

Sustainability Appraisal (SA) of the Hertsmere Local Plan

Interim SA Report

April 2026

Quality information

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Non-technical summary

This Interim SA Report is published alongside as part of the current Hertsmere Local Plan Regulation 18 consultation. It assumes that the candidate sites at the heart of the current consultation are ‘emerging preferred allocations’ such that in combination they represent an ‘emerging preferred approach’. In turn, the aim of this report is to present an appraisal of the emerging preferred approach alongside ‘reasonable alternatives’ in a similar fashion to the Interim SA Reports previously published alongside emerging preferred approaches in 2021 and 2024.

More specifically, this report refers to the emerging preferred approach to site allocations as the preferred ‘growth scenario’ and, in turn, presents an appraisal of alternative growth scenarios. Within this report:

- Part 1 – explains a detailed process to **define growth scenarios**.
- Part 2 – presents the **appraisal** of growth scenarios.
- Part 3 – discusses **next steps**.

Part 1 ultimately defines the following growth scenarios (N.B. they are described with reference to the emerging preferred approach, which is Scenario 8):

- Scenario 1 – lower growth at Borehamwood, Potters Bar and Bowmans Cross = **18,550 homes**
- Scenario 2 – lower growth at Borehamwood and Bowmans Cross = **18,650 homes**
- Scenario 3 – lower growth at Borehamwood and Potters Bar = **19,050 homes**
- Scenario 4 – lower growth at Borehamwood = **19,150 homes**
- Scenario 5 – lower growth at Potters Bar and Bowmans Cross = **20,900 homes**
- Scenario 6 – lower growth at Bowmans Cross = **21,000 homes**
- Scenario 7 – lower growth at Potters Bar = **21,400 homes**
- Scenario 8 – the emerging preferred approach = **21,500 homes**¹

For context, local housing need (LHN) is 970 homes per annum (from the standard method, March 2026)² multiplied by an 18 year plan period (2025/26 to 2042/43) which equals 17,460 homes. There is limited case to be made for a housing requirement set below this figure (where the housing requirement is the number of homes that the Borough commits to delivering, in the knowledge that failure to deliver leads to punitive measures, namely ‘the presumption in favour of sustainable development’) and the case for a housing requirement set above this figure is not strong. As such, the likelihood is a housing requirement set at LHN (17,460 homes in total), but then it is in the Borough’s interests to ensure a supply ‘headroom’ over-and-above the housing requirement to ensure that it is delivered year-on-year, at least over the early years of the plan period. As part of this, there is the need to factor-in the need or risk of having to apply a 20% ‘buffer’ (NPPF para 78).

Part 2 of the report presents an appraisal of the eight growth scenarios under the ‘SA framework’, which primarily comprises a list of 15 sustainability topics. The appraisal concludes with a summary appraisal ‘matrix’ with a column for each of the SA topics and a row for each of the scenarios. The summary matrix is presented below, where each row aims to: **1)** rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence, and “?” used where there is uncertainty at this stage); and then **2)** categorise performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green**.³

The appraisal shows there to be a clear case for supporting Scenario 8 (the emerging preferred approach), in that it is: ranked first under the greatest number of sustainability topic headings; predicted more positive effects than any other scenario (specifically, it is the only scenario to be predicted a ‘significant’ positive effect); and is predicted equal fewest negative effects.

¹ Under the emerging preferred approach (Scenario 8) supply comes from: 1) non-allocated planning permissions = ~1,000 homes; 2) a windfall assumption = ~2,000 homes; and 3) emerging preferred allocations (i.e. candidate sites) = ~18,500 homes.

² LHN was previously 1,010 homes (it is updated annually in March). Also note that the plan period is yet to be confirmed.

³ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

However, it is important to be clear that the appraisal does not necessarily lead to a conclusion that Scenario 8 is the best performing scenario overall. This is because the appraisal is undertaken with no assumptions made regarding the degree of importance ('weight') that should be assigned to each of the topics as part of decision-making (and, to be clear, the topics are not assumed to have equal weight). It is for the Council to assign weight and reach a decision 'on balance' regarding which of the scenarios is best performing / best represents sustainable development.

The following bullet points explain the appraisal conclusions under each of the topics:

- **Air quality** – there are no air quality management areas (AQMA) in the Borough although there are a number of traffic congestion hotspots where air quality is potentially problematic or could become problematic under growth scenarios, including acknowledging the likelihood of significant growth in neighbouring areas, including a potential new town at Crews Hill (Enfield). Higher growth could lead to challenges, but equally the baseline situation is one whereby air quality is improving nationally. Also, there is a need to recognise that Hertsmere is generally well connected in transport terms and that lower growth in Hertsmere could potentially lead to increased pressure for growth in neighbouring areas that are either less well-connected or where there are currently AQMA (notably Watford and all neighbouring London Boroughs). Overall, it is difficult to confidently and meaningfully differentiate between the growth scenarios.
- **Biodiversity** – the Borough is overall subject to limited biodiversity constraint, such that there is a case for higher growth, but the primary factor that dictates the order of preference is the approach to growth at Borehamwood. Specifically, under the lower growth scenario at Borehamwood the assumption is that two strategic urban extensions subject to limited biodiversity constraint (and with an inherent biodiversity opportunity on account of their scale) would be replaced by two modest urban extensions that are both subject to a degree of constraint, in particular a site to the north that is currently designated as a Local Wildlife Site.
- **Climate change adaptation** – the key issue here is flood risk, although it is acknowledged that the matter of overheating risk is also a significant consideration for the Local Plan given the high urban growth strategy that is assumed as a 'constant' under all of the growth scenarios. Focusing on flood risk, whilst this has fed-in strongly as a factor influencing the selection of sites for inclusion within the growth scenarios, there are still a number of sites – which feature as either a constant or a variable across the scenarios – with an element of risk. Greenfield sites can often address flood zones by targeted onsite green/blue infrastructure, and urban sites can address flood risk through use mix and design/construction measures, but this will be explored further through Strategic Flood Risk Assessment (SFRA) prior to plan finalisation.
- **Climate change mitigation** – the focus under this topic heading is per capita built environment decarbonisation, given that transport decarbonisation factors-in under the 'transport' heading. Key considerations are: A) a 'moderate or uncertain' negative effect is predicted across all of the scenarios given the urgency of built environment decarbonisation and because it is difficult to conclude that this is a priority objective at the heart of the emerging Local Plan; and B) there is support for large-scale strategic urban extensions and new settlements that have the potential to be 'exemplar' schemes that deliver in line with a strict definition of 'net zero development'.
- **Communities 1: Education** – secondary school capacity has long been understood to be a key issue for the Local Plan, but planning for secondary school capacity is challenging, both because it is difficult to identify preferred locations for new and/or expanded schools and because the baseline situation is constantly shifting as neighbouring areas explore growth scenarios and consider potential locations for new schools (in particular, the latest situation is that the St Albans Local Plan is near finalisation, and proposes a new secondary at London Colney, and the Three Rivers Local Plan is nearing finalisation and proposes a new secondary at Carpenders Park).⁴ It will be for Hertfordshire County Council (HCC) to comment in detail (once again) through the current consultation, but the current appraisal aims to flag support for strategic growth at both Borehamwood and Bowmans Cross (in particular) given potential to deliver a new secondary. It is also important to note that the approach to growth at Radlett is held 'constant' across the growth scenario on balance, with the settlement notably lacking a secondary school.
- **Communities 2: Services** – planning for healthcare is challenging because the NHS requires flexibility such that it can be difficult to be certain that land provided will ultimately be taken up.

⁴ There may also be some challenges in respect of primary school capacity, particularly in terms of maintaining the ongoing viability of schools in light of an ageing population at certain villages, notably Shenley and South Mimms.

Having said this, what can be certain is that strategic growth locations give rise to an excellent opportunity to deliver new healthcare facilities, and overall there are not known to be any significant concerns under any of the scenarios. The other key consideration is then town centre regeneration, which is assumed as a 'constant' under all scenarios. There is very strong support for the ambitious regeneration strategies, informed by ongoing visioning and wider workstreams.

- **Communities 3: Health** – there are also many wider ways in which the Local Plan influences the determinants of good health. One key matter for consideration relates to strategic planning for green and blue infrastructure, both within and outside of development sites, and also the related matter of ensuring that sites are masterplanned and designed with good health as a priority objective. In this regard it is fair to say that a priority objective is simply adopting a Local Plan such that growth comes forward in a plan-led way, as opposed to the baseline situation whereby growth continues to come forward in a piecemeal fashion in the absence of an up-to-date Local Plan with issues arising and opportunities missed in respect of planning for health.
- **Communities 4: Cohesion** – it is difficult to confidently and meaningfully differentiate between the growth scenarios. A key issue is an acknowledged local concern with large scale housing growth; however, on the other hand, A) the baseline is a situation whereby growth continues unabated under the presumption in favour of sustainable development (an essential component of the plan-led system under the NPPF, with the aim being to motivate local authorities to maintain an up-to-date local plan); and B) under the lower growth scenarios it could potentially prove challenging to progress the local plan as objectors might argue there is insufficient supply.
- **Economy and employment** – existing sites with planning permission are sufficient to provide for identified needs under all scenarios, but there is nonetheless a case to be made for providing for additional employment land. In this regard there is understood to be a significant opportunity to deliver new employment land as part of a new settlement at Bowmans Cross.
- **Historic environment** – constraints are widespread but concerns with growth are limited, albeit there is a need for further work to include Historic Impact Assessments (HIAs). All or most of the 'variable' sites are subject to a degree of constraint, but (on balance) the alternatives are differentiated with a view to flagging support for a more modest strategic urban extension NE of Borehamwood (Scenarios 1, 2, 3, 4) and directing to Bowmans Cross (Scenarios 3, 4, 7, 8).
- **Homes** – Scenario 8 is potentially very proactive in that the total identified supply is ~23% above LHN such that: A) the housing requirement could be set at LHN with a large supply headroom (23%); or B) the requirement could be set modestly above LHN with a commensurately smaller supply headroom, e.g. to reflect the high level of affordable housing needs in the Borough. Also, Scenario 8 is proactive in that Bowmans Cross would primarily deliver beyond the plan period. However, in practice the allocations assumed to deliver the emerging preferred approach are 'candidate sites' such that some may fall away or reduce in scale ahead of plan finalisation, plus further work may confirm that some sites can deliver only late in the plan period. Also, it is important to note that an issue with all of the scenarios, including Scenario 8, is a likely inability to deliver on LHN over the early years of the plan period, such that there will likely be a need for a 'stepped requirement' that is below LHN in the early years of the plan period and then commensurately higher (above LHN) over the latter years of the plan period. Finally, providing for Gypsy and Traveller accommodation needs is an important outstanding issue.
- **Landscape** – whilst there are no designated landscapes within the Borough there is a widespread concern regarding creep of the London suburbs into Hertfordshire, generally loss of open countryside that is highly appreciated and loss of settlement separation. Concerns can be flagged at all settlements, but the appraisal aims to reflect a view that directing growth to Bowmans Cross represents a means of delivering growth in line with landscape objectives.
- **Soils / resources** – agricultural land quality is not particularly high in the Borough although land south of Radlett (a 'constant' growth location) is known to be of high quality (grade 2). Another point to note is support for a focus on urban growth and also several greenfield sites comprising degraded land or golf courses, although several significant sites are in arable cultivation. Finally, minerals and waste planning is a factor in parts of the Borough including Bowmans Cross.
- **Transport** – the Borough is overall very well connected and there are major opportunities to deliver growth in proximity to a well-connected railway stations, along bus corridors and along priority routes identified in the Draft Local Cycling and Walking Infrastructure Plan (LCWIP, 2026). Also, there are significant opportunities to deliver large-scale strategic sites that can deliver strategic infrastructure upgrades and will benefit from a high degree of trip internalisation.

However, the emerging preferred growth strategy is a major step-change on that previously consulted-on in 2024, such that it will be crucial to work closely with HCC, National Highways and others ahead of plan finalisation, including informed by transport modelling.

- **Water** – there are not known to be any key challenges in respect of either water supply or wastewater treatment capacity, but the EA and Thames Water will wish to comment through the consultation. One issue is reliance on Maple Lodge Sewage Treatment Works (at Maple Cross), which serves a very large catchment that includes numerous local authority / local plan areas.

Part 3 discusses next steps. Specifically, the next step is to prepare the final draft ('proposed submission') version of the Local Plan, which will then be published under Regulation 19 alongside the formally required SA Report, which must present an appraisal of "the plan and reasonable alternatives". Again, the intention will be to present reasonable alternatives in the form of 'growth scenarios'. Following Reg 19 publication the intention will be to submit the plan for an Examination in Public overseen by the Planning Inspectorate alongside all of the representations received.

Table A: Growth scenarios summary appraisal

| | Scenario 1 BW, PB, BC | Scenario 2 BW, BC | Scenario 3 BW, PB | Scenario 4 BW | Scenario 5 PB, BC | Scenario 6 BC | Scenario 7 PB | Scenario 8 - |
|---------------------------|--------------------------|----------------------|----------------------|------------------|----------------------|------------------|------------------|-----------------|
| Lower growth at... | | | | | | | | |
| Air quality | = | = | = | = | = | = | = | = |
| Biodiversity | 2 | 2 | 2 | 2 | ★1 | ★1 | ★1 | ★1 |
| Climate change adaptation | = | = | = | = | = | = | = | = |
| Climate change mitigation | 2 | 2 | 2 | 2 | 2 | 2 | ★1 | ★1 |
| Communities 1: Education | 2 | 2 | 2 | 2 | 2 | 2 | ★1 | ★1 |
| Communities 2: Services | = | = | = | = | = | = | = | = |
| Communities 3: Health | = | = | = | = | = | = | = | = |
| Communities 4: Cohesion | ? | ? | ? | ? | ? | ? | ? | ? |
| Economy and employment | 2 | 2 | ★1 | ★1 | 2 | 2 | ★1 | ★1 |
| Historic environment | ★1 | ★1 | ★1 | ★1 | 3 | 3 | 2 | 2 |
| Homes | 8 | 7 | 6 | 5 | 4 | 3 | 2 | ★ |
| Landscape | 2 | 2 | ★1 | ★1 | 2 | 2 | ★1 | ★1 |
| Soils / resources | = | = | = | = | = | = | = | = |
| Transport | ? | ? | ? | ? | ? | ? | ? | ? |
| Water | ? | ? | ? | ? | ? | ? | ? | ? |

1. Introduction

1.1. Background

- 1.1.1. AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Hertsmere Local Plan being prepared by Hertsmere Borough Council.
- 1.1.2. Once adopted, the plan will set a strategy for growth and change up to 2043, allocate sites to deliver the strategy and establish policies to guide planning applications.
- 1.1.3. SA is a required process for considering and communicating the effects of a plan, and alternatives, with a view to minimising adverse effects and maximising the positives.⁵

1.2. SA explained

- 1.2.1. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004.
- 1.2.2. In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives” with a particular focus on appraising “significant effects”.
- 1.2.3. More specifically, the SA Report must:
 - explain **work to date** and, in particular, appraisal of ‘reasonable alternatives’;
 - present **an appraisal of current proposals**, i.e. the draft plan; and
 - explain **next steps**.
- 1.2.4. The aim is to inform the draft plan consultation and, in turn, plan finalisation.

