. The Draft Local Plan seeks to balance the need to deliver housing and employment growth to meet identified needs whilst protecting valued community facilities, open spaces, and rural character through policies protecting open space and recreational facilities. Where site allocations involve land currently in equestrian use, the Council has assessed the contribution of those sites to meeting development needs and considers that the benefits of allocating sites for housing or other development outweigh the loss of equestrian use, particularly where alternative equestrian facilities exist or can be provided. The Council will consider representations regarding specific sites where equestrian uses may be affected and will assess whether any additional policy protection or mitigation is appropriate to support continued equestrian activity where it contributes to the rural economy and community needs across Hertsmere.
Infrastructure (other than transport)	Social Infrastructure	Recommendation that a site allocation policy should require on-site provision of sports facilities to meet increased demand generated by development, as supported by Open Space, Sport and Recreation Strategy to provide a strategic framework for sport and recreation provision.	The Council will consider the requirements for on-site sports provision to be a policy requirement for allocations where the Outdoor Sports and Playing Pitch Study (2026) has identified a need for on-site provision and continue to engage with Sports England in relation to open space and sports provision on site allocations. Policy SCI3 (Delivering Sports, Recreation and Play Spaces) will also seek to enhance and retain existing provision as well as requiring proposals containing new sports provision to be supported by an appropriate maintenance and management strategy to ensure the ongoing management of open space and sports provision in the long term.
Infrastructure (other than transport)	Social Infrastructure	Support for requiring provision of sufficient, quality community facilities.	The Council recognises that community facilities are essential to creating sustainable, healthy, and inclusive communities. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing necessary community facilities through planning obligations, conditions, and direct provision on allocated sites, ensuring that development contributes appropriately to the infrastructure required to support growing communities. The Draft Local Plan's site allocations identify specific requirements for community facilities where these have been identified through engagement with service providers and assessment of capacity, and proposed policies including Policy GI1 (Hertsmere's Green and Blue Infrastructure) and Policy GI7 (Open Space) protect and enhance existing provision. The Council is committed to ensuring that new development delivers sufficient, high-quality community facilities that are well-designed, accessible, and meet the diverse needs of residents, supporting the creation of vibrant, cohesive, and well-serviced communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Social Infrastructure	Concern that proposed policy SCI1 is not effective in its current form. Further flexibility is required to ensure redundant sites can still be used to provide alternative social or community uses, or to help fund improve healthcare services if chosen for disposal as surplus to requirement. Proposed Modification to Draft Policy SCI1: "Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use."	*The Council recognises the importance of ensuring that redundant sites can still be used to provide alternative social and community uses or to help fund improving healthcare services. Policy SCI1 (Safeguarding and Securing Social and Community Infrastructure) is worded so that the disposal of land surplus to requirement will not be resisted if it can be demonstrated that the disposal is part of a public sector disposal or it is clearly evidenced that there is no current or future need for the provision. The wording of Policy SCI1 will be clarified to ensure flexibility and consideration will be given the recommended wording of the policy as contained within the representation.*
Infrastructure (other than transport)	Social Infrastructure	Suggestion for addition to paragraph 8.1.5 to recognise that an exception to the general presumption against the loss of community infrastructure may be made where a proposal can be justified as part of public sector disposal of the use to help improve service provision but needs to be qualified. It should be stated that this does not apply to community infrastructure that includes sport and recreation facilities.	The Council recognises the need to enable public service providers including the NHS, local authorities, and other public bodies to rationalise estates and reinvest disposal proceeds into improved facilities and services, whilst maintaining appropriate protection for valued community infrastructure. The Council acknowledges that sport and recreation facilities, including playing fields and outdoor sports facilities, are afforded specific protection under paragraph 104 of the NPPF and Sport England guidance, requiring evidence that facilities are surplus to requirements, would be replaced by equivalent or better provision, or that the benefits of alternative development clearly outweigh the loss. The Council will consider whether additional explanatory text in paragraph 8.1.5 would provide beneficial clarity by recognising that public sector disposal to improve service provision may justify loss of some community infrastructure whilst making clear that sport and recreation facilities remain subject to specific protective policies
Infrastructure (other than transport)	Social Infrastructure	Recommendation that scope of policy SCI3 should be broader than play space as implied by paragraph 8.3.3, as it will need to cover sport and recreation as well. While a policy focus, as set out in paragraphs 8.3.3 and 8.3.8, upon securing on-site provision for play space and some forms of recreation provision may be appropriate, this will not be appropriate for sports facilities.	Proposed Policy SCI3 and supporting paragraphs seek to ensure that development delivers appropriate provision based on evidence-based standards set out in the Open Space Assessment and Playing Pitch Strategy, recognising that larger strategic sports facilities serving wider catchments may be more appropriately delivered through off-site contributions to enhance existing facilities or create new strategic provision rather than on-site delivery. The Council will review the policy wording and supporting text to ensure that Policy SCI3 clearly distinguishes between requirements for on-site play space and informal recreation provision, which are appropriate for most residential developments, and requirements for sports facilities, which may be met through on-site provision, off-site contributions, or a combination depending on site scale, identified needs, and strategic facility requirements, ensuring flexible and effective delivery of sport and recreation infrastructure across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Social Infrastructure	Recommendation of added reference to new development being designed to encourage active movement, having regard to the Healthy Street approach and the Active Design guidance in policy SCI3. Key design policies especially should consider how developments should be designed to encourage activity in broader terms, as the scope of this approach should not just be focused on informal play.	The Council recognises that creating healthy, active communities requires development to be designed to encourage physical activity, active travel, social interaction, and access to nature through well-connected streets, attractive walking and cycling routes, accessible green spaces, and layouts that prioritise pedestrians and cyclists. Proposed Policy HQD1 (Delivering High-Quality Design in Hertsmere) requires development to achieve high-quality design that responds to context and creates attractive, safe, and accessible environments, and proposed Policy TR1 (Sustainable Transport and Movement) requires development to prioritise walking, cycling, and public transport. The Council will consider whether explicit reference to the Healthy Streets approach and Active Design guidance within Policy SCI3 and other key design policies would provide beneficial clarity and reinforce the expectation that development should incorporate design principles that encourage physical activity across all age groups
Infrastructure (other than transport)	Social Infrastructure	Objection to a site allocation as it is currently in uses as a sports ground and is not recommended for release and disposal in the Hertsmere Playing Pitch Strategy (2019) Action Plan. The strategy is currently under review, and any recommendations should be taken into consideration when allocating the site. Allocation of site will only be supported if there was a policy requirement for a replacement playing field site to be provided with equivalent or better facilities in terms of quantity and quality in a suitable location prior to any development on the site. The Council should consider making a related site allocation in the emerging Local Plan for a replacement playing field site to provide certainty that the replacement site could be delivered in planning terms.	The Council recognises the need to comply with national policy on the protection of sports facilities and playing fields. The Council notes that the Playing Pitch Strategy is currently under review to provide an updated evidence base on playing pitch supply, demand, quality, accessibility, and future requirements arising from population growth and development. The Council take into account the findings and recommendations of the updated Playing Pitch Strategy to inform the Regulation 19 Publication version of the Local Plan and will update policy requirements as required.
Infrastructure (other than transport)	Social Infrastructure	General concern about how improved infrastructure will be delivered alongside growth.	The Council recognises that infrastructure delivery is fundamental to sustainable development and that communities need confidence that necessary facilities and services including transport, education, healthcare, utilities, open spaces, and community facilities will be provided to support new development. The Draft Local Plan has been prepared alongside an Infrastructure Delivery Plan (April 2026) that identifies the type, scale, cost, timing, and funding sources for infrastructure required to support planned growth, based on engagement with infrastructure providers including Hertfordshire County Council, Integrated Care Boards, utility companies, Highways England, and transport authorities. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing developer contributions through Section 106 planning obligations to fund necessary infrastructure, and site-specific policies identify key infrastructure requirements for strategic allocations. The Council is committed to working proactively with infrastructure providers and developers to coordinate delivery, phasing development appropriately where necessary to align with infrastructure provision, and monitoring implementation to ensure that infrastructure is delivered at the right time to support sustainable communities. The Council will continue to update the Infrastructure Delivery Plan throughout the plan period to respond to changing circumstances and ensure effective infrastructure delivery across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Social Infrastructure	Recommendation that an additional policy or addition to the proposed draft policy SCI2 is included in the Regulation 19 draft Local Plan along the following lines: “The Council will support the providers and promoters of new and improved educational facilities within the Borough, by affording great weight in planning decisions to the need to create, expand or alter these facilities.”	The Council recognises the critical importance of ensuring adequate education provision to meet the needs of existing and growing communities, and that educational facilities are essential social infrastructure. Proposed Policy SCI2 establishes the framework for delivering education infrastructure and protecting existing educational facilities, and the Council works in partnership with Hertfordshire County Council as the local education authority to assess capacity and requirements arising from planned growth. The Council will consider whether additional policy wording explicitly affirming that great weight will be afforded to the need to create, expand, or alter educational facilities would provide beneficial clarity and reinforce the Council's commitment to supporting education provision.
Infrastructure (other than transport)	Social Infrastructure	Recommendation that subsection is added to Policy SCI2 to greater align with paragraph 100 of the NPPF. For example: “The Council will adopt a proactive, positive and collaborative approach to working with school promoters through pre-application discussions and planning applications to support the delivery of new and expanded educational facilities.”	The Council recognises the importance of working constructively with school promoters, including local education authorities, academy trusts, and free school providers, to facilitate the timely delivery of new and expanded educational facilities through pre-application engagement and planning application processes, ensuring that education infrastructure is delivered to meet the needs of growing communities. The Council will consider whether additional policy wording explicitly confirming that the Council will adopt a collaborative approach would provide beneficial clarity.
Infrastructure (other than transport)	Social Infrastructure	Support for Policy SCI3 as sports facilities facilitate participation and physical activity for health improvement, mental health and development of individuals and team skills.	The Council welcomes this support for proposed Policy SCI3. The Council is committed to ensuring that development delivers accessible, high-quality sport and recreation facilities that support active lifestyles and meet the diverse needs of all residents across Hertsmere.
Infrastructure (other than transport)	Social Infrastructure	No mention of how the police and fire services will be able to cover the housing increase, especially after funding cuts to local services.	The Council recognises that emergency services including police and fire are essential infrastructure that must have adequate capacity and resources to serve existing and growing communities safely and effectively. The Draft Local Plan has been prepared in consultation with emergency service providers including Hertfordshire Constabulary and Hertfordshire Fire and Rescue Service to assess the implications of planned growth on service delivery and infrastructure requirements, and this engagement informs the Infrastructure Delivery Plan (April 2026), which identifies necessary infrastructure to support development. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) provides the framework for securing developer contributions through Section 106 planning obligations towards infrastructure made necessary by development, which may include contributions towards police and fire service facilities, equipment, or other infrastructure where evidence demonstrates that development creates additional demand that requires mitigation. The Council is committed to continuing engagement with emergency service providers throughout the plan period to ensure that capacity and infrastructure requirements are identified and addressed, and that development contributes appropriately towards the facilities and resources needed to maintain effective emergency service provision across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Social Infrastructure	Requirement for the Borough Council and County Council to collaborate to address matters relating to education, including identifying an appropriate and sustainable secondary school site to serve the west of the borough and ensuring that the identified school site in Borehamwood is deliverable	The Council recognises that effective partnership working between the Borough Council as local planning authority and the County Council as local education authority is essential to ensure that adequate education infrastructure is planned and delivered to meet the needs arising from planned growth, in accordance with the duty to cooperate. The Council works closely with Hertfordshire County Council through ongoing engagement to assess education capacity, identify requirements for new or expanded school provision, and ensure that sites allocated for education use are appropriate, deliverable, and available when needed. The Draft Local Plan and Infrastructure Delivery Plan (April 2026) have been informed by this collaborative work, and the Council is committed to continuing this partnership throughout the plan period to address education needs including secondary school provision in the west of the borough and delivery of the identified school site in Borehamwood.
Infrastructure (other than transport)	Utilities infrastructure	General concern about existing drainage infrastructure being able to cope with increased run-off.	The Council recognises that sustainable drainage and flood risk management are critical to ensuring that development does not increase flood risk elsewhere and that drainage infrastructure has adequate capacity to manage surface water from new development. Proposed Policy SD8 (Water Supply and Wastewater) requires all major development to incorporate SuDS to manage surface water run-off, reduce flood risk, improve water quality, and deliver biodiversity and amenity benefits, with drainage strategies demonstrating that surface water discharge rates will not exceed existing greenfield run-off rates and that adequate attenuation is provided. The Draft Local Plan has been informed by the Strategic Flood Risk Assessment and ongoing engagement with the Lead Local Flood Authority (Hertfordshire County Council), Thames Water, and the Environment Agency to assess drainage capacity and flood risk, and the Infrastructure Delivery Plan identifies necessary drainage infrastructure improvements. The Council is committed to ensuring that development incorporates effective SuDS, does not increase flood risk, and where necessary contributes towards strategic drainage infrastructure improvements to ensure that existing and new communities are protected from flooding and that drainage systems have adequate capacity across Hertsmere.
Infrastructure (other than transport)	Utilities infrastructure	Support for increased provision of high-speed broadband to support jobs and businesses and improve home-working conditions.	The Council recognises that high-quality digital infrastructure including high-speed broadband and full fibre connectivity is essential to support economic growth, enable flexible and home working, facilitate access to services, and ensure that businesses and residents can participate fully in the digital economy. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for ensuring that necessary infrastructure including digital connectivity is planned and delivered alongside development. The Council is committed to supporting the expansion of high-quality digital infrastructure across Hertsmere and is working proactively with telecommunications providers to facilitate network deployment.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Utilities infrastructure	Concern over existing infrastructure capacity to accommodate new housing e.g. electricity, water, gas and wastewater	The Council recognises that adequate utilities infrastructure is essential to support new development and that existing networks must have sufficient capacity or be upgraded to serve growing communities safely and reliably. The Draft Local Plan has been prepared in consultation with utilities providers including Thames Water, Affinity Water, National Grid, UK Power Networks, and Cadent Gas to assess existing capacity constraints and infrastructure requirements arising from planned growth, and this engagement informs the Infrastructure Delivery Plan (April 2026), which identifies necessary infrastructure improvements including water supply reinforcement, wastewater treatment capacity upgrades, and electricity network enhancements. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for ensuring that development is supported by adequate utilities infrastructure, requiring developers to engage with providers at early stages to identify capacity issues and secure necessary upgrades, with contributions secured through planning obligations or conditions where appropriate. The Council is committed to continuing engagement with utilities providers throughout the plan period to ensure that infrastructure capacity constraints are identified and addressed, and that necessary improvements are delivered in a timely manner to support sustainable development across Hertsmere.
Infrastructure (other than transport)	Utilities infrastructure	Recommendation that Council should safeguard all existing NGET transmission assets; support future reinforcement and expansion; ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion; safeguard existing and potential access routes required for delivery and removal of Abnormal Indivisible Loads (AILs); resist development or highway alterations that would prejudice, constrain or render impracticable AIL access; and encourage early engagement with NGET to identify and resolve potential impacts at earliest possible stage of planning process.	The Council recognises that electricity transmission infrastructure is critical national infrastructure that must be protected from inappropriate development and that planned growth requires adequate energy infrastructure capacity. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for ensuring adequate infrastructure provision, and the Council consults NGET on planning applications that may affect transmission assets or access routes. The Council will consider whether additional policy wording or supporting text should be included in the Draft Local Plan at the next stage.
Infrastructure (other than transport)	Utilities infrastructure	Freehold land, often held as “operational” for future operational use, is critical to allow for future expansion of NGET infrastructure already within the existing site, and this is particularly important given the context of NGET's role and responsibilities relating to the Great Grid Upgrade and UK’s transition toward net zero	The Council recognises that energy infrastructure is critical national infrastructure that plays a fundamental role in delivering the UK's climate change commitments and that adequate land must be safeguarded to enable network expansion and reinforcement to meet future demand. The Council will work with NGET to ensure that operational land held by NGET is safeguarded as appropriate.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Utilities infrastructure	Recommendation that the relevant water company is consulted to ensure adequate water supply and wastewater infrastructure provision, in line with the requirements set out in Policy SD8.	The Council recognises that adequate water supply and wastewater treatment capacity are essential to support new development and that early engagement with water and wastewater undertakers is necessary to identify infrastructure constraints and secure timely delivery of necessary improvements. The Council has undertaken a Water Cycle Study to ensure that sufficient water supply is identified for new development and this will be published with the Regulation 19 draft Local Plan. The Council is committed to continuing consultation with water companies throughout the development management process, requiring applicants to engage with providers at pre-application and application stages to identify capacity issues and secure necessary infrastructure delivery.
Infrastructure (other than transport)	Social Infrastructure	Recommendation that there should be no net loss of local services, including retail	The Council recognises that protecting and enhancing access to local services and facilities including shops, community facilities, healthcare, education, leisure, and cultural facilities is essential to support sustainable communities, reduce the need to travel, promote social inclusion and wellbeing, and maintain the vitality and viability of town centres and local neighbourhoods. The Draft Local Plan includes policies to support the vitality and viability of town centres and local centres (Policies EC14 and EC15), protect and enhance community facilities (Policy DM2), resist the loss of valued facilities and services unless specific criteria are met demonstrating that retention is not viable or alternative provision is made, and require major developments to provide or contribute to necessary social and community infrastructure to support new and existing communities. The Council will undertake a review and ensure that the Regulation 19 Publication version of the Local Plan includes strong, clear, and effective policies to protect existing local services and retail provision, support the enhancement and expansion of services where needed, and ensure that development contributes to vibrant, sustainable, and well-served communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Social Infrastructure	Recommendation that any construction associated with growth arising from the Local Plan should not impact existing residents negatively	The Council recognises that construction activity can have temporary adverse impacts on existing communities including noise, dust, air quality, traffic congestion, highway safety, access disruption, and amenity impacts, and that these impacts must be appropriately managed, mitigated, and minimised through planning conditions, construction management plans, and regulatory controls to protect the health, safety, and quality of life of existing residents. The Draft Local Plan includes policies requiring high-quality design that respects amenity (Policy JBF1, Delivering a Better Future for Hertsmere and supporting policies) protects environmental quality including air quality and minimises pollution, requires sustainable construction practices (SD1 and supporting policies) and ensures that development proposals are accompanied by appropriate assessments and mitigation measures to address environmental, amenity, and operational impacts. Major developments will require the submission and approval of Construction Management Plans / Construction Environmental Management Plans setting out measures to control construction traffic routing, hours of operation, noise, dust, vibration, pollution, site access, waste management, and neighbour liaison. The Council will work with developers, contractors, and enforcement services to ensure that construction activity associated with growth is appropriately managed and that existing residents are protected from unacceptable impacts during the construction phase of developments allocated or permitted under the Local Plan.
Infrastructure (other than transport)	General opinion/view	Recommendation that housing should not be developed before key infrastructure is delivered	The Council recognises that ensuring adequate infrastructure provision, including transport, education, healthcare, utilities, green infrastructure, community facilities, and digital connectivity, is essential to support sustainable development, mitigate the impacts of growth on existing communities and services, and ensure that new developments are well-integrated, accessible, and create high-quality places. The Draft Local Plan is supported by an Infrastructure Delivery Plan (IDP) which identifies the infrastructure required to support the proposed growth, assesses the capacity of existing infrastructure, sets out the timing, cost, funding sources, and delivery responsibilities for necessary infrastructure improvements and new provision, and informs the Plan's policies on infrastructure delivery, developer contributions, and phasing of development. The Plan's policies on infrastructure provision and planning obligations (policies SCI1, DM2 and DM3) will require developments to deliver or contribute to necessary infrastructure in a timely manner and the Council will continue to work with infrastructure providers, statutory bodies, and developers to coordinate and secure timely infrastructure delivery to support the sustainable growth of Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Infrastructure (other than transport)	Green/blue infrastructure	Support for green infrastructure in development proposed	*The Council recognises that green infrastructure, provides essential environmental, social, economic, and health benefits. The Draft Local Plan includes proposed policies requiring new development to incorporate high-quality green infrastructure (Policy GI1), protect and enhance existing green spaces, trees, and hedgerows (Policy GI6), deliver biodiversity net gain (Policy GE1), provide sustainable drainage systems (Policy SD8), and ensure that major developments provide accessible open space and play facilities appropriate to the scale and character of development (Policy GI7). The Council will ensure that site allocation policies include specific requirements for green infrastructure provision tailored to the characteristics, opportunities, and constraints of each site, will work with developers and stakeholders to maximise the quality, connectivity, multifunctionality, and long-term management of green infrastructure, and will ensure that the Regulation 19 Publication version of the Local Plan strongly supports the provision of green infrastructure as an integral component of sustainable, healthy, and resilient development across Hertsmere.*
Infrastructure (other than transport)	Social Infrastructure	Concern local plan does not identify how healthcare infrastructure will be planned and delivered	*The Draft Local Plan includes proposed strategic policies on infrastructure delivery (Policies SCI1, DM2 and DM3) requiring development to be supported by adequate infrastructure capacity including healthcare, with infrastructure requirements identified through the Infrastructure Delivery Plan prepared in consultation with the NHS Central East Integrated Care Board, other healthcare providers, and relevant stakeholders, and with healthcare infrastructure secured through planning obligations, Community Infrastructure Levy, and coordination with healthcare commissioners and providers. The Council will ensure that the Regulation 19 Publication version of the Local Plan and accompanying Infrastructure Delivery Plan clearly demonstrate how healthcare infrastructure will be planned, funded, and delivered to support new development and meet the needs of Hertsmere's growing and changing population.*
Infrastructure (other than transport)	Social Infrastructure	Concern that plan does not take advantage of national funding and programme opportunities with regard to health infrastructure	*The Draft Local Plan Infrastructure Delivery Plan identifies infrastructure requirements arising from planned development including healthcare capacity needs, sets out anticipated delivery mechanisms and funding sources including developer contributions, public sector investment, and partnership arrangements, and has been prepared in consultation with infrastructure providers including the NHS Integrated Care Board to align planned development with healthcare service planning and capital investment programmes. The Council will continue to work with NHS commissioners and healthcare providers to identify relevant national funding programmes, capital investment opportunities, NHS estate strategies, and government initiatives that could support healthcare infrastructure delivery, and to align Local Plan delivery with NHS planning cycles, capital programmes, and funding bids.*
Infrastructure (other than transport)	Social Infrastructure	Request for Policy SC13 to be revised to ensure play provision and access to sports is provided equally across both the male and female gender as well as giving consideration to ensuring appropriate distribution across age and ability	Policy SC13 will require new residential development to provide or contribute towards sports, recreation and play provision that is accessible and inclusive to all, which includes people of all genders. Provision will be informed by an up-to-date Outdoor Sports and Playing Pitch Study and Indoor Sports Study which will ensure that needs are being met across the borough, giving proper consideration to people of different ages and ability.

