



# Elstree and Borehamwood Neighbourhood Plan

2025 to 2040



**Consultation Statement to accompany the  
Submission Version Elstree and Borehamwood  
Neighbourhood Plan**

**January 2026**

**Prepared by the Neighbourhood Plan Steering Group on behalf  
of Elstree and Borehamwood Town Council**

## Contents

|   |                                                                                                                                    |    |
|---|------------------------------------------------------------------------------------------------------------------------------------|----|
| 1 | Introduction .....                                                                                                                 | 3  |
| 2 | Summary of engagement and consultation activities, issues and outcomes .....                                                       | 4  |
|   | Stage I: Preparing the Pre-Submission Version Neighbourhood Plan.....                                                              | 4  |
|   | Stage II: Consulting on the Pre-Submission Version Neighbourhood Plan .....                                                        | 15 |
|   | Stage III: Finalising the Submission Neighbourhood Plan.....                                                                       | 21 |
| 3 | Conclusion.....                                                                                                                    | 22 |
|   | Appendix A: List of those consulted at Regulation 14 (Pre-Submission stage).....                                                   | 23 |
|   | Appendix B: Summary of comments received at Pre-Submission Regulation 14 consultation<br>and response from the Steering Group..... | 25 |

## 1 INTRODUCTION

- 1.1. The policies contained in the Elstree and Borehamwood Neighbourhood Plan (EBNP) have been developed following extensive interaction and consultation with the local community.
- 1.2. This Consultation Statement sets out how the EBNP has been developed and contains, in accordance with Regulation 14 of Neighbourhood Development Planning (General) Regulations 2012 (as amended):
  - details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - details as to how they were consulted;
  - a summary of the main issues and concerns raised by the persons consulted; and
  - how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

### **The Neighbourhood Plan Steering Group**

- 1.3. Elstree and Borehamwood Town Council is the qualifying body officially responsible for preparing the Neighbourhood Plan. A Steering Group, comprising local councillors and volunteers from the community, was set up to lead on the development of the EBNP with each member take the lead on a particular topic. Members of the Steering Group were:

Chair: Cllr Prabhakar Kaza (formerly Clive Butchins)

Vice Chair: Ilana Gershlick

Members: Cllr Graeme Alexander, Suzanne Alford, Ann Goddard, Andrew Grady, Cllr Tushar Kumar, Andrew Lewis, Cllr Pooja Nirmalakumaran, Cllr Dan Ozarow, Julia Smith, Alison Eardley (Neighbourhood Plan Consultant)

Additional support was provided by other members of the community during the course of the Plan.

## 2 SUMMARY OF ENGAGEMENT AND CONSULTATION ACTIVITIES, ISSUES AND OUTCOMES

2.1. A high-level summary of the engagement and consultation activity is shown in *Table 1*:

*Table 1: High level summary of the key milestones*

| Date         | Milestone                                                                                               | Detail                                                                                                                                                                                                                                                                                                    |
|--------------|---------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2022         | Starting the project and understanding the key issues                                                   | <ul style="list-style-type: none"><li>• Neighbourhood Area designated</li><li>• Plan formally launched locally</li><li>• Steering Group established</li><li>• Engagement with the local community</li></ul>                                                                                               |
| 2023         | Building the evidence base and developing policy options                                                | <ul style="list-style-type: none"><li>• Vision and Objectives agreed</li><li>• Ongoing community engagement</li><li>• Housing Needs Assessment prepared</li><li>• Design Guidance and Codes prepared</li></ul>                                                                                            |
| 2025 to 2026 | Pre-Submission Version document<br><br>Submission Version document<br><br>Examination<br><br>Referendum | <ul style="list-style-type: none"><li>• Draft Plan developed and sent to HBC for informal comment.</li><li>• SEA/HRA Screening undertaken</li><li>• Pre-Submission Consultation commences</li><li>• Submission Version Plan prepared and submitted to HBC</li><li>• Plan independently examined</li></ul> |

2.2. The sections below describe, in fuller detail, the engagement and consultation process which took place during the Plan preparation. This is divided into three stages:

Stage I: Preparing the Pre-Submission Version Neighbourhood Plan

Stage II: Consulting on the Pre-Submission Version Neighbourhood Plan

Stage III: Finalising the Submission Neighbourhood Plan

### Stage I: Preparing the Pre-Submission Version Neighbourhood Plan

2.3. The Town Council took the decision to prepare a neighbourhood plan for Elstree and Borehamwood in late 2021. It was considered to be an important opportunity to enable the

community to have a greater say in how the area might develop in the future. Neighbouring parishes had recently completed their plans and there was felt to be merit in following suit.

- 2.4. An external planning consultant was engaged in October 2021. They prepared a detailed route map setting out the key activities and milestones that would need to be undertaken for the project. A meeting of the initial Steering Group, comprising town councillors, took place in December 2021. Subject to ongoing issues surrounding the Covid-19 pandemic, it was agreed that a Launch event would take place between 2pm and 4pm on Saturday 5 March 2022 at the Fairway Hall. This was ratified at the Environment and Planning Committee on the 10 January 2022.
- 2.5. The event was publicised on the Town Council website, via direct emails to local groups and posters (*Figure 1*) placed in locations around the neighbourhood area.

*Figure 1: Launch event poster*



- 2.6. An article promoting the Launch Event was placed in the Town Council's Town Crier magazine (*Figure 2*):

Figure 2: Text for the Town Crier, January 2022

**Elstree and Borehamwood Neighbourhood Plan – Coming Your Way Soon: Have your Say! Find Out More!**

The Town Council is calling out for volunteers to join a steering group to help shape the local area by creating a Neighbourhood Plan for Elstree and Borehamwood. This is an exciting opportunity for the community to have a real say in planning matters and the future of the Town.

The formation of the Plan will be facilitated by the Town Council but the Plan belongs to the residents and it is essential that the Steering Group is made up of a good mix of local expertise and interest groups. If you are interested in supporting this project, please email the Town Clerk at [clerk@elstreeborehamwood-tc.gov.uk](mailto:clerk@elstreeborehamwood-tc.gov.uk).

Subject to Covid-19 restrictions, the Council has planned a launch event to take place at Fairway Hall on Sunday 13 February 2022 2.00pm to 6.00pm (drop in sessions) in order to raise awareness of the Plan and to recruit volunteers to help on the Steering Group. Town Councillors and the Consultants who are helping to deliver the project will be available to answer questions and to help advise on exactly what a Neighbourhood Plan can do to improve the local area.

More information about Neighbourhood Plans can be found at [neighbourhoodplanning.org](http://neighbourhoodplanning.org)

- 2.7. A detailed plan was drawn up to show the event would be set up and what should be prepared. Visitors were invited to place a dot on the map of the neighbourhood area, showing where they live. There was a good geographic spread of attendees for this first event.
- 2.8. A series of posters were displayed around the room asking for feedback on a variety of topics relating to the area. In terms of how the area might look in the next 15 to 20 years, the following topics were raised by residents:

Figure 3: Topics of importance to the community



- 2.9. Other topics explored included the natural environment, getting around, the Town Centre and local economy, and community facilities. Attendees were also asked to suggest ways that the Steering Group should engage during the project, with ideas including a roadshow exhibition, engaging specific groups such as younger people, regular updates in the Town Crier and using podcasts. *Figure 4* shows some images from the events. A full report of the Launch Event is included in the Evidence Base available on the Town Council website.

*Figure 4: Images from the Launch Event*



- 2.10. Following the launch event, a permanent Steering Group was established. They met for the first time in May 2022 and received a presentation about what neighbourhood planning is and the sorts of things that it can achieve. They also put a Terms of Reference together, setting out the scope of their role and key tasks to be undertaken on behalf of the Town Council. One of their first tasks was to officially designate the Elstree and Borehamwood Neighbourhood Area. An application was drafted and formally agreed at the Environment and Planning Committee meeting of 21 June 2022. The [application](#) was submitted in July 2022. The application was confirmed by Hertsmere Borough Council (HBC) as the local planning authority, on 13 July 2022.
- 2.11. A dedicated area of the Town Council website was established to host information about the project. Part way through the project, the Town Council changed website provider and unfortunately some of the material was lost. A new [webpage](#) was set up, however, which continues to host progress on the Plan.

- 2.12. Given the population size of the area, an Engagement Plan was drawn up to enable the Steering Group to get in touch with as many residents as possible. An initial and ongoing element of this was the development of a Community Survey, which was available in paper form with dedicated return boxes placed in various locations in the area (for instance the shop in Elstree Village, 96 Shenley Road, and a number of the places of worship). The survey was also available to complete online and promoted across the neighbourhood area (Figure 5).