1.3. This Interim SA Report

- 1.3.1. The current consultation is held under Regulation 18 of the Local Planning Regulations akin to an emerging draft version of the Local Plan. This is the third Regulation 18 consultation on a draft Local Plan, following consultation in 2021 and 2024.
- 1.3.2. Subsequently the ‘proposed submission’ version of the plan will be prepared and published under Regulation 19 alongside the formal SA Report. As such, this is an ‘Interim’ SA (ISA) Report. ISA Reports were also published in both 2021 and 2024.
- 1.3.3. The focus of this report is on presenting an appraisal of the ‘strategy for growth and change’ (including in terms of sites for allocation) that is at the very heart of the current consultation. Specifically, the aim is to present an appraisal of the emerging preferred approach alongside a series of reasonable alternatives (RAs). However, it is important to emphasise that the current consultation is on an emerging draft plan, such that the sites that are put forward for potential allocation are referred to as ‘candidate sites’.
- 1.3.4. This ISA Report is structured in three parts as follows:
 - Part 1 – explains **work to date** to define reasonable alternatives.
 - Part 2 – presents an appraisal of **the current emerging strategy and RAs**.
 - Part 3 – explains **next steps**.
- 1.3.5. Ahead of Part 1, there is a need for two further introductory sections.

⁵ The Planning and Compulsory Purchase Act 2004 sets out that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2024), and the Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published alongside the ‘Proposed Submission’ Local Plan (Regulation 19). The Government is now reforming required process, but this does not apply to the Hertsmere Local Plan provided it is prepared in a prescribed transitional window.

2. The plan scope

2.1. Introduction

- 2.1.1. The aim here is to briefly introduce the context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion below); the plan period; and the objectives that are in place to guide plan preparation.

2.2. Context to plan preparation

- 2.2.1. The current Local Plan dates from 2013 and looks ahead only to 2027,⁶ whilst the NPPF expects local plans to be reviewed every five years and look ahead 15 years, including in terms of identifying a supply of land sufficient to meet development needs.
- 2.2.2. On this basis alone it is clear that there is an urgent need to adopt a new Local Plan, but plan-making has proved challenging. Three early consultations were held in 2016, 2017 and 2018, before a draft plan was consulted on in 2021 and then a second draft plan was consulted on in 2024. This current consultation is on a further draft version of the Local Plan and will be followed by a final 'Regulation 19 publication' stage ahead of submission in late 2026 and then adoption likely in 2027 or perhaps 2028.⁷ The Government has set a deadline of submission by December 2026, with all plans nationally submitted after this date having to align with a new plan-making system.
- 2.2.3. Identifying a 'supply' of land to meet development needs over the course of the plan period, as far as is consistent with sustainable development, is at the heart of preparing any local plan. Focusing on housing, local housing need (LHN) for the Borough now stands at 970 dwellings per annum (dpa) as understood from the government's standard method for calculating LHN (March 2026). This is a 25% increase on the figure that applied when preparing the previous draft plan in 2024, and more than four times recent rates of housing delivery (circa 225 dpa over 2022-2025). Also, it can be noted that standard method LHN is now much higher across the wider sub-region and in London.⁸
- 2.2.4. LHN as understood from the government's standard method now applies as the housing requirement for the plan area, because the adopted Local Plan is out-of-date. For context, the housing requirement is the number of homes that any local authority is committed to delivering,⁹ where failure to deliver means that planning applications must be decided under the 'presumption in favour of sustainable development', which is otherwise known as the 'tilted balance' in favour of development.
- 2.2.5. The Borough is unable to deliver its housing requirement such that the presumption is in force, which makes it difficult to defend against planning applications. Specifically, if an application is refused the risk is that it will then be granted at appeal under the presumption ('planning by appeal') and it is important to note that fighting appeals is resource intensive and potentially costly. Numerous major planning applications have been decided under the presumption over recent years, and this continues unabated.
- 2.2.6. The implication is a need to boost supply and the best way to do this is via a Local Plan, as opposed to via ad hoc piecemeal planning applications. Also, through the new Local Plan there is also an opportunity to consider whether the housing requirement might be set at a level below LHN. However, there is a high evidential bar that must be reached in order to justify a housing requirement below LHN, particularly where the resulting 'unmet need' would not be provided for elsewhere, as is likely the case for Hertsmere.

⁶ See www.hertsmere.gov.uk/planning-building-control/planning-policy/hertsmere-local-plan/current-local-plan

⁷ To reiterate, the current consultation is on an *emerging* draft plan, with sites put forward referred to as 'candidate sites'.

⁸ Focusing on London, the new London Plan will need to account for a standard method LHN figure of 84,200 dpa whilst the current London Plan makes provision for 52,000 dpa and, in practice, delivery has been far lower than this over recent years.

⁹ Specifically, the NPPF requires that local authorities maintain a rolling 'five year housing land supply' (5YHLS) of deliverable sites, as measured against the housing requirement, plus housing supply performance is evaluated using the Housing Delivery Test (HDT). In summary, the HDT evaluates performance against the housing requirement looking back, whilst the 5YHLS test evaluates performance looking forward. Also, it is important to note that the 5YHLS test actually involves demonstrating a supply of deliverable sites amounting to the housing requirement plus either 5% or 20% (dependent on HDT performance).

- 2.2.7. The above discussion introduces the ‘stick’ that is in place to encourage adoption of a new Local Plan. However, it is also important to state that there are many ‘carrots’:
- Firstly, meeting housing needs is not only of great importance in-and-of itself, but also important given wide-ranging secondary benefits, for example in terms of the health and well-being of communities and supporting the local and national economy.
 - Secondly, plan-led housing growth creates an opportunity to strategically target investment and policy ‘asks’ of developers (in the context of development viability parameters), thereby maximising the benefits of growth and potentially delivering ‘planning gain’ for existing communities, the environment and the local economy. Growth-related opportunities are easily missed without an up-to-date local plan.
- 2.2.8. Finally, it is important to reiterate that the plan area does not stand alone but rather functions as part of a wider sub-region. The matter of generating unmet housing need being problematic, and therefore challenging to justify, has already been introduced, but it is also important to add that neighbouring plan areas are also at risk of generating unmet housing need, which must factor in when preparing the Hertsmere Local Plan. Also, aside from the matter of seeking to cooperate across the sub-region in respect of providing for housing needs, there are a range of wider cross-border strategic matters including planning for the economy / employment land and infrastructure.

2.3. The plan area

- 2.3.1. Hertsmere Borough is located at the southern extent of Hertfordshire, bordering the London Boroughs of Harrow, Barnet and Enfield to the south. Hertsmere is also bordered by four Hertfordshire local authorities (Three Rivers, Watford, St. Albans and Welwyn Hatfield) and these five authorities, together with Dacorum Borough, are understood to function cohesively as a South West Hertfordshire grouping. At the time of writing there is an ongoing consultation on three options for Local Government Reorganisation (LGR), where one option would see the South West Herts authorities merging to form a single new unitary local authority (see www.hertfordshire-lgr.co.uk/).
- 2.3.2. It is difficult to place the Borough’s settlements in a hierarchy, but the Settlement Hierarchy Review (2026) provisionally places settlements in a hierarchy as follows:
- Borehamwood – is the primary town, located in the south the Borough close to edge of the London suburbs to the south. It has comfortably the largest population of any of the Borough’s settlements and also comfortably the best services/facilities offer.
 - Potters Bar – is located in the east of the Borough in a more rural location. It is a substantial town, but the local offer is significantly lower than that of Borehamwood.
 - Bushey – is located in the far south west of the Borough, in close proximity to Watford and the London suburbs, and is in distinct parts which creates a challenge in terms of calculating population and a services/facilities offer.
 - Radlett – is the final town and is distinct from Bushey in that it is smaller, has a significantly lower services/facilities offer and is a more rural town.
 - Villages – the three primary villages are Shenley, Elstree Village and South Mimms. Shenley is the largest village, but all three have a primary school.
- 2.3.3. The Borough is located at the inner edge of the London Green Belt, and, in turn, a defining feature is the transition from the London suburbs to Hertfordshire as a county of distinct settlements separated by open countryside. As such, avoiding the sprawl of London into Hertfordshire is an important objective, as is maintaining countryside gaps between settlements. The Hertsmere Green Belt Assessment (GBA, 2026) identifies that a high proportion of the Borough is ‘grey belt’ or ‘provisional grey belt’, but this is on the basis of looking at small parcels of land strictly in isolation. The GBA also explains that, taking a step back, there are broad swathes of land within the Borough where maintaining openness is of strategic importance and where there is a risk of piecemeal developments in combination and over time ‘fundamentally undermining’ the Green Belt.

2.3.4. This matter of fundamentally undermining the Green Belt is important in light of NPPF paragraph 146, which states that where there are exceptional circumstances to warrant the release of Green Belt through a Local Plan (which is the case for Hertsmere):

“... authorities should review Green Belt boundaries... and propose alterations to meet [housing] needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.”

2.3.5. Aside from these Green Belt sensitivities, there are relatively few ‘headline’ constraints to growth locally, where a headline constraint is one that potentially factors into arguments for setting a housing requirement below LHN (see Section 2.2).

2.3.6. Taking the headline constraints listed at footnote 7 of the NPPF in turn:¹⁰

- Biodiversity designations – there are no internationally designated sites in the Borough, although there is an internationally designated woodland nearby in Welwyn Hatfield, namely Northaw Great Wood Special Area of Conservation (SAC), which is potentially a constraint to growth north / north east of Potters Bar. There is then one internationally designated Site of Special Scientific Interest (SSSI) at the north east extent of the Borough, namely Redwell Wood SSSI, which is in proximity to an area that has been considered as a potential location for a new settlement over recent years (Bowmans Cross; discussed further below). Also there are two SSSIs in close proximity to the north west (Bricket Wood Common) and south (Harrow Weald).
- Flood Risk – the Borough drains to the River Colne, which is a major tributary of the Thames that passes through the north west of the Borough, flowing south from London Colney to Watford and then onwards to Rickmansworth (which is the start of the Colne Valley Regional Park). There are two main tributaries of the Colne and a number of sub-tributaries. Overall the effect of fluvial (river) flood risk as a constraint to growth is relatively limited across the Borough, in that it is difficult to envisage pressure to direct growth to areas at risk of flooding. However, downstream flood risk is a consideration, including noting areas currently at risk of flooding within Watford, plus surface water flood risk is extensive in some parts of the Borough, notably within Borehamwood.
- Historic environment designations – are widespread but overall the Borough does not stand-out as subject to high constraint in the sub-regional context. Understanding of the varying significance of assets and their spatial distribution across the Borough is a key consideration for spatial strategy / site selection, but it is difficult to envisage historic environment constraints having a strong bearing on any arguments that might be made for a housing requirement set below LHN. Borehamwood, Potters Bar and Radlett are subject to notably low constraint, given largely 19th/20th century origins.
- Irreplaceable habitats – ancient woodland is the primary consideration, and, in this regard, the Borough is subject to notably low constraint in the sub-regional context.
- Landscape designations – there are no designated landscapes within the Borough, nor are there any broad areas established as being of larger-than-local significance. The Landscape Sensitivity Study (2020) does identify some ‘assessment units’ as having ‘high’ sensitivity, but these are mostly quite small discrete areas. This suggests limited potential for landscape constraint to factor-in as part of any argument for a housing requirement set below LHN. However, on the other hand, there are extensive parts of the Borough with ‘medium-high’ landscape sensitivity, and this constraint must be considered in the context of the Green Belt sensitivities discussed above.¹¹

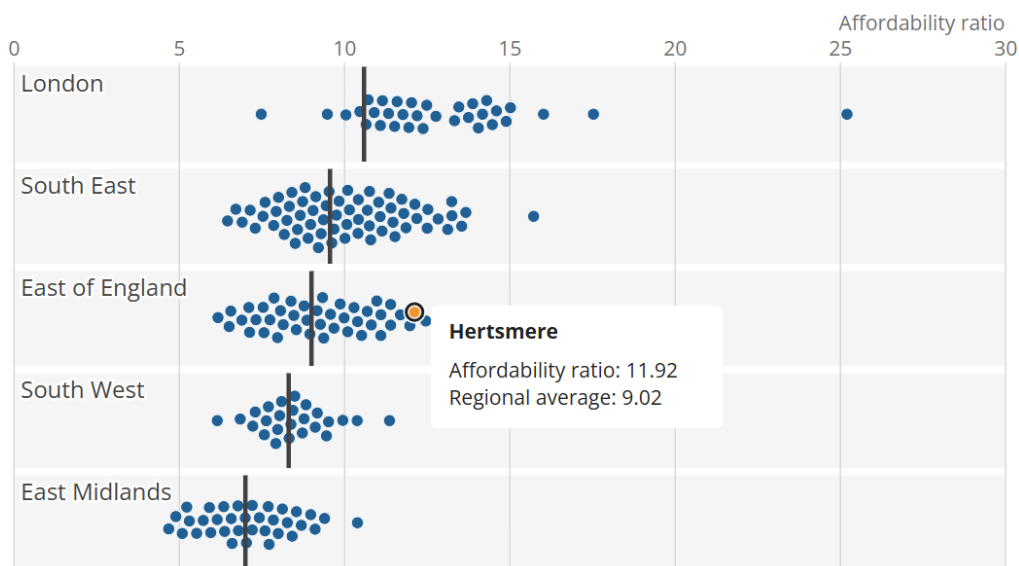
2.3.7. Having introduced Green Belt sensitivities and environmental constraints to growth, the next matter for consideration relates to infrastructure challenges and opportunities.

¹⁰ A final headline constraint listed at NPPF footnote 7 is Local Green Space (LGS), but by its very nature this is a constraint that will rarely if ever factor into arguments that might be made for setting a housing requirement below LHN.

¹¹ The Landscape Sensitivity Study considers sensitivity to specific types of development, with a key consideration here being its conclusions in respect of sensitivity to residential development.

- 2.3.8. Beginning with transport infrastructure, a defining characteristic of the Borough is very good connectivity by road and rail, with three railway lines linking the key settlements into London and numerous junctions onto the strategic road network. Also, some parts of the Borough are associated with good opportunity to cycle to key destinations, such as strategic employment areas or Watford town centre. Whilst growth generates a range of concerns regarding transport infrastructure capacity there are also growth-related opportunities to be realised and, overall, it is very difficult to envisage transport factoring-in strongly as part of an argument for a housing requirement set below LHN.
- 2.3.9. Community infrastructure capacity is then a key challenge for the Local Plan. There is little if any precedent for arguing that community infrastructure constraints justify (or even partly justify) a housing requirement set below LHN, but it is clear that challenges locally are significant. Also, because the Borough has recently seen a spike in ‘speculative’ planning permissions granted under the presumption in favour of sustainable development (and this trend could continue in the short term ahead of local plan adoption), a high level concern is worsening pressure on community infrastructure.
- 2.3.10. Secondary school capacity is understood to be a key issue and, whilst large scale strategic growth locations might be considered that could deliver a new school, there are limited growth options of this nature, and they take time to deliver. Also, whilst regeneration of the two main town centres – at Borehamwood and Potters Bar – is a key priority, this again will take time. The risk is that housing growth dispersed across smaller sites leads to ever-increasing pressure on community infrastructure, although a Community Infrastructure Levy is in place to raise funds from across numerous sites.
- 2.3.11. Having discussed potential constraints to growth (Green Belt, environmental constraints and infrastructure challenges), the final task here is to introduce key aspects of the socio-economic baseline and give initial consideration to local plan implications.
- 2.3.12. Beginning with housing affordability, Figure 2.1 is taken from the website of the Office for National Statistics (ONS) and shows that the ratio of median house prices to median workplace earning is 11.9 (having risen from 5 in 1997 and peaked at 15.5 in 2021). Hertsmere’s ratio is lower than for some neighbouring areas but is nonetheless high.
- 2.3.13. There is also a high need for affordable housing (i.e. housing for those whose needs are not met by the market), with the Local Housing Needs Assessment (LHNA, 2026) finding there to be a need for between 589 and 779 affordable homes per annum (of which a high proportion should be homes for social rent), which compares to delivery averaging under 50 homes p.a. over the past 10 years. Assuming delivery at LHN (970 dpa) then there is no potential to provide for affordable housing needs in full without major public funding, given that viability limits the rate at which market led schemes can deliver affordable housing at between from 0% to ~50% depending on site-specific viability.