Theme	Sub-Theme / Issue	Summary	*Response*
Local Plan Process/Planning Process	Consultation Process	General support for the consultation process on the Local Plan	The Council welcomes this support for the consultation process on the Local Plan. The Council is committed to ensuring meaningful and inclusive community engagement throughout the plan-making process, providing opportunities for residents, businesses, stakeholders, and interested parties to participate in shaping the future development of Hertsmere, and ensuring that the Local Plan reflects the needs, priorities, and aspirations of the local community. The Council will continue to engage with the community and stakeholders as the Local Plan progresses through the Regulation 19 stage, submission to the Planning Inspectorate, examination in public, and adoption, ensuring transparency, accessibility, and responsiveness throughout the process to deliver a sound, legally compliant, and community-supported Local Plan for Hertsmere.
Local Plan Process/Planning Process	Consultation Process	General concern about / objection to the consultation process on the Local Plan	The Council is committed to ensuring meaningful, inclusive, and legally compliant community engagement throughout the plan-making process, providing fair and accessible opportunities for residents, businesses, stakeholders, and interested parties to participate in shaping the future development of Hertsmere. The Council has undertaken consultation on the Draft Local Plan including public exhibitions, online consultation materials, stakeholder engagement, and opportunities to submit written representations, seeking to ensure that all interested parties have been able to make their views known. The Council remains committed to transparency, inclusivity, and responsiveness throughout the plan-making process, and will ensure that the Regulation 19 Publication stage and subsequent stages provide appropriate opportunities for participation, with all representations given due consideration in preparing a sound, legally compliant, and community-informed Local Plan for Hertsmere.
Local Plan Process/Planning Process	Consultation Process	Request for consultation process to be more open, transparent, accessible, inclusive and/ or more widely publicised to local residents.	The Council is committed to ensuring meaningful, inclusive, and accessible community engagement throughout the plan-making process, reaching as wide an audience as possible, and providing clear and accessible information and opportunities for participation. The Council has undertaken consultation on the Draft Local Plan including public exhibitions, online consultation portal, social media, press releases, direct notification to registered stakeholders, and opportunities to submit written representations, but recognises that there may be opportunities to improve the openness, transparency, accessibility, inclusivity, and reach of future consultation stages. The Council will carefully consider all feedback regarding how the consultation process can be enhanced and is committed to ensuring that the Regulation 19 Publication stage and subsequent consultation stages are as open, transparent, accessible, and inclusive as possible, reaching all sections of the community and enabling full and informed participation in the plan-making process for Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Local Plan Process/Planning Process	Consultation Process	Lack of policy wording means it is difficult to comment on the draft Plan.	The Council acknowledges that the policies are presented in outline form at this stage, with further refinement, additional detail, and clarification to be incorporated in the Regulation 19 Publication version of the Draft Local Plan. The purpose of the Regulation 18 consultation has been for consultees to provide comments on the principles, approach and content of the Draft Local Plan. The Council will carefully consider all feedback received and there will be a further opportunity to comment on the full and detailed policy wording at the Regulation 19 Publication stage before the Plan is submitted for examination.
Local Plan Process/Planning Process	Consultation Process	Concern about the number of consultation processes on the Local Plan and the amount of involvement in planning expected of residents	The Council has considered previous feedback in its current draft Plan. However, the context has changed since earlier versions, including changes to national planning policy, housing need, and wider economic and social changes, making a new Plan necessary in line with government requirements. The Council appreciates the time and effort offered by residents in responding to consultation efforts, and wishes to take local views into account, while also having to comply with government requirements regarding plan making and engagement on each plan published.
Local Plan Process/Planning Process	Council decision-making	Appeal for the Council to prioritise the wishes of existing residents in decision-making	The Council wishes to and is obliged to take into account views of existing residents as well as to plan for future needs, which include those of existing as well as future residents. The Council is also obliged by national policy and legislation to plan for housing and other needs which will arise during the Plan period. The Council will take residents' and other representations received into account when writing the Regulation 19 version of the Local Plan. However, HBC will still be bound by national policy and legislation, as well as by the results of technical evidence (in terms of available housing land supply, environmental constraints, identified needs etc), which limits what the Council is able to propose in its Local Plan. Equally, the Council is bound to assess and approve planning applications based on material considerations in line with planning policy and legislation, particularly where the Council has struggled in the past to meet its identified needs for housing and/or economic development. Objections from residents and councillors can only lead to a refusal if they are justified through material planning considerations. Where a refusal is deemed unreasonable, applicants can appeal the decision.
Local Plan Process/Planning Process	Council decision-making	General concern about Council's approach to decision-making	*The Council makes planning decisions in accordance with the statutory development plan and material considerations, as required by planning legislation. The planning system balances competing interests and must consider national policy, local evidence, and the merits of individual proposals. The Council's approach to decision-making is subject to scrutiny through the planning appeals process and judicial review, ensuring accountability and legal compliance.*

Theme	Sub-Theme / Issue	Summary	*Response*
Local Plan Process/Planning Process	Council decision-making	Concern regarding experience / competence of officers making planning decisions	*Planning decisions are made by qualified planning officers with relevant professional experience and qualifications. Officers provide recommendations based on material planning considerations, national policy, and local plan policies. Significant decisions are determined by the Planning Committee, comprising elected members who receive training on planning matters. The Council's decision-making processes follow national regulations and guidance, and decisions can be appealed if they are considered unreasonable.*
Local Plan Process/Planning Process	Council decision-making	Concern regarding planning committee's political allegiances affecting planning decisions	*Planning Committee members are required to make decisions based on material planning considerations, national policy, and the development plan, regardless of political affiliation. Members receive training on their roles and responsibilities and must follow the Members' Code of Conduct. Planning decisions that are not made in accordance with proper procedures can be challenged through the appeals process or judicial review. The Council is committed to ensuring that planning decisions are made fairly, transparently, and in accordance with planning law.*
Local Plan Process/Planning Process	Council decision-making	General support for Council's approach to decision-making	*The Council welcomes support for its approach to planning decision-making. The Council is committed to making decisions that balance competing interests, follow national policy and local evidence, and deliver sustainable development that meets the needs of existing and future residents.*
Local Plan Process/Planning Process	Decision-making process	General support for how the local plan will be used to inform decisions	*The Council welcomes support for the Local Plan's role in informing planning decisions. Once adopted, the Local Plan will form part of the statutory development plan and will be the starting point for determining planning applications, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.*
Local Plan Process/Planning Process	Decision-making process	General concern for how the local plan will be used to inform decisions	*The Local Plan will be used to inform planning decisions in accordance with the Planning and Compulsory Purchase Act 2004. Once adopted, planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The Plan provides clear policies against which proposals will be assessed, providing certainty for applicants and communities. The Council is committed to implementing the Plan effectively through its decision-making processes.*
Local Plan Process/Planning Process	Decision-making process	Requirement that MOD should be consulted on any wind energy infrastructure applications that exceed 11m or have a rotary blade diameter of greater than 2m and any solar energy infrastructure applications in the vicinity of aerodromes and airports.	*Policy TR7 protects the operational integrity and safety of safeguarded civil and military aerodromes, including the safeguarding context associated with RAF Northolt. Relevant proposals are subject to the applicable statutory safeguarding and consultation requirements.*

Theme	Sub-Theme / Issue	Summary	*Response*
Local Plan Process/Planning Process	Decision-making process	Recommendation that policy should not duplicate requirements for planning applications already set out in the Local Validation Checklist	*The Council recognises that Local Plan policies should set out clear policy requirements, principles, and criteria against which planning applications will be assessed, whilst avoiding unnecessary duplication of procedural or validation requirements that are more appropriately set out in the Local Validation Checklist, planning application guidance, or other supplementary documents. The Council will ensure that the Regulation 19 Publication version of the Local Plan provides clear policy direction and requirements without unnecessary duplication, that the Local Validation Checklist and other guidance documents appropriately set out submission and validation requirements, and that there is clear signposting between policies and supporting guidance to assist applicants, decision-makers, and other users of the Plan in understanding policy requirements and application procedures across Hertsmere.*
Local Plan Process/Planning Process	Evidence	Concern about the evidence to support the plan	*The Council recognises that Local Plans must be based on a robust, proportionate, and up-to-date evidence base that addresses the key issues and opportunities facing the area, informs policy development and site allocations, and demonstrates that the Plan's strategy and policies are justified, effective, and consistent with national policy. The Draft Local Plan has been informed by a comprehensive evidence base including the Housing and Economic Land Availability Assessment (HELAA), Housing and Economic Development Needs Assessment (HEDNA), Infrastructure Delivery Plan, Green Belt Study, Sustainability Appraisal, Habitats Regulations Assessment, Transport Assessment, Strategic Flood Risk Assessment, and topic-specific studies covering heritage, landscape, ecology, air quality, viability, and other material considerations. The Council will carefully consider all representations raising concerns about the adequacy, robustness, methodology, or conclusions of evidence base documents, will review whether any evidence requires updating, additional work, or independent review to ensure it is fit for purpose and supports the Plan's strategy and policies*

Theme	Sub-Theme / Issue	Summary	*Response*
Local Plan Process/Planning Process	Evidence	General opposition to policies because they do not reference and/ are missing key evidence	*The Council recognises that Local Plan policies must be underpinned by a robust, proportionate, and up-to-date evidence base that addresses the key issues and opportunities facing the area, informs policy development, demonstrates that policies are justified by appropriate analysis and reasonable alternatives have been considered, and ensures that policies are effective and deliverable. The Draft Local Plan has been informed by a comprehensive evidence base covering housing and economic needs, site availability and deliverability, infrastructure requirements, Green Belt assessment, sustainability appraisal, habitats regulations assessment, transport, flood risk, heritage, landscape, ecology, air quality, viability, and other material considerations, with policies developed based on this evidence and supported by explanatory text that references key evidence documents. The Council will review whether policy wording, supporting text, or evidence base documents require amendment, clarification, or additional work to ensure that all policies are appropriately evidenced and justified, and will ensure that the Regulation 19 Publication version of the Local Plan includes clear cross-references between policies and supporting evidence, and that any identified evidence gaps are addressed to ensure that the Plan is robustly evidenced and capable of being found sound at examination.*
Local Plan Process/Planning Process	Evidence	Support for infrastructure delivery plan (IDP) in identifying infrastructure requirements.	*The Council welcomes the support for the Infrastructure Delivery Plan (IDP) in identifying infrastructure requirements. The Council recognises that strategic planning for infrastructure is essential to support sustainable growth, ensure that development is supported by adequate physical, social, and green infrastructure, and demonstrate that the Local Plan strategy is deliverable and effective. The Council is committed to working closely with infrastructure providers including Hertfordshire County Council, the Integrated Care Board, utility companies, emergency services, and other stakeholders to ensure that infrastructure is planned, funded, and delivered in a timely and coordinated manner to support sustainable growth, and will continue to update and refine the Infrastructure Delivery Plan as the Local Plan progresses through examination and implementation, ensuring that infrastructure delivery remains on track and responsive to changing needs and circumstances across Hertsmere.*
Local Plan Process/Planning Process	Evidence	Recommendation that a separate cost input for health infrastructure in the whole plan viability assessment would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development. This should be reflected and updated accordingly within both the draft IDP and the Local Plan to ensure accuracy and alignment with the current NHS organisational structure.	*The Draft Local Plan whole plan viability assessment has been prepared in accordance with national planning guidance to test whether the cumulative impact of policy requirements and infrastructure contributions would render development unviable, with infrastructure requirements and anticipated funding mechanisms including developer contributions identified in the Infrastructure Delivery Plan. The Council will carefully consider this recommendation that health infrastructure costs should be separately identified and costed within the whole plan viability assessment and ensure that the Local Plan is supported by a robust evidence base that provides a sound justification for the employment land requirement*