Figure 5: Poster promoting the community survey



- 2.13. The Engagement Plan included a number of strands and the paragraphs below detail the activities that took place across each during 2023 and into 2024:

Target group approach

- 2.14. Details were gathered on specific target demographic groups in the area so that they could be directly approached about the project. This comprised:
- Young Children – their needs were to be captured via communication with parents/guardians through, for instance, play groups, toddler groups and primary schools. All such groups were written to and invited to complete the community survey. Members of the Steering Group attended some playgroups across the area to capture views and feedback and generally to inform people about the project. A member of the Steering Group was a school Governor and shared information on the emerging EBNP at the quarterly school meetings. Information was also posted to schools to include in their electronic newsletters. Members of the Steering Group attended a parent café at the local Family Centre.

- **Teenagers** – this cohort was considered a more challenging group to capture views from, but nevertheless very important to hear from. The Steering Group compiled information on secondary schools in the area and wrote each of them. A presentation and planning afternoon was held with Year 12 and 13 students at Yavneh College. This included a general introduction to planning including possible careers. Students were then invited to undertake a SWOT analysis of the area from a teenage perspective. This provided some interesting insight into the challenges faced by this group, including around anti-social behaviour, the availability of activities and also challenges about getting around the area, for instance by foot and by bicycle. The group then undertook a mapping exercise marking up where they frequented, improvements that could be made to encourage walking and cycling and where improvements to spaces would be helpful. One of the students attending subsequently chose neighbourhood planning as their topic for their Year 12 extended project.

A further activity undertaken to hear from teenagers was to engage with the Elstree and Borehamwood Youth Council, which comprises young people aged 11 to 19. The Youth Council aims to comment on current local youth issues, giving the local youth a voice, and also to undertake some projects to the benefit of local youngsters. The Neighbourhood Plan was discussed at a number of the Youth Council meetings, with opportunities for discussion and input. Some of the projects being led by the Youth Council, for instance the Cycle to School project, was of direct relevance to the EBNP and aspirations were built into the document.

The Youth Council compiled a Youth Survey aimed at all those aged up to 19 years old. The survey was promoted through the local schools and attracted 110 responses. It added useful information on local facilities needed, including with the Town Centre.

In addition, Hertfordshire County Council youth services engaged with the Steering Group so that their aims and ambitions for the area could be incorporated into the plan. In particular this focused on additional youth and sport provision, including non-chargeable activities. This was something that had been raised by the Yavneh College students.

Finally, a list of venues and clubs serving teenagers was contacted with the Community Survey to provide information.

- Young adults/ working age adults: Posters advertising the project and the survey were put in locations around the area, including the Job Centre, pubs, 96 Shenley Road. The active residents' associations were contacted and members of the Steering Group spoke at their meetings about the project.
- Older people: Information was sent to a number of organisations operating locally that focussed on the needs of older people locally. This included the Friends of Care Homes, the Rotary Clubs, the U3A and local care homes.
- Faith groups: The Steering Group ensured information was made available to the faith groups represented locally, including promoting the Plan at festivals and key dates in the calendar.
- Inclusivity and disability groups: Other organisations contacted were the Radlett, Elstree and Borehamwood Talking Newspaper, the Foodbanks, the local branch of the NSPCC,

MIND, the local CVS (community and voluntary sector umbrella body), the Citizens Advice Bureau, MENCAP, and the Borehamwood visually impaired group. Members of the Steering Group attended a local group called 'Chatter Tables' both at St Michael's Church and at one of the Community Centres, which comprised a social space for adults of all ages, for general chat.

#### Theme approach

2.15. In addition to the targeted activities that took place, the Steering Group engaged with groups who might either be interested in a specific theme or have an expertise. The themes engaged upon in this way were:

- Community facilities: the experiences and needs of specific providers were considered, including 96 Shenley Road, the various community centre, the Elstree and Borehamwood Museum and Allum Manor and local orchestra groups.
- Environment: This included engagement with the Green Belt Society, the Aldenham Country Park Trust and the Local Biodiversity Record Centre. Much work was undertaken to identify potential green spaces in the area that were considered to be demonstrably special. Members of the Steering Group undertook a detailed audit of the area to identify a long-list of such spaces. Spaces had also been suggested via the community survey and during the engagement events. Similarly, important views/view points were identified in this way. An biodiversity profile was provided by the Local Biodiversity Centre, which was used to inform the landscape and biodiversity policy.
- Local economy: A survey targeted at local businesses was developed and a member of the Steering Group engaged directly with other businesses. The team working for HBC on the new Elstree Corridor Vision also met with members of the Steering Group to talk through their plans and how these might integrate with the EBNP. Future plans for the various studios were also carefully considered.
- Housing/ Design: The community survey asked people their views on issues relating to housing, which revealed anecdotal evidence on the type, size and affordability of housing needed locally. In addition, the group commissioned consultancy, AECOM, to prepare a [Housing Needs Assessment](#) for the area, focussing on the settlements within the area. This was published in April 2023. In addition, a [Design Code and Guidance](#) document was commissioned and again prepared by AECOM, setting out local character areas, design principles and a forward plan for the Town Centre itself. This was published in March 2024 and forms an integral part of the EBNP.
- Heritage: The group met with those involved in the museum as well as Elstree Screen Heritage, a community group founded by residents in 2006 which aims to record, preserve and share the rich film and television heritage of the area. An audit of potential non-designated heritage assets was undertaken and information gathered as to why each was important.
- Getting Around: Local walkers and cyclists were engaged to talk about their experiences of getting around the area without a car. The work of the Youth Council, noted earlier, also fed into this topic area. A full audit of 'key movement routes' and areas where

interventions would improve people's experiences was undertaken with the associated maps provided in the Plan. This was cross-checked with the emerging Local and cycling infrastructure plan for the area. The general approach was one of trying to encourage 'active travel' by identifying where roads and footways could be improved to enable better connectivity and safer routes.

- 2.16. In terms of communications, regular updates about the project were posted on the website and also a range of Facebook pages that existed in the area. The quarterly Town Crier was used to publish progress reports. This Town Council-led magazine did stop due to funding for some time but has recently been resurrected and progress reports continue to be added. It is delivered to all households in the area. Articles were also posted in the Herts Community News.
- 2.17. During the project, a number of Podcasts were recorded about the emerging Plan as well as news on the associated emerging Local Plan. These can be accessed in Spotify under the banner 'Borehamwood Tales'.
- 2.18. The ENBP group had a exhibition board presence at various events including local concerts, coffee mornings and local festivals.
- 2.19. The information gathered from the various sources, alongside evidence that had been prepared as part of the Local Plan, enabled the group to put together a draft vision and objectives (*Figure 6*) and a draft set of policies (*Figure 7*) in late 2023. This was considered to be the Informal Draft Plan and comments and amendments could still be made.

*Figure 6: Draft vision and objectives for the ENBP, January 2024*

In 2040, Elstree and Borehamwood will be a friendly, safe, clean and accessible place where people choose to live and stay, where the diversity of communities is celebrated.

We will continue to recognise each of our main settlements: Borehamwood, Elstree, Elstree Village and Well End, and find ways to celebrate their distinctiveness from one another and nearby areas, most notable outer London to the south.

We will have carefully influenced the delivery additional housing to tackle the overall shortage in the area, prioritising the needs of our local residents in terms of family homes, homes suited to those wishing to downsize, and affordable homes. Alongside new homes, we will seek to influence the provision of services and facilities and other infrastructure so that it meet the needs of our community as it continues to grow. This includes the provision of a theatre, community growing spaces and additional safe spaces for our children and teenagers.

Borehamwood town centre will remain a vibrant focal point for the community offering a mix of retail shops, local services and facilities and leisure activities. We will have a thriving Street Market and attractive areas for residents to sit and socialise. We will also support a thriving night-time economy. We will continue to treasure our film and television industry roots, while supporting our wider economic offering including both large scale employers and those starting out.

We recognise the climate emergency and embed the need to mitigate climate change in all areas. This includes protecting our valued green spaces and wider countryside, safeguarding the green belt and improving our biodiversity through, for instance, the planting of new trees and the use of

wildlife friendly features. We will emphasise the importance of carbon neutral design in all developments.

We will support opportunities for active travel (walking, cycling and equestrian) locally, promoting, extending and improving our network of rights of way. Linked to this, we will seek to provide improved car parking, including for disabled access, and e-charging points across the area to promote a shift towards less polluting vehicles.