Figure 2.1: Ratio of median workplace-based earnings to median house price



- 2.3.14. A high affordability ratio combined with a high need for affordable housing suggests a strong case for not seeking a housing requirement set below LHN.
- 2.3.15. Also, there are wider arguments for housing growth from a perspective of wishing to deliver on social objectives locally. The matter of delivering targeted new or upgraded community infrastructure has already been discussed above (and strategic green/blue infrastructure is a further consideration), but further key considerations include:
- Relative deprivation – Hertsmere is less deprived than 72% of local authorities nationally according to the Index of Multiple Deprivation 2025, but there are pockets of relative deprivation including one area in Borehamwood that is amongst the 10% most deprived nationally. There are also areas of deprivation in Watford and South Oxhey.¹² Targeted growth can help to address issues of relative deprivation by bringing with it targeted investment, including in infrastructure, as well as new job opportunities.
 - Town centre regeneration – is a key objective for the Local Plan, both in terms of providing for housing needs and in terms of place-making, the local economy and ensuring functioning town centres at the heart of communities. There are many town centre sites evidently with a dated built form in need of considerable investment and potentially redevelopment, which can bring with it wide-ranging targeted benefits, particularly when investment / redevelopment is coordinated across sites. Town centre regeneration is a corporate priority of the Council, e.g. as discussed [here](#), and with a [Hertsmere Visions](#) consultation recently having been completed. However, high reliance on complex regeneration schemes for housing supply leads to delivery risk.
 - A mixed community – the Borough has a distinctly ageing local population (discussed below), and so new homes can help with maintaining a healthy population profile.
- 2.3.16. Finally, key evidence comes from the Hertsmere Economic Study (2026):
- Hertsmere’s employment land supply is characterised by a small number of high-performing, modern sites (notably Centennial Park, Elstree Way, and Stirling Way), alongside a range of older, less competitive locations. The Borough faces challenges from limited vacant land, Green Belt constraint, and older premises, such that strategic planning and targeted interventions are essential to support the local economy.
 - The creative sector, especially film and TV, is a key strength, and the sector’s true impact is likely under-represented in official data. The Borough is also poised for growth in data centres, e.g. [DC01UK](#), and there is potential for tech-media synergy.
 - The Study explores three economic growth scenarios before recommending one that accounts for ‘labour demand’ alongside an uplift film industry and data centre growth. It provides *“a realistic, evidence-led estimate of future requirements, balancing economic growth forecasts with local sectoral strengths and market dynamics.”*
 - This translates as a requirement for 24.7 ha of new employment land by 2041, specifically: 1.3 ha for offices; 3.2 ha for industrial uses; 10.2 ha for the film sector; and up to 10 ha for data centres. Existing commitments can provide for this requirement, with a number of key sites recently having been permitted ahead of the Local Plan.
 - Hertsmere’s population grew by 7.8% between 2011 and 2021 (in line with the sub-region and slightly below the average for the East of England (8.3%)) and, as part of this, the working-age population (16–64) increased by 5.6%, outpacing all comparator geographies. However, projections to 2041 suggest a mere 0.5% overall population increase, with a striking 41.4% rise in the 65+ cohort and an 8.6% decline in the working-age group. This demographic shift signals a future challenge: an ageing population and a shrinking labour pool, which could constrain economic growth and reduce the borough’s attractiveness for investment and innovation. Also, there are likely to be implications for commuting patterns and, in turn, road traffic.

¹² The IMD is a key metric for understanding the spatial distribution of relative disadvantage, but the Joseph Rowntree Foundation advocates use of the IMD alongside a second metric, namely the Community Needs Index (CNI) with the combined metric showing areas that the JRF refers to as “double disadvantaged”. A map of the combined metric is available [here](#).

2.4. The plan period

- 2.4.1. The plan period will be to either 2041/42 or 2042/43, but a plan period to 2042/43 is assumed here. The intention is to align with NPPF paragraph 22, which states:
“Local plans] should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities...”
- 2.4.2. There is little case for a longer plan period given the context of Devolution and Local Government Review (LGR), i.e. given that a new Local Plan prepared by a Unitary Authority that includes Hertsmere, will likely soon be commenced and will be well placed to identify strategic growth locations to provide for longer term needs. Indeed, there is a case to suggest that impending LGR serves as a reason for plans currently in preparation seeking to provide for needs over a period of less than 15 years, with this being the approach currently proposed by Welwyn Hatfield in their Draft Local Plan.¹³
- 2.4.3. With regards to the plan start date, this will likely be set as close as possible to the point of plan adoption – likely 2025/26 – as opposed to at a date in the past, which is logical because housing is currently being delivered at a rate well below LHN, with only around 225 homes completed annually over the past three monitoring years 2024/25. Whilst it can be suggested that the plan start date should be in the past to account for recent ‘under delivery’, a counter argument is that the standard method is adjusted annually to account for changes to the affordability ratio such that it captures under delivery.
- 2.4.4. Assuming a plan period of 2025/26 to 2042/43 then LHN over the plan period is 970 dpa x 18 years = 17,460 homes in total, and the aim must be to provide for this need as far as possible whilst also delivering on wider plan objectives. Importantly, there will be a considerable level of supply from sites that already have planning permission, plus it is appropriate to account for supply from ‘windfall’ sites not identified in the Local Plan (e.g. small urban sites), such that the key task for the Local Plan is to identify ‘new’ supply over-and-above ‘existing’ supply from permissions and a windfall assumption.

2.5. Plan objectives

- 2.5.1. It is important to set objectives to guide the plan-making process. Also, plan objectives are a key input to the SA process, because ‘reasonable alternatives’ must be defined taking account of *“the objectives... of the plan.”*
- 2.5.2. Plan objectives were presented in the previous consultation document in 2024, and are considered to remain broadly up-to-date, albeit there is an acknowledgement that the context to preparing the Local Plan has evolved since 2024.
- 2.5.3. The plan objectives in 2024 were presented under the following eight themes:
- Future Hertsmere
 - Housing Hertsmere
 - Working Hertsmere
 - Green Hertsmere
 - Connected Hertsmere
 - Healthy Hertsmere
 - Creative Hertsmere
 - Distinctive Hertsmere

¹³ The Draft Welwyn Hatfield Local Plan (2026) proposes to take a “ten year approach to allocations” meaning that, whilst it seeks to provide for LHN in full over the first ten years of the plan period post adoption, very limited supply is identified for years 11 to 15 and, in turn, total supply over the plan period falls short of total LHN over the plan period (see Appendix A of the plan document). The plan document justifies this as follows: *“In light of [LGR] it is appropriate for strategic growth beyond year ten of the plan period to be considered at the scale of the future unitary authority. This will enable long term development to be planned in a coordinated way, aligned with infrastructure delivery, environmental considerations and wider regional priorities.”*

3. The SA scope

Introduction

- 3.1.1. The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan nor the scope of reasonable alternatives.
- 3.1.2. At the heart of the SA scope is an appraisal ‘framework’ that aims to ensure that appraisal work is focused on the key issues / impacts and is suitably clear and concise.

The SA framework

- 3.1.3. An SA framework was established through consultation in 2017 and was subsequently used to guide appraisal work as reported in subsequent Interim SA Reports up to and including the Interim SA Report published alongside the Draft Local Plan in 2024.
- 3.1.4. At the heart of the appraisal framework from 2024 was a list of 15 sustainability topics, and it is now considered appropriate refresh this list.
- 3.1.5. Table 3.1 shows the refreshed SA framework alongside the previous for comparison, and it can be seen that: A) two previous topics are amalgamated for clarity; B) one new topic is added; and C) flooding can be appropriately considered under a ‘climate change adaptation’ heading; and D) other adjustments are minor.

Table 3.1: *The refreshed SA framework alongside the previous for comparison*

| New | Previous |
|---------------------------|--|
| Air quality | Air quality |
| Biodiversity | Biodiversity and geodiversity |
| Climate change adaptation | Flooding |
| Climate change mitigation | Energy efficiency; Greenhouse gas emission |
| Communities 1: Education | Education |
| Communities 2: Services | Services |
| Communities 3: Health | Health |
| Communities 4: Cohesion | Community cohesion |
| Economy and employment | Economy |
| Historic environment | Historic environment |
| Homes | Housing provision |
| Landscape | Landscape |
| Soils / resources | Soils and minerals |
| Transport | - |
| Water | Water quality and quantity |

Part 1: Work to date

4. Introducing Part 1

4.1. Overview

- 4.1.1. The aim is to explain work that led to the **reasonable alternatives** appraised in Part 2.

4.2. Reasonable alternatives in relation to what?

- 4.2.1. The requirement is to examine reasonable alternatives (RAs) taking account of “the objectives and geographical scope of the plan”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites**, to provide for objectively assessed needs alongside delivering-on wider plan objectives.
- 4.2.2. Establishing a spatial strategy is invariably a central objective of any local plan, and the Hertsmere Local Plan is no exception, e.g. recognising that the consultation in 2024 focused solely on this matter. The current consultation also extends to development management (DM) policies, but it is clear that spatial strategy is the central matter.
- 4.2.3. Given the objectives of any local plan, spatial strategy alternatives can perhaps more accurately be described as **alternative key diagrams**, where the key diagram is a reflection of established development requirements, spatial strategy and site selection. Alternative key diagrams can then be referred to for ease as **‘growth scenarios’**.¹⁴
- 4.2.4. In short, a focus on RAs in the form of ‘growth scenarios’ ensures a focus on mutually exclusive alternatives that go to the heart of the local plan.¹⁵

What about site options?

- 4.2.5. Whilst individual site options clearly generate interest, they are not RAs in the context of most local plans. Were the objective to allocate one site, then site options would be RAs, but that is rarely the case for local plans. Rather, the objective is to allocate a package of sites and so RAs must be in the form of alternative packages of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of defining RA growth scenarios (Sections 5.3 & 5.4).

What about DM policies?

- 4.2.6. As well as establishing a spatial strategy, allocating sites etc, local plans also typically seek to establish area-wide thematic policies as well as area and/or site-specific policies. These can be broadly described as development management (DM) policies.
- 4.2.7. However, it is often challenging to define “reasonable” DM policy alternatives given that DM policy decision-making is of far more limited significance than is the case for spatial strategy (etc) decision-making. Whilst there can be choices to explore (notably in respect of how to balance various DM policy options with cost implications such that the combined effect is not to render developments unviable) whether there are RAs that warrant formal appraisal and consultation via the SA process is a separate question.
- 4.2.8. Comments are welcome on DM policy areas that may warrant work to explore RAs.

¹⁴ A focus on RA growth scenarios also guarantees the potential to reach meaningful conclusions on differential significant effects and negates the need for a process of screening what should and should not then be a focus of work to explore (i.e. define, appraise and consult upon) RAs. It is also important to note that appraising a draft proposal versus the ‘do nothing’ option does not equate to an appraisal of RAs, because do nothing is the baseline and significant effects are defined as effects *on the baseline*.

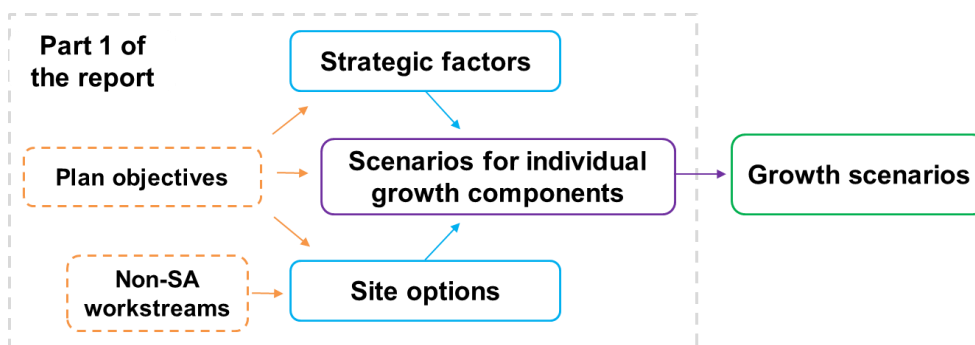
¹⁵ A further consideration is that the regulatory requirement, when read at face value, suggests a need to appraise and consult upon alternative plans (specifically, the requirement is to appraise and consult upon: “... the plan and reasonable alternatives”). Appraising alternative local plans is patently unachievable but a focus on RA growth scenarios represents the next best thing.

5. Defining growth scenarios

5.1. Introduction

5.1.1. The aim here is to discuss the process that led to the definition of RA growth scenarios in 2026. To reiterate, growth scenarios equate to **reasonable alternatives**.

Figure 5.1: A standard broad process to define RA growth scenarios



5.1.2. This process is described across the following sub-sections:

- **Section 5.2** – considers strategic factors ('top down').
- **Section 5.3** – considers individual site options ('bottom up').
- **Section 5.4** – considers scenarios for individual growth components in light of the preceding top down / bottom up factors. In practice, the focus is on **settlements**.
- **Section 5.5** – combines settlement growth scenarios to form RA growth scenarios.

A note on limitations

5.1.3. This section does not present an appraisal of reasonable alternatives but rather describes the process that led to the *definition* of reasonable alternatives. The work reported here is a means to an end (reasonable alternatives) which, in turn, has a bearing on the extent of work that is proportionate, also recalling the legal requirement, which is to present an *“outline of the reasons for selecting alternatives...”* [emphasis]

5.2. Strategic factors

Introduction

5.2.1. The aim here is to explore strategic factors (issues and options) with a bearing on the definition of RA growth scenarios. Specifically, this section of the report explores:

- Quantum – how much development is needed (regardless of capacity)?
- Broad spatial strategy – broadly where is more/less suited to growth; also, what growth typologies are supported, e.g. large ('strategic') sites versus smaller sites?

Quantum

5.2.2. This section recaps the **Local Housing Need (LHN)** figure for the plan area, before exploring *high-level* arguments for a housing requirement set above or below LHN.

N.B. this section focuses on housing with **employment land** needs already having been set out in Section 2. A further consideration is providing for **Gypsy and Traveller accommodation needs**, with a recent needs assessment identifying a need for between 123 and 132 pitches (to 2045). This is a very significant need, and is discussed further in the appraisal section of this report (Part 2).

Background

- 5.2.3. A central tenet of local plan-making is the need to **A)** objectively establish housing needs ('policy-off'); and then **B)** develop a policy response to those needs ('policy-on'). The Planning Practice Guidance (PPG) explains:

"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process... It should be undertaken separately from... establishing a housing requirement figure..."

- 5.2.4. With regard to (A), the NPPF states that local housing need (LHN) should be established via an assessment "conducted using the standard method". With regard to (B), most local authorities respond to LHN by setting a housing requirement that equates precisely to LHN; however, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.

Local Housing Need (LHN)

- 5.2.5. As discussed, LHN for the Borough is 970 dpa on the basis of the Government's standard method, which accounts for: A) existing dwelling stock; and B) affordability. The figure was updated from 1,010 dpa in March 2026 in light of new affordability data.

Is it reasonable to explore a housing requirement below LHN?