Theme	Sub-Theme / Issue	Summary	*Response*
Local Plan Process/Planning Process	Evidence	Opposition to the approach taken in the Economic Study 2026 as it omits a number of key considerations such as the lack of an employment land uptake model; downward adjustments on future long-term need because of short term high vacancy rate; lack of incorporation of strategic scale logistics need; and recommendation of a labour demand model.	*The Draft Local Plan employment land requirement has been informed by the Economic Study 2026, which assesses future employment land needs using standard methodologies including labour demand forecasting based on econometric projections of job growth, past employment land take-up trends, and consideration of qualitative factors such as market signals, economic strategies, sector-specific requirements, strategic employment locations, and consultation with businesses, commercial agents, and economic development stakeholders. The Council will carefully consider this representation raising concerns about the methodology and assumptions underpinning the Economic Study 2026*
Local Plan Process/Planning Process	Plan-making process (general)	General support for the proposed plan making process	*The Council welcomes the support for the proposed plan-making process. The Council is committed to preparing a sound, legally compliant, and community-supported Local Plan through a transparent, inclusive, and evidence-based plan-making process that meets the requirements of national legislation and policy, engages effectively with the community and stakeholders, and delivers a strategic vision and policy framework for sustainable development across Hertsmere to 2041. The plan-making process has included evidence gathering, strategic options assessment, Regulation 18 consultation on the Draft Local Plan, and will progress through consideration of representations, preparation of the Regulation 19 Publication version, submission to the Planning Inspectorate, examination in public, and adoption. The Council will continue to ensure that the plan-making process is conducted with transparency, rigour, and inclusivity, that all representations are carefully considered and inform refinement of the Plan, that the evidence base is comprehensive and robust, and that the community and stakeholders have meaningful opportunities to participate at each stage, delivering a Local Plan that meets the development needs of Hertsmere whilst protecting and enhancing the environment, heritage, and quality of life for current and future generations.*

Theme	Sub-Theme / Issue	Summary	*Response*
Local Plan Process/Planning Process	Plan-making process (general)	General concern about / objection to the proposed plan making process	*The Council is committed to preparing a sound, legally compliant, and community-supported Local Plan through a transparent, robust, and inclusive plan-making process that meets the requirements of national legislation and policy, engages effectively with the community and stakeholders, and is capable of examination against the tests of soundness. The plan-making process has included evidence gathering, strategic options assessment, Sustainability Appraisal, Habitats Regulations Assessment, and Regulation 18 consultation on the Draft Local Plan, and will progress through consideration of representations, preparation of the Regulation 19 Publication version, submission to the Planning Inspectorate, examination in public, and adoption. The Council will carefully consider all feedback raising concerns about the plan-making process, including concerns about methodology, evidence base, consultation approach, assessment of alternatives, legal compliance, procedural matters, or alignment with the duty to cooperate, and will reflect on whether any improvements, additional work, or adjustments are necessary to ensure full compliance with legal and procedural requirements and best practice. The Council remains committed to transparency, rigour, and responsiveness throughout the plan-making process, ensuring that all representations are given due consideration, that the evidence base is comprehensive and robust, and that the Local Plan is prepared in accordance with statutory requirements and capable of being found sound and legally compliant at examination.*
Local Plan Process/Planning Process	Plan-making process (general)	General concern about / objection to the proposed plan period	*The Draft Local Plan covers the period from 2026 to 2041, providing a 15-year planning horizon from the anticipated adoption date, which is consistent with national policy requirements. The Council considers that 15 years provides an appropriate timeframe to plan for housing and economic development needs, infrastructure delivery, environmental protection, and community facilities across Hertsmere. Where appropriate the Council will ensure that policies include appropriate flexibility and trigger points for early review to ensure the Plan remains effective and responsive to changing circumstances throughout the plan period.*
Local Plan Process/Planning Process	Plan-making process (general)	General opposition to the Local Plan, asserting that the process has not been completed in a legal manner	*The Council is committed to preparing a sound and legally compliant Local Plan in accordance with all statutory requirements and procedural regulations. The plan-making process has included appropriate evidence gathering, assessment of reasonable alternatives, Sustainability Appraisal, Habitats Regulations Assessment, consultation in accordance with the Statement of Community Involvement and Regulation 18 requirements, and cooperation with neighbouring authorities and prescribed bodies under the duty to cooperate. The Council will ensure that the Regulation 19 Publication version and submission of the Local Plan for examination meet all legal and procedural requirements, that the Plan is accompanied by appropriate supporting documents including consultation statements, and that the Plan is capable of being found legally compliant and sound by an independent Planning Inspector at examination.*

Theme	Sub-Theme / Issue	Summary	*Response*
Local Plan Process/Planning Process	Plan-making process (general)	General opposition to the Local Plan, as not complying with local wishes	The Council will take residents' and other representations received into account when writing the Regulation 19 version of the Local Plan. However, HBC will still be bound by national policy and legislation, as well as by the results of technical evidence (in terms of available housing land supply, environmental constraints, identified needs etc), which limits what the Council is able to propose in its Local Plan.
Local Plan Process/Planning Process	Plan-making process (general)	Concern regarding qualifications, competence, and / or independence of officers writing the plan	*The Council's Local Plan has been prepared by qualified planning professionals with relevant experience in plan-making, supported by specialist consultants and technical evidence from appropriate experts. The plan-making process follows statutory requirements and national guidance, with governance oversight from elected members. The Council is confident that the Plan is being prepared to a professional standard that will meet the tests of soundness at examination.*
Local Plan Process/Planning Process	Plan-making process (general)	General opposition to the Local Plan due to a perceived lack of transparency	*The Council is committed to transparency in the plan-making process. All consultation materials, evidence documents, and committee reports are published on the Council's website. The consultation process follows national regulations, providing opportunities for residents and stakeholders to comment on the Plan at each stage. The Council publishes a Consultation Statement setting out how representations have been considered, demonstrating transparency and accountability in decision-making.*
Local Plan Process/Planning Process	Plan-making process (general)	Concern regarding councillors' individual agendas affecting their involvement in the plan making process	*Elected members have a democratic mandate to represent their constituents and make planning decisions in the public interest. Members are required to follow the Members' Code of Conduct and to declare any interests. Planning decisions must be made on material planning considerations in accordance with national policy and local evidence. The Local Plan will be subject to independent examination by a Planning Inspector appointed by the Secretary of State, ensuring it meets legal and soundness requirements regardless of individual member views.*
Local Plan Process/Planning Process	Plan-making process (general)	Neighbouring plan-making authority supports ongoing engagement to fulfil effective engagement requirement.	*The Council welcomes the support for ongoing engagement from neighbouring planning authorities. The Council is committed to continuing constructive cooperation on strategic cross-boundary matters throughout the plan-making process, in accordance with national policy requirements following the abolition of the formal Duty to Cooperate.*
Local Plan Process/Planning Process	Plan-making process (general)	Support from statutory body for ongoing engagement with the Council through the next stages of plan making.	*The Council welcomes the support from statutory bodies and is committed to maintaining ongoing engagement through the Regulation 19 and examination stages of plan-making. This collaborative approach ensures that the Plan is informed by the expertise and requirements of statutory consultees and delivers sustainable development.*

Theme	Sub-Theme / Issue	Summary	*Response*
Local Plan Process/Planning Process	Plan-making process (general)	Support from non-statutory stakeholder for ongoing engagement with the Council through the next stages of plan making.	*The Council values the contributions and expertise of non-statutory stakeholders in informing policy development, site assessments, evidence gathering, and implementation planning, and will continue to engage proactively with stakeholders as the Local Plan progresses through consideration of Regulation 18 representations, preparation of the Regulation 19 Publication version, submission to the Planning Inspectorate, examination in public, adoption, and subsequent implementation and monitoring. The Council encourages all stakeholders to remain actively engaged throughout the process, to submit representations at Regulation 19 and participate in the examination if appropriate, and to continue working collaboratively with the Council on delivery of infrastructure, sustainable development, environmental protection, and community priorities across Hertsmere.*
Local Plan Process/Planning Process	Plan-making process (general)	The Council must undertake a cooperation exercise on cross boundary matters to include matters raised.	*The Council recognises its responsibility to cooperate with neighbouring authorities on strategic cross-boundary matters, in accordance with national policy. The Council has engaged and will continue to engage with relevant authorities on matters including housing need, employment land, transport infrastructure, environmental protection, and service provision. Statements of Common Ground will be prepared where appropriate to document areas of agreement and any outstanding issues*
Local Plan Process/Planning Process	Plan-making process (general)	Concern that the draft Local Plan is not sound.	*The Council is preparing the Local Plan to meet the tests of soundness set out in the NPPF paragraph 35: that it is positively prepared, justified, effective and consistent with national policy. The Plan is supported by a comprehensive evidence base, has been subject to Sustainability Appraisal, and will be submitted for independent examination. The Council will consider all representations received and make necessary amendments to ensure the Plan is sound and legally compliant.*
Local Plan Process/Planning Process	Plan-making process (general)	Concern that the proposals are not in conformity with national planning policy.	*The Council has prepared the Local Plan in accordance with the National Planning Policy Framework (NPPF) and national Planning Practice Guidance. The Plan's policies and site allocations are informed by the most recent national policy and will be reviewed to ensure conformity with any updates to national policy prior to submission for examination. The Plan will be tested for soundness against national policy requirements by an independent Planning Inspector.*
Local Plan Process/Planning Process	Plan-making process (general)	General concern that Hertsmere have not carried out the duty to cooperate with neighbouring authorities.	*The Council has engaged with neighbouring authorities and statutory bodies throughout the plan-making process on strategic cross-boundary matters. While the formal Duty to Cooperate has been abolished, the Council remains committed to effective cooperation on matters such as housing, employment, transport, and environmental protection. This engagement is documented through meeting records and Statements of Common Ground, demonstrating that the Council has worked constructively to address strategic issues.*

Theme	Sub-Theme / Issue	Summary	*Response*
Local Plan Process/Planning Process	Plan-making process (general)	Concern that the proposals in the plan are inappropriate / premature due to imminent local government reorganisation	*The Council is required to prepare a Local Plan under planning legislation to guide development in the Borough. While decisions and changes regarding local government reorganisation is awaited, the Council must continue to plan for its area until any changes take effect. The Plan will provide an up-to-date policy framework regardless of future administrative changes. Any reorganisation can be addressed through subsequent plan reviews if necessary, in accordance with national policy. Putting a Plan in place for the current Hertsmere geography will also help to ensure that the interests of Hertsmere are embedded in planning decisions in any future, wider geography.*
Local Plan Process/Planning Process	Plan-making process (general)	Concerns that insufficient progress will have been made on addressing key challenges related to Bowmans Cross before publication of the Regulation 19 publication and submission.	*The Council is undertaking comprehensive evidence gathering and masterplanning work to address the challenges associated with Bowmans Cross, including transport access, infrastructure provision, environmental mitigation, and delivery phasing. The Regulation 19 Plan will be supported by updated evidence demonstrating that these challenges can be addressed and that the site can be delivered sustainably over the plan period. Ongoing technical work will inform detailed allocation policies for the site.*
Local Plan Process/Planning Process	Site selection	Concern over proposed policies not being considered adequately in the site selection process	*The Council's site selection process has been informed by the Plan's emerging policies, including those on design, environment, heritage, infrastructure, and transport. The Sustainability Appraisal assesses sites against policy objectives to ensure allocations are compatible with the Plan's strategy. Site-specific policies will include requirements to address constraints and deliver policy objectives. The Council will review site selection to ensure it fully reflects policy requirements for the Regulation 19 Plan.*
Local Plan Process/Planning Process	Plan-making process (general)	Recommendation to ensure policy is in line with national policy / does not duplicate national policy requirements	*The Draft Local Plan has been prepared in accordance with national policy and guidance. As part of preparing the Regulation 19 Publication version of the Local Plan the Council will undertake a review to ensure that all local policies are aligned with national policy, including the National Planning Policy Framework published following the conclusion of this Regulation 18 consultation, to minimise duplication of requirements and standards where relevant and possible, considering the timeframes of the emerging Local Plan.*
Local Plan Process/Planning Process	Site selection	Concern that that the Council is not meeting its Public Sector Equality Duty, of explicitly assessing the impacts of development on proposed sites on persons with protected characteristics (e.g. disabled persons)	*The Council is committed to meeting its Public Sector Equality Duty under the Equality Act 2010. The Sustainability Appraisal includes assessment of impacts on equalities and social inclusion. The Plan includes policies requiring accessible and inclusive design for all development. The Council will ensure that the Equality Impact Assessment explicitly considers the impacts of site allocations on persons with protected characteristics, including disabled persons, older people, and other groups, to inform policy development and site selection for the Regulation 19 Plan.*
Local Plan Process/Planning Process	Site selection	Technical reports missing which limits residents' ability to comment on sites	*The Council acknowledges that additional technical evidence is being prepared to inform the Regulation 19 Plan. Key studies including transport modelling, Heritage Impact Assessments, and updated infrastructure planning will be published to support the next consultation stage. This will ensure that residents and stakeholders have access to comprehensive evidence on which to base their representations on proposed site allocations.*

Theme	Sub-Theme / Issue	Summary	*Response*
Local Plan Process/Planning Process	Site selection	Suitable locations for housing to meet the needs of specific local groups, such as key workers (e.g. NHS staff), should be explored as part of the site selection process.	*The Local Housing Needs Assessment considers the needs of different groups within the Borough. Policies H1 and H3 seek an appropriate mix of housing and maximise the delivery of genuinely affordable housing in response to identified housing need*
Local Plan Process/Planning Process	Site selection	Viability assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the borough. This enables an informed judgement about which developments would be able to deliver the range of infrastructure required.	*The Council agrees that viability is a key consideration in site selection. The Whole Plan Viability Assessment tests the Plan's policies and site typologies to ensure they are deliverable. Site selection is informed by viability evidence alongside environmental, heritage, infrastructure, and deliverability considerations. The Council will ensure that site allocations are viable and can deliver required infrastructure, affordable housing, and other planning obligations, informed by the viability assessment.*
Local Plan Process/Planning Process	Site selection	Recommendation that greater consideration should be given to the cumulative impacts of multiple allocations.	*The Council recognises the importance of assessing cumulative impacts of multiple allocations, particularly on transport, infrastructure, environment, and community facilities. The Sustainability Appraisal, Transport Study, Infrastructure Delivery Plan, and other evidence documents consider cumulative impacts. The Plan will include policies requiring consideration of cumulative impacts in planning decisions, and the Council will monitor development to ensure cumulative impacts are managed effectively.*
Local Plan Process/Planning Process	Site selection	Opposition to proposed allocation because there are more suitable alternative sites.	*The Council's site selection process assesses all reasonable alternative sites through the Housing and Employment Land Availability Assessment, Sustainability Appraisal, and technical evidence. Sites are selected based on their suitability, availability, achievability, and performance against sustainability criteria. The Council will consider all representations on site selection and review the evidence to ensure the most appropriate sites are allocated in the Regulation 19 Plan.*
Local Plan Process/Planning Process	Plan-making process (general)	Recommendation for The Council to use legal mechanisms to compel developers to build out permitted sites	*The Council has limited powers to compel developers to build out permitted sites. However, the Council can consider using Completion Notices under Section 94 of the Town and Country Planning Act 1990 where development has commenced but not been completed within a reasonable time. The Council could also use Compulsory Purchase powers where this would facilitate development to meet identified needs, subject to demonstrating that this represents value for money and is in the public interest. The Plan will focus on ensuring a robust housing trajectory with a range of sites to provide flexibility and resilience.*