**Objective 1: Protecting and enhancing our rural setting within the Green Belt:**

- Protect, preserve and enhance existing green space and provide new ones too.
- Support initiatives to protect and enhance wildlife, biodiversity and habitat provision.
- Maintain and enhance the connectivity of wildlife corridors.
- Maximising opportunities for the reservoir.

**Objective 2: Celebrating our unique heritage:**

- Local heritage assets are identified and conserved for future generations.
- Making the most of our links to the television and film industry.
- Telling the story of our area – how it has evolved and the communities who have settled here.
- Reinforcing our identity and sense of place.

**Objective 2: Providing homes to meet the needs of the local community:**

- Supporting the provision of affordable homes.
- Influencing new housing that caters for occupants throughout their different stages of life.
- Designing quality neighbourhoods that enable exemplary sustainable design.
- Reducing
- Directing new housing to the most sustainable parts of the area, near to local facilities.

**Objective 3: Enabling a thriving economy:**

- Revitalising the town centre as a safe, friendly and accessible destination offering a mix of retail, housing, local services and entertainment, including into the evening.
- Supporting the television and film industry with greater involvement in the local community and provision of facilities.
- Safeguarding existing employers, including the medical/pharma industries.
- Providing a supportive environment for those working from home.

**Objective 4: A walkable and cyclable neighbourhood (a 20-minute town?):**

- Encourage walking and cycling, particularly for local journeys.
- Enhancing the network of walking and cycling routes that link key services to housing and ensuring that new developments connect to this.
- Supporting initiatives to tackle congestion.

**Objective 5: Celebrating and supporting our communities:**

- Providing a range of facilities, services and recreational activities to meet the needs of different ages, cultures and interests across the area.
- Supporting our football club.
- Encouraging a friendly and involved community.

Figure 7: Draft EBNP policies, May 2024

| Policies                                      | Main intent                                                                                                                                                                                                                               |
|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy EB1: Achieving sustainable development | Direct new development towards the most sustainable locations, whilst protecting the Green Belt and the greenfield spaces within the Parish and avoiding coalescence. Prioritises brownfield sites. Sets out how major development should |

|                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                         | come forward, in collaboration with the community to be planned sustainably. Protects against ‘backland’ development (inc. residential gardens).                                                                                                                                                                                                                                 |
| Policy EB2: Meeting Local Housing Needs                                                 | Ensure that new homes meet the needs of local people and achieve a balanced mix of development. Evidenced by findings from the Community Survey and the EB Housing Needs Assessment. Sets out affordable housing need and the requirement for housing to be suited to all ages as people progress through their lives.                                                           |
| Policy EB3: Character and design of Development                                         | Protect and enhance the character of the area, incorporating the principles set out in the Elstree Village Conservation Area Appraisal and the EB Design Code and Guidance. Identifies key ‘gateways’ into the area to be enhanced. Seeks to ensure that developments abutting the countryside are less dense to improve transition between built area and the open countryside. |
| Policy EB4: Energy Efficiency and Design                                                | Ensure all developments meet the highest energy efficiency and environmental standards – as is possible at the moment. The Future Homes Standard expected in 2025 will assist this as national targets will be enshrined in policy.                                                                                                                                              |
| Policy EB5: Design of shop fronts and signage                                           | Ensures that shops fronts and signage contribute positively to local character – underpinned by the EB Design Code and Guidance. Adds greater detail to the HBC SPD.                                                                                                                                                                                                             |
| Policy EB6: Heritage assets                                                             | Safeguard local heritage and identifies additional ‘non-designated heritage assets’. Supports proposals that would enable a larger museum/heritage centre space.                                                                                                                                                                                                                 |
| Policy EB7: Borehamwood Town Centre<br><br>(insert something about Elstree Village?)    | Support mixed development in the town centre to enable greater footfall and futureproof the centre as a shared space offering a range of activities. Supports upper floor residential. Supports temporary uses.                                                                                                                                                                  |
| Policy EB8: A Safe, attractive and welcoming public realm                               | Set out expectations to improve the public realm within the town centre, based on the EB Design Code and Guidance.                                                                                                                                                                                                                                                               |
| Policy EB9: Safeguarding existing major employment and supporting sustainable expansion | Safeguard existing employment land whilst also encouraging new businesses to locate to the area.                                                                                                                                                                                                                                                                                 |
| Policy EB10: Supporting start-ups, flexible work space and homeworking                  | Recognise the importance of entrant businesses and sole traders and provide an environment to support them.                                                                                                                                                                                                                                                                      |
| Policy EB11: Green and Blue Infrastructure                                              | Identify, protect, enhance and extend areas and corridors featuring valuable flora and/or fauna. Support opportunities for biodiversity opportunity areas. Include Aldenham Country Park and Reservoir here.                                                                                                                                                                     |

|                                                                         |                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy EB12: Managing the Environmental Impact of Development           | Protect and enhance identified habitats to ensure the Rural and Green character of the Parish is retained. Identify how environmental features to support biodiversity can be integrated into development proposals |
| Policy EB13: Local Green Spaces                                         | Designates local green spaces that are demonstrably special to the local community from inappropriate development.                                                                                                  |
| Policy EB14: Protection of Locally Significant Views                    | Protect individual views throughout the Parish that hold particular significance of local heritage.                                                                                                                 |
| Policy EB15: Aldenham Country Park and Reservoir (optional)             | Set out a vision for this area – work needed.                                                                                                                                                                       |
| Policy EB16: Improving walking and cycling opportunities                | Protect and enhance key movement routes (particularly footpaths and cycle routes) within the area. Support the '20-minute' community concept. Identify where improvements to the route network are needed.          |
| Policy EB17: Providing a range of community facilities                  | Focus on support for covered space, theatre, facility in Elstree village, flexible space, safe spaces, community growing spaces                                                                                     |
| Policy EB18: Provision of Leisure Facilities for Children and Teenagers | Ensure all new major developments consider and provide for the needs of children and young people. Notably more play equipment across the area, safe spaces for teens, improvements to skate parks                  |

- 2.20. The Informal Draft Plan was publicised locally to seek feedback and comments. A roadshow of information posters was created and hosted at various venues around the area including some places of worship and 96 Shenley Road.
- 2.21. Meetings were held with local councillors and other interested parties to discuss the draft plan and identify any areas still requiring work or amendments. The Steering Group also spoke at the Annual Town Meeting on the 6 March 2024 about the draft Plan.
- 2.22. The Strategic Environmental Assessment and Habitats Regulations Assessment screenings were undertaken during this period by HBC, with the outcomes published in March 2024. This confirmed that the EBNP was unlikely to have either significant environmental impacts or impacts on a protected habitat site.
- 2.23. Amendments were made to the document and on 26 June 2024, the then Chair of the Steering Group gave a presentation at the Full Council meeting with a view to agreeing the scope of the Plan and the content, bar some additional evidence gathering (largely related to local green spaces), that was still being compiled. At that meeting, a decision was taken to provide comment and refer for approval during 18 September 2024 Full Council be approved with Consultation late September 2024. In fact, it was not until April 2025 that the Pre-Submission Draft Plan was officially signed off by Full Town Council, so that it could progress to the Regulation 14 consultation.

## Stage II: Consulting on the Pre-Submission Version Neighbourhood Plan

2.24. The Pre-Submission (Regulation 14) consultation took place between **Monday 28 April 2025** and **Monday 7 July 2025**. It was publicised in the following ways:

- Hard copies of plan were made available at Fairway Hall and on request from the Town Council. Residents were able to loan these to read at home. Paper surveys were made available to fill in and boxes were placed around the parish for people to return them to.
- A [set of posters](#) about the Plan, including the vision, objectives and policies, were printed for use throughout the consultation.
- A full feedback form was prepared that could be filled in on paper or electronically. A smaller, less cumbersome form was also published. The larger survey was sent to everyone on the EBNP mailing list. The smaller survey was distributed at local events. It was also distributed to all residents booking the over-60s coach trips, enabling targeted engagement with older residents who may not access online systems.
- A formal launch (*Figure 8*) was held at Borehamwood Market on 27 April, with a stall staffed by Steering Group Members, Officers and Councillors.

*Figure 8: Images from the Regulation 14 consultation launch event*



- Promotional posters were placed on all community noticeboards, each with a QR code linking directly to the online survey and information about where to find the Plan documents.
- A [dedicated webpage](#) on the Town Council website was updated showing the Plan itself, the Housing Needs Assessment, the Design Guidance, the SEA/HRA Screening Determination Statements and links to other evidence.
- Leaflets about the EBNP were distributed to all market stall holders, with requests for onward circulation and display.