- 5.2.6. The context NPPF paragraph 11, which states:

*"... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits..." [emphasis added]*

- 5.2.7. There has always been the potential to evidence and ultimately justify a housing requirement set below LHN, and it can be noted that the proposal in 2024 was to set a housing requirement at around 75% of LHN (which at the time was 726 dpa).
- 5.2.8. However, it has always been understood that there is high evidential bar that must be reached in order to justify a housing requirement set below LHN ('no stone left unturned'), particularly where there is little or no chance of the 'unmet need' generated being provided for by a neighbouring authority, as is likely the case for Hertsmere.
- 5.2.9. The latest situation is the context of the 2024 NPPF, which arguably 'raises the bar' that must be reached in order to evidence and ultimately justify LHN, but what the 2024 NPPF certainly does not do is to make it "mandatory" that all Local Plan set a housing requirement at LHN or higher (which would be tantamount to banning unmet need).
- 5.2.10. It is paragraph 146 of the 2024 NPPF that is most consequential for Hertsmere given that Green Belt is a primary constraint (see discussion in Section 2). Specifically, paragraph 146 states that where there are exceptional circumstances to warrant the release of Green Belt through a Local Plan (which is the case for Hertsmere):
- "... authorities should review Green Belt boundaries... and propose alterations to meet [housing] needs **in full**, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan."*
- 5.2.11. Having to demonstrate that the effect of growth will be to "fundamentally undermine" the Green Belt "across the plan area" clearly amounts to setting a high bar. However, this paragraph must be read in the context of the NPPF as a whole (as well as the PPG, e.g. see the quote presented above). In this light, there remains at least the theoretical potential to evidence and ultimately justify a housing requirement set below LHN, if it can be demonstrated that the adverse impacts of setting the housing requirement at LHN would significantly and demonstrably outweigh the benefits.

- 5.2.12. Also, a further consideration is that any local plan must only ever commit to a housing requirement that is deliverable, because failing to deliver means that the local plan is judged out-to-date (such that the presumption in favour of sustainable development applies), and there are concerns regarding delivering 970 dpa, which would involve in more than quadrupling recent rates of delivery. It is recognised that an up-to-date local plan is an opportunity to support a step-change in delivery; also, it is recognised that there can be flexibility for a 'stepped' housing requirement whereby the housing requirement is lower in the early years of the plan and then commensurately higher in the latter years (to allow strategic allocations time to deliver); however, overall there is a high level delivery concern that must factor in (ahead of further detailed work). Uncertainties around funding for infrastructure delivery must also factor in here.
- 5.2.13. To end, the following bullet points review a selection of recent adopted and emerging local plans that generate, or are considering generating, unmet housing need:
- Three Rivers – the Secretary of State recent intervened to require that additional allocations are added to the Local Plan in order to boost supply and, in turn, the housing requirement. However, the effect of the supply boost will be to allow the housing requirement to be set at around 85% of LHN.
 - Welwyn Hatfield – the plan is at an early stage of preparation, with a Draft Plan recently published under Regulation 18, but it is notable that the plan is proposing a “ten year approach to allocations” on the basis that supply for years 11 to 15 is a matter for a future local plan following LGR. Ultimately the plan identifies supply of 13,323 homes in the context of LHN standing at 15,960, which arguably amounts to generating unmet need although the Council would argue otherwise.
 - Hastings – the plan is at an early stage of preparation, with a Draft Plan recently published for consultation under Regulation 18, and this is a distinct context in that the plan area is mostly urbanised, i.e. such that there are few greenfield supply options. However, it is notable that the Secretary of State wrote to the Council in February 2026 stating a concern with the proposal to set the housing requirement at less than 27% of LHN and requiring further work to demonstrate no stone left unturned.¹⁶
 - Mole Valley – the Inspector’s Report (2024) found a housing requirement set at 82% LHN to be sound, explaining:
 - “... the Council sought to balance the LHN against... constraints.”
 - “[The requirement] is based on a thorough and robust assessment [of options].”
 - “[It] would be ambitious, almost doubling the target in the existing Plan.”
- 5.2.14. In **conclusion**, it is difficult to suggest a *high level* case for exploring growth scenarios that would involve a housing requirement below LHN, notwithstanding this having been the proposed approach in 2024 (when LHN was lower). However, a final decision can only be made after having explored supply options (below). The deliverability challenge is clear, but this might be addressed by a stepped requirement.

Is it reasonable to explore a housing requirement above LHN?

- 5.2.15. In short, the answer is “yes” in light of NPPF para 67 which states:
- “The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”*
- 5.2.16. Specifically, whilst there is no case for exploring growth scenarios involving a housing requirement set above LHN on the basis of “growth ambitions” there is a clear case on the basis of existing or potential unmet housing need within the sub-region, notably:

¹⁶ Along and in proximity to the South Coast there are numerous other adopted and emerging local plans that generate or are proposing to generate unmet need, although most are able to point to either clear land supply limitations due being a heavily urbanised local authority or ‘headline’ constraints including in terms of a National Park, a National Landscape or a clear risk of impacts to an internationally designated biodiversity site. Reviews of plans generating or at risk of generating unmet housing need across Hampshire and Sussex were recently presented in Section 5.2 of reports prepared for Lewes and New Forest.

- Three Rivers – as discussed it appears likely that the emerging Local Plan will generate unmet need, although potentially quite a modest amount. The 85% figure quoted above is on the basis of standard method LHN as it stood in 2025, but the new standard method figure releases in March 2026 is 8% lower. However, on the other hand, the 85% figure appears to be on the basis of an assumption that the housing requirement will be set precisely in line with identified supply, whilst in practice any local plan must consider the possibility of a housing requirement set below supply such that there is a supply ‘headroom’ as a contingency for delivery issues, i.e. to ensure that the housing requirement is delivered in practice such that the local plan remains ‘up to date’ and ‘the presumption in favour of sustainable development’ is avoided.
- Welwyn Hatfield – as discussed, the recent Draft Local Plan arguably generates unmet need, but the Council would argue that it does not (because the shortfall in supply will be provided for in due course by a new local plan following LGR).
- Dacorum – the submitted Local Plan arguably generates unmet need (page 44 of the [SA Report](#)) but the latest situation is that the plan will likely not generate unmet need.
- St Albans – the submitted Local Plan provides for housing in full over the plan period but on the basis of a heavily stepped requirement, such that the housing requirement is set below LHN over the early years of the plan period. In turn, the plan is likely to be adopted with a requirement to immediately commence production of a new local plan. To be clear, the submitted St Albans Local Plan does not generate unmet need, but the possibility of the next local plan generating unmet need cannot be discounted.
- Watford and Broxbourne – are two quite heavily urbanised local authorities where the adopted local plans provide for LHN in full, but delivery is proving challenging and there is a risk that the forthcoming local plans could generate unmet need.
- London – the new London Plan will need to account for an LHN figure of 84,200 dpa whilst the current London Plan makes provision for 52,000 dpa (it was prepared on the understanding that LHN was 66,000, i.e. such that it generated unmet need) and, in practice, delivery has been far lower than this over recent years, with 5,891 housing ‘starts’ in 2025. A consultation document committed to providing for housing needs in full through the New London Plan but was non-committal on whether this would be within London or, alternatively, whether London’s housing needs will be met partly within surrounding local authorities (in contrast to the situation with the adopted London Plan, which is one whereby none of the unmet need has been provided for).

5.2.17. Having discussed unmet need, the other key argument to be made for a housing requirement set above LHN relates to affordable housing need, in light of the PPG explaining that a housing requirement set above LHN “*may need to be considered where it could help deliver the required number of affordable homes*”. As discussed in Section 2, under a scenario whereby the housing requirement is set at LHN only a small proportion of affordable housing needs will be provided for, hence there is an ‘affordable housing’ case to be made for a housing requirement set above LHN.¹⁷

5.2.18. In **conclusion**, there is a *high level* case for exploring growth scenarios that would involve a housing requirement above LHN. However, a final decision can only be made after having given detailed consideration to supply options (below).

Conclusion on growth quanta

5.2.19. This section has introduced LHN and *high-level* arguments for a housing requirement set either above or below LHN. There are arguments to be made either way, such that a pragmatic response may simply be to set the housing requirement *at* LHN. This could help to expedite progress of the Local Plan to adoption, which is an important objective.

5.2.20. Finally, it is important to note that whatever requirement is set there may be a need for a supply that is higher (‘headroom’), at least in the early years of the plan period.

¹⁷ This assumes a continuation of the current situation whereby virtually all affordable housing is delivered by market led schemes and at a rate of 0 to 50% depending on site-specific viability considerations.

Broad spatial strategy

- 5.2.21. This is the second of two sections exploring top down strategic factors with a bearing on defining RA growth scenarios. Specifically, this section is an opportunity to discuss 'broad strategy' issues and options largely unincumbered by knowledge of site options.
- 5.2.22. Whilst it can be appropriate to undertake detailed work to explore broad spatial strategy issues and options, in the Hertsmere context, and the current stage of a plan-making process that stretches back to 2017, detailed work of this nature is not called for.
- 5.2.23. Formal work to explore five broad spatial strategy options was undertaken in 2017/18 (and then the Draft Plan consultations in 2021 and 2023 also provided an opportunity for stakeholders to comment on broad spatial strategy). However, at this stage it is clear that the scale of the task in terms of providing for LHN (and recalling limited strategic case to be made for a housing requirement set below LHN, as discussed) is such that:
- There is a need to deliver considerable growth at the four **higher order settlements**, both through urban intensification and urban expansion. Focusing on the latter, there is a need for a balance between **strategic sites** well suited to delivering infrastructure alongside new homes and **smaller sites** with strong delivery and viability credentials.
 - There remains a question-mark regarding whether to support a new settlement at **Bowmans Cross** (the only new settlement option), but there is arguably a strong case to be made in light of: A) repeated consultation on this option since 2017/18; and B) the new strategic context in respect of housing needs.
 - There remains a question-mark regarding whether to allocate growth at the **villages** over-and-above the growth that is already set to come forward at sites with planning permission. In particular, attention focuses on the possibility of modest-sized allocations at one or more of these villages, with none being associated with a clear opportunity for transformative growth. On the one hand, the new strategic context in respect of housing needs suggests a need to consider modest allocations at villages, which will tend to benefit from strong viability and deliverability credentials. However, on the other hand, there is now a considerably stronger focus within the NPPF (2024) on taking a 'vision-led' approach to growth in transport terms, which can serve as an argument against village growth.¹⁸ Finally, it can be noted that village allocations were previously proposed in both 2021 and 2024, but that was in a different context in that: A) sites have since gained permission; and B) there is now a move away from the 'dispersal' strategy that influenced the proposed approach in 2024.
- 5.2.24. Having made these introductory remarks, the remainder of this section presents a review of the spatial strategy discussion presented within the current plan consultation document. The aim is to highlight: A) aspects of the emerging strategy that are relatively firmly justified at this point in the process; and B) aspects that remain more open for debate such that they might be explored as a variable across the RA growth scenarios.

Review of the emerging preferred spatial strategy

- 5.2.25. The discussion within the current consultation document begins by introducing the **settlement hierarchy**, which has already been introduced in this report (Section 2).
- 5.2.26. In short, there is a clear strategic case to be made for distributing growth broadly in line with the hierarchy (other than in respect of a new settlement), i.e. there is limited case for directing distinctly high or distinctly low growth to any of the settlements. This is not to say that there are not important discussions to be had regarding the broad scale of growth that is appropriate for each of the settlements (see discussion below), but there are few 'headline' factors to highlight at this point in the discussion.

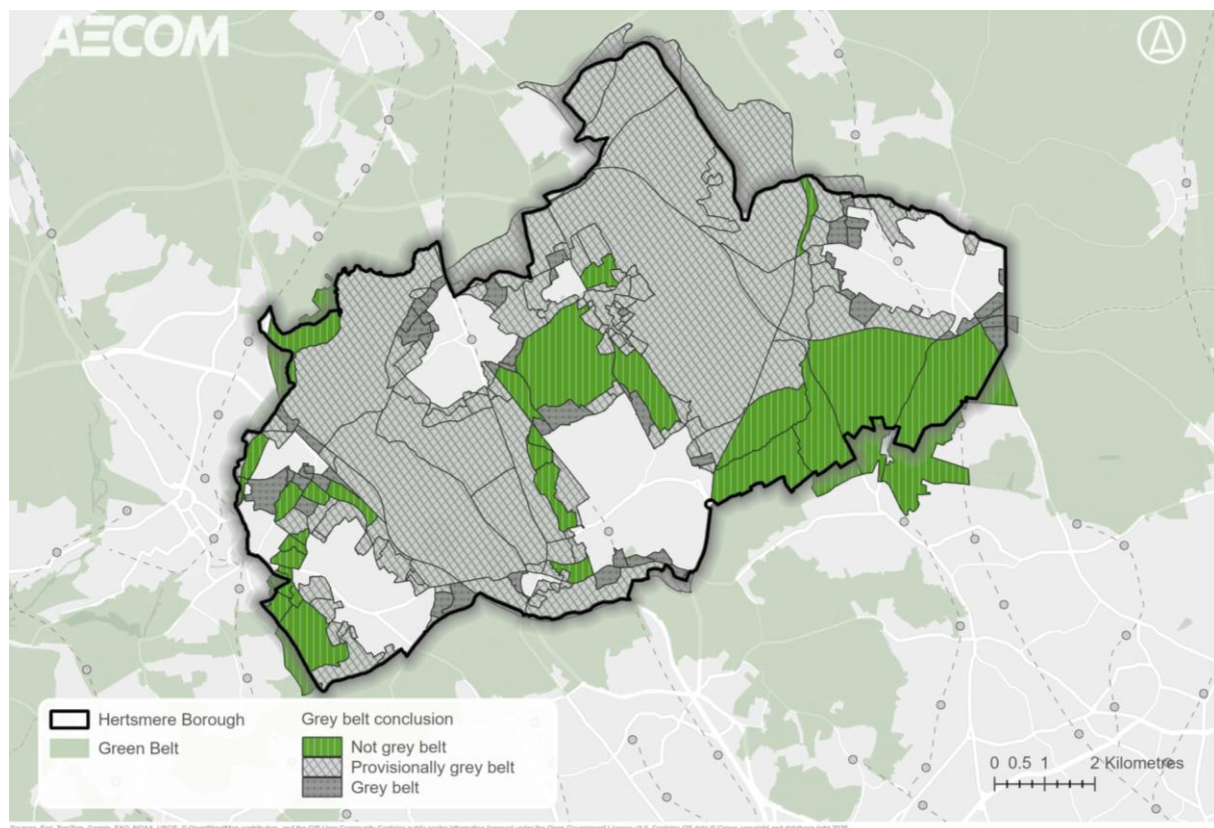
¹⁸ There are also several other smaller villages, but none are considered suited to a local plan allocation. These villages are washed over by the Green Belt, but small sites to meet local needs could come forward as windfall 'exception sites', plus the new national policy on grey belt increases the potential for windfall sites where "a sustainable location" can be demonstrated.