Theme	Sub-Theme / Issue	Summary	*Response*
Local Plan Process/Planning Process	Plan-making process (general)	General opinion that withholding future planning permissions from "underperforming" developers is legally dubious and impractical because permissions run with the land, so stronger options are land value taxation or time-limited delivery conditions on major consents	*The Council recognises that planning permissions are interests in land that run with the land rather than the applicant, and that the planning system must operate within the legal framework established by the Town and Country Planning Act 1990 and related legislation. The Draft Local Plan seeks to ensure timely and effective delivery of development through policies that support the delivery of the spatial strategy, monitoring mechanisms to track housing delivery against targets including through the Housing Delivery Test, and engagement with developers and landowners to understand and address barriers to delivery, whilst the Council can use planning conditions to control the timing and phasing of development, require commencement within specified periods, use Section 106 agreements to secure delivery obligations and review mechanisms, and where appropriate pursue enforcement action or consider compulsory purchase powers to bring forward stalled sites. The Council will carefully consider this representation regarding developer performance and delivery mechanisms and will review the legal and practical options available to encourage and secure timely delivery of allocated sites and permitted developments. It is noted that land value taxation is a fiscal measure beyond local planning authority powers and that any delivery mechanisms must operate lawfully within the statutory planning framework.*
Local Plan Process/Planning Process	Evidence	Request for The Council to confirm whether additional evidence is being undertaken to support the proposed allocation	*As part of the site allocation process developers and site promoters have had to provide evidence that site allocations are deliverable, viable and supported by robust technical assessment covering highways and transport impacts, environmental constraints, heritage impacts, landscape and visual effects, flood risk and drainage, utilities and infrastructure capacity, contamination and remediation, ecology and biodiversity, and any other material considerations. The Council will review consultation responses received during the Regulation 18 consultation stage and confirm whether any additional evidence or further assessment is required for specific candidate sites.*
Local Plan Process/Planning Process	Plan-making process (general)	Parish Council request support from the Council for producing an updated Neighbourhood Plan	*The Shenley Neighbourhood Plan has been produced by Shenley Parish Council and is already a material consideration in the determination of planning applications within the neighbourhood area. The Borough Council will support Neighbourhood Planning groups as far as possible within its available resources, to produce new Neighbourhood Plans where they seek to do so, taking a proactive and positive approach, working collaboratively with the relevant qualifying body, sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success.*
Local Plan Process/Planning Process	Plan-making process (general)	Concern about speculative development in the green belt and a lack of a robust emerging Plan to address this	*The draft Local Plan seeks to improve the Council's housing land supply position from the point of adoption to avoid speculative development across Hertsmere. Allocations are proposed to ensure a robust housing land supply.*
No comment			*N/A*

Theme	Sub-Theme / Issue	Summary	*Response*
Places & Growth Sites	Borehamwood - Omission Site	Site is suitable and available for allocation in the plan but has been omitted from the strategy for the Borehamwood area.	*The Council has assessed all reasonable alternative sites through the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Site selection is based on sustainability, deliverability, infrastructure capacity, environmental constraints and contribution to the spatial strategy. Sites not allocated have been found to perform less favourably against these criteria or present significant constraints. The Council will review all representations on omission sites when preparing the Regulation 19 Plan.*
Places & Growth Sites	Bushey - Omission Site	Site is suitable and available for allocation in the plan but has been omitted from the strategy for the Bushey area.	*The Council has assessed all reasonable alternative sites through the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Site selection is based on sustainability, deliverability, infrastructure capacity, environmental constraints and contribution to the spatial strategy. Sites not allocated have been found to perform less favourably against these criteria or present significant constraints. The Council will review all representations on omission sites when preparing the Regulation 19 Plan.*
Places & Growth Sites	Delivery	Submission of evidence that the site is suitable, available and achievable and therefore developable and deliverable.	*The Council welcomes evidence submissions demonstrating site suitability, availability and achievability. All evidence will be considered through the Housing and Employment Land Availability Assessment process and will inform site selection for the Regulation 19 Plan, in accordance with national Planning Practice Guidance on Housing and Economic Land Availability Assessment.*
Places & Growth Sites	Delivery	Concern about the amount of affordable housing that could be delivered due to the tension between mitigation costs and viability. Compromises on mitigation and affordable housing should not be accepted to improve viability.	*The Council will include a comprehensive monitoring framework in the Local Plan, setting out indicators, targets, and triggers for policy review. An Annual Monitoring Report will track implementation of policies and delivery of allocations, identifying any issues that require corrective action. This approach ensures the Plan remains effective and responsive to changing circumstances over the plan period, in accordance with national policy requirements.*
Places & Growth Sites	Delivery	Concerns about proposed processes for monitoring the future implementation / impact of the Local Plan, its policies and allocations	*The Council recognises that effective monitoring is essential to track the implementation of the Local Plan, assess whether policies are achieving their intended outcomes, identify any unforeseen impacts or delivery challenges, and provide an evidence base to inform future plan reviews and policy adjustments. The Draft Local Plan includes a draft monitoring framework setting out key indicators, targets, and triggers for policies covering housing delivery, employment land provision, infrastructure delivery, environmental quality, climate change mitigation and adaptation, heritage protection, biodiversity net gain, and other strategic and development management objectives, with monitoring to be reported through the Council's Authority Monitoring Report published annually. The Council will ensure that the Regulation 19 Publication version includes a comprehensive, effective, and deliverable monitoring framework that enables the Council to track plan implementation, assess policy effectiveness, respond to changing circumstances, and ensure accountability and transparency in delivering sustainable development across Hertsmere.*

Theme	Sub-Theme / Issue	Summary	*Response*
Places & Growth Sites	Delivery	Concern over the deliverability of Bowmans Cross due to the lack of publicly available information which sets out the mineral extraction, waste insertion, waste settlement and restoration processes	*The previous and in some case existing uses in the area of Bowmans Cross encompass a range of activities including quarrying, waste to energy production, offices, farming and equestrian businesses. The Council agree that clarity is needed on restoration and delivery timescales. The Council is working with the site operator and Hertfordshire County Council as Waste Planning Authority to establish the phasing of restoration and timing for development delivery. The Regulation 19 Plan will be supported by evidence demonstrating that the site can be delivered within the plan period and that restoration and development can proceed in a coordinated manner. Site-specific policies will address phasing requirements.*
Places & Growth Sites	General Opinion / View	Objection to / concern about development on site proposed	*The Council has assessed all proposed allocations through the site selection process, informed by the HELAA, Sustainability Appraisal, and technical evidence. The Council will consider all objections received and review site allocations in light of representations, updated evidence, and deliverability considerations for the Regulation 19 Plan. Sites will only be allocated where they are suitable, available, achievable, and can be delivered sustainably over the plan period.*
Places & Growth Sites	General Opinion / View	General support for development of the site/area to support new employment and economic growth within the area	*The Council welcomes support for site allocations that will deliver employment and economic growth. The Plan seeks to provide sufficient employment land in appropriate locations to meet identified needs over the plan period, supporting economic prosperity and job creation in accordance with national policy.*
Places & Growth Sites	General Opinion / View	General objection to any kind of development in this area / settlement	*The Council has to plan to meet identified housing and employment needs over the plan period in accordance with national policy and legislation. The spatial strategy directs development to the most sustainable locations, balancing the need to meet development requirements with protecting environmental assets and local character. The Council will consider all representations in finalising site allocations for the Regulation 19 Plan.*
Places & Growth Sites	General Opinion / View	Concern that proposed development will devalue existing housing stock in the area.	*The Council has to plan to meet identified housing and employment needs over the plan period in accordance with national policy and legislation. The planning system is concerned with land use in the public interest and cannot prevent development on the grounds that it may affect individual property values. The Plan seeks to ensure that all development is of high quality, well-designed, and appropriately integrated with existing communities. Property values are influenced by many factors and are not a material planning consideration in plan-making or decision-making.*
Places & Growth Sites	General Opinion / View	Concern that proposed development will impact businesses in the area.	*The Council recognises that development can have impacts on existing businesses, both positive and negative. The Plan's policies require development to protect employment land and town centre vitality, and to minimise adverse impacts on existing businesses during construction and operation. Where development generates significant impacts, appropriate mitigation will be required through planning conditions and obligations.*

Theme	Sub-Theme / Issue	Summary	*Response*
Places & Growth Sites	General Opinion / View	General support for development in this area / settlement	*The Council welcomes support for development in principle. The Plan seeks to deliver sustainable development that meets identified needs while protecting and enhancing environmental, social, and economic assets. The Council will work with communities and stakeholders to ensure development is well-planned and delivers benefits for existing and future residents.*
Places & Growth Sites	General Opinion / View	General support for development on site proposed	*The Council welcomes support for proposed site allocations. The Plan seeks to allocate sites that are deliverable, sustainable, and can contribute to meeting identified housing and employment needs over the plan period. The Council will continue to refine site allocation policies to ensure development delivers positive outcomes.*
Places & Growth Sites	General Opinion / View	Support for delivering more growth on site than proposed within the plan period	*The Council has assessed site capacities based on site constraints, environmental and heritage impacts, infrastructure capacity, and design considerations. Where evidence supports higher capacity on allocated sites without unacceptable impacts, the Council will consider increasing proposed allocations in the Regulation 19 Plan, subject to updated technical assessments and viability considerations.*
Places & Growth Sites	General Opinion / View	Objection to development of proposed site due to the impact on playing pitch provision and the absence of a full needs assessment in Potters Bar. Objection will stand until Playing Pitch Strategy has been published and informs site allocations.	*The Council is updating the Playing Pitch Strategy to inform the Regulation 19 Plan. Where sites include or are adjacent to playing pitches or sports facilities, the Plan will require replacement provision of equivalent or better quality and quantity in accordance with Sport England guidance and NPPF paragraph 104. Site allocation policies will be informed by the updated Playing Pitch Strategy and will ensure no net loss of sports facilities unless they are demonstrably surplus to requirements.*
Places & Growth Sites	General Opinion / View	No special circumstances to support development of a site in the Green Belt	*The Council is preparing an exceptional circumstances case to justify Green Belt release to meet identified housing and employment needs that cannot be met on non-Green Belt land. The Plan will demonstrate that all reasonable alternatives have been explored, that the Green Belt boundaries proposed will endure beyond the plan period, and that the release represents sustainable development in accordance with national policy. This case will be set out comprehensively in the Regulation 19 Plan and supporting evidence, including the Green Belt Assessment.*
Places & Growth Sites	General Opinion / View	Recommendation that policy outlines that where an MOD assessment indicates development will have a detrimental impact on MOD assets or operations that an application will either be refused or conditions would be attached to the permission.	*The Council notes the MOD's requirements regarding safeguarding of defence assets and operations. Site allocation policies for sites within MOD safeguarding zones will require consultation with the MOD and will state that development must not compromise MOD operations or defence assets. Where impacts are identified, appropriate mitigation or design amendments will be required, or planning permission may be refused if impacts cannot be satisfactorily addressed.*

Theme	Sub-Theme / Issue	Summary	*Response*
Places & Growth Sites	General Opinion / View	Concern/opposition to development on the proposed site due to the impact on visual receptors and landscape character	*The Council has assessed landscape and visual impacts of proposed allocations through landscape assessments and the Sustainability Appraisal. Site allocation policies will include requirements for landscape mitigation, including buffer planting, appropriate building heights and layout, and retention of landscape features. Development will be required to respond sensitively to landscape character and minimise visual impacts through careful design, in accordance with national policy and local landscape character assessments.*
Places & Growth Sites	General Opinion / View	Recommendation that the policy wording and requirements for allocations sites should mention the specific designated heritage assets present both on site and nearby and also refer to specific mitigation measures e.g. landscaping /buffers /setbacks, design measures, or protection of key views, identified by the relevant Heritage Impact Assessment (HIA) for the site. Recommended wording for developments which impact on designated heritage assets: "Development should conserve or where appropriate enhance the significance of heritage assets including [list heritage assets on site and nearby] including any contribution made to their significance by their settings. Appropriate mitigation measure including … will be required."	*The Council will ensure that Heritage Impact Assessments inform site allocation policies for the Regulation 19 Plan. Where heritage assets are present on or near allocated sites, site-specific policies will identify the assets, set out their significance, and specify mitigation requirements including design measures, landscaping, buffers, setbacks, and protection of key views. This approach will ensure heritage assets are conserved or enhanced in accordance with national policy.*
Places & Growth Sites	General Opinion / View	Site specific concern about trees on the site that are protected by Tree Preservation Orders (TPOs).	*Site allocation policies will require development to retain trees protected by Tree Preservation Orders (TPOs) wherever possible. Where loss of TPO trees is unavoidable to enable development, this will need to be justified through an arboricultural assessment, and appropriate replacement planting will be required. The Plan's policies on trees will ensure TPO trees are protected and that development does not result in unacceptable loss of trees that contribute to amenity and character.*
Places & Growth Sites	General Opinion / View	Opposition to the location of proposed development close to the M4 as this in direct conflict with paragraph 185 & 186 of the NPPF and policy SD11 of the draft Plan	*The Council will ensure that sites located near major roads are assessed for noise, air quality, and other environmental impacts in accordance with NPPF paragraphs 185 and 186. Site allocation policies will require appropriate mitigation measures including acoustic barriers, building design and layout, and buffer zones to protect future occupiers from unacceptable noise and air quality impacts. Development will only be allocated where it can be demonstrated that acceptable living conditions can be achieved.*
Places & Growth Sites	General Opinion / View	Query about how the proposed site will benefit the community	*Each site allocation policy sets out the opportunities and benefits that development is expected to deliver, including affordable housing, employment opportunities, infrastructure improvements, green infrastructure, and community facilities. The Council will work with developers to ensure allocated sites deliver tangible benefits for existing and new communities through well-designed, sustainable development that meets identified local needs.*
Places & Growth Sites	General Opinion / View	Support for development on site proposed as it will help address housing need	*The Council welcomes support for allocation of specific sites to contribute towards meeting the Borough's housing need.*

Theme	Sub-Theme / Issue	Summary	*Response*
Places & Growth Sites	Other omission sites	Site is suitable and available for allocation in the plan to meet the needs of the Borough.	*The Council has assessed all submitted sites through the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Site selection is based on suitability, availability, achievability, sustainability performance, and conformity with the spatial strategy. The Council will review all representations promoting omission sites and consider whether any should be allocated in the Regulation 19 Plan, informed by updated evidence and the need to meet the housing requirement.*
Places & Growth Sites	Potters Bar - Omission Site	Site is suitable and available for allocation in the plan but has been omitted from the strategy for the Potters Bar area.	*The Council has assessed all submitted sites through the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Site selection is based on suitability, availability, achievability, sustainability performance, and conformity with the spatial strategy. The Council will review all representations promoting omission sites and consider whether any should be allocated in the Regulation 19 Plan, informed by updated evidence and the need to meet the housing requirement.*
Places & Growth Sites	Radlett - Omission Site	Site is suitable and available for allocation in the plan but has been omitted from the strategy for the Radlett area.	*The Council has assessed all submitted sites through the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Site selection is based on suitability, availability, achievability, sustainability performance, and conformity with the spatial strategy. The Council will review all representations promoting omission sites and consider whether any should be allocated in the Regulation 19 Plan, informed by updated evidence and the need to meet the housing requirement.*
Places & Growth Sites	General opinion / view	Support for removal of omission site	*The Council welcomes this support for the outcomes of the site allocation process and omission of specific sites. The Draft Local Plan candidate sites have been selected following comprehensive assessment of all sites promoted through the Housing and Economic Land Availability Assessment (HELAA) process, with sites excluded from allocation where they are found to be unavailable, unsuitable due to policy constraints or technical issues that cannot reasonably be mitigated, or unachievable in terms of viability or deliverability within the plan period, with the site selection methodology, assessment findings, and justification for inclusion or exclusion of sites documented transparently in the HELAA report, site selection background paper, and sustainability appraisal, and informed by consultation responses, technical evidence, and engagement with landowners, statutory consultees, infrastructure providers, and the local community.*