- Public display boards (*Figure 9*) were installed at: 96 Shenley Road Community Hub, Fairway Hall, Allum Manor, The Venue Leisure Centre. These also formed the backdrop for the Mayor-making event.

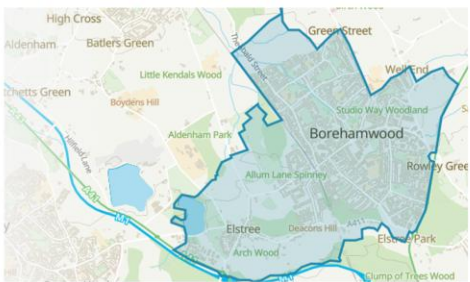
*Figure 9: Example of the public display boards*



- A presentation (*Figure 10*) was prepared for the June Youth Council on powerpoint.

*Figure 10: Youth Council presentation cover slide*

## Our Elstree and Borehamwood Neighbourhood Development Plan to 2040 is out for consultation



<https://www.elstreeborehamwood-tc.gov.uk/neighbourhood-plan/>

Scan the QR code to complete the feedback survey

- Display packs provided to Borehamwood Library and Threeways Community Centre to extend reach to non-digital audiences.
- Advertising was placed on the electronic kiosk at Elstree and Borehamwood railway station (*Figure 11*).

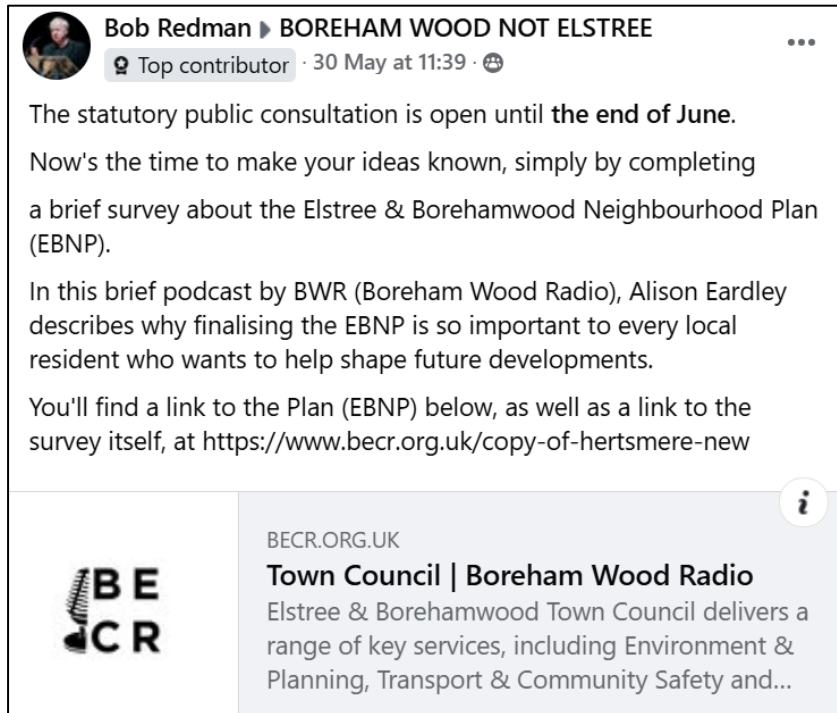
Figure 11: Promotion at the railway station



- Postal copies of the consultation leaflet and survey were issued to all allotment holders, ensuring inclusion of residents who may be less digitally engaged.
- All hall-hire groups at Fairway Hall and 96 Shenley Road were provided with consultation details and hard-copy surveys for distribution to their members.
- There was continuous promotion throughout Festival Fortnight, with Officers present at events to distribute leaflets and encourage survey participation.
- There was a major presence at the Families Day event, including a prize draw for completed surveys to boost engagement.
- Promotion was undertaken on the Town Council Website front page.
- Homepage banners were used across the website to maintain visibility throughout the consultation period.
- Email footer banners were added to all Council staff email accounts.
- Regular social media posts published to reinforce awareness and direct residents to the survey.
- Members undertook a local radio interview with Borehamwood Radio to explain the consultation and encourage participation.

- A consultation inbox was monitored throughout, with all representations logged and acknowledged.
- A Podcast (*Figure 12*) about the EBNP was recorded and put out via 'Borehamwood Tales' on Spotify and other channels. It was used in the promotional material on social media to promote the consultation.

*Figure 12: Podcast description*



- Statutory consultees were written to directly as were the owners of the proposed Local Green Spaces and proposed non-designated heritage assets (NDHAs).
- 2.25. A list of the consultees contacted is contained in Appendix A and responses were received from the following:
- Hertsmere Borough Council
  - Natural England
  - Historic England
  - Environment Agency
  - Thames Water
  - Network Rail
  - Clarion Housing
  - National Grid
  - Warner Planning obo Griggs
  - Citizens Advice Hertsmere
  - Hertfordshire County Council
  - 3 residents (via email)
  - Fuller survey: 25 responses
  - Smaller survey: 850 responses, all positive
  - Hertfordshire County Council

- 2.26. Representations received at the Pre-Submission Consultation were recorded by topic/policy and carefully considered by Steering Group members. A summary of the comments and responses from the Steering Group, are set out in Appendix B. Full copies of the responses are available on the neighbourhood plan website. The following paragraphs provide a summary, by topic area, of the comments received during this process and how these were integrated into the Submission Version EBNP.
- 2.27. **General comments:** Overall, the comments were very supportive of the Plan and its scope. A number of factual corrections and text additions were submitted, which have been addressed. This was largely in relation to Section 2 (About the neighbourhood area).
- 2.28. Some refinements were made to the Issues and Opportunities section, to reflect feedback, for instance in relation to local employment and community facilities.
- 2.29. The EBNP has been reviewed to ensure that it meets accessibility requirements. The only exception is the Design Guidance aspect, which was produced by an external company.
- 2.30. The new Local Plan continues to progress in parallel with the EBNP and paragraphs have been updated to provide the latest situation on this and with reference to the most recently published Local Development Scheme.
- 2.31. **Vision and objectives:** Some amendments have been made to the vision, reflecting comments received. For instance, an additional point about coalescence in relation to nearby Radlett and Shenley. Also, the inclusion of information about non-isolated footways to be prioritised to encourage safe access. Some minor amendments were made to the objectives, largely to add clarity.
- 2.32. **Spatial strategy:** Clause D was amended slightly on the advice of HBC, to ensure that it delivers what is expressed in the final bullet point of paragraph 4.7 in relation to the use of residential garden land for development.
- 2.33. **Housing:** The policy supports the development of affordable homes that over uplifts on the usual 15% affordability uplifts. A caveat has been added on the advice of HBC to ensure that First Homes is not provided at the expense of social and affordable rent homes. The definition of 'older people' has been provided to align with that set out in the NPPF. Some minor drafting amendments have been made to Policy EB2 (Meeting local housing needs) for instance the use of the term 'tenure neutral' in place of 'tenure blind'.
- 2.34. **Character, heritage and design:** Policy EB3 (Character and design of development) was very much supported. The supporting text has been embellished to add further emphasis on the role of the railway station as a gateway to the area. The Design Guidance prepared for the EBNP was also amended following the consultation to take into account comments received. It forms an integral part of the Plan and has been embedded into the document.
- 2.35. Policy EB4 (Meeting the highest environmental standards) received support from all parties.
- 2.36. The other policies in this section were supported.
- 2.37. **The town centre and wider employment:** The policies received few comments. Some additional text has been added at paragraph 7.15 in relation to the safe movement of pedestrians. A new clause has been added to Policy EB9 (Safeguarding existing commercial

employment and supporting sustainable expansion) in relation to supporting mixed use development, in line with national policy.

- 2.38. **Environment and Green Space:** The policies in this section were very much supported. A reference to the emerging Nature Recovery Strategy has been added to Policy EB12 (Landscape and biodiversity), which is due to be published in 2026 and which will add additional detail to areas of biodiversity importance. A clause relating to sustainable drainage has been included in Policy EB14 following comments received at Regulation 14.
- 2.39. Policy EB15 contains the list of sites proposed for designation as Local Green Space. All site owners were written to. HBC queried a number of the spaces, but ultimately advised that the group should pursue them if the community considered them to be demonstrably special. Seven additional spaces were included following the Regulation 14 consultation. All are owned by either by EBTC or HBC. Officers at HBC were contacted to discuss their inclusion and no objection was received. They are all considered to meet the NPPF local green space requirements.
- 2.40. **Getting around:** The policies in this section were supported. Reference has been included to the HCC Transport Plan, the Rights of Way Improvement Plan and the Local Cycling and Walking Infrastructure Plan, on the recommendation of HCC.
- 2.41. **Community facilities:** Policies in this section were supported and few changes were made following the consultation.