5.2.27. The discussion then goes on to discuss the **Green Belt** constraint in the context of:

- Grey belt – the Green Belt Assessment (GBA, 2026) identifies extensive grey belt and ‘provisional grey belt’ on the basis of work to examine parcels in isolation (Figure 5.2).
- Areas of fundamental importance – taking a step back, there are several areas where development of parcels in combination could risk ‘fundamentally undermining’ a strategic sector of the Green Belt, and potentially the Hertsmere Green Belt.
- The NPPF – is clear that: 1) local plans should direct growth to grey belt ahead of Green Belt; 2) for decision-making purposes development of grey belt sites is not inappropriate development in the Green Belt provided certain criteria are met (including in respect of a ‘sustainable location’ and alignment with ‘golden rules’); and 3) a key question, as discussed, is whether the effect of growth will “*fundamentally undermine the... remaining Green Belt... across the area of the plan.*”

N.B. ‘provisional grey’ belt’ is the conclusion reached for parcels that are grey belt pending further detailed consideration of NPPF footnote 7 constraints (most notably historic environment and flood risk constraints). In practice, a considerable proportion of the identified provisional grey belt will be grey belt following detailed investigation, and it can also be noted that the Draft NPPF (2025) proposes to remove NPPF footnote 7 constraints as a factor with a bearing on the identification of grey belt, such that all of the provisional grey belt may become grey belt for decision-making purposes once the new NPPF is adopted. However, the 2024 version of the NPPF applies for plan-making purposes providing that the Local Plan is submitted for examination by December 2026.

Figure 5.2: Identified grey belt and provisional grey belt



5.2.28. The next matter discussed is then **infrastructure**, as follows:

“Connections to infrastructure networks have informed consideration on an appropriate spatial strategy. This being particularly relevant in terms of access to sustainable travel networks – with connections to higher Tier centres to the North and South (particularly London). Access to the strategic highway network... is a parallel consideration – particularly in terms of [employment uses]. Potential connectivity to [Local Cycling and Walking Infrastructure Plan, LCWIP] investment is also a consideration.

Equally, many parts of the Borough, especially those places outside of the four main settlements, experience relatively poor levels of accessibility to key infrastructure networks. This is particularly the case in respect of access to sustainable travel networks. Consequently, much of the Borough, outside of the four main towns, provides limited scope for genuinely sustainable place-making.

The Council continues to work positively with infrastructure partners and the development industry to ensure that the proposals that will deliver the planned-for growth will be supported by a proportionate investment in necessary infrastructure networks... this will be evidenced through statement of common ground... technical evidence (such as transport modelling), and the infrastructure delivery plan..."

- 5.2.29. There is no doubt that the spatial strategy must be infrastructure-led, in so far as possible (in the context of competing objectives), both in terms of: A) distributing growth (between settlements and between specific locations), in line with infrastructure issues and opportunities; and B) supporting strategic growth locations (including clusters of sites) well suited to delivering new or upgraded infrastructure alongside new homes.
- 5.2.30. However, the reality is that strategic planning for infrastructure alongside planning for housing growth is highly challenging, and work is ongoing at the current time.
- 5.2.31. A key source of evidence to report here is the summary of “main topics” set out in the response received from the County Council through the Draft Local Plan consultation in 2024, recognising that the plan undoubtedly now needs to deliver much higher growth than was the proposal in 2024 (likely around twice as much, as discussed).

Table 5.1: Commentary on the main topics raised by HCC’s consultation response in 2024

| Main topic raised by HCC | Commentary |
|--|--|
| Identify an appropriate secondary school site to serve the west of the district in a sustainable location. | This is a key issue including because there is now set to be much higher growth in both Hertsmere and Three Rivers relative to what was assumed by HCC in 2024. Importantly, Three Rivers now proposes a new secondary at Carpenders Park. |
| Ensure that the identified school site in Borehamwood is deliverable in the proposed policy framework. | A potential site for a new secondary school at the southeast edge of Borehamwood (south of Barnett Lane, west of Stirling Corner) was identified in 2021, but by 2024 it was not clear that it was required given the proposed lower growth strategy. There is also a need to consider the possibility of a new secondary school at Bushey and/or Radlett, as discussed here . |
| Identify and set out a borough wide transport strategy required to help mitigate the transport impacts of local plan development on the transport network across the Borough. | A Transport Study (2023) presented a range of key information regarding key issues and opportunities assuming a spatial strategy / quantum of growth in line with that previously consulted on in 2021, including with a major focus on connectivity by rail, bus and walking/cycling. This is a key source of evidence, and the study is discussed further below, in Section 5.4. A further Transport Study is now underway and a Draft LCWIP is now out for consultation . |
| Identify and set out site-specific transport measures to mitigate the highway impacts of the development at Bowmans Cross . | HCC does not object in principle to a new settlement at Bowmans Cross, although St Albans District has consistently objected. A key point to note is that only around 500 homes would deliver in plan period to 2043 (of circa 3,500 to 7,500 homes in total), such that detailed infrastructure planning would be an ongoing process. |
| Maintain ongoing and collaborative working to resolve the above matters in a timely manner. | The shifting strategy over time has clearly created challenges for strategic infrastructure planning, such that what is needed now a need to provide certainty to partner organisations in respect of growth quantum and locations. Ongoing ‘speculative’ planning applications creates a clear challenge in this regard. |

5.2.32. The spatial strategy discussion in the plan document then goes on to explain:

*“The spatial strategy envisages that most growth, specifically during the first five-years of the plan period distributed to the Borough’s two higher order settlements, with a focus upon intensification through urban regeneration. For clarity, the Borough’s two high order settlements are **Borehamwood and Potters Bar.**”*

5.2.33. This approach is considered to be strongly justified, including on the basis of repeated consultation and appraisal work over recent years. Breaking this down:

- Regeneration and intensification – there is an established strategic opportunity to deliver a major step-change in housing supply from within both Borehamwood and Potters Bar, with detailed work having been completed since the Council announced this as a key priority for the new Local Plan in 2025, including with the leader of the Council stating: *“We are proposing to meet the growth challenge through massive investment in our major town centres in Borehamwood and Potters Bar. This is a once-in-a-generation opportunity to drive prosperity, employment and investment in our borough. Work to set out the outline economic case is already well under way.”*

A consultation was held in 2026 on emerging visions for both towns (see the summary exhibition boards here) and detailed work remains ongoing, including working closely with landowners to understand their views on redevelopment, including from a timing perspective. It is beyond the scope of this Local Plan SA process to explore alternative approaches to regeneration / intensification within either town; however, what is crucial is that a realistic understanding of delivery risks and viability challenges feeds into work to define the RA growth scenarios (see further discussion in Section 5.5).

This is crucial because: A) at the local plan stage it is difficult to foresee how complex urban sites will ultimately come forward for redevelopment, often many years down the line, including in terms of density (including but not limited to building heights) and use mix; B) viability challenges mean that urban sites often struggle to deliver the full policy quota of affordable housing and it is not unusual for such sites to deliver no affordable housing at all; and C) urban sites tend strongly to be associated with delivery risk including given complex land ownership and existing viable uses, and the Local Plan as a whole must not be adopted with undue delivery risk given the importance of a Local Plan that remains ‘up to date’ in order to avoid the presumption of favour of sustainable development being in force (as it has been over recent years).

- Greenfield expansion – Borehamwood is associated with a more readily apparent growth opportunity in terms of its local offer and connectivity, including close links to both London and Watford, but there are also opportunities for strategic expansion of Potters Bar, including with a view to comprehensive planning for land between the town and motorways. At both towns a number of important sites have recently gained planning permission, and others are the subject of live applications (being considered under the presumption in favour of sustainable development), but at both towns there are key strategic choices to be made in respect of expansion through the Local Plan.

5.2.34. Moving on to **Bushey** and **Radlett**, the spatial strategy discussion explains:

“The Strategy considers that the Borough’s remaining two settlements, Radlett and Bushey would take a lesser level of growth – in the form of smaller scale urban extensions and intensification through windfall and infill development. This would reflect the typologies found within those settlements – low density and high value properties arrayed in a suburban/ commuter-belt townscape – and their limited range of main town centre uses and community facilities...”

5.2.35. Bushey is arguably associated with the more readily apparent strategic growth opportunity, given its close links to Watford and London, and there is a case to be made for comprehensive large scale expansion in order to deliver a secondary school, new strategic transport links and wider infrastructure, and to secure a long term settlement in terms of Green Belt gaps. However, given the available site options it is not clear that this is a realistic option for the current Local Plan, given available site options.

- 5.2.36. Radlett is a more rural settlement with a significantly lower local offer but does benefit from a clearly recognisable local centre (whilst Bushey has two smaller centres). Given the available site options, and wider factors discussed further below (Section 5.4), a key consideration for the Local Plan is strategic expansion to the west and, as part of this: A) there is a need to consider secondary school capacity and the possibility of focused growth to deliver a new secondary school; and B) there is a need to avoid piecemeal expansion that risks being sub-optimal in terms of securing benefits, and risks sprawl.
- 5.2.37. The strategy discussion in the plan document then goes on to discuss the option of a new settlement at **Bowmans Cross**. This has already been introduced above and is discussed further below (Section 5.4). Key points to make here are:
- This new settlement option has been consulted on repeatedly over recent years.
 - HCC does not object, but St Albans District Council (SADC) does strongly object noting that the new settlement would link closely to London Colney in SADC, plus the Environment Agency has concerns given a range of existing minerals and waste uses.
 - Much of the site is degraded land due to existing and past minerals and waste uses.
 - There are environmental sensitivities, with a key woodland network adjacent to the east (including Rodwell Wood SSSI) and the River Colne corridor to the north.
 - The site promoters currently propose ~5,000 homes to include a range of other uses including a secondary school, but there is a need to consider a higher density scheme to deliver a town centre and significant employment land, e.g. 7,500 homes.
 - The site is arguably well contained in Green Belt / landscape terms, with the River Colne to the north, rising land and woodlands to the east and the M25 to the west.
 - Major strategic transport upgrades and an overall vision-led approach to transport planning is fundamentally important, but there is a need to recognise that the site will deliver over the very long term, such that detailed plans would evolve over time (albeit allocation requires a level of confidence in respect of achievability/deliverability).
 - Detailed work has been completed by the site promoters who envisage a planning application in 2026 (under the presumption in favour of sustainable development).¹⁹
 - The current assumption is that only around 500 homes would be delivered in the plan period. The figure could potentially be higher, but there is no confidence at this stage, and it is important to reflect suitably conservative delivery assumptions.
- 5.2.38. The spatial strategy discussion ends by discussing the **smaller settlements**:
- “The Strategy considers the remainder of the Borough – specifically the smaller rural settlements (such as Shenley) – as being inappropriate and unsustainable locations for growth/ place-making during the plan period. The strategy explicitly seeks to protect these places from inappropriate levels of growth... The possible exceptions to this approach could be single infill dwellings, delivered as self or custom build housing; and/ or rural exceptions sites that deliver affordable housing that meets specific local needs. Major housing proposals (ten or more units) will be strongly resisted. This is specifically the case with specialised forms of housing – elderly person accommodation and co-living – which must be located within existing urban areas...”*
- 5.2.39. Attention focuses on the three larger villages (as discussed), each of which benefits from a village primary school, and key considerations include:
- Shenley – is the largest of the three villages but there is significant committed growth and there a constraints including in terms of landscape (see the Landscape Sensitivity Study, 2020) and the historic environment (with an extensive conservation area).

¹⁹ Clearly new settlements should ideally be allocated through a Local Plan; however, ‘speculative’ planning applications for new settlements are not unusual nationally given the number of out-of-date Local Plans. For example, in Swale Borough in Kent there are currently four pending ‘speculative’ planning applications for new settlements including one for ~10,000 homes.

- Elstree Village – is a smaller village but benefits from good access to higher order settlements and strategic employment areas. Landscape and historic environment constraints are similar to Shenley, and again there is significant committed growth.
- South Mimms – is a small village that is washed over by the Green Belt and where there is no committed growth. Virtually all land surrounding the village has been promoted as available for development, and the possibility growth might be envisaged to consolidate the village and add to the local offer (with the village then inset from the Green Belt) with careful consideration given to the extensive conservation area at the heart of which is a prominent Grade 1 listed church. However, an important consideration is that Bowmans Cross is located a short distance to the north, and a new settlement here would need to link to Potters Bar via South Mimms.

Conclusion

- 5.2.40. This section has presented a *targeted* review of broad spatial strategy factors that feed into work to define RA growth scenarios. The factors discussed in this section input to and serve to frame the discussion of settlement-specific growth scenarios in Section 5.4.
- 5.2.41. It is important to emphasise that this section does not aim to be comprehensive, with the potential to explore numerous factors in more detail, including informed by: A) detailed studies completed over recent years (e.g. the Landscape Sensitivity Study (2020) and the Transport Study (2023) and the Baseline Infrastructure Capacity Report Sept (2021)); B) key messages received through recent consultations; and C) new evidence including the Draft LCWIP and the Government's Connectivity Tool. Broad spatial strategy considerations are explored further below within Section 5.4 and then through the appraisal in Part 2, and comments are welcomed through the current consultation.

Conclusion on strategic factors

- 5.2.42. This section has considered growth quantum and broad spatial strategy with a view to establishing the key strategic factors that act as a top down influence on work to define RA growth scenarios in Section 5.5. It serves to highlight that there are potentially a range of importance choices, although choices narrow following consideration of available site options and settlement-specific growth scenarios.

5.3. Site options

Introduction

- 5.3.1. Having discussed 'top down' strategic factors with a bearing on defining growth scenarios, the next step is to give 'bottom up' consideration to the available site options.

HELAA

- 5.3.2. The Housing and Economic Land Availability Assessment (HELAA) is a prescribed process for identifying a shortlist of sites for potential allocation where each site is 'available', 'achievable' and 'suitable'. Sites that feature within the shortlist are discussed further below simply as '**HELAA sites**'.
- 5.3.3. A key point to note is that the total capacity of these sites exceeds the number of homes that might need to be provided for through the Local Plan under any reasonable scenario. As such, there are significant choices to be made in respect of site selection. However, choice is limited at some settlements, given the strategic context.
- 5.3.4. Further considerations in respect of the HELAA sites are as follows:
- Availability and achievability – work to establish availability and achievability through the HELAA is high level and for some complex urban sites it may transpire that there is insufficient confidence that sites will deliver in the plan period, or that there is only confidence of delivery late in the plan period, or that they can be allocated but with an acknowledged delivery risk, which then must factor-in (discussed further below).

- Suitability – work to reach a conclusion of ‘suitable’ through the HELAA is high level, and a key task for any local plan is to consider whether there are sites that are insufficiently suitable to warrant allocation given better performing sites that in combination will deliver on strategic objectives. Also, work through the HELAA strictly considers site options in isolation, whilst it is the role of a local plan to consider issues / impacts and opportunities associated with allocating sites in combination.
- Planning permissions – numerous of the HELAA sites have planning permission, as explained further below in Section 5.4.
- Live and forthcoming applications – a number of sites are the subject of a live planning application, sometimes with it being the case that permission has recently been refused and there is now a forthcoming appeal (or an appeal is likely). Also, for several sites it is known that there will likely be a planning application submitted in 2026, such that the site might be ‘decided’ ahead of the Local Plan (under the presumption in favour of sustainable development given an out-of-date Local Plan).

These are important considerations for the Local Plan, for two reasons. Firstly, where a planning application is well-advanced there can often be confidence that the site will deliver relatively early in the plan period, which is a key consideration because there must be a five year housing land supply at the point of plan adoption and it is in the Council’s interest to ensure a five year housing land supply will be maintained over the early years of the plan period ahead of a new local plan. Secondly, the reality of sites potentially gaining planning permission is an important pragmatic consideration, because sites unexpectedly gaining permission can have the effect of creating issues for progressing the Local Plan, e.g. in terms of infrastructure planning. Sites unexpectedly gaining permission can lead to arguments to ‘de-allocate’ other sites.

- Previous draft allocations – numerous sites were a draft allocation in 2021 and/or 2024, and this is an important consideration at the current time, including because stakeholders and the public have been provided with a clear opportunity to comment. Where a site was previously proposed for allocation in the context of a lower housing growth strategy there is now a clear case for allocation given the new strategic context.