Theme	Sub-Theme / Issue	Summary	*Response*
Places & Growth Sites	General opinion / view	Support for site proposed due to evidence provided demonstrating that technical matters can be satisfactorily addressed	*The Council recognises that site allocations must be based on robust evidence that sites are available, suitable, and achievable, with technical constraints including access, highways, drainage, flood risk, contamination, ecology, landscape, heritage, utilities, and other infrastructure requirements capable of being satisfactorily addressed through appropriate design, mitigation measures, and planning conditions or obligations. The site allocation process has been informed by the Housing and Economic Land Availability Assessment (HELAA), technical studies including transport assessments, flood risk assessment, ecology surveys, landscape and visual impact assessment, heritage impact assessment, and infrastructure capacity analysis, site-specific evidence submitted by site promoters, and consultation with statutory consultees including highways authorities, environmental bodies, heritage organisations, and infrastructure providers to assess the suitability and deliverability of proposed allocations. The Regulation 19 Publication version of the Local Plan includes only those site allocations that are demonstrably deliverable, supported by robust evidence, and capable of coming forward for development in accordance with the Plan's spatial strategy and sustainability objectives.*
Places & Growth Sites	General opinion / view	Support for development of site due to it aligning with the spatial strategy	*The Council recognises that site allocations should be consistent with and support the delivery of the Local Plan's spatial strategy, which sets out the overall pattern, scale, and distribution of development across the borough, directs growth to the most sustainable locations, and balances the need to meet objectively assessed development needs with the protection of environmental assets, Green Belt, heritage, and settlement character. The Council will ensure that the Regulation 19 Publication version of the Local Plan includes a coherent and integrated package of site allocations that collectively deliver the spatial strategy, meet development needs, and support the creation of sustainable, inclusive, and well-connected communities across Hertsmere in accordance with the Plan's vision and national policy requirements.*
Places & Growth Sites	General opinion / view	Support for development of site due to the benefits it would bring	*The Draft Local Plan seeks to allocate sites that deliver a range of benefits including contributing to housing supply and choice, providing affordable housing, supporting economic growth, delivering necessary infrastructure, protecting and enhancing environmental assets, and creating high-quality, sustainable, and inclusive places. The Council will ensure that the Regulation 19 Publication version of the Local Plan allocates sites that deliver the greatest overall benefits and contribute positively to the delivery of sustainable development, the Plan's vision and objectives, and the well-being of current and future communities across Hertsmere.*

Theme	Sub-Theme / Issue	Summary	*Response*
Places & Growth Sites	Delivery	Concern that delivery speed will impact on quality of development and conflict with the aims of the plan	The Council recognises that whilst timely delivery of housing and infrastructure is essential to meet identified needs and maintain housing land supply, this must not be at the expense of design quality, place-making, environmental protection, heritage conservation and infrastructure provision. The Draft Local Plan includes robust proposed policies on design quality and place-making (Policy HBF1), infrastructure provision and phasing (Policy SCI1), sustainable construction (SD1 and supporting policies) and site-specific allocation policies setting out design principles, infrastructure requirements, and delivery expectations to ensure that development is delivered to a high standard and in a manner consistent with the Plan's vision and objectives. The Council will ensure that development management processes including pre-application engagement, design review, planning conditions, Section 106 obligations, and monitoring mechanisms maintain quality standards throughout the development process, and will ensure that the Regulation 19 Publication version of the Local Plan balances the imperative to deliver housing and infrastructure in a timely manner with the equally important objective of securing high-quality, sustainable, and well-designed development that enhances the character, environment, and quality of life across Hertsmere.
Places & Growth Sites	General opinion / view	Suggestion that proposed development will support relevant policy/guidance	The Council welcomes this support for development which aligns with relevant policy/guidance. The Draft Local Plan has been prepared in accordance with the statutory development plan preparation process, national policy and guidance, the legal duty to cooperate, sustainability appraisal and strategic environmental assessment requirements, and consultation and engagement obligations, with policies and site allocations designed to deliver sustainable development that meets the economic, social, and environmental objectives set out in national policy whilst reflecting local character, needs, priorities, and constraints.
Places & Growth Sites	Delivery	Suggestion that mitigation measures proposed for a specific development are appropriate and viable	The Draft Local Plan includes proposed policies requiring development to assess and mitigate impacts through appropriate design, layout, landscaping, infrastructure provision, environmental protection measures, and planning obligations (Policy SCI1), with site allocation policies setting out specific mitigation requirements tailored to the characteristics, constraints, and impacts of each site, including highways improvements, drainage infrastructure, biodiversity enhancements, landscape buffers, heritage protection measures, and community facility provision. The Council has reviewed technical evidence including transport assessments, flood risk assessments, ecology surveys, heritage impact assessments, viability appraisals, and other supporting studies to verify the appropriateness, effectiveness, and deliverability of proposed mitigation and consulted with statutory consultees and technical specialists to confirm that mitigation measures adequately address identified impacts and comply with relevant standards and regulations. The Regulation 19 Publication version of the Local Plan will include robust site allocation policies that clearly specify necessary mitigation measures and secure their delivery through planning conditions and obligations to ensure that allocated sites can be developed in a sustainable and acceptable manner that protects the environment, infrastructure, amenity, and character of Hertsmere.

Theme	Sub-Theme / Issue	Summary	*Response*
Places & Growth Sites	General opinion / view	Support for development in areas which are more sustainable and don't require reliance on private vehicles	*The Draft Local Plan spatial strategy prioritises development in the major settlements of Borehamwood, Bushey, Potters Bar, and Radlett, which benefit from mainline railway stations providing frequent services to London and other destinations, a range of local services, facilities, employment opportunities, schools, healthcare, and shops accessible by walking and cycling, established bus networks, and existing infrastructure to support sustainable travel patterns, with site allocations focused on accessible locations within or adjacent to these settlements to minimise car dependency and maximise opportunities for sustainable transport use. The Council will ensure that site allocation policies require development to prioritise walking, cycling, and public transport provision, provide high-quality pedestrian and cycle infrastructure including safe routes to schools, stations, employment areas, and local centres, support public transport improvements and integration, provide appropriate levels of car parking that reflect accessibility and do not encourage unnecessary car use, incorporate electric vehicle charging infrastructure, and deliver transport assessments, travel plans, and necessary highway and sustainable transport improvements, and will ensure that the Regulation 19 Publication version of the Local Plan delivers a sustainable pattern of development that reduces reliance on private vehicles, supports modal shift to walking, cycling, and public transport, and contributes to reducing carbon emissions, improving air quality, promoting healthy lifestyles, and creating inclusive, connected, and sustainable communities across Hertsmere.*
Places & Growth Sites	General opinion / view	Concern number of homes provided would not provide levels of funding required to mitigate impacts on local infrastructure	*The Council recognises that development must be supported by adequate infrastructure. The Draft Local Plan Infrastructure Delivery Plan identifies the infrastructure requirements arising from planned development over the plan period, assesses existing capacity and future needs for education, healthcare, transport, utilities, emergency services, community facilities, green infrastructure, and other infrastructure and sets out anticipated costs, funding sources, delivery mechanisms, phasing, and responsibilities. The IDP has been prepared in consultation with infrastructure providers including Hertfordshire County Council as education, highways, and minerals and waste planning authority, the NHS Integrated Care Board, utility companies, emergency services, and other statutory and non-statutory consultees to ensure that infrastructure planning is robust, coordinated, and deliverable.*
Places & Growth Sites	General opinion / view	Recommendation for the Council to undertake engagement with site promoters on site-specific allocation policies	The council has been engaging with developers, agents, and site promoters throughout the site allocation process and will continue this engagement as we move towards Regulation 19 publication and examination.
Places & Growth Sites	Social Infrastructure	Concern about lack of provision for outdoor and amenity space in new development	The Local Plan will include strategic policies requiring all new residential development to provide or contribute towards open space, play facilities, sports provision, and recreation facilities to meet the needs of future occupants based on local standards informed by up-to-date evidence, including the Open Space Assessment, Green and Blue Infrastructure Study and Outdoors Sports and Playing Pitch Study.

Theme	Sub-Theme / Issue	Summary	*Response*
Transport	Active Travel (incl. walking, cycling)	Concern over the impacts of development on PRoW network	*The Council recognises the importance of protecting and enhancing the Public Rights of Way (PRoW) network. The Plan will require development proposals to retain existing PRoW and, where possible, enhance connectivity to support active travel. Site allocation policies will include requirements to integrate PRoW into green infrastructure networks and improve accessibility where appropriate. This aligns with NPPF paragraph 104 on promoting sustainable transport and paragraph 100 on protecting and enhancing PRoW and access to high-quality open spaces.*
Transport	Active Travel (incl. walking, cycling)	Requirement that existing Public Rights of Way (PRoW) connected to and in the vicinity of sites will need to be retained and enhanced to make active travel connections and have regard to the HCC Rights of Way Improvement Plan (ROWIP). Should site specific policy requirements in relation to PRoW be deemed not to be deliverable, the Highway Authority would object to the inclusion of the site(s) in future versions of the plan. Further recommendation that a separate Plan policy on PRoW and their integration into other relevant policies should be included.	*The Regulation 19 Local Plan recognises Public Rights of Way through its green infrastructure, movement and place-based policies. Policy GI1 seeks to strengthen connections between neighbourhoods, open spaces, rights of way, water bodies and the wider countryside, with site-specific requirements included where relevant.*
Transport	Buses	Need for investment from development to improved public transport to support the number of homes proposed in the area/on the site.	*The Council recognises that proposed housing growth will generate increased demand for public transport. The Transport Study and Infrastructure Delivery Plan identify public transport capacity requirements and mitigation measures. Site allocation policies will require contributions toward bus service improvements, infrastructure enhancements, and where appropriate, new or diverted routes to serve major developments, secured through Section 106 obligations in accordance with national policy.*
Transport	General Opinion / View	General opposition to / concern about development due to perceived difficulty in supporting growth with transport infrastructure in practice	*The Council is undertaking transport modelling through the Transport Study to assess the impact of proposed growth on the transport network. The Infrastructure Delivery Plan identifies necessary transport infrastructure improvements to support development. Site allocation policies will include transport mitigation requirements, and developer contributions will be secured to deliver necessary improvements. Development will only be allocated where it can be demonstrated that transport impacts can be adequately mitigated.*
Transport	General Opinion / View	Objection to / concern about proposed "car-lite" approach as not yet convincingly justified or realistically deliverable, particularly in rural and semi-rural areas	*The Council's approach to car-lite development is informed by evidence of site accessibility, public transport provision, and active travel connectivity. The Plan recognises that car-lite approaches are most appropriate in highly accessible urban locations with good public transport links. In rural and semi-rural areas, the Plan will apply parking standards that reflect accessibility levels and local circumstances, in accordance with NPPF paragraph 108, which requires development to provide appropriate opportunities for sustainable transport while recognising that opportunities will vary between urban and rural areas.*

Theme	Sub-Theme / Issue	Summary	*Response*
Transport	General Opinion / View	Support for reduced car-lite development in principle as long as it is supported by improved active travel and public transport links	*The Council welcomes support for car-lite development where supported by sustainable transport infrastructure. The Plan will require major developments proposing reduced parking provision to demonstrate that they are supported by high-quality public transport, walking and cycling infrastructure. This aligns with NPPF paragraph 109 on optimising the density of development and paragraph 114 on prioritising pedestrian and cycle movements.*
Transport	General Opinion / View	National Highways support Policy TR1 and TR4 and request that they are consulted as follows: With regards to infrastructure network improvements, early on any proposed improvement works to the SRN as part of the emerging Local Plan policies; on any planning applications for major developments that are likely to generate significant delivery or construction traffic as these vehicles, are more likely to use the SRN as part of their route; and for any developments located close to the M1 so the full impact of development on the safety or operation of the SRN can be assessed.	*The Council welcomes National Highways' support for transport policies and will ensure appropriate consultation on matters affecting the Strategic Road Network (SRN). The Plan will include a requirement for developers to consult National Highways on applications likely to impact the SRN, including major developments generating significant construction or delivery traffic, and developments near the M1, M25 and A1 / A1(M). Site allocation policies will reflect National Highways' consultation requirements.*
Transport	General Opinion / View	National Highways ask the Council to present robust evidence on cumulative impacts on the SRN as set out in DfT Circular 01/2022 (Para. 33) and seek further discussion.	*The Council's Transport Study assesses cumulative impacts of proposed development on the Strategic Road Network in accordance with DfT Circular 01/2022. The Council will continue to engage with National Highways to ensure robust evidence is provided on strategic transport impacts and to identify any necessary mitigation measures through the plan-making process.*
Transport	General Opinion / View	Support for the focus on sustainable travel networks, including the Hertsmere LCWIP, in line with NPPF focus on sustainable development	*The Council welcomes support for sustainable travel policies. The Local Cycling and Walking Infrastructure Plan (LCWIP) will inform the Plan's approach to active travel infrastructure, identifying priority routes and interventions. Development will be required to contribute to LCWIP delivery where appropriate, supporting the NPPF's objectives for sustainable development and reducing carbon emissions.*
Transport	General Opinion / View	Support for transport policies within the draft Plan.	*The Council welcomes support for the Plan's transport policies, which seek to deliver sustainable, accessible development while managing transport impacts effectively.*
Transport	General Opinion / View	General concern about cross-boundary transport pressures arising from development outside Hertsmere.	*The Council recognises that development in neighbouring authorities can generate cross-boundary transport impacts. The Council's Cooperation efforts (following the abolition of the Duty to Cooperate process) addresses strategic transport matters with adjoining authorities. The Transport Study considers cross-boundary movements, and the Council will continue to work with neighbouring authorities and Hertfordshire County Council to manage cumulative transport impacts on the highway network.*

Theme	Sub-Theme / Issue	Summary	*Response*
Transport	General Opinion / View	Concern over the trip rates being generated from Bowmans Cross and emphasis of importance of exploring a comprehensive transport scheme that prioritises trip internalisation and sustainable transport links to Potters Bar, London Colney, St Albans and Hatfield.	*The Council recognises the significant transport implications of development at Bowmans Cross. Detailed transport assessment work will inform the scale, design and phasing of development. The allocation policy requires a transport strategy prioritising trip internalisation through mixed-use development, sustainable transport links to Potters Bar, London Colney, St Albans and Hatfield, and measures to minimise reliance on private car travel, all to be agreed with Hertfordshire County Council as Highway Authority.*
Transport	General Opinion / View	Recommendation that Policy TR7 recognises the recreational and economic value of aviation activities, in particular uses that support the operational requirements of the aerodrome. Uses that facilitate the continued use of the aerodrome should be supported and protected.	*The Council recognises the economic and recreational value of aviation activities at aerodromes in the Borough. Policy TR7 will be reviewed to ensure it supports uses that facilitate the continued operational requirements of aerodromes, while balancing this with residential amenity, environmental protection and safety considerations, in line with national policy.*
Transport	General Opinion / View	Requirement for the Borough Council and County Council to collaborate to address key transport issues relating to the Plan, including devising a borough wide transport strategy and identifying measures to mitigate highway impacts from the development at Bowmans Cross	*The Council recognises that effective partnership working between the Borough Council as local planning authority and the County Council as local highway authority is essential to ensure that transport infrastructure and highways capacity can accommodate planned growth and that necessary improvements are identified and delivered, in accordance with the duty to cooperate. The Draft Local Plan has been informed by ongoing engagement with Hertfordshire County Council and transport evidence including the Local Plan Transport Study, which assesses highway capacity, identifies infrastructure requirements, and informs proposed transport policies including Policy TR1 (Sustainable Transport and Movement) and Policy DM2 (Infrastructure Funding and Planning Obligations). The Council is committed to continuing close collaboration with the County Council to develop a comprehensive transport strategy that supports sustainable travel, addresses highways impacts from strategic allocations including Bowmans Cross, secures necessary infrastructure improvements through developer contributions and public investment, and ensures that transport networks can safely and efficiently accommodate planned growth across Hertsmere.*
Transport	General opinion / view	Clarity needed on potential policy related to the Elstree Aerodrome and implications for residential developments within the Bushey area	*As set out in the draft Local Plan, Policy TR7 will be a strategic policy that supports the continued operation of the Aerodrome and will set out any specific requirements for new residential developments in the vicinity of the aerodrome.*
Transport	Highways	Recommendation for Council to publish a targeted shortlist of funded transport and junction fixes for Elstree and Borehamwood bottlenecks prior to finalising the plan.	*The Infrastructure Delivery Plan identifies transport infrastructure priorities, including junction improvements to address capacity constraints in Elstree and Borehamwood. The Council is working with Hertfordshire County Council as Highway Authority to identify deliverable interventions. The Regulation 19 Plan will be supported by an updated Infrastructure Delivery Plan setting out funded and developer-funded transport improvements required to support growth.*