### **Stage III: Finalising the Submission Neighbourhood Plan**

- 2.42. Following the changes made to the EBNP as a result of the Regulation 14 consultation, the Submission Version was formally submitted to HBC who, once satisfied that the correct set of documents have been received, will undertake the Regulation 16 consultation. The document will then proceed to Examination and, assuming a favourable outcome, to referendum.

### **3 CONCLUSION**

- 3.1. The Steering Group has undertaken a very thorough engagement programme in order to develop the Elstree and Borehamwood Neighbourhood Plan. It has set out a comprehensive vision and objectives and guiding principles. In developing the policies to achieve the vision and objectives, the Group has actively engaged with a wide range of stakeholders and the Plan has evolved accordingly.
- 3.2. Feedback from the Regulation 14 consultation has enabled the Plan to be shaped into its final version, to submit to HBC.
- 3.3. This report fulfils the requirements for the Consultation Statement, set out in Regulation 15(2) of the Neighbourhood Development Planning (General) Regulations 2012 (as amended).
- 3.4. Gratitude is extended to everybody who has contributed to the Plan's development, either as a valued member of the Steering Group or as someone who has taken the time to contribute their views and opinions. This has been invaluable in helping to shape the scope and content of the Elstree and Borehamwood Neighbourhood Plan.

## APPENDIX A: LIST OF THOSE CONSULTED AT REGULATION 14 (PRE-SUBMISSION STAGE)

In addition to residents, the following organisations were contacted:

| Organisation                         |
|--------------------------------------|
| Hertsmere Borough Council            |
| Hertfordshire County Council         |
| Homes England                        |
| Natural England                      |
| Environment Agency                   |
| Historic England                     |
| Network Rail                         |
| National Highways                    |
| Water supplier (Affinity)            |
| Waste water (Thames Water)           |
| Gas provider                         |
| UK Power Networks                    |
| British Telecom                      |
| Herts Community NHS Trust            |
| Community organisations              |
| Local businesses                     |
| Disability / inclusion organisations |
| Schools and colleges                 |

### Local Green Space owners:

|                           |
|---------------------------|
| Hertsmere Borough Council |
| Clarion Housing           |
| Allum Manor               |
| Diocese of Westminster    |

|                                                    |
|----------------------------------------------------|
| Cowley Hill Free Church                            |
| Affinity Sutton                                    |
| Hollywood Court (Elstree) Flats Management Co. Ltd |
| Holy Cross Church                                  |
| Rhinestone Properties Ltd.                         |
| Cedar Close Property Management Co. Ltd.           |
| Martins Walk Management Ltd.                       |
| EBTC                                               |

## **APPENDIX B: SUMMARY OF COMMENTS RECEIVED AT PRE-SUBMISSION REGULATION 14 CONSULTATION AND RESPONSE FROM THE STEERING GROUP**

### **Responses were received from:**

1. Hertsmere Borough Council
2. Natural England
3. Historic England
4. Environment Agency
5. Thames Water
6. Network Rail
7. Clarion Housing
8. Resident
9. Resident
10. Survey Monkey responses (25)
11. Resident
12. National Grid
13. Warner Planning obo Griggs
14. Citizens Advice Hertsmere
15. Hertfordshire County Council

A summary of the responses is provided in *Table 2* alongside a commentary explaining the response from the Steering Group.

Table 2: Summary of reps received at Regulation 14

| Re f | Who ? | Page/para/ policy | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                    | SG response                                                                                                                                     |
|------|-------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.   | 2     | General           | Natural England does not have any specific comments on this draft neighbourhood plan.                                                                                                                                                                                                                                                                        | Noted.                                                                                                                                          |
| 2.   | 3     | General           | While we do not wish to make any detailed comments at this stage, we welcome the production of the Neighbourhood Plan and, in particular, the numerous references to the historic environment - especially Chapter 6, Policy EB6: Heritage Assets, and its supporting text, including the identification of three additional non-designated heritage assets. | Noted.                                                                                                                                          |
| 3.   | 4     | General           | No specific comments. General advice note attached.                                                                                                                                                                                                                                                                                                          | Noted.                                                                                                                                          |
| 4.   | 5     | General           | We appreciate you sending us the plans for your neighbourhood and I can confirm I've forwarded this to our Asset Management team, as noted above. However, it is important to mention, we aren't a statutory consultee, but we appreciate you reaching out to us.                                                                                            | Noted.                                                                                                                                          |
| 5.   | 6     | General           | No comments received.                                                                                                                                                                                                                                                                                                                                        | Noted.                                                                                                                                          |
| 6.   | 9     | General           | The neighbourhood plan should totally restrict any developments on greenbelt fields like this, and this one in particular. Its nature, its separation, ITS SIZE - would be unacceptable to build on!!!!                                                                                                                                                      | Noted. This is in relation to a specific planning application. Two additional views have been identified, which have relevance to this comment. |
| 7.   | 10    | General           | We don't look after and house people who are born and breed in Borehamwood which is very disappointing to see                                                                                                                                                                                                                                                | Noted.                                                                                                                                          |
| 8.   | 10    | General           | Better ways to get in and out of the town as congestion on roads is becoming an issue!!!                                                                                                                                                                                                                                                                     | Noted although this largely falls outside the scope of the EBNP.                                                                                |
| 9.   | 14    | General           | The plan is aspirational as local plans need to be. I like that there I the idea of a local theatre (makes sense in a town so loosely associated with the film industry). I support the size and mix of affordable and shared ownership housing. It is vitally important that local people are given the opportunity                                         | Thank you and noted.                                                                                                                            |

| Ref | Who? | Page/para/policy  | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | SG response                                                                                                                                                                                                                                                                |
|-----|------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |      |                   | <p>to get onto the property ladder. Hopefully there are mechanisms for them to move from shared ownership to full ownership which nationally seems to be a stumbling block.</p> <p>I am not an expert but the plan looks good to me. I hope the funding will be forthcoming to support the proposed work.</p>                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                            |
| 10. | 15   | General           | Update on school planning.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted for information.                                                                                                                                                                                                                                                     |
| 11. | 7    | Local Green Space | <p>I have looked at the attached and added comments/ ownership where relevant t(both those flagged as clarion owned and those not ).</p> <p>There are no current plans to change the usage of these areas , but we do need to observe due diligence as to the impact of this being in perpetuity.</p>                                                                                                                                                                                                                                                                                                                                                         | Noted.                                                                                                                                                                                                                                                                     |
| 12. | 1    | Para 2.9          | <p><i>“Despite its built-up nature, the area has remained attractive”</i></p> <p>This phrasing suggests that built-up areas are inherently unattractive. Consider rephrasing to highlight the specific qualities that contribute to the area's appeal, such as its retained leafiness, rural edges, and green spaces.</p>                                                                                                                                                                                                                                                                                                                                     | We have rephrased this sentence.                                                                                                                                                                                                                                           |
| 13. | 1    | Para 2.11         | <p><i>“Retaining the identities of the distinct settlements is important”</i></p> <p>This is a key statement which should be addressed more thoroughly throughout the Neighbourhood Plan and the Design Guide appendix. <b>What</b> are the distinct qualities of each of the areas within the NP, and <b>how</b> can they be retained? This might include, for example, materials — supported by a survey of those that positively contribute versus those that don’t — street characteristics that shape local character, or the types of landscapes present, whether rural, suburban, formal, or wetland. Without this level of character analysis, it</p> | There is limited scope for the Design Guide to be reviewed due to the lack of national funding to support this. We are minded to retain the guidance as is and ensure that the Town Council is involved in the place-shaping work being commissioned at the borough level. |