Other workstreams

- 5.3.5. There are numerous wider workstreams that are examining the merits of individual site options, and these have fed into work to explore site options and settlement growth scenarios in Section 5.4 as far as possible. However, there are inevitably some limitations given work streams being progressed in parallel, which serves to highlight the importance of further work to reconsider site options following the current consultation.
- 5.3.6. Also, it can be noted that whilst SA work in the past has involved a focus on appraising the merits of individual site options, at this stage it was determined that there was insufficient value to be added by formally revisiting work of this nature. Matters can be revisited at the next stage, and for example work might be undertaken to appraise competing large-scale strategic site options and/or options for one of more such sites.

Non-housing site options

- 5.3.7. With regards to employment land, there are sites with planning permission sufficient to provide for established needs, although on site at Potters Bar requires discussion. With regards to Gypsies and Traveller sites, this will be a matter to revisit at the next stage.

Conclusion on site options

- 5.3.8. Some of the ‘candidate sites’ that are a focus of the current consultation are clearly associated with a strong case for allocation at this point in the process, indeed a number have planning permission. However, there are also several where the case for allocation is less clear cut, and these must be a focus. Additionally, there is a need to consider select ‘omission sites’ where there is a case to be made for allocation.

5.4. Settlement scenarios

Introduction

- 5.4.1. Discussion has so far focused on A) ‘top down’ consideration of strategic factors (growth quantum and broad spatial strategy); and B) ‘bottom-up’ consideration of site options.
- 5.4.2. The next step is to explore alternative ways of allocating sites in combination (‘growth scenarios’) in order to deliver on strategic objectives (avoid issues / maximise benefits).
- 5.4.3. In practice, it is logical to consider growth scenarios for each of the settlements in turn, followed by a discussion of options in respect of a new settlement at Bowmans Cross.
- 5.4.4. For context, there is merit to planning at the settlement scale because objectives are often established at this scale which can then usefully feed into work to progress / rule out site options and define growth scenarios. For example, a site options might perform well when viewed in the context of other sites at the borough-scale, but when viewed at the settlement scale it might be found that there are preferable sites that would deliver on objectives, such that the site can be ruled out. Vice versa, a site might perform poorly when viewed through a borough-wide lens but better when viewed through a settlement lens because in combination with other sites it will deliver on objectives.

Methodology

- 5.4.5. For each settlement the aim is to draw together the ‘top down’ and ‘bottom up’ inputs discussed above before concluding on scenarios to take forward to Section 5.5, where the aim is to combine settlement scenarios to form borough-wide RA growth scenarios.
- 5.4.6. Site options are discussed in a broad order of preference with attention focusing on those sites where the question of allocation versus omission site is more marginal. In turn, the aim is *not* to focus discussion on ‘candidate sites’ where the case for allocation is relatively clear cut (e.g. because the site has planning permission), nor those omission sites where there is not considered to be a strong case for allocation.
- 5.4.7. It is important to note that the aim is not to present a formal appraisal, but rather to contribute to “an outline of the reasons for selecting” the RA growth scenarios ultimately defined in Section 5.5 and then subjected to appraisal in Section 7.

‘Candidate sites’

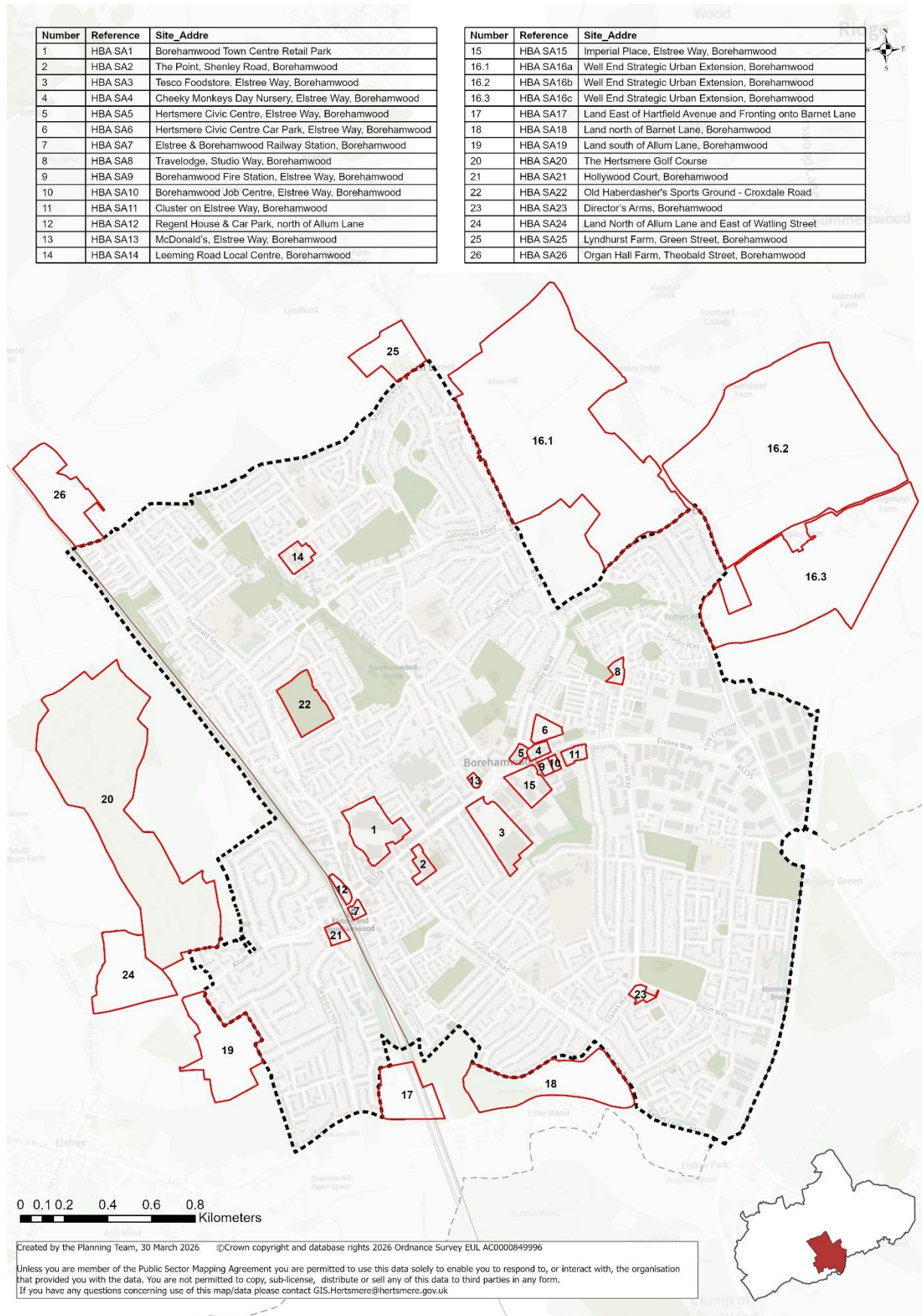
- 5.4.8. Each of the settlement specific discussions begins by discussing the ‘candidate sites’ that feature in the current consultation document, before moving on to discuss other HELAA sites that are not candidate sites.
- 5.4.9. The terminology of candidate sites is used within the consultation document to emphasise the point that the current consultation is held under Regulation 18 such that no final decisions have been made regarding which sites will feature in the final plan that is published (Regulation 19) and then submitted (Regulation 22) in due course.
- 5.4.10. However, for the purposes of defining RA growth scenarios it is appropriate to refer to the candidate sites as ‘**preferred sites**’ and other sites as ‘**omission sites**’.

Borehamwood

- 5.4.11. Borehamwood is the primary settlement in the Borough such that it warrants being a primary focus of growth, plus there are growth opportunities relating to: town centre regeneration; very good transport connectivity; a highly strategic employment land offer particularly relating to the film and television industry (with significant recent investment); and close links to Watford and the London Boroughs where growth is challenging.
- 5.4.12. Headline constraints to growth are fairly limited, with perhaps the primary consideration being the sensitive and potentially fragile Green Belt gap to Radlett, to the north. Otherwise it is infrastructure capacity that is the key constraint to growth, in terms of:

- secondary school capacity, as discussed above, with a potential new site for a school previously having been identified at the south east edge of the town;
 - road and junction capacity, particularly on the strategic road network, including recognising that the M1 is reached via Elstree Village and the M25 via a constrained junction onto the A1 (also in combination impacts on M25 Junction 1); and
 - walking and cycling infrastructure, including noting that key options for strategic growth are to the north and north east ~3km distant from the railway station to the south west.
- 5.4.13. The emerging preferred approach is to allocate 18 **urban sites** for a total of ~2,100 homes and none of these sites have planning permission. This reflects an ambitious strategy of town centre regeneration and wider urban intensification, and there will be a need to revisit sites, site capacities, use mix and design matters (etc) at the next stage, informed by the current consultation (including responses received from landowners), the ongoing visioning work (discussed above) and wider ongoing work streams.
- 5.4.14. The seven largest sites have a combined capacity ~1,600 homes and most are associated with a good degree of confidence regarding deliverability, although flood risk will require further detailed consideration at a number of sites. The only clear issue is in respect of a site for 95 homes (Site 22; Old Haberdasher's Sports Ground, Croxdale Road) which is valued urban green space / sports pitches notwithstanding the sports club that currently occupies the site wishes to vacate (there was previously an application for 170 homes in 2016 although this was subsequently withdrawn).
- 5.4.15. With regards to the remaining smaller sites, three more challenging sites are:
- Site 21 (Hollywood Court; 71 homes) – availability remains uncertain given numerous flat owners. The railway station is in very close proximity.
 - Site 14 (Leeming Road Local Centre; 71 homes) – this would involve redevelopment of Council-owned local centre but is likely to be achievable in the plan period.
 - Site 7 (Elstree & Borehamwood Railway Station; 43 homes) – there is a clear case for developing above the station, but this would be technically very challenging.
 - Site 13 (McDonald's, Elstree Way; 26 homes) – a locally listed building.
- 5.4.16. There are not known to be any urban 'omission sites' (i.e. sites reasonably in contention for allocation but not emerging preferred options) and there is no clear basis for questioning the emerging preferred approach (~2,100 homes), hence urban supply in Borehamwood can be progressed as a 'constant'. However, there is clearly an element of delivery risk at this stage, which must factor in (see Section 5.5).
- 5.4.17. Moving on to **Green Belt sites**, the emerging preferred approach involves allocation of ten sites for a total of ~5,850 homes, including three adjacent sites to the north east that collectively would deliver a 3,750 home strategic urban extension ('Well End').
- 5.4.18. A starting point is three preferred sites with planning permission, namely:
- Site 18 (Land North of Barnet Lane; 220 homes) – planning permission was granted at appeal in 2024 ([23/0937/OUT](#)). The western part of this site comprises the eastern part of Woodcock Hill Village Green Local Wildlife Site (discussed below).
 - Site 25 (Lyndhurst Farm, Green Street; 186 homes) – permitted in 2025.
 - Site 26 (Organ Hall Farm, Theobald Street; 110 homes) – permitted in 2024.
- 5.4.19. Also, Site 17 (Paddocks, Barnet Lane (west)) is a preferred site that is partly permitted for 74 homes ([23/0053/OUT](#)). The 'red line' boundary of the preferred site extends beyond the permitted site, but the proposal is nonetheless to deliver 74 homes, with the remaining part of the site a Local Wildlife Site (LWS), plus part of the LWS was recently designated as 'Woodcock Hill Village Green Replacement Land' to compensate for release of an area of the pre-existing Village Green. There is also the context of a live application for 98 homes at adjacent HELAA site 0511-2 ([25/1615/FUL](#)).

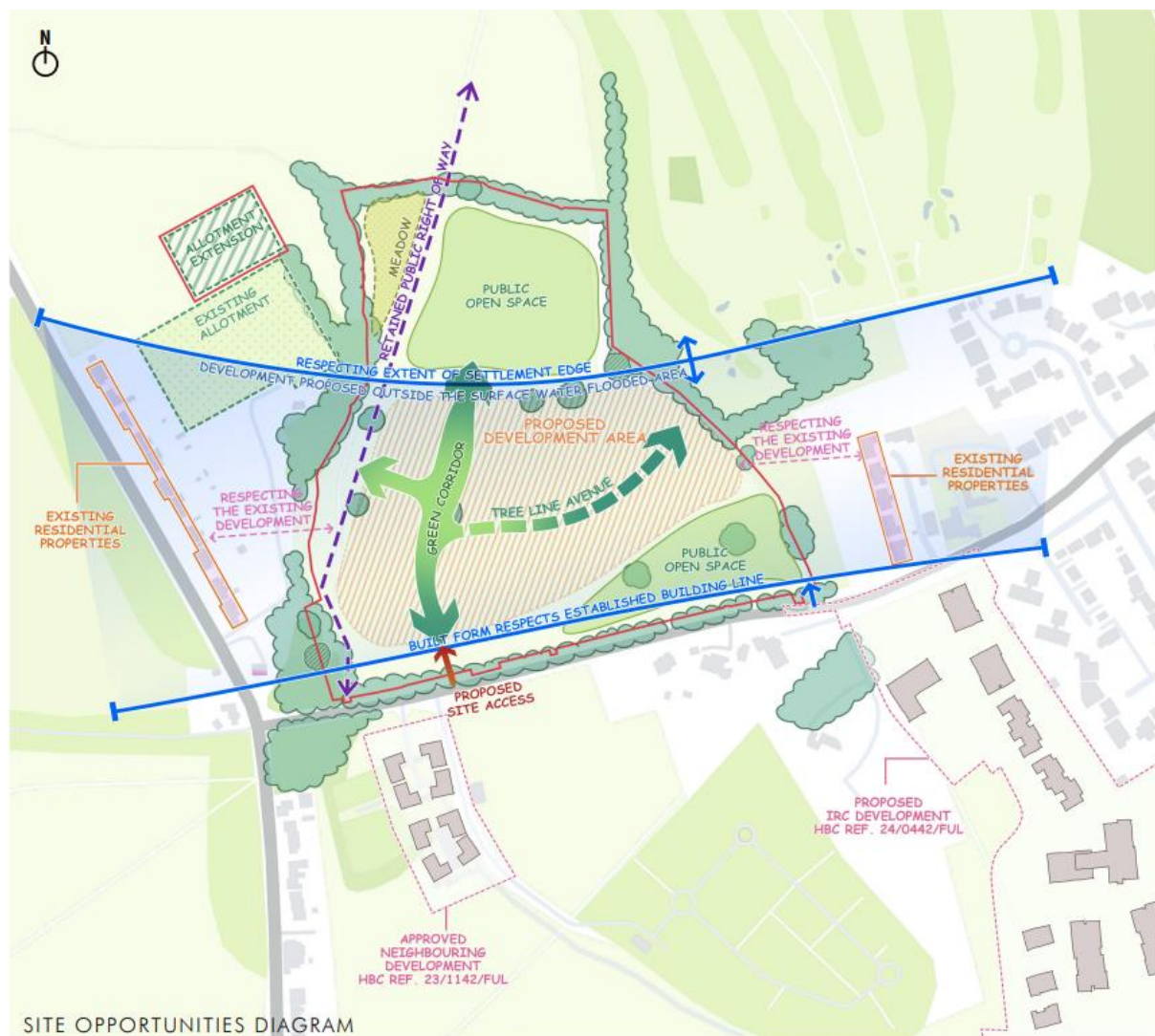
Figure 5.3: The emerging preferred approach – Borehamwood



5.4.20. Next there is a need to consider two near adjacent preferred sites with live planning applications located to the west of the town:

- Site 19 (Land South of Allum Lane; 241 homes) – the majority of the site is the subject of an application for 150 retirement homes ([24/0442/FUL](#)), and the proposal is also to relocate the existing Elstree Village GP surgery to the site, as discussed [here](#). However, there is a clear case for a larger scheme that extends south beyond the extent of the planning application site, with a view to a more comprehensive scheme. This is considered a strongly performing site, including as it is mostly well contained and benefits from proximity and good links to the train station and the town centre. However, there is a need to consider the landscape gap to Elstree Village.
- Site 24 (Land North of Allum Lane; 198 homes) – a planning application was recently submitted for 136 homes ([26/0318/OUT](#)), but the concern is that the proposed density would not make optimum use of the land (thereby increasing pressure for allocations elsewhere). A further consideration is that this site could warrant planning in conjunction with HBA SA20, which is discussed below. Overall this is a reasonably strongly performing site, including on the basis of proximity to the train station and as there is a good bus service, with a key issue being the need for comprehensive planning for the broad sector of land west of Borehamwood and east of Elstree Village.