Theme	Sub-Theme / Issue	Summary	*Response*
Transport	Highways	Concerns over the limited existing access points into the Bowmans Cross site and its relationship with the strategic road network, requiring significant intervention to provide safe, efficient and sustainable access both within the site and to surrounding areas.	*The Council acknowledges that Bowmans Cross presents significant access challenges given its current use and relationship with the strategic road network. Comprehensive masterplanning and transport assessment will be required to demonstrate that safe, efficient and sustainable access can be provided both within the site and to the surrounding area. The allocation policy sets out detailed access requirements to be agreed with Hertfordshire County Council and National Highways.*
Transport	Highways	Access for vehicles will be impacted by exacerbated flood risk.	*The Council will ensure that vehicular access arrangements for developments take account of flood risk. Site allocation policies will require flood risk assessments to demonstrate that access routes remain safe and operational during flood events for the lifetime of the development, in accordance with NPPF Chapter 14 on meeting the challenge of climate change, flooding and coastal change.*
Transport	Highways	Concern that the proposals can only provide one vehicular access which is insufficient for the size and scale of development and will cause congestion issues	*The Council will require site-specific transport assessments to demonstrate that proposed access arrangements are appropriate for the scale and nature of development. Where a single vehicular access is proposed for major development, evidence will need to demonstrate that this can safely accommodate anticipated traffic flows and emergency vehicle access without causing unacceptable congestion, to the satisfaction of Hertfordshire County Council as Highway Authority.*
Transport	Highways	Requirement of technical testing of the impacts to the highway network to understand and mitigate the resulting impact from development. Until such a time that this information is available, HCC reserve their position on the proposed plan.	*The Council acknowledges Hertfordshire County Council's requirement for detailed technical testing of highway impacts. Further transport modelling and junction capacity assessments will be undertaken to inform the Regulation 19 Plan. Site allocation policies will include transport mitigation requirements based on this evidence. Until this work is completed, HCC's position on the Plan is reserved, and the Council will continue to work closely with the Highway Authority to address outstanding technical matters.*
Transport	Highways	Support for urban extensions being consulted upon, as they largely align with the prioritisation of sustainable development and the HCC Local Transport Plan, however detailed work will be required to evidence the suitability of many of the allocations.	*The Council welcomes Hertfordshire County Council's general support for the proposed urban extensions, which align with the HCC Local Transport Plan's priorities for sustainable development. Detailed transport assessments will be required at the planning application stage to demonstrate the suitability of individual allocations and identify necessary mitigation measures.*
Transport	Highways	Caution that HCC commentary provided on individual sites is specific to each site and does not suggest that HCC as Highway Authority accepts any specific development scenario (or selection of sites) in terms of additional cumulative impact on the highway network.	*The Council notes Hertfordshire County Council's position that site-specific comments do not constitute acceptance of the cumulative impact of the proposed development scenario on the highway network. The Council will continue to work with HCC to undertake cumulative transport impact assessments and identify necessary strategic highway improvements through the Infrastructure Delivery Plan.*

Theme	Sub-Theme / Issue	Summary	*Response*
Transport	Highways	General concern about lack of commitment to delivering new highways infrastructure to support growth.	*The Council is committed to delivering necessary transport infrastructure to support growth. The Infrastructure Delivery Plan identifies highway improvements required to mitigate development impacts. These will be funded through a combination of developer contributions, secured through Section 106 agreements, and where appropriate, external funding sources. The Plan will include mechanisms to ensure infrastructure is delivered in tandem with development.*
Transport	Highways	Concern that safe vehicular access for emergency services has not been demonstrated.	*The Council will require site allocation policies to address emergency vehicle access. Development proposals will need to demonstrate compliance with Building Regulations Approved Document B on fire safety and meet the requirements of emergency services. Access arrangements will be subject to consultation with the emergency services and approval by the Highway Authority.*
Transport	Highways	Concern that highways are too narrow to safely support increased traffic arising from growth.	*The Council will ensure that transport assessments identify capacity constraints on the existing highway network. Where development would result in unacceptable impacts on highway safety or severe cumulative impacts on the road network, mitigation measures including highway widening, junction improvements or traffic management will be required, in accordance with NPPF paragraph 115. Development will only be allocated where it can be demonstrated that impacts can be satisfactorily mitigated.*
Transport	Parking	Concerns around new development impacting on parking availability for existing residents.	*The Council recognises concerns about parking displacement onto residential streets. The Plan will include parking standards that balance the need to promote sustainable transport with ensuring adequate parking provision to protect residential amenity. Major developments will be required to demonstrate through parking assessments that they will not result in unacceptable on-street parking pressure in surrounding residential areas.*
Transport	Buses	Need for improved public transport.	*Policy TR1 supports improvements to the public transport network, including bus priority and bus-stop infrastructure, while site-specific transport requirements are identified where necessary to support allocated development.*
Transport	Parking	Objection to / concern about proposed reduction of parking and query on how this could be implemented and what alternatives would be in place to ensure town-centre vitality and commuter access	*The Council's approach to town centre parking will balance the need to optimise land use for regeneration with maintaining adequate parking to support town centre vitality and commuter access. Any reduction in public parking will be subject to parking impact assessments and consultation with stakeholders. Alternative parking provision or improved sustainable transport access will be required where public parking is reduced, in accordance with NPPF paragraph 109.*

Theme	Sub-Theme / Issue	Summary	*Response*
Transport	Parking	General concern that reducing car parking will displace demand on to residential streets, exacerbating congestion and undermining access to rail services	*The Council recognises that reduced parking provision at town centres and rail stations could displace parking onto residential streets. The Plan will require parking assessments to demonstrate that proposals will not result in unacceptable displacement. Amendments to existing Controlled Parking Zones or additional Zones may be considered where appropriate to manage parking demand alongside improved sustainable transport links to stations.*
Transport	Parking	Recommendation to protect car parking provision at railway stations.	*The Council recognises the importance of station car parking in facilitating rail use and reducing highway congestion. The Plan will seek to protect existing station car parks unless it can be demonstrated that alternative sustainable transport access is provided, or replacement parking is deliverable. Station car park development proposals will need to be supported by robust parking demand assessments and consultation with the train operating companies and Network Rail/Great British Railways.*
Transport	Parking	Recommendation to acknowledge that High Barnet car park will be developed so there will be no parking provision and this is likely to be the case for Edgware and other stations including Burnt Oak and Mill Hill, therefore, provision will need to be made for sustainable options for those wanting to travel to stations in Barnet.	*The Council notes that station car parks in the London Borough of Barnet, including High Barnet, Edgware, Burnt Oak and Mill Hill, may be developed, reducing parking availability for Hertsmere residents. The Plan will work with Transport for London (London Underground), the London Borough of Barnet and train operating companies to ensure sustainable transport alternatives are provided for residents wishing to access these stations, including improved bus links, cycle parking and pedestrian routes.*
Transport	Parking	General concern about loss of car parking.	*The Council will include policies to manage the loss of public car parking. Loss of car parking will only be supported where it can be demonstrated that there is sufficient alternative provision, the parking is genuinely surplus to requirements, or the benefits of redevelopment outweigh the loss, and adequate sustainable transport alternatives are available. This approach is consistent with NPPF requirements to support town centre vitality.*
Transport	Rail	Concern that growth will necessitate improved rail connections in Hertsmere.	*The Council recognises that growth will increase demand for rail services. The Plan promotes development in accessible locations well-served by rail. The Council will work with Network Rail and train operating companies to advocate for improved station and train service capacity including increased frequencies and faster services to London. Developer contributions will be sought toward station improvements and enhanced connectivity where development generates significant rail demand.*
Transport	Rail	General concern about existing pressure on rail services and lack of commitment from operators to upgrade local stations in line with growth.	*The Council acknowledges existing pressure on rail services and the need for capacity and accessibility improvements. While the Council cannot require rail operators to upgrade services or stations, it will work proactively with Network Rail and operators to identify infrastructure needs arising from planned growth. The Infrastructure Delivery Plan will set out rail infrastructure requirements, and the Council will advocate for rail investment through engagement with transport authorities and government.*

Theme	Sub-Theme / Issue	Summary	*Response*
Transport	Rail	Concern that access to the railway tunnel near the site's boundary is pedestrian only and subject to Network Rail restrictions.	*The Council notes Network Rail's operational and safety requirements for structures on or adjacent to the railway. Site allocation policies for sites near railway infrastructure will require early engagement with Network Rail to address access, safety, and operational matters. Where pedestrian access to railway infrastructure is restricted, alternative access routes will be required, subject to Network Rail approval.*
Transport	Traffic	General concern about growth in Hertsmere causing increased traffic	*The Council recognises that growth will generate additional traffic. The emerging Transport Study models traffic impacts of proposed development and identifies necessary mitigation measures. The Plan will include policies requiring development to minimise traffic generation through sustainable design, provide appropriate sustainable transport infrastructure, and contribute to highway improvements where necessary, in accordance with NPPF paragraph 114.*
Transport	Traffic	Site Specific concern about growth in Hertsmere causing increased traffic	*The Council will ensure that site-specific transport assessments identify local traffic impacts and necessary mitigation measures. Site allocation policies will include requirements for traffic management, highway improvements, and sustainable transport provision to address site-specific concerns, to be agreed with Hertfordshire County Council as Highway Authority.*
Transport	Traffic	General concern about existing traffic in Hertsmere.	*The Council acknowledges existing traffic congestion in parts of the Borough. While the Plan alone cannot solve pre-existing traffic issues, it seeks to avoid exacerbating them through sustainable development patterns, transport impact mitigation, and infrastructure investment. The Infrastructure Delivery Plan identifies transport improvements that will benefit both new and existing residents.*
Transport	Highways	Support for site due to no significant impacts on highways	*The site allocation process has been informed by transport modelling, highways capacity assessments, junction modelling, site-specific transport assessments submitted by site promoters, and consultation with Hertfordshire County Council as the local highways authority to assess the highways impacts of proposed allocations, identify necessary mitigation measures, and ensure that allocated sites can be satisfactorily accessed and will not result in unacceptable impacts on highway safety or severe residual cumulative impacts on the road network. The Council will ensure that site allocation policies include appropriate requirements for access arrangements, transport assessments, travel plans, highways improvements, and sustainable transport provision, and will ensure that the Regulation 19 Publication version of the Local Plan includes only those site allocations that can be delivered without unacceptable highways impacts and that support the promotion of sustainable transport in accordance with national policy.*

Theme	Sub-Theme / Issue	Summary	*Response*
Transport	Active Travel (incl. walking, cycling)	Proposed allocation is in a sustainable location with good accessibility	*The Council recognises that site allocations should be directed to the most sustainable locations with good access to employment, services, facilities, and public transport, thereby reducing the need to travel, promoting sustainable transport modes including walking, cycling, and public transport, supporting healthy and inclusive communities, and minimising environmental impacts. The Draft Local Plan spatial strategy prioritises development in the borough's major settlements of Borehamwood, Bushey, Potters Bar, and Radlett due to their range of services, facilities, employment opportunities, and public transport connectivity, particularly rail services, and the site selection process has assessed the sustainability and accessibility of potential allocations considering proximity to services and facilities, public transport accessibility levels, opportunities for walking and cycling, employment accessibility, and integration with existing communities. The Council will ensure that the Regulation 19 Publication version of the Local Plan allocates sites in the most sustainable and accessible locations in accordance with the spatial strategy, settlement hierarchy, and national policy requirements for promoting sustainable development and transport.*
Transport	Parking	Recommendation that Policy TR3 has an appropriate level of flexibility and considers varying parking requirements in different areas of the Borough to reflect differing accessibility levels.	*Policy TR3 will set maximum parking standards for the Borough, allowing flexibility for proposed developments to provide less provision where appropriate. Proposals that optimise the potential for future car-lite development and demonstrably provide the flexibility and enable technological advancements in travel will be supported.*
Transport	Active Travel (incl. walking, cycling)	General concern that growth in Hertsmere will decrease walkability	The emerging Spatial Strategy is intended The Local Plan will include strategic policies on sustainable transport and movement requiring development to prioritise walking, cycling, and public transport, to be located and designed to minimise the need to travel and maximise opportunities for sustainable travel and to deliver high-quality, safe, direct, attractive, and accessible pedestrian and cycle routes within developments and connecting to surrounding areas, as well as other infrastructure to support active travel. This will help ensure that growth enhances rather than diminishes walkability and that new and existing residents can access daily needs, opportunities, and green spaces safely, conveniently, and enjoyably on foot or by cycle
Transport	Rail	Transport Assessments included within planning applications for site allocations should include an assessment of the impacts on the railway network from an increase in housing, to ensure that Network Rail can determine changes in passenger numbers and types and assess the appropriateness of existing facilities and identify any improvements that may be required.	*The Council will encourage applicants proposing development on allocated sites or other major housing sites to engage with Network Rail at an early stage and request assessment of rail passenger impacts within transport assessments where appropriate.*
Transport	Rail	Recommendation that the Radlett Rail Freight Interchange terminal is referenced as an example of sustainable freight policy.	*The representation is noted. Policy TR4 supports sustainable freight movement by rail, water and road and provides the policy framework for freight-related development and servicing.*

Theme	Sub-Theme / Issue	Summary	*Response*
Transport	Active Travel (incl. walking, cycling)	Proposed allocation is not in a sustainable location and beyond walking distance from services and facilities	*The Council's spatial strategy prioritises development in accessible locations well-served by public transport, shops and services, where possible. Where sites are proposed in less accessible locations, allocation policies will require evidence that sustainable transport connectivity can be provided, or that the site delivers specific benefits such as affordable housing or employment that justify its allocation. Site selection is informed by sustainability appraisal, accessibility analysis and the settlement hierarchy.*
Transport	Active Travel (incl. walking, cycling)	Site is in a more sustainable location that other proposed candidate sites	*The Council's site selection process assesses all reasonable alternatives against sustainability criteria including accessibility, environmental constraints, deliverability and infrastructure capacity. The Sustainability Appraisal compares sites to inform allocation decisions. The Council will take into account comparative sustainability in finalising site allocations for the Regulation 19 Plan.*
Transport	Active Travel (incl. walking, cycling)	Concern over the impacts of development on the safety of pedestrians and cyclists due to narrow or missing footpaths/pavements/cycle lanes	*The Council will require development to provide safe pedestrian and cycle access. Site allocation policies will include requirements for pedestrian and cycle infrastructure improvements, including new or widened footways, cycle lanes, and crossing facilities where necessary. Development will be required to deliver safe routes to schools, shops, public transport and employment in accordance with NPPF paragraph 114 on prioritising pedestrian and cycle movements and creating safe and accessible places.*
Transport	Active Travel (incl. walking, cycling)	The needs of pedestrians and cyclists should be prioritised.	*The Council recognises that prioritising walking and cycling is essential to delivering sustainable development, reducing car dependency, improving air quality, supporting climate change mitigation, promoting health and well-being, and creating attractive, liveable communities. Proposed Policy TR1 (Sustainable Transport and Movement) requires development to prioritise walking, cycling, and public transport, provide safe, direct, and attractive pedestrian and cycle routes, ensure connectivity to existing networks and key destinations, and incorporate measures to encourage active travel. Proposed Policy HQD1 (Delivering High-Quality Design in Hertsmere r) requires development to create high-quality, permeable, and legible layouts that prioritise pedestrians and cyclists, and site-specific policies for strategic allocations identify requirements for walking and cycling infrastructure. The Council is committed to ensuring that development prioritises the needs of pedestrians and cyclists through comprehensive walking and cycling networks, safe and accessible routes, high-quality public realm, traffic calming measures, secure cycle parking, and layouts that make walking and cycling the natural choice for local journeys, supporting sustainable, healthy, and active communities across Hertsmere.*

Theme	Sub-Theme / Issue	Summary	*Response*
Transport	Active Travel (incl. walking, cycling)	Concern that transport policies emphasise walking and cycling but do not make equivalent reference to equestrian activity as a form of active travel	*The Council recognises that equestrian activity contributes to rural character, provides recreational opportunities, supports rural economies, and forms part of the wider rights of way network including bridleways that accommodate pedestrians, cyclists, and horse riders. Proposed Policy GI1 (Hertsmere's Green and Blue Infrastructure) and proposed Policy GI2 (Hertsmere's Watercourses and Blue Infrastructure) require development to protect and enhance green infrastructure networks including public rights of way, bridleways, and multi-user routes that support walking, cycling, and equestrian access, and proposed Policy TR1 (Sustainable Transport and Movement) prioritises sustainable and active travel modes. The Council will consider whether explicit reference to equestrian access and bridleways within transport and green infrastructure policies would be beneficial.*
Transport	Traffic	Need for more new highways capacity to accommodate new development	*The Council's emerging Transport Study will identify where highway capacity improvements are required to accommodate proposed growth. The Infrastructure Delivery Plan sets out necessary highway schemes, to be funded through a combination of developer contributions and external funding sources. Allocation policies will include requirements for site-specific highway mitigation in accordance with NPPF paragraph 114.*
Transport	Traffic	General concern that transport proposals in the Local Plan will not solve existing traffic problems.	*While the Plan cannot solve all existing transport issues, it seeks to avoid exacerbating them through sustainable development patterns, transport mitigation, and infrastructure investment. The Infrastructure Delivery Plan identifies improvements that will benefit both new and existing residents. The Council will continue to work with Hertfordshire County Council to address transport priorities.*
Transport	Traffic	Concern that lack of infrastructure in this location increases reliance on highway network and reinforces car dependency.	*The Council's spatial strategy prioritises development in accessible locations well-served by sustainable transport. Where sites in less accessible locations are proposed, allocation policies will require measures to improve sustainable transport connectivity and reduce car dependency, including enhanced bus services, walking and cycling infrastructure, and travel planning measures.*
Transport	Traffic	General concern that a lack of public transport options increase traffic congestion at peak hours.	*The Council recognises that inadequate public transport increases car dependency and congestion. The Plan requires major developments to contribute to public transport improvements. The Infrastructure Delivery Plan identifies priority bus service enhancements and new routes to support growth, to be secured through Section 106 obligations.*
Transport	Traffic	Concern that development in Borehamwood and Elstree is likely to have impacts on junctions that already have capacity constraints in the LB of Barnet such as Canons Corner (A5/A410), Apex Corner (A1/A41/A5109) and the Stirling Corner (A1/A411) and Rowley Lane A1/A5135) junctions that are likely to cause congestion on Bernet borough roads.	*The Council recognises that development in Borehamwood and Elstree can generate cross-boundary traffic impacts on junctions in the London Borough of Barnet. The Transport Study models these impacts, and the Council is working with LB Barnet and Transport for London through the cooperation process to identify necessary mitigation measures. Developer contributions will be sought toward junction improvements where development generates significant impacts.*