| Ref | Who? | Page/para/policy | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | SG response                                                                                                                                                                                        |
|-----|------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |      |                  | becomes difficult to establish what new development should be aiming for, and the plan risks becoming overly generic and vague.                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                    |
| 14. | 11   | 2.11             | A permanent Film & Television Museum / Visitors Centre: this has been suggested for over 20 years, with endorsement from (historically) the 2 largest political parties.                                                                                                                                                                                                                                                                                                                                                                | Noted.                                                                                                                                                                                             |
| 15. | 11   | 3.1 Vision       | Over a century of local film and TV production is the Town's USP (Unique Selling Point); in most other respects it looks no different from other towns of a similar size, with a high street largely given over to fast food outlets, vape and phone shops. This USP and the globally -recognised Elstree brand should be exploited to attract visitors as well as to create 'pride of place' among local residents.                                                                                                                    | We have added an extra sentence to the vision to encapsulate this.                                                                                                                                 |
| 16. | 11   | 3.2 Objectives   | Objective 5 suggests 'greater involvement of the television and film industry with the local community and provision of facilities, though it does not suggest how this might be achieved.                                                                                                                                                                                                                                                                                                                                              | The objectives set out what we want to achieve. The 'how' will be a combination of policy and projects.                                                                                            |
| 17. | 1    | Para 4.7         | <p><i>Identifying and prioritising the use of brownfield sites and only permitting greenfield development in exceptional circumstances, with clear and strict guidance on what is acceptable. There are, for example, a number of garage developments which could be redeveloped into green and amenity space, for instance at Byron Avenue.</i></p> <p>This item is unclear. The opening sentence sets out a preference for brownfield development and strict control over greenfield sites — though it's worth clarifying whether</p> | <p>The first part of this clause relates to support for brownfield development, in advance of greenfield or Green Belt, although this is a preference and no hierarchy exists in policy terms.</p> |

| Ref | Who ? | Page/para/policy                              | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | SG response                                                                                                                      |
|-----|-------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
|     |       |                                               | <p><i>greenfield</i> is the correct term here, or whether <i>Green Belt</i> is intended.</p> <p>The following sentence, however, appears to contradict the first. It suggests that garage sites — which are typically brownfield — could be converted into green or amenity space. In practice, these sites often represent opportunities for small-scale infill development, and it would generally not be viable to convert leased garage land into public open space. The logic here needs to be revisited to clarify both the policy intent and the practical delivery implications.</p>                                                                                 | The second part of the sentence has been amended to state that these examples of small areas of brownfield could be redeveloped. |
| 18. | 1     | 4.7 Elstree Way Area Action Plan bullet point | This document is likely to be superseded.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | We have added 'or its successor' to account for this.                                                                            |
| 19. | 1     | 4.7 Garden land development and EB1           | <p>There is a potential conflict here both within the plan and in relation to Policy SADM3 which not allow tandem development. The intent of item 4.7 intent is “<i>Restricting the development of private garden space into dwellings, which not only erodes local character, but reduces access to open space for future occupants</i>”.</p> <p>EB1 item D however accepts some residential garden land development, so long as it responds positively to the character and appearance of the local area and does not create unacceptable harm.</p> <p>Suggest Policy EB1.D is more appropriately worded and in doing so, conflict with SADM3 on tandem development is</p> | The policy wording has been amended to align with SADM3.                                                                         |

| Ref | Who ? | Page/para/policy                     | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | SG response                                                                                                                                                                        |
|-----|-------|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |       |                                      | avoided. Item 4.7 should be rephrased to align more closely with the policy outcome.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    |
| 20. | 1     | 5.12                                 | If this is an official definition it should be referenced.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | The NPPF definition has been provided.                                                                                                                                             |
| 21. | 1     | Policy EB1 (Sustainable development) | We do have some concerns that Policy EB1 D is potentially in conflict with Policy SADM3 with regard to tandem development. Policy EB1 D appears to accept some residential garden land development, so long as it responds positively to the character and appearance of the local area and does not create unacceptable harm, whereas Policy SADM3 specifically rules out tandem development. We would suggest the wording of Policy EB1 be amended to rectify this potential conflict.                                                                                                           | We have amended the wording to align more closely with SADM3.                                                                                                                      |
| 22. | 15    | Policy EB1                           | <p>Paragraph 4.7 states “locating development away from areas prone to flood risk. Parts of the neighbourhood area fall within flood zone 3 (Figure 5). Land within flood zone 3 has a high probability of flooding from rivers and development should be avoided here. “</p> <p>Suggest to reference all sources of flooding and update the flood maps to the most recent.</p> <p>Make reference to SuDS - SuDS and the principle of landscape-led development should be considered holistically, and shallow, landscaped and at-source drainage features should be promoted across the plan.</p> | The flood maps and supporting information has been updated. SuDS have been included in Policy EB14.                                                                                |
| 23. | 1     | Policy EB2 (Housing)                 | We welcome the recognition that new housing should contribute to the wider strategic housing need of the borough but have concerns that Policy EB2 may raise expectations that                                                                                                                                                                                                                                                                                                                                                                                                                     | The Neighbourhood Plan policy is based on the findings of the HNA for the neighbourhood area. The policy states that proposals should support the delivery of housing that assists |

| Ref | Who? | Page/para/policy     | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | SG response                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----|------|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |      |                      | applications for new housing in Elstree and Borehamwood will only meet the needs of the neighbourhood plan area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | in meeting the needs as identified in the HNA. This would not prevent proposals coming forward that also contribute to the strategic needs of the wider borough.                                                                                                                                                                                                                                                 |
| 24. | 1    | Policy EB2 (Housing) | <p>In relation to First Homes, we note that Policy EB2 states that an uplift of 40% to 50% discounts will be ‘particularly supported’ but would request that any reference to First Homes uplifts be caveated that any uplift in the discount should not be at the expense of social and affordable rent housing. Please note that the government has removed First Homes as a mandatory requirement and we would suggest that Policy EB2 is amended to reflect that it is no longer a requirement or priority; there has been relatively little take-up locally of First Homes and the administrative burden associated with their delivery locally has been significant.</p> <p>Part B: Suggest changing Tenure Blind, to Tenure Neutral, to align with National Design Guide terminology.</p> | <p>The policy does not require housing to be delivered as First Homes, rather it is included as an example of a product that can enable greater uplifts in affordability.</p> <p>Further clarification has been added to para 5.7 to note that First Homes are no longer a requirement and that any uplift should not be at the expense of social and affordable rent housing.</p> <p>This has been amended.</p> |
| 25. | 10   | Policy EB2           | Policy EB2, designed to ensure that local housing provision meets the genuine needs of local communities, has repeatedly failed in practice. Despite being framed as a tool to guide sustainable and balanced development, the reality on the ground tells a different story—one where the core principle of “local homes for local people” has been lost. Local Housing Needs: Consistently Unmet Under EB2, local authorities are expected to identify and meet the housing needs of their own populations. However, year after year,                                                                                                                                                                                                                                                          | The allocation of affordable housing (beyond First Homes) is the remit of the Housing Allocations Team at HBC and sits outside planning policy.                                                                                                                                                                                                                                                                  |

| Ref | Who? | Page/para/policy | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | SG response |
|-----|------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
|     |      |                  | <p>these needs remain unmet. Rising waiting lists for social and council housing, the displacement of long-standing residents, and soaring rents are all evidence of a system that is not delivering for the people it was meant to serve. The developments that do go ahead tend to focus on market-rate or luxury housing, often with minimal or token provision for affordable or council housing. Many “affordable” homes are priced far beyond the reach of average local incomes, making them inaccessible to the very residents they are meant to support. Private Development Driven by Profit The overwhelming majority of new housing developments are private ventures led by developers whose primary motivation is profit. This has resulted in developments that cater to the most lucrative segment of the market, rather than those most in need. In many cases, planning obligations to include a quota of affordable or council homes are watered down, renegotiated, or ignored altogether under the pretext of “financial viability.” Even when affordable housing is included in planning agreements, it often represents a very small proportion of the total build—and may later be converted to private ownership or buy-to-let schemes. Genuine council housing, once a cornerstone of social stability, is now rarely built. Instead, we see the continued erosion of public housing stock without meaningful replenishment. Commuter Pull from London Another critical issue affecting housing in areas covered by Policy EB2 is the increasing attractiveness of these locations to outside buyers—particularly those commuting from London. With excellent transport links and relatively</p> |             |

| Ref | Who? | Page/para/policy | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | SG response |
|-----|------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
|     |      |                  | <p>lower property prices compared to the capital, these areas have become hotbeds for investment and second homes. This influx of wealthier, external buyers pushes up property values and prices local residents—especially young families and key workers—out of the market. In many new-build estates, a significant proportion of homes are snapped up off-plan by investors or those relocating from London, further eroding the local character and making communities less inclusive. The Consequences Loss of Community Identity: Local families are priced out, while new developments fail to integrate or reflect the needs of existing residents. Social Inequality: The growing gap between high-end private developments and the scarcity of council housing deepens social divides. Unsustainable Growth: Infrastructure, schools, healthcare, and transport are often not expanded in line with population growth, leaving communities overburdened. Permanent Housing Crisis: Without real intervention, the mismatch between supply and need will continue, fuelling homelessness, overcrowding, and instability. Conclusion Policy EB2, in theory, aims to ensure that housing growth is fair, balanced, and locally responsive. In practice, it has become a framework that too often enables profit-driven development at the expense of community well-being. Without urgent reform—such as stricter affordable housing requirements, greater protection for council housing, and stronger controls on speculative development—the policy will continue to fail those it was meant to protect. Local housing needs are not being met. Instead, local land is increasingly being commodified, serving outsiders and investors rather</p> |             |