Figure 5.4: Concept plan from the planning application for Site 24, also showing part of Site 19 (to the south east) and part of Site 20 (to the north east)



5.4.21. The final two preferred sites would deliver strategic urban extensions:

- Site 16 (i, ii, iii) (Well End Strategic Urban Extension; 3,750 homes) – located to the north east of Borehamwood, adjacent to the north of the permitted northern extension to Sky Studios. The western part of this site was previously a proposed allocation for 800 homes in 2021 (but it was not a proposed allocation in 2024, when the proposal was for a lower growth strategy with an element of dispersal), but it is now considered appropriate to consider the option of a comprehensive scheme to maximise the benefits of growth. There would be the potential to deliver a range of non-housing uses and benefits in terms of new and upgraded infrastructure, and there are few headline constraints to growth in this part of the Borough; however, constraints / challenges relate to: A) transport connectivity, given distance to the town centre and railway station and potentially limited capacity at the A1 junction to the south (including noting that it serves extensive existing and committed employment land); and B) a landscape that is associated with a degree of sensitivity, noting topography and the distribution of heritage assets, as well as a high density of historic field boundaries.

It will be important to consider the possibility of a reduced scheme that factors-in accessibility/connectivity challenges (albeit higher growth could deliver improvements) and draws upon topography and heritage assets for containment, albeit acknowledging that this would result in trade-offs in terms of delivering infrastructure etc. Finally, it is important to note that a large proportion of the site (specifically all bar the western part of the site that was previously proposed for allocation in 2021) has not been promoted as available (but there could be a reasonable prospect of it becoming available).

- Site 20 (The Hertsmere Golf Course; 1,073 homes) – in combination with adjacent site HBA SA24 (discussed above) this site could deliver reasonably comprehensive growth across a key area in proximity to the railway station and town centre (also tube stations to the south at Stanmore and Edgware), as well as along an important bus corridor (also a priority corridor for upgrade in the LCWIP, although the current proposal is only to deliver a new shared use path). Also, the site benefits from an adjacent large park.

However, access is challenging and this is particularly the case if access cannot be achieved via HBA SA24, and the risk is a scheme that does not relate well to the settlement, with the Green Belt Assessment (2026) finding the site to perform strongly in terms of preventing the sprawl of large built up areas (such that it is not grey belt). Further constraints relate to: A) mature trees reflecting current use as a golf course, many with a Tree Preservation Order (TPO); and B) the Watling Chase long distance path. It is noted that adjacent land to the west is in the same land ownership as HBA SA24 and so through negotiations there may be the potential for a combined scheme.

5.4.22. Finally, with regards to **omission sites**, key sites for consideration are as follows:

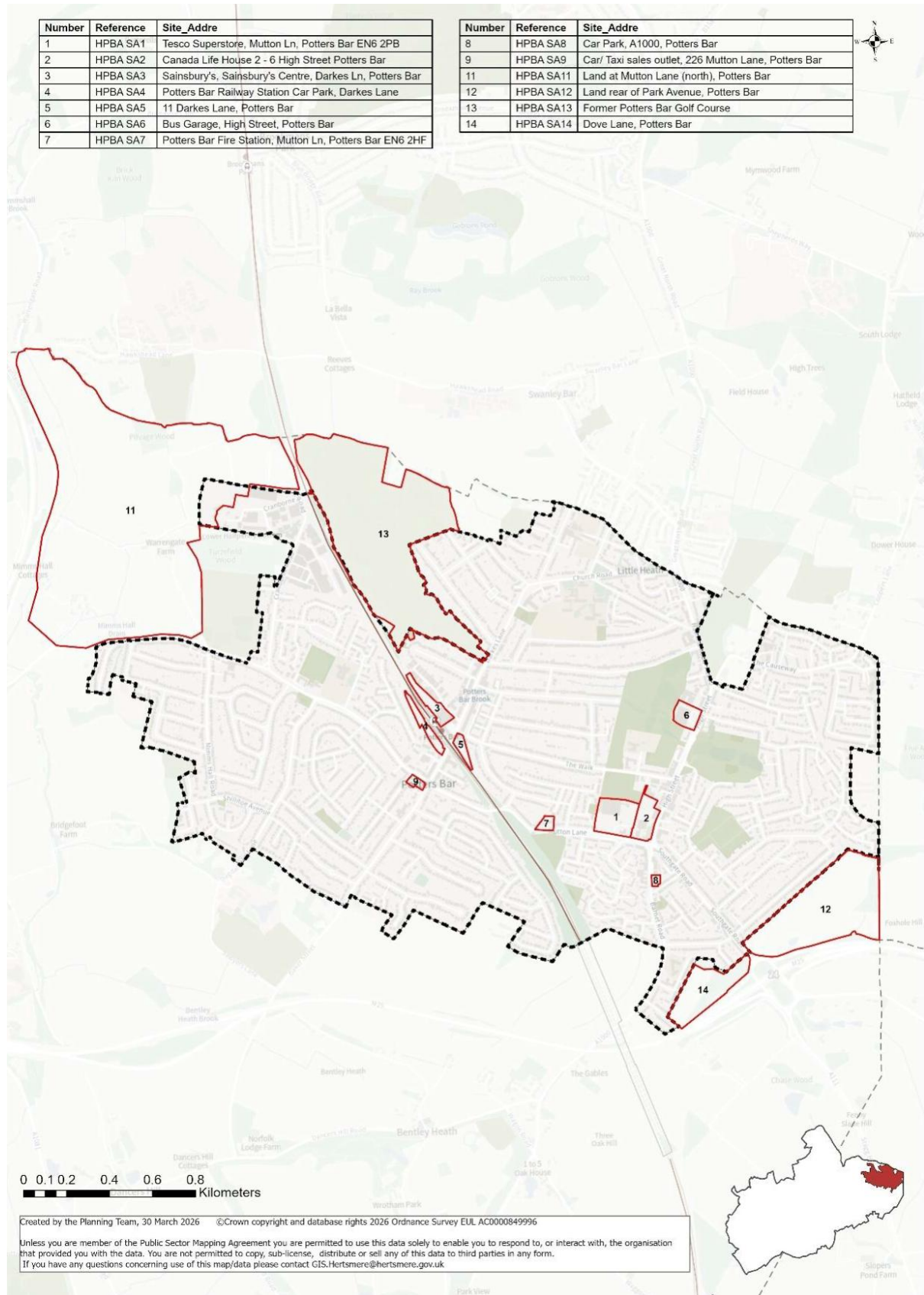
- North – HELAA site 359 is the subject of a live planning application for 292 homes (25/1713/OUT), but a key concern is part of a large LWS that constrains much of the northern edge of Borehamwood. Work through the planning application process may reach a conclusion that the LWS warrants de-designation because the land has been ploughed for arable cultivation (discussed here), but this is currently uncertain. There is also broadly a concern with piecemeal expansion along the western edge of Borehamwood (an adjacent site is under construction, namely preferred site HBA SA25); however, any such concerns would be allayed were there to be confidence that LWS to the west of the site still warrants designation and will remain designated.
- South – HELAA site 0511-2 has already been discussed above as currently being the subject of a live application for 98 homes. The site relates well to the settlement edge and is in relative proximity to the town centre and railway station, but there are sensitivities including relating to the former village green designation.
- South west – HELAA sites 341 and 506 could potentially be delivered in combination with the preferred sites HBA SA19 and HBA SA24 in order to deliver a comprehensive approach to growth in this broad area, with a view to maximising the benefits of growth and securing a long term defensible settlement gap to Elstree. However, there is no certainty regarding precisely what could be achieved at this stage.

- West – HELAA site 514 includes preferred site HBA SA20 but then also extends a considerable distance further to the north. Issues are: A) this is an LWS; B) there is significant flood risk; and C) extending HBA SA20 further to the north would certainly require a strategic transport solution given the adjacent railway line.
- 5.4.23. In **conclusion**, whilst it is difficult to suggest inherent concerns with the emerging preferred approach of 28 allocations to deliver a total of ~ 8,000 homes, there is considered to be a reasonable need to explore a lower growth alternative that would involve: A) deletion of Site 20; and B) a reduced scheme at Site 16 for ~2,000 homes.
- 5.4.24. Additionally, under the lower growth scenario it is considered reasonable to assume that there would be additional allocation of the two omission sites that are currently the subject of live planning applications, namely HELAA site 359 (292 homes) and HELAA site 0511-2 (98 homes) in order to avoid problematic low growth at Borehamwood.
- 5.4.25. As such, two settlement growth scenarios are progressed to Section 5.5:
- The emerging preferred approach = ~8,000 homes
 - An alternative scenario = ~5,650 homes

Potters Bar

- 5.4.26. Potters bar sits comfortably below Borehamwood in the settlement hierarchy, but nonetheless warrants being a key focus of growth, given the strategic context, plus there are settlement-specific growth opportunities relating to: town centre regeneration; good transport connectivity including a very good train service, frequent bus services to underground stations, and a National Cycle Network link (with an aspiration to link this to the town centre). Also, the previous Draft Plan consultation document (2024) explained:
- “There is also an older population in Potters Bar compared to the other main settlements, with a higher proportion of over 65 and a lower proportion of under 18s. The town has seen considerably less development over the past two decades than other urban areas in the borough.”*
- 5.4.27. Headline constraints to growth are fairly limited, and there is understood to be fewer issues with regards to secondary school capacity in this part of the Borough, but it is important to note two conservation areas located at the northern and southern edges of the town. Also, a broad strategic constraint relates to biodiversity designations, heritage designations and ancient woodlands in proximity to parts of the settlement edge.
- 5.4.28. Finally, a broad strategic consideration is the location of a proposed Government New Town at Crews Hill, to the south east of Potters Bar within LB Enfield (see location map [here](#)), with this also partly a proposed allocation within the Enfield Local Plan.
- 5.4.29. The emerging preferred approach is to allocate 9 **urban sites** for a total of ~2,100 homes, of which three have planning permission (525 homes). This reflects an ambitious strategy of town centre regeneration and wider urban intensification, and there will be a need to revisit sites, capacities etc. at the next stage to confirm deliverability.
- 5.4.30. Site 1 (Tesco Superstore, Mutton Ln) is a stand-out large site for 588 homes, and there is a good degree of confidence that the site is developable in the plan period, indeed the site is expected to start delivering in years 6 to 10 of the plan period.
- 5.4.31. With regards to the remaining urban sites, one challenging site is Site 6 (Bus garage, High Street), where further work is needed to investigate availability in the plan period. Another site of note comprises a fire station, but there is confidence in relocation.
- 5.4.32. There are not known to be any urban ‘omission sites’ and there is no clear basis for questioning the emerging preferred approach (2,100 homes), hence urban supply in Potters Bar can be progressed as a ‘constant’. However, there is inevitably an element of delivery risk at this stage, which must factor in (see Section 5.5).

Figure 5.5: The emerging preferred approach – Potters Bar



5.4.33. Moving on to **Green Belt sites**, the emerging preferred approach involves allocation of four sites for a total of ~2,600 homes, of which none are permitted, nor is it the case that any are the subject of a live planning application. Taking these sites in turn:

- Site 13 (Former Potters Bar Golf Course; 400 homes) – this site was proposed for allocation not only in 2021 but also in 2024. It benefits from excellent proximity to the railway station, but there are a range of onsite constraints, including a significant flood risk zone, an 'area TPO' (reflecting its former use as a golf course; the site is shown simply as farmland with a series of field boundaries on historic mapping) and an adjacent conservation area. The site capacity has been adjusted to reflect these constraints, and a 400 home scheme would 'round off' the settlement edge. In 2021 and 2024 the proposal was to deliver a primary school, but this is now unconfirmed.

N.B. as an update an application was very recently submitted (26/0427/OUTE1).

- Site 14 (Dove Lane; 82 homes) – this site was proposed for allocation not only in 2021 but also in 2024 (for 95 homes). It relates well to the settlement edge and is very well contained, although the M25 is in very close proximity.
- Site 12 (Land rear of Park Avenue; 260 homes) – this site has not previously been proposed for allocation but relates well to the settlement edge and is overall subject to limited constraint, although there is a need to consider close proximity to M25 Junction 4, including in terms of achieving access. The site slopes away from the settlement edge but is well-contained by a small woodland and then Potters Chase Wood.
- Site 11 (Land at Mutton Lane (north); 1,875 homes) – growth here could relate well to the settlement edge, there is an adjacent leisure centre, there are good links to the railway station and the LCWIP identifies the potential for a new segregated cycle path. However, there is a need to carefully consider the scale of growth given a number of constraints, including the Hertfordshire Way, which follows Potters Bar Brook, Furzehill Wood (which is not ancient woodland but is shown on historic mapping) and a cluster of three listed buildings at Mimms Hall. Also, this site has not been promoted as available and has not previously been proposed as an allocation.

5.4.34. With regards to Site 12 and Site 14, it should also be noted that these sites are located at the south east edge of Potters Bar in proximity to the historic High Street (see historic mapping), although the railway station is associated with the Potters Bar's other centre to the west (Darkes Lane). Both sites also have good access to A-roads with good bus services (particularly the A111) and there is a community hospital in close proximity.

5.4.35. Finally, with regards to **omission sites**, there two key sites for consideration:

- HELAA site 362 – is located directly to the south of Potters Bar and there is currently a live planning application for 900 homes (plus other uses including a primary school) that was recently refused and is now the subject of an appeal (24/1101/OUTE1). There are a range of detailed considerations that have been / continue to be explored through the planning application, but one point to note here is LCWIP proposals to improve links to the north. The proposed scheme is shown below as Figure 5.6.
- HELAA site 361 – comprises the majority of the land between the south west edge of Potters Bar and South Mimms Services. The western part of the site (adjacent to the services) has planning permission for a large data centre, but the eastern part of the site (abutting the urban edge) could potentially deliver a strategic urban extension.

There could be merit in exploring a scenario whereby there is a focus on comprehensive growth to the south of Potters Bar to complete the expansion of the town as far as the A1(M) to the west and the M25 to the south, including with a focus on maximising the benefits of growth in terms of infrastructure. However, the site is not being actively promoted for housing, and it is not clear that there is a transport solution that would enable growth here to link suitably well to the strategic road network.

5.4.36. In **conclusion**, in addition to the emerging preferred approach of 13 allocations to deliver a total of ~4,100 homes, there is considered to be a reasonable need to also test an alternative scenario that sees a reduced scheme at Site 11, with the assumption being a reduced scheme of ~900 homes (which could likely deliver a primary school).