Theme	Sub-Theme / Issue	Summary	*Response*
Transport	Traffic	Opposition to any increase in capacity on strategic roads in Barnet, whether the LB Barnet Council is the highways authority or where these are managed by TfL of the Highways Agency.	*The Council notes the opposition to strategic road capacity increases in Barnet. The Plan's approach focuses on sustainable transport improvements and demand management rather than major highway capacity expansion. However, where evidence demonstrates that junction improvements are necessary to safely accommodate forecast traffic, these will be identified through cooperation with LB Barnet and TfL.*
Vision, Objectives and Spatial Strategy	General Comment	General view / comment on the plan vision/objectives/spatial strategy	*The Council welcomes all comments on the Plan's vision, objectives and spatial strategy. All representations will be carefully considered in preparing the Regulation 19 version of the Local Plan.*
Vision, Objectives and Spatial Strategy	Objectives	Supports the objectives of the Plan	*The Council welcomes support for the Plan's objectives.*
Vision, Objectives and Spatial Strategy	Objectives	Opposes the objectives of the Plan	*The Council has developed objectives based on evidence of local needs and challenges, community engagement, and national policy requirements. All representations will be considered in finalising the Plan's objectives for the Regulation 19 version.*
Vision, Objectives and Spatial Strategy	Objectives	Concern that there is an objective missing from the Plan related to X	*The Council will review all representations suggesting additional objectives and will consider whether amendments are needed to ensure the Plan's objectives comprehensively address local priorities and national policy requirements.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Supports the spatial strategy	*The Council welcomes support for the spatial strategy.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposes the spatial strategy	*The Council's spatial strategy is based on evidence of sustainability, infrastructure capacity, environmental constraints, and housing and employment needs. The strategy seeks to deliver sustainable development patterns in accordance with the NPPF. All representations will be considered in finalising the spatial strategy for the Regulation 19 Plan.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposes the spatial strategy because it proposes too many homes	*The Council's housing requirement is based on the government's standard method for calculating housing need, which reflects local housing stock and affordability pressures. National policy requires the Council to plan for this need, and failure to do so would result in the Plan being found unsound at examination.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposes the spatial strategy due to concern over cumulative impact of proposed new housing in combination with recent development already permitted/built	*The Council has considered cumulative impacts identified through the Sustainability Appraisal, Transport Study, Infrastructure Delivery Plan and other evidence base documents. The Plan includes policies and infrastructure provision to manage cumulative impacts on the environment, heritage, transport and social infrastructure.*

Theme	Sub-Theme / Issue	Summary	*Response*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposes the spatial strategy because it is not a sustainable strategy supported by clear evidence	*The Council's spatial strategy is supported by a comprehensive evidence base including the Sustainability Appraisal, Transport Study, Infrastructure Delivery Plan, and technical studies on environmental, heritage and infrastructure matters. The strategy directs development to the most sustainable locations and is consistent with the NPPF's requirements for sustainable development.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Preference for building a new settlement to provide housing rather than further developing existing settlements so that new infrastructure can be provided instead of putting pressure on existing infrastructure	*The Council has considered the option of a new settlement through the spatial strategy development process. However, evidence demonstrates that urban extensions and development within/adjacent to existing settlements is more deliverable within the plan period, makes better use of existing infrastructure and services, and supports sustainable travel patterns. New settlements typically require very long lead-in times for infrastructure delivery and may not deliver homes within the plan period. Even where a new settlement is being considered, this would not be able to meet all the identified development needs for the Hertsmere area in one location without further development in other locations.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposes the spatial strategy because it does not protect the Green Belt/countryside	*The Council's spatial strategy seeks to minimise Green Belt loss through prioritising brownfield land, optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated. However, given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is necessary. The Plan follows the approach set out in NPPF Chapter 13 on protecting Green Belt land.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Preference for prioritising delivery on allocated and brownfield sites to prevent incremental and cumulative development / over-intensification	*The Council's spatial strategy prioritises brownfield land and allocated sites. Policies will tightly control development outside allocated sites and settlement boundaries to prevent incremental development and over-intensification. The Plan will provide sufficient allocated sites to meet needs, reducing pressure for unplanned development.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposes the spatial strategy because not enough infrastructure is proposed to support/mitigate the impacts of the scale of development proposed	*The Infrastructure Delivery Plan identifies all infrastructure required to support proposed development, including transport, education, healthcare, utilities and green infrastructure. Developer contributions will be secured through Section 106 obligations, taking into account the need to also ensure that sites are sufficiently viable to come forward for development.*

Theme	Sub-Theme / Issue	Summary	*Response*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concerns over coalescence of settlements	*The Council recognises that preventing coalescence and maintaining the identity and separation of individual settlements is a fundamental purpose of Green Belt, as set out in paragraph 142(b) of the National Planning Policy Framework (NPPF) 2024. The Draft Local Plan has been informed by the Green Belt Study (Stages 1, 2, and 3), which assesses the contribution of Green Belt parcels to preventing coalescence between settlements including Radlett, Bushey, Bushey Heath, Borehamwood, Elstree, Shenley, Potters Bar, and other settlements within and beyond Hertsmere, and the spatial strategy and site allocations have been developed to minimise harm to Green Belt purposes including maintaining settlement separation. The Council will carefully consider all representations raising concerns about specific instances where proposed development may lead to coalescence or erosion of settlement separation, and will ensure that the Regulation 19 Publication version of the Local Plan appropriately protects settlement identity and separation through the spatial strategy, Green Belt boundaries, policy requirements, and, where appropriate, protective designations to prevent coalescence and preserve the distinct character and identity of Hertsmere's settlements.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern over the distribution of the spatial strategy	*The Council recognises that the spatial strategy must distribute development in a sustainable manner that meets identified housing and employment needs, makes effective use of land including previously developed and lower-quality Green Belt land, supports the role and function of existing settlements, promotes sustainable transport and accessibility, protects and enhances environmental assets and Green Belt, and ensures adequate infrastructure to support growth. The Draft Local Plan spatial strategy directs the majority of development to the borough's main settlements of Borehamwood, Bushey, Potters Bar, and Radlett, reflecting their roles as sustainable locations with good access to services, facilities, employment opportunities, and public transport, whilst also allocating appropriate development in smaller settlements where this supports local needs and vitality, and prioritising previously developed land and lower-quality Green Belt identified through the Green Belt Assessment. The Council will carefully consider all representations raising concerns about the distribution of development across the borough and ensure the Regulation 19 version of the Draft Local Plan presents a sustainable, equitable, and deliverable distribution of growth across Hertsmere that meets the Plan's objectives and the tests of soundness.*

Theme	Sub-Theme / Issue	Summary	*Response*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposition to proposed approach to discourage large developments outside of major settlements, as this does not take into account the potential for making use of previously developed land outside major settlements or 'grey belt' as defined in paragraph 155 of the NPPF.	*The Draft Local Plan spatial strategy directs the majority of development to the borough's major settlements of Borehamwood, Bushey, Potters Bar, and Radlett, reflecting their sustainability credentials, but the Council acknowledges that there may be circumstances where previously developed land or grey belt land outside major settlements could accommodate sustainable development, particularly where sites have good transport links, existing infrastructure capacity, or can be brought forward as part of a comprehensive and well-planned scheme that delivers supporting infrastructure and community benefits. will review whether the spatial strategy and site selection methodology appropriately recognise and prioritise such opportunities in accordance with emerging national policy guidance on grey belt land to inform the Regulation 19 Publication version of the Local Plan.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern that the growth proposed in the spatial strategy will cause impacts to the environment.	*The Council recognises that all development has the potential to impact the natural and built environment, and that the Local Plan must ensure that growth is planned and delivered in a way that protects and enhances environmental assets, minimises harm to biodiversity, landscape, heritage, air and water quality, and climate, and achieves environmental net gains. The Draft Local Plan has been subject to Sustainability Appraisal, Habitats Regulations Assessment, and Strategic Environmental Assessment to evaluate the environmental impacts of the proposed spatial strategy, strategic policies, and site allocations, and includes proposed policies to protect and enhance biodiversity and geodiversity (Policy GI1), achieve biodiversity net gain (Policy GI2), protect landscape character (Policy GI5), protect trees and woodland (Policy GI6), ensure sustainable drainage and flood risk management (Policies SD7 and SD8), improve air quality (Policy SD5), achieve carbon reduction and climate resilience (Policies SD1 and supporting policies) and conserve and enhance heritage assets (Policies HE1 Hertsmere's Historic Environment, HE2 Designated Heritage Assets and HE3 Non-Designated Heritage Assets. The Council will carefully consider all representations raising specific concerns about environmental impacts of the spatial strategy or individual site allocations, will review the findings of environmental assessments and supporting evidence, and will ensure that the Regulation 19 Publication version of the Local Plan includes robust environmental protection policies and appropriate mitigation and enhancement measures embedded in site allocation policies.*

Theme	Sub-Theme / Issue	Summary	*Response*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern that the plans proposed economic strategy is not consistent with national planning policy	*The Draft Local Plan economic strategy is informed by the Housing and Economic Development Needs Assessment (HEDNA) and evidence on employment land supply, market demand, and economic trends, and includes proposed policies to support employment development (Policy EC1), protect existing employment sites (Policy EC2), support town centres and retail development (Policies EC11-EC16 and support rural economy and diversification, aiming to provide sufficient employment land to meet projected needs and support the borough's economic prosperity whilst balancing environmental protection and sustainable development objectives. The Council will carefully consider all representations raising specific concerns about the consistency of the economic strategy with national policy to ensure that the Regulation 19 Publication version of the Local Plan includes an economic strategy that is positively prepared, ambitious, deliverable, and fully consistent with the requirements of national planning policy.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Support for the settlement hierarchy and where development should be provided	*The Council welcomes this support for the settlement hierarchy. The Council is committed to ensuring that the spatial strategy and settlement hierarchy direct development to the most sustainable and appropriate locations, support the continued prosperity and vitality of Hertsmere's towns and villages, make effective use of previously developed land and infrastructure, promote sustainable travel and accessibility, protect the borough's environmental assets and Green Belt, and deliver high-quality, well-planned development that meets the needs of current and future communities across Hertsmere.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposition to the settlement hierarchy and the way that settlements have been classified	*The Council recognises that the settlement hierarchy must be based on robust, transparent, and objective assessment of the role, function, sustainability, services, facilities, employment opportunities, public transport accessibility, and development capacity of each settlement, to ensure that development is appropriately distributed according to settlement character and capacity, and that the hierarchy supports sustainable development patterns and meets the tests of soundness. The Draft Local Plan settlement hierarchy has been informed by assessment of settlement size, range of services and facilities including shops, schools, healthcare, community facilities, employment provision, public transport connectivity including rail and bus services, and accessibility to higher-order centres, resulting in the classification of Borehamwood, Bushey, Potters Bar, and Radlett as major settlements, with smaller settlements and villages classified according to their relative sustainability and role. The Council will carefully consider all representations raising concerns about the classification of specific settlements within the hierarchy to ensure that the Regulation 19 Publication version of the Local Plan includes a settlement hierarchy that is robust, justified, transparent, and appropriately reflects the role, function, and sustainability of Hertsmere's settlements.*

Theme	Sub-Theme / Issue	Summary	*Response*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern that the collective impact of the spatial strategy will impact landscape character across Hertsmere and at the main towns	*Further work is being undertaken on the Settlement Visions, alongside wider evidence and engagement. These visions will be completed before the Plan is adopted and sites are allocated. They will inform the key spatial objectives and policies relevant to specific places in Hertsmere, as well as policies on spatially sensitive matters such as building heights. If it is deemed that further detail is required, beyond what is in the Local Plan, the Council will consider subsequently producing settlement specific design codes or standards which would undergo consultation and independent examination before being adopted as Supplementary Plans. However, sites allocated in the Local Plan may come forward prior to such Supplementary Plans being adopted.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	The Settlement Visions Spatial Strategy is not yet available but Key Themes and Priorities have been published. What is the status of this, and will it be adopted as a Supplementary Planning Document? Delivery of housing on sustainable sites should not be held up while awaiting publication of settlement vision documents.	*The settlement visions, masterplanning and design work for Borehamwood, Potters Bar, Bushey and Radlett have informed the Regulation 19 place policies, site allocations and relevant design requirements..*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern over the deliverability of sites within the Spatial Strategy	*The Council recognises that the Local Plan must be deliverable and effective, with site allocations that are realistic, viable, and capable of being delivered within the plan period, supported by appropriate infrastructure, free from insurmountable constraints, and backed by evidence of landowner willingness and developer interest. The site selection process has been informed by the Housing and Economic Land Availability Assessment (HELAA), which assesses the availability, suitability, and achievability of sites, viability assessments, infrastructure planning through the Infrastructure Delivery Plan, environmental assessments including Sustainability Appraisal and Habitats Regulations Assessment, technical studies on transport, flood risk, heritage, landscape, and ecology, and engagement with landowners, developers, infrastructure providers, and stakeholders to understand delivery intentions, timescales, and constraints. The Council will carefully consider all representations raising specific concerns about the deliverability of individual sites or the overall spatial strategy and will review evidence on site deliverability, undertake additional viability or deliverability assessments where necessary, engage with site promoters and infrastructure providers to clarify delivery expectations, and ensure that the Regulation 19 Publication version of the Local Plan includes a realistic, deliverable, and appropriately phased housing trajectory and spatial strategy with sufficient flexibility and contingency to maintain housing land supply throughout the plan period.*

Theme	Sub-Theme / Issue	Summary	*Response*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Recommendation for exploring sites accessible to the wider road network, such as by the Hillfield substation where there is access on to the A41 or in Shenley where there is access onto the M25 and via Borehamwood and the A1.	*The Draft Local Plan spatial strategy prioritises development in the borough's major settlements of Borehamwood, Bushey, Potters Bar, and Radlett due to their sustainability credentials including access to services, facilities, employment opportunities, and public transport, particularly rail connections, whilst the site selection process has considered accessibility, transport impacts, infrastructure capacity, and sustainability alongside other factors including Green Belt harm, environmental constraints, landscape impact, heritage considerations, availability, suitability, and achievability. The Council will carefully consider this and all other representations proposing alternative sites or locations, including sites with good access to the strategic road network ensuring that the Regulation 19 Publication version of the Local Plan includes an appropriate and justified site selection strategy that delivers sustainable development in accordance with national policy across Hertsmere.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Recommendation to consider site to the west of Theobald Street.	*The site selection process has been informed by the Housing and Economic Land Availability Assessment (HELAA), Green Belt Assessment, Sustainability Appraisal, Habitats Regulations Assessment, and technical studies covering transport, flood risk, heritage, landscape, ecology, and infrastructure capacity, with sites assessed objectively and consistently to inform the spatial strategy and site allocations in the Draft Local Plan. The Council will carefully consider all representations proposing alternative sites for development, will review whether the site has been assessed through the HELAA process or requires assessment, will evaluate the site's availability, suitability, achievability, sustainability credentials, Green Belt impact, environmental constraints, accessibility, infrastructure requirements, and consistency with the spatial strategy, and will determine whether the site should be allocated in the Regulation 19 Publication version of the Local Plan, taking into account the site's merits relative to other potential allocations, the overall housing land supply position, spatial distribution objectives, and the need to ensure a sound, deliverable, and justified plan that meets development needs whilst protecting Hertsmere's environmental and heritage assets.*