| Ref | Who ? | Page/para/policy | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | SG response                                                                                                                                                                                                                                                |
|-----|-------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |       |                  | than the people who live, work, and belong to the communities in question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                            |
| 26. | 10    | EB2              | I believe the local housing needs should have been met a long time ago due to the small population. If there are housing needs now in this current day then it would therefore mean it is not for local people.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted, although the evidence suggests otherwise. Nevertheless, any housing in the neighbourhood area would also need to contribute to the wider strategic housing need.                                                                                    |
| 27. | 10    | EB 2, 3 and 4    | Needs to clearly clarify the rational for sustained housing needs and growth and it compatibility or likely incompatibly to Green Belt and the concerns around 'mission creep'. Existing planning acceptance of.. and proposal/submissions suggests how unclear and unpredictable such plans are. eg: Shenley Grange , Woodcock Hill, etc. Climate Change is presently a topic or 'possibly' a science that cannot quantified, is challengeable in its own right, and therefore risky to use as a reason or lever for change on a planning and practical level. It is NOT a settled science of fact, but moderately speculative. Not a good basis to responsibly plan ahead. Energy efficiency and design is still in its relatively early stages in terms of it being a provable and affective instrument for positive change. Black outs in Spain and other nations, the risk to UK grid , the disappointment with the poor cost (outlay) savings if any, to solar heated panels for homes, the stepped speed of change - efficient savings becoming outdated soon after implementation is a very real and costly risk both for the corporate, public and individual customer. | Policy EB2 is evidenced by the HNA and reflects the identified housing needs in the NA.                                                                                                                                                                    |
| 28. | 1     | 6.9              | The current statement that “new buildings should not exceed 6 storeys) is overly prescriptive and not sufficiently justified. Rather than focusing on regulating building height, the emphasis should be on how new development can positively contribute to the streetscape and townscape character. The                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | The wording has been amended in this para including that such buildings should be carefully designed to ensure that they do overshadow the role of the open space between them as social spaces with access to light, green space and a sense of openness. |

| Ref | Who? | Page/para/policy | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | SG response                                    |
|-----|------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
|     |      |                  | <p>potential for taller, well-designed landmark buildings in appropriate and well-justified locations should be acknowledged as part of a forward-looking and place-responsive strategy, that efficiently utilised brownfield land to limit greenbelt development.</p> <p>Imposing a maximum building height of six storeys is not appropriate in the absence of detailed design analysis and comprehensive masterplanning. Such blanket limitations risk undermining innovation, design quality, and the efficient use of land. A more nuanced, site-specific approach is required that recognises varying site contexts, opportunities for intensification, and the strategic role certain sites may play in supporting sustainable growth. HBC is undertaking work to this effect to support the local plan.</p> |                                                |
| 29. | 11   | 6.10             | <p>15 years ago Elstree Screen Heritage established the 'First Impressions' initiative, a voluntary collaboration between it and the Town, Borough and County Councils as well as the railway operator (first FCC, then GTR Thameslink). It identified several gateways to Elstree and Borehamwood, adding eye-catching signage welcoming visitors to 'The home of Film and Television', although several of these signs have since been removed.</p>                                                                                                                                                                                                                                                                                                                                                               | The text has been amended to incorporate this. |

| Ref | Who? | Page/para/policy | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                             | SG response |
|-----|------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
|     |      |                  |  <p>The railway station is a key gateway for visitors as well as residents and in conjunction with rail operators, we transformed the forecourt and surroundings, with banners, stars in the pavements, signage, heritage panels and the now iconic mural honouring film and TV.</p> |             |

| Ref | Who? | Page/para/policy | Comments/ Proposed change                                                                                                                                             | SG response                                                 |
|-----|------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
|     |      |                  |   |                                                             |
| 30. | 11   | 6.32             | The plan says 'an action will be to explore venues with local partners'                                                                                               | Noted – this should be progressed via the various partners. |

| Ref | Who? | Page/para/policy | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | SG response |
|-----|------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
|     |      |                  | <p>(6.32) We understand that as part of its plans to celebrate the centenary of Elstree Studios, Hertsmere Borough Council has now formally committed to such a venue, though it is not clear which partners are involved in its plans, and whether EBTC will be one of these partners.</p> <p>Elstree Screen Heritage has worked closely with the Museum, staging ambitious six-month long exhibitions to celebrate the centenary of film production in 2014 and the 150<sup>th</sup> anniversary of the railway station ('All Change!') in 2018.</p>    |             |

| Ref | Who? | Page/para/policy | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | SG response |
|-----|------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
|     |      |                  |    <p>The film and TV heritage trail (6.33) of almost 30 heritage panels was Designed, installed and paid for by 'First Impressions', and is now to be extended by EBTC's green plaque scheme. We understand that further efforts on a heritage trail are included in Hertsmere's plans.</p> <p>Creation of public art and landmarks (7.11) also refers to enhancing the heritage trail. We are reminded that 'this</p> |             |

| Ref | Who? | Page/para/policy                  | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | SG response                                                                                                                                   |
|-----|------|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
|     |      |                                   | aligns with the Action Plan for the Hertsmere Creative Strategy and the EBTC Culture and Creative Strategy' but we would welcome evidence that these 2 strategies are actually working together.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Noted.<br><br>This would be an action for the Town Council and HBC.                                                                           |
| 31. | 1    | Figure 9                          | Are these the existing heights, or proposed? Title should be clearer. But as above, focus should not be on setting a rigid framework for heights.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | The title has been amended to reference 'existing' building heights.                                                                          |
| 32. | 1    | Policy EB3 (Character and Design) | <p>Clause A: <i>"It should reflect the variety of architectural styles found locally, using materials that are in keeping with those used in existing buildings in the immediate locality"</i></p> <p>This statement should be rephrased to clarify that new development should respond to the variety of architectural styles found locally, using materials that are not only in keeping with those used in existing buildings in the immediate locality, but are also of high quality and contribute positively to the character of the area. This is to recognise that not all materials used locally are of high quality or make a positive contribution to the character of streets.</p> <p>Clause Bii: The idea of small gateway features is a positive one, but this would ideally be a coordinated and designed feature that would create unity within the NP area, and</p> | <p>The clause has been amended to reflect the comment.</p> <p>Noted. The TC will pick this up for inclusion in the Development Framework.</p> |

| Ref | Who? | Page/para/policy    | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | SG response                                                                                                                                                                                                                                                                        |
|-----|------|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |      |                     | between the gateway points. There is potential for this to be incorporated into HBCs Development Framework outputs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                    |
| 33. | 1    | Policy EB3 (Design) | <p>We recognise the considerable work which has gone into the production of the Design Codes and Guidance and have attached some detailed comments, prepared with input from our urban design officers. We would urge you to focus, in particular, on clearly on the defining characteristics of Borehamwood and Elstree through a character appraisal of different parts of the NA. The production of a character statement by applicants showing how development responses to such an appraisal would support the robust assessment of planning applications by Hertsmere Borough Council.</p> <p>The Council is in the process of procuring consultants to lead on a range of place-shaping regeneration across the main settlements in the borough. This work will include the preparation of illustrative masterplans and delivery strategies including for Borehamwood. In relation to the section in the Neighbourhood Plan on Town Centre Revitalisation, the proposals have the potential to overlap or conflict with emerging HBC initiatives. We recommend reviewing and streamlining this content, and instead would suggest that the Neighbourhood Plan Steering Group, and their consultants, engage as key stakeholders in the development of the broader strategic work being undertaken by HBC, to help ensure alignment and influence.</p> | <p>The Design Guidance has been prepared by AECOM and was reviewed by the SG. It is considered to be locally specific. The SG has amended it to reflect comments received by HBC.</p> <p>This is understood and the Town Council would be keen to be involved in this process.</p> |
| 34. | 11   | EB10                | Section 7.28 reminds us 'There is scope to further capitalise, not only to provide venues that will support the local                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted.                                                                                                                                                                                                                                                                             |