Theme	Sub-Theme / Issue	Summary	*Response*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Recommendation to prioritise sites on flatter land to support active travel.	*The Council recognises that promoting active travel including walking and cycling is an important objective of sustainable development, contributing to health and wellbeing, climate change mitigation, air quality improvement, and reduced car dependency, and that site topography can influence the attractiveness and accessibility of walking and cycling as transport modes. The Draft Local Plan includes proposed policies to promote sustainable transport and active travel (Policy TR1), require appropriate provision of walking and cycling infrastructure within new developments (Policy TR2), support improvements to walking and cycling networks across the borough, and prioritise development in sustainable locations with good access to services, facilities, and public transport, reducing the need to travel and supporting modal shift. Whilst topography is a relevant consideration, site selection must balance multiple factors including availability, suitability, achievability, sustainability, accessibility to services and public transport, Green Belt impact, environmental constraints, heritage considerations, infrastructure capacity, and deliverability. Furthermore, active travel can be supported through appropriate site design, layout, connections to existing networks, provision of facilities, and traffic management measures even on sites with more varied topography. The Council will ensure that the Regulation 19 Publication version of the Local Plan includes a spatial strategy and site allocations that appropriately prioritise sustainable and accessible locations, and that policies require all developments to maximise opportunities for active travel through high-quality design, connectivity, infrastructure provision, and integration with existing and planned walking and cycling networks across Hertsmere.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern that Hertsmere Borough Council have not demonstrated that all other brownfield and regeneration opportunities have been explored before proposing development on greenfield.	*The Council recognises that planning policies should promote an effective use of land in meeting the need for homes and other uses, giving substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. The site selection process has been informed by the Housing and Economic Land Availability Assessment (HELAA), which identifies and assesses all available, suitable, and achievable sites including previously developed land, brownfield sites, underutilised urban land, regeneration opportunities, and greenfield sites, and the Draft Local Plan spatial strategy prioritises development on previously developed land within settlements and allocates brownfield sites where these are available, suitable, achievable, and consistent with other planning objectives including environmental protection, heritage conservation, and sustainable development principles. The Regulation 19 Publication version of the Local Plan will demonstrate a clear and justified approach to maximising the use of previously developed land and regeneration opportunities before proposing development on greenfield sites*

Theme	Sub-Theme / Issue	Summary	*Response*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern over scale of proposed development	*The Draft Local Plan proposes development to meet the borough's minimum housing need calculated using the Government's standard method, informed by the Housing and Economic Development Needs Assessment (HEDNA), and seeks to provide sufficient employment land to support economic growth and prosperity, with development distributed across sustainable locations in accordance with the settlement hierarchy and spatial strategy. The Council will carefully consider all representations raising concerns about the scale of proposed development to ensure that the Regulation 19 Publication version of the Local Plan proposes an appropriate scale of development that meets objectively assessed needs, is realistic and deliverable, is supported by adequate infrastructure, respects settlement character and environmental constraints, and represents sustainable development in accordance with national policy and the tests of soundness.*
Vision, Objectives and Spatial Strategy	Vision	Supports the vision for Hertsmere	*The Council welcomes this support for the vision for Hertsmere. The Draft Local Plan vision for Hertsmere sets out an ambition for the borough to be a thriving, inclusive, and sustainable place with high-quality homes to meet diverse needs, a prosperous economy with varied employment opportunities, vibrant and resilient town centres, well-connected communities with excellent transport links and digital infrastructure, accessible green spaces and enhanced biodiversity, conserved and celebrated heritage assets, climate-resilient and low-carbon development, and strong, healthy communities supported by high-quality services, facilities, and infrastructure. The Council is committed to ensuring that the strategic objectives and policies of the Local Plan translate this vision into deliverable actions and outcomes, that the spatial strategy and site allocations support the vision's realisation, and that implementation, monitoring, and review mechanisms ensure that the Plan remains effective in delivering the vision for Hertsmere throughout the plan period and beyond.*
Vision, Objectives and Spatial Strategy	Vision	Opposes the vision for Hertsmere	*The Draft Local Plan vision has been developed through community engagement, consultation on issues and options, evidence gathering, and assessment of the borough's development needs, constraints, and opportunities, and seeks to balance the need to provide sufficient housing and employment development to meet identified needs with the protection and enhancement of Hertsmere's environmental assets, Green Belt, heritage, settlement character, and quality of life. The Council will carefully consider all representations raising opposition to the vision and will review whether amendments or refinements to the vision are necessary to ensure that the Regulation 19 Publication version of the Local Plan includes a vision that is positively prepared, reflects effective engagement, commands broad support, appropriately addresses the borough's needs and challenges, and provides a sound basis for the Local Plan's strategy and policies.*
Vision, Objectives and Spatial Strategy	Vision	Recommendation to place a greater emphasis on the natural environment within the plan vision	*The Council will ensure that the Regulation 19 Publication version of the Local Plan includes a vision and strategic objectives that give appropriate prominence and ambition to protecting, enhancing, and restoring the natural environment as a fundamental component of sustainable development*

Theme	Sub-Theme / Issue	Summary	*Response*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Recommendation for Hertsmere Borough Council to adopt a countryside and landscape led approach rather than growth-led approach as set out in the consultation version of the Local Plan.	*The Council recognises that the Local Plan must balance multiple objectives including meeting objectively assessed development needs for housing and employment, protecting and enhancing the natural and built environment including Green Belt, landscape, biodiversity, and heritage assets, supporting economic prosperity and community wellbeing, and ensuring sustainable development that respects local character and environmental constraints. The Draft Local Plan seeks to balance these objectives by meeting the borough's minimum housing need calculated using the Government's standard method whilst directing development to the most sustainable locations, prioritising previously developed land where available, minimising harm to Green Belt purposes through the application of exceptional circumstances and the Green Belt Assessment evidence, and including robust policies to protect and enhance landscape character, biodiversity, trees and woodland, heritage assets, and environmental quality. The Council will carefully consider this recommendation to adopt a countryside and landscape-led approach. It will review whether the spatial strategy and site selection appropriately balance development needs with environmental protection, whilst recognising that national policy requires the Council to plan positively to meet objectively assessed needs and that a failure to plan adequately for housing and employment development would be inconsistent with the legal duty to prepare a sound Local Plan and could result in unplanned, speculative development through the appeal process.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	General view that all forms of sustainable development, not just housing, should be considered as an exception to the spatial strategy	*The Regulation 19 spatial strategy directs major growth to the four main towns and resists major housing development in smaller settlements. Limited provision is made for single infill dwellings delivering self or custom-build housing and/or affordable housing meeting specific local needs, while separate policies address appropriate rural economic and community uses.*

Theme	Sub-Theme / Issue	Summary	*Response*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Recommendation for consideration to be given to the cumulative impacts from development	*The Council recognises that the Local Plan must assess and address the cumulative impacts of proposed development on infrastructure, services, the environment, heritage assets, highways, air quality, flood risk, biodiversity, landscape character, and community amenity, ensuring that the combined effects of multiple developments do not result in unacceptable impacts on existing communities, environmental quality, or the proper functioning of infrastructure networks. The Draft Local Plan has been subject to Sustainability Appraisal, Strategic Environmental Assessment, Habitats Regulations Assessment, transport modelling and assessment, Infrastructure Delivery Plan preparation, and other technical studies which consider the cumulative impacts of the proposed spatial strategy and site allocations on environmental, social, economic, and infrastructure considerations, informing policy development, mitigation requirements, and infrastructure planning. The Council will ensure that the Plan's policies require development proposals to assess and mitigate cumulative impacts in combination with committed and planned developments and will ensure that the Regulation 19 Publication version of the Local Plan demonstrates a robust and comprehensive approach to identifying, assessing, and mitigating cumulative impacts to protect the environment, infrastructure, and quality of life for existing and future communities across Hertsmere.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern that approach to development undermines the spatial strategy	*The Draft Local Plan spatial strategy directs the majority of development to the major settlements of Borehamwood, Bushey, Potters Bar, and Radlett due to their sustainability, accessibility, services, facilities, and infrastructure capacity, with more limited development in smaller settlements and strict control in the Green Belt and countryside, and this strategy is reflected in the distribution of site allocations, housing and employment targets, infrastructure planning, and development management policies. The Council will review whether site allocations, policy requirements, distribution of development, and flexibility mechanisms are consistent with and support the delivery of the spatial strategy ensure that the Regulation 19 Publication version of the Local Plan presents a coherent, integrated, and internally consistent spatial strategy supported by appropriately distributed site allocations and development management policies that collectively deliver sustainable development in accordance with the Plan's vision, objectives, and national policy requirements..*

Theme	Sub-Theme / Issue	Summary	*Response*
Vision, Objectives and Spatial Strategy	Spatial Strategy	General comment about strategic policy	*The Regulation 19 Local Plan's overarching spatial strategy is set out principally through Policy HBF1 (Delivering a Better Future for Hertsmere), supported by the strategic policies contained throughout Parts 1 and 2 of the Plan..*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Support for the spatial strategy subject to appropriate consideration of designated sites and wider biodiversity in policy	*The Council welcomes this support for the spatial strategy. The Council confirms that the spatial strategy and site allocations have been subject to rigorous assessment of environmental constraints and opportunities including habitats regulations assessment ensuring no adverse effects on European designated sites. The Local Plan will include strategic policies and site allocation policies that provide appropriate and robust protection for designated sites and wider biodiversity.*
Vision, Objectives and Spatial Strategy	Objectives	Request for amendment to one of the Key Spatial Objectives	*The Draft Local Plan Key Spatial Objectives cover themes including delivering sustainable growth, meeting housing need, supporting economic prosperity, protecting and enhancing the environment and heritage, promoting design quality and placemaking, addressing climate change, providing infrastructure and services, promoting healthy and inclusive communities, and protecting the Green Belt and landscape character, with these objectives informing the spatial strategy and strategic policies. The Council will carefully consider this request for amendment to the Key Spatial Objective and review whether the suggested amendment would strengthen the clarity, ambition, deliverability, or alignment with evidence and national policy of the spatial objectives. The spatial objectives will be clearly articulated, evidence-based, ambitious yet deliverable, responsive to community priorities and consultation feedback, and provide a robust foundation for delivering sustainable development and achieving the Plan's vision for Hertsmere's future.*
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern that planning permissions granted for housing developments in Shenley in 2025/26 are contrary to the spatial strategy and therefore should be perceived as contrary to policy and should be withdrawn	*Planning permissions that have been lawfully granted following proper assessment against the adopted development plan, national policy, and material considerations are valid permissions that establish lawful development rights, and the Council does not have legal powers to withdraw or revoke planning permissions that have been lawfully granted except in exceptional circumstances. The emerging spatial strategy in the Draft Local Plan will inform future planning decisions with increasing weight as the plan progresses through examination and towards adoption but carries limited weight at this stage.*

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Appendix 5 – Frequently Asked Questions: Regulation 19
Hertsmere Regulation 19 Local Plan

This summary explains the main proposals, timetable and implications set out in the Cabinet report.

1. What is the Hertsmere Local Plan?
It is the Council's statutory long-term strategy for development and growth across Hertsmere. It will guide where development takes place, the policies applied to planning proposals, infrastructure delivery, place-making and how progress is monitored.

The Hertsmere Local Plan is comprised of a Borough-wide Vision and Spatial Strategy, which follows the Council's adopted Corporate Plan and Strategic Objectives; generic planning policies that apply to all future development proposals; place and settlement policies for the Borough's four main towns, these include site allocations; and delivery and monitoring policies. Collectively the Plan's policies and site allocations will deliver the spatial strategy and seek to meet the Borough's needs in full.

2. What is Regulation 19?
Regulation 19 is the formal publication stage immediately before submission of the Local Plan to the Secretary of State for the purpose of examination in public. It gives interested people and organisations an opportunity to make representations on whether the Plan is legally compliant and meets the tests of soundness[1].

Plan-making in England is legally required to follow the Town & Country Planning Regulations 2012. The plan-making process broadly follows the chronology set out under Regulations 18 – 26. The Regulations can be viewed here: The Town and Country Planning (Local Planning) (England) Regulations 2012

3. What decisions are Cabinet/Council being asked to make?
Cabinet is asked to recommend that Council approves publication of the Regulation 19 Local Plan for six weeks, agrees that the Plan and supporting documents should be submitted to the Planning Inspectorate by 31 December 2026, and authorises officers to make necessary minor changes and provide further information during examination.

4. When will Regulation 19 take place?
Subject to Council approval, the proposed six-week publication period runs from 8 October to 19 November 2026.

5. How is this different from the Regulation 18 consultation?
Regulation 18 sought views on the Council's emerging approach, growth strategy, potential development sites and draft policies. More than 4,000 responses were received and used to shape the Plan.

[1] The tests of soundness are set out in the NPPF (December 2024) Paragraph 36. Under the transitional arrangements the new Hertsmere Local Plan will be assessed under the previous version of the NPPF not the most recent (as published during August 2026).

Regulation 19 focuses on the version of the Plan that the Council considers is ready to submit. As such the Council believes that the Plan is legally compliant and fundamentally sound, or capable of being made sound through the examination process.

Those responding to Regulation 19 are specifically required to identify what is unsound about the Plan, or where the Council has failed in meeting its legal requirements, and what actions need to be taken to make it sound.

Whilst those making representations to the Regulation 19 Publication will submit them to the Council, they are primarily for the consideration and benefit of the independent Planning Inspectors who will be appointed to examine the Plan. Representations submitted under Regulation 19 will be considered as part of the Regulation 24 Examination in Public process.

6. What happens to representations made at Regulation 19?
Representations will be passed to the independent Planning Inspector appointed by the Secretary of State and considered as part of the public examination.

7. Why must the Plan be submitted by 31 December 2026?
Submission by that date is required for the Plan to proceed under the current plan-making system's transitional arrangements[2]. Missing the deadline could require substantial changes under the new system and prolong the borough's local planning policy gap.

8. Can the Plan change after the Regulation 19 consultation?
There is no provision to change the Local Plan directly. As stated above the assumption is that the Council believes that their submitted Plan is fundamentally sound and legally compliant. However, the Council may submit an addendum of changes identified following consultation, or, through the examination process, changes may be necessary to secure soundness. If the Inspector later considers that main modifications are needed to make the Plan sound or legally compliant, these would be discussed during the examination, be proposed to the Council by the Inspector and may require a further public consultation.

9. When is the examination likely to take place?
The examination begins formally when the Plan is submitted. Because many plans are expected to be submitted by the end of December 2026, the indication is that hearing sessions are unlikely to begin before summer or autumn 2027.

10. What does the Local Plan contain?
The Plan has five parts: the vision and spatial strategy; development management policies; policies and site allocations for Hertsmere's towns and places; delivery and monitoring arrangements; and supporting appendices.

11. What supporting documents accompany the Plan?

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[2] That is the plan-making system as set out under the previous version of the NPPF (December 2024). The transitional arrangements are set out under NPPF (August 2026) Annex A: Implementation Para 8.

The report includes a Sustainability Appraisal, a Habitats Regulations Assessment and a Regulation 18 Consultation Statement. These assess reasonable alternatives and sustainability effects, consider potential impacts on protected habitats, and explain how earlier consultation feedback was considered.

12. Why does Hertsmere need an up-to-date Local Plan?
An up-to-date Plan would help direct growth to sustainable locations, plan infrastructure investment, meet identified needs and provide a stronger basis for deciding planning applications. Without one, development does not stop; decisions rely more heavily on national policy, with greater exposure to speculative development, appeals and possible government intervention.

13. Definition of changes (e.g. minor change vs. change)
It is anticipated that the examination process will identify changes to the submitted Plan. All Plans submitted for examination are subject to change. Experience from elsewhere demonstrates that even the most soundly prepared and legally compliant plans are subject to amendment by the appointed Inspectors – that is a fact of life.

The changes brought forward through the examination process fall into two categories –

a) Main Modifications – these, as their title suggest, concern major matters. They typically relate to changes to the spatial strategy, planning policies, settlement and place policies, and site allocations; and in all cases their supporting text. These substantive changes relate to matters of detail and policy approach. The Inspectors are only interested in the Main Modifications – as these are the substantive changes that secure soundness. For clarity, the Inspectors are only seeking to secure soundness, they are not interested or concerned in making the plan “more sound”.
b) Minor Modifications – these relate to minor matters that include correcting spelling mistakes, poor grammar, formatting, and factual information. They are matters that do not have a bearing on the soundness of the Plan. All submitted Local Plans contain such minor errors – that is a factual reality, which is recognised by examining Inspectors. They have less interest in these matters but will work with the plan-making authority to identify them, as minor modifications, which can be introduced as amendments through the examination process.

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