| Ref | Who ? | Page/para/policy | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | SG response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----|-------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |       |                  | community ..'. Again, we have always strongly endorsed this objective.<br><br>Section 10.11 again refers to an alternative museum space (Policy EB6)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 35. | 15    | Policy EB13      | Amend to PROW being open all the time as no longer a private path.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Updated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 36. | 10    | Policy EB14      | Strong Disagreement: Infrastructure Strain and Lack of Healthcare Provision Policy EB14 is intended to ensure that new developments are environmentally sustainable and that their broader impacts—on infrastructure, services, and quality of life—are responsibly managed. However, in practice, this policy is falling far short, especially when it comes to the cumulative pressure that ongoing housing development places on essential public services such as healthcare.<br>Disconnect Between Development and Infrastructure While housing developments continue to rise rapidly, there has been a clear failure to invest in or expand local infrastructure to match. In particular, there has been no meaningful increase in GP surgeries, clinics, or healthcare provision to support the growing population. This is not just an oversight—it is a direct contradiction of the principles outlined in Policy EB14. When new estates bring hundreds of additional households into an area, it is entirely foreseeable that the demand for medical care will rise accordingly. Yet in many communities, long-standing residents are now struggling to access even basic health services, with some unable to book routine GP | This is a very important point. The challenge is that healthcare and other critical infrastructure provision sits outside the scope of what the EBNP can directly influence, as it is the remit of other organisations, such as HCC and the NHS. The EBNP, through EB1, for instance, emphasises the need for infrastructure to support growth and Policy EB17 emphasises the need for walkability. Furthermore EB18 supports the provision of new community infrastructure, in consultation with the community. |

| Ref | Who? | Page/para/policy | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | SG response |
|-----|------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
|     |      |                  | <p>appointments for weeks, if at all. Impact on Long-Standing Residents This imbalance does not affect everyone equally. Long-standing residents, who have contributed to and relied upon local services for years, are now being pushed to the margins. The increased demand from new residents has overwhelmed the capacity of existing surgeries, making it nearly impossible for local people to receive timely care. This not only creates frustration but also real health risks. Delays in diagnosis, reduced continuity of care, and growing health inequalities are becoming routine in areas where population growth has not been matched by service expansion. Environmental and Social Sustainability Overlooked Policy EB14 should be about more than just green spaces and carbon emissions—it should also consider the social and public health infrastructure needed to support sustainable, liveable communities. Yet in its current application, it appears to ignore the broader human and environmental consequences of unchecked development. New homes may be built to certain environmental standards, but what about the environmental cost of: Increased car journeys due to lack of accessible healthcare? Overburdened buildings and services operating beyond capacity? The social stress and community tension caused by under-resourced amenities? Conclusion Despite the intentions of Policy EB14, its failure to require adequate healthcare infrastructure alongside housing growth is leading to unsustainable, unhealthy communities. Without new GP surgeries and investment in medical services, the policy cannot credibly claim to be</p> |             |

| Ref | Who? | Page/para/policy                | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | SG response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----|------|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |      |                                 | managing the environmental or social impact of development. A truly responsible planning policy would link all major housing growth to mandatory, upfront investment in local services—including healthcare, schools, and transport. Until that happens, the policy remains a paper promise—while residents, old and new, suffer the consequences.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 37. | 1    | Policy EB15 (Local Green Space) | <p>We are concerned about the extent of Policy EB15 (Local Green Space) and object to it in its current form. Local Green Spaces (LGS) are required by the NPPF to be ‘demonstrably special’ and the bar is set high for such a designation, given the level of protection from development which they are afforded. Although some of the sites listed may be enjoyed and/or appreciated locally, some of them are poor quality or poorly maintained; the blanket designation of almost all open space as LGS within the area covered by the Neighbourhood Plan has not been justified and we do not consider that justification exists for such an approach or that this would be consistent with local and national policy. For example, the Older Haberdashers’ Sports Ground is a private sports club which is not accessible to or used by the general public. It should be emphasised that open spaces in Borehamwood and Elstree are afforded protection under Policy SADM34 of the Local Plan. It should also be noted that whilst Figure 26 refers to LGS ‘also proposed by HBC’, these LGS have already been designated by HBC in the current Local Plan.</p> <p>The Council is also concerned that LGS designation would potentially hinder its plans to invest in and deliver improved sports and recreation facilities on some of the sites or its wider regeneration proposals. As such, we would encourage</p> | <p>The LGS designation does not include a test relating to the ‘quality’ of green spaces. An audit of potential green spaces was undertaken by the Steering Group, which involved an ‘on-the-ground’ inspection of each site. Residents were questioned about which green spaces were of value to them, which contributed to the final selection.</p> <p>In an urban area such as this, with pockets of deprivation, it is imperative that residents are able to access green space near to them. Access to green space has been proven to contribute positively to physical and mental health and wellbeing.</p> <p>All of the spaces are considered to meet the stringent requirements of the LGS designation.</p> <p>With regards to the Haberdashers’ Sport Ground, there is no requirement for LGS to be accessible to the general public. This is an important space for recreation for the community it serves.</p> <p>The LGS designation is considered to offer greater protection of these valued spaces beyond Policy SADM34 of the Local Plan. Although the spaces identified as part of that policy have been reviewed as part of the LGS audit.</p> |

| Ref | Who? | Page/para/policy                   | Comments/ Proposed change                                                                                                                                                                                                                                                           | SG response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----|------|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |      |                                    | the Town Council to engage with Ian Kershaw, Streetscene Manager, David Smith, Parks and Amenities Manager and Andrew Donn, Head of Asset Management, to discuss this further. The attached schedule clarifies the ownership of the sites on the proposal to designate them as LGS. | <p>The LGS protection would not hinder opportunities to invest in schemes that would embellish their particular value as an LGS. Para 154 (b) of the NPPF specifically allows for <i>“the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it”</i>.</p> <p>No objections have been raised about any of the spaces by the owners, where ownership is not HBC.</p> <p>The SG are minded to retain the set of LGS as identified.</p> |
| 38. | 10   | Policy EB15                        | Importance of protecting LGSs to prevent infilling of large open green space between Ayot Path and Stapleton Road which is in Figure 26 but doesn't contain detailed information. The large oak tree on this LGS should be given protected status.                                  | These spaces were intended to be included, and are on the map. The templates have not been included in the Appendix which is a human error. They will be reinstated in the Regulation 16 version.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 39. | 10   | Policy EB15                        | EB15- protect local green space at all cost!                                                                                                                                                                                                                                        | Noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 40. | 15   | Policy EB17                        | Amendments suggested to improve the text.                                                                                                                                                                                                                                           | These have been incorporated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 41. | 15   | Policy EB17                        | Include reference to the ROWIP.                                                                                                                                                                                                                                                     | This has been included.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 42. | 10   | Policy EB18 (Community Facilities) | Playground are really bad, the venue softplay and swimming dirty                                                                                                                                                                                                                    | Noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 43. | 10   | Design Guide                       | If you are proposing that we continue operating under HCC with your plans, I must strongly oppose it. Borehamwood and Elstree need to embrace change; our proximity to London                                                                                                       | Noted, however the NDP is not the vehicle to call for governance change.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Ref | Who? | Page/para/policy | Comments/ Proposed change                                                                                                                                                                                                                                                                                                                | SG response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----|------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |      |                  | means we should actively participate in its development. London is expanding rapidly, and we have an incredible opportunity to pursue all of those initiatives under the GLA. We cannot afford to be left behind. Infrastructure is critical to our success and prosperity. It forms the foundation upon which everything else is built. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 44. | 1    | Design Guide     | See comments on their response.                                                                                                                                                                                                                                                                                                          | <p>The Design Guide was prepared by AECOM using Locality Funding and the funding has now been removed, which means that AECOM are unable to amend the document.</p> <p>The SG has amended the document in terms of adding additional examples as suggested. Many of the comments from HBC relate to building heights. Whilst we agree that development needs to be optimised from a density perspective, it was clear through the engagement that there does need to be a limit to what this means in terms of buildings heights, particularly for residential. In particular Canterbury House was noted as not being ideal as a home, with limited access to open space and challenging for those with limited mobility. The experiences of those living here during lockdown were shared and were not considered positive aspects that should be replicated in new homes. The suggestion that the Design Guide should take a cue from Lewisham and other areas of London, does not reflect what the community have told us in terms what they value locally.</p> <p>Fundamentally, the document reflects design aspirations locally. We understand that HBC are to produce additional design guidance for parts of the Borough which may include</p> |

| Ref | Who? | Page/para/policy | Comments/ Proposed change                                                                                                | SG response                                                    |
|-----|------|------------------|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
|     |      |                  |                                                                                                                          | Borehamwood and the TC would be keen to work with HBC on this. |
| 45. | 15   | Design Guide     | Comments relating to sustainability: solar tiles, battery storage, EV bays, community battery systems and green roofing. | Comments have been integrated into the Design Guide.           |