5.4.37. Additionally, under the lower growth scenario it is considered reasonable to assume that there would be additional allocation HELAA site 362 for 900 homes, with a view to avoiding problematic low growth at Potters Bar.²⁰

5.4.38. As such, two settlement growth scenarios are progressed to Section 5.5:

- The emerging preferred approach = ~4,100 homes
- An alternative scenario = ~4,000 homes

5.4.39. As a final point, it is important to note that the north east edge of Potters Bar (Little Heath) abuts Welwyn Hatfield Borough, and here the current Draft Local Plan policies map shows: 1) one permitted site; 2) two proposed allocations; and 3) a further site that remains under consideration for allocation. This serves to highlight the importance of ensuring a comprehensive approach to growth north of Potters Bar, as far as possible.

Figure 5.6: Site promoter’s masterplan for HELAA site 362



Bushey

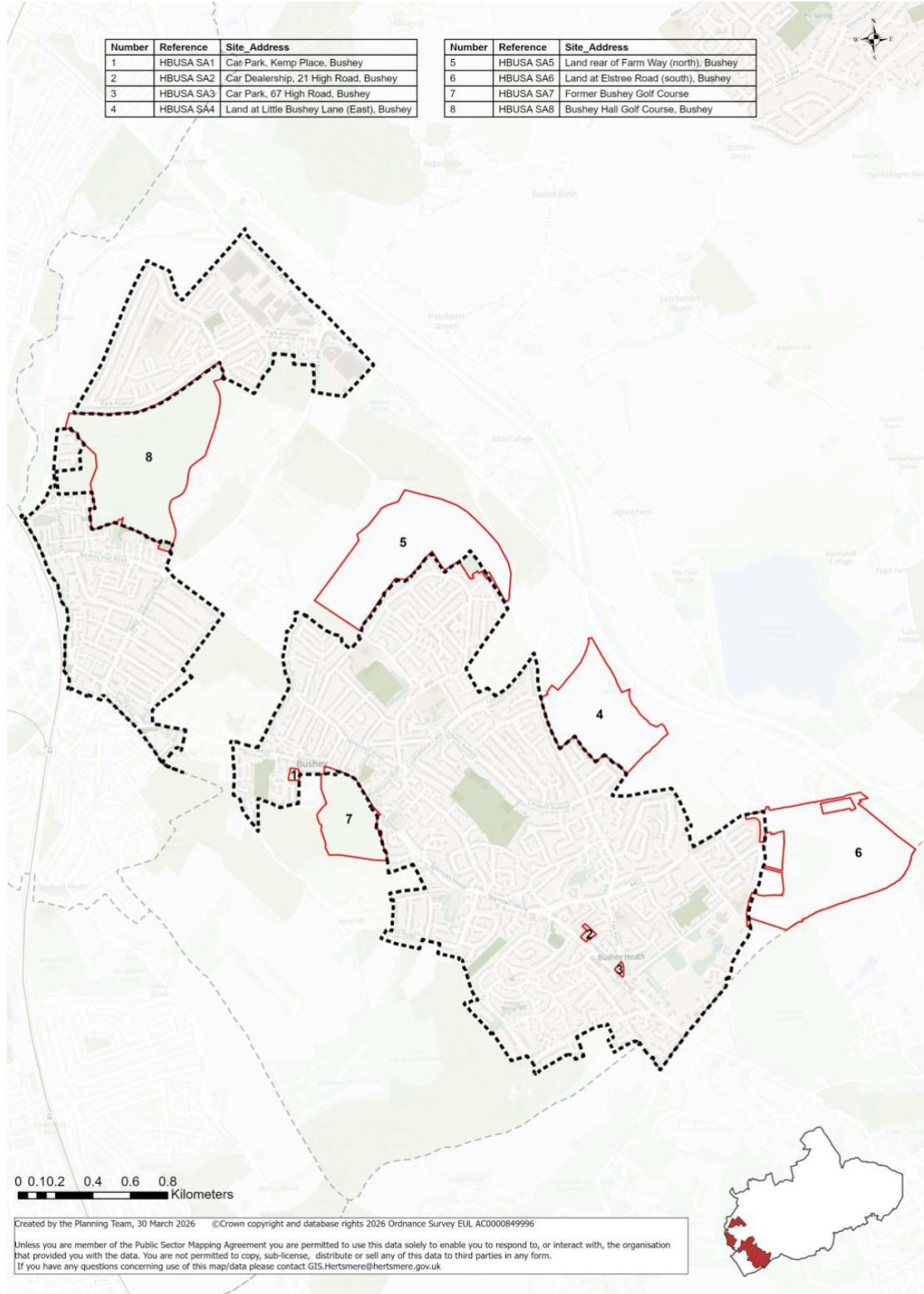
5.4.40. Bushey is located in the far south west of the Borough, in close proximity to Watford and the London suburbs, and is in distinct parts which creates a challenge in terms of calculating population and a services/facilities offer. The Bushey area may have a higher services/facilities offer than Potters Bar but does not benefit from a rail station.

5.4.41. There are quite clear constraints to growth to the south (including Harrow Weald Common and Stanmore Common) and to the west (the fragile Green Belt gap to Watford and Oxhey), and further key consideration is secondary school capacity (but the emerging Three Rivers Local Plan proposes a new secondary at Carpenders Park, and the near finalised St Albans Local Plan proposes a new secondary at London Colney).

²⁰ This decision is taken on balance, in the knowledge that lower growth at Potters Bar would serve to increase pressure for growth at lower order settlements. Also, there could be the possibility of assuming that HELAA site 362 would deliver a reduced scheme and/or additional benefits (e.g. a larger primary school, as envisaged by the draft allocation policy in 2021). However, on balance it is considered appropriate to assume a 900 home scheme in line with the current planning application.

5.4.42. The emerging preferred approach is to allocate 3 **urban sites** for a total of 47 homes, none of which have planning permission, nor are any the subject of a live application. None of the sites are known to give rise to any particular challenges, and it can be noted that the lower of two density assumption options is applied for each of the sites (if the higher density assumption were to be used the combined capacity would be 93 homes).

Figure 5.7: The emerging preferred approach – Bushey



- 5.4.43. Moving on to **Green Belt sites**, the emerging preferred approach involves allocation of five sites for a total of ~3,000 homes, and an immediate point to note is that: A) one site has planning permission for 350 homes; and B) the remaining four sites were previously proposed for allocation in 2021 (and one was also proposed for allocation in 2024).
- 5.4.44. Beginning with Site 8 (Bushey Hall Golf Course; 235 homes), this site was granted permission in 2025 (24/1022/OUT), and will deliver a new medical centre and extensive publicly accessible open space. It also benefits from proximity to Watford town centre.
- 5.4.45. Of the remaining four preferred sites, three are currently the subject of live applications:
- Site 5 (Land rear of Farm Way (north); 802 homes) – was previously an allocation for 750 homes in 2021, and is now the subject of a planning application for 700 homes (25/0972/FULEI) but officer-led work suggests a capacity of 802 homes, with a view to making most best use of the site. The site can deliver a primary school and a significant new area of parkland, which would likely provide a long term defensible boundary to this northern edge of Bushey, given existing uses to the north.
 - Site 6 (Land at Elstree Road (south); 1,300 homes) – was previously an allocation for 800 homes in 2021, with the intention of at the time that 25% of the homes should be for older people. The situation now is that there is a planning application (24/0692/OUTEI) for a 1,300 home new community with the headline as follows: “... *reclaim a previous landfill site to create an exemplar and innovative phased Intergenerational Continuing Care Community development based on principles of social prescribing and Age Friendly place-making.*” There is a question-mark regarding the site capacity, but a lower density scheme would likely have serious implications for the scheme vision and what it could deliver, e.g. a new local centre.
 - Site 4 (Land at Little Bushey Lane (east); 280 homes) – was previously an allocation for 350 homes in 2021, plus land for a primary school and a neighbourhood centre. This was then followed by a planning application for 310 homes plus land for a primary school and a community/mobility hub, which was refused and dismissed at appeal. Most recently a planning application for 280 homes and a ‘community facility / mobility hub’ was refused in March 2026 and an appeal may be forthcoming (24/1522/OUT).
- 5.4.46. The final site is then Site 7 (Former Bushey Golf Course (Bushey Country Club); 286 homes), which was previously an allocation for 200 homes in 2021 and then 165 homes in 2024. This is Council-owned land and partly PDL, with the PDL part of the site located along Bushey High Street in between two conservation areas and adjacent to a significant cluster of heritage assets (Bushey Rose Garden and a grade 2 listed church built in 1904). A key consideration relates to the extent and location of built form within the site, with a clear commitment to delivering a significant new area of public open space. This is an accessible location, including given good links to Bushey Station, and with the LCWIP describing the A411 here as a “core active travel corridor”.
- 5.4.47. Finally, with regards to **omission sites**, there are few significant sites with a strong case for allocation, including recognising that the sites discussed above would deliver a fairly high growth strategy for Bushey. Taking the sectors around the urban edge in turn:
- North Bushey – to the northwest is an area of land that forms the gap to Watford and is subject to flood risk. The only other significant area of undeveloped land is then to the north, where consideration has previously been given to a park and ride. This land does require ongoing consideration but could be better suited to employment land given the adjacent M35 junction. Elsewhere around North Bushey it is difficult to envisage significant growth options given existing uses (and recalling committed Site 8). There could be merit in giving strategic consideration to the broad sector of land south of North Bushey, with a view to consolidating the wide range of existing uses (some of which are shown in Figure 5.8) and providing confidence that there will not be erosion of this settlement gap over time. Also, it can be noted that the Landscape Study (2020) identifies this area as one of the lowest sensitivity parts of the Borough. However, at the current time there is only one HELAA site in this area that does not relate well to the settlement edge and comprises former landfill.

- North of Bushey – to the north west are existing uses including the Grange Academy, Bushey Manor Field and the Royal Connaught Park. Directly to the north of Bushey is then Site 5 which, as discussed, proposes to deliver a park at its northern extent (an area of former parkland) such that it secures a long-term defensible northern edge to Bushey, given existing uses further to the north (Figure 5.8).
- East of Bushey – this is the location of Site 4, but there could be additional growth opportunity aimed at securing comprehensive growth between Bushey and the M1 and maximising the benefits of growth, e.g. a new primary school in this area could be well-located. Also, the Landscape Study (2020) identifies relatively limited sensitivity in this area. Rossway Drive is a recent scheme located to the north of Site 4 that delivered on PDL but were Site 4 to be allocated there could be a case for additional growth to the north to consolidate the built form in this area. However, this is a less accessible part of Bushey and there are challenging links to the strategic road network.
- South of Bushey – Site 6 is located at the eastern extent of this sector but otherwise it is difficult to envisage further strategic growth opportunity, given constraints and also noting the boundary with LB Harrow (who adopted a Local Plan on 26th March 2026).
- West of Bushey – this is the location of Site 7, where development would have the effect of rounding off the settlement edge, and then there is a clear strategic case for resisting further growth in order to maintain the integrity of the settlement gap to Watford and respecting the characteristic association of Bushey Heath with raised land, i.e. acknowledging that land falls away quite steeply from the settlement edge towards. However there may be some further modest opportunities.
- Edge of Watford/Oxhey – there are two adjacent pending planning applications for sites within Three Rivers along the A4008 and one of these abuts Hertsmere Borough (25/1055/FUL) and now has a resolution to grant planning permission. The adjacent field within Hertsmere is being actively promoted to deliver an extension of the scheme within Three Rivers (HELAA site 357), but there is significant surface water flood risk and a scheme that extends into Hertsmere would not relate well to the existing settlement edge of Oxhey. Consideration could be given to comprehensive growth at the edge of Oxhey within Hertsmere, potentially to include HELAA site 357, but this is not a clear option at the current time (the only other HELAA site comprises allotments) and the effect would be to significantly erode the settlement gap to Bushey.²¹

- 5.4.48. In **conclusion**, in addition to the emerging preferred approach of 8 allocations to deliver a total of ~3,000 homes, there is perhaps a strategic case for exploring a lower growth scenario, given Bushey's position in the settlement hierarchy. However, it is difficult to identify a lower growth scenario once consideration is given to the emerging preferred sites, in that: A) Site 5 (north) and Site 7 (west) are both considered to perform relatively well; and B) Site 6 (south east) is a unique proposition given the proposal for a large Intergenerational Continuing Care Community plus it would make good use of degraded land. As such, attention focuses on Site 4 (east), but this is a modest sized site, there is limited landscape sensitivity, and it was previously proposed for allocation in 2024. As such, there is not considered to be a reasonable lower growth scenario.
- 5.4.49. With regards to higher growth, as discussed, some strategic opportunities can be identified, but there is limited numerical case for higher growth, and it is difficult to pinpoint specific omission sites with a case for allocation. Ongoing consideration should be given to ensuring comprehensive growth to the east, and potentially also to the west (at least at the edge of Oxhey) given good accessibility/connectivity in this area.
- 5.4.50. In summary, just one growth scenario is progressed to Section 5.5, namely the emerging preferred approach involving 8 allocations to deliver a total of ~3,000 homes.

²¹ One of the two sites in Three Rivers currently the subject of a planning application is shown clearly on a map [here](#), which also shows the Hertsmere Borough Boundary. The field adjacent to the south east of the site is the subject of separate planning application 25/1055/FUL. It is this latter site that abuts and could feasibly be extended into Hertsmere.

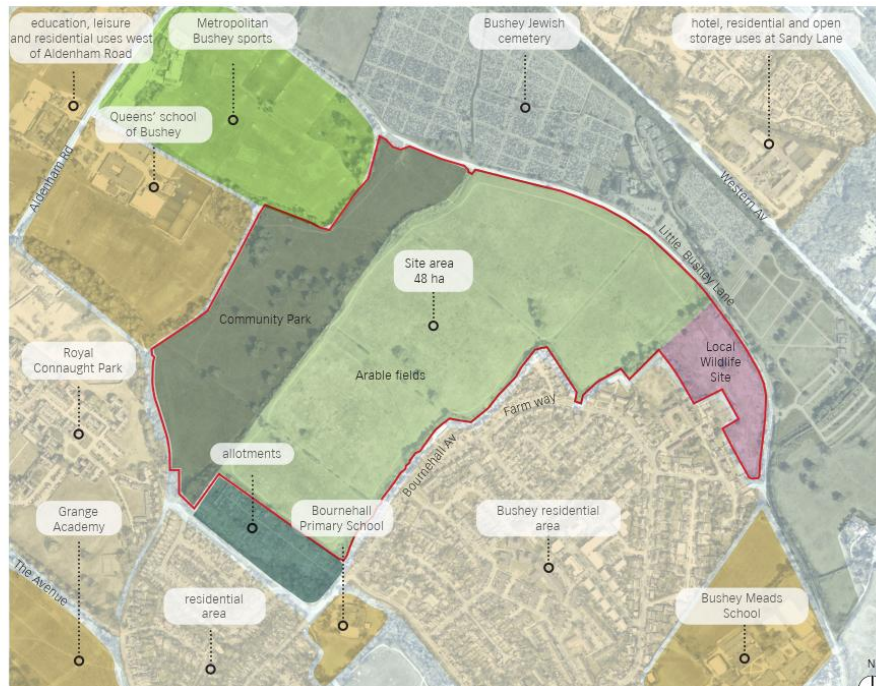
Figure 5.8: A figure from the planning application for Site 5 showing land uses north of Bushey

- The site is bordered by the following:
- North: Little Bushey Lane and a large cemetery.
 - East: residential area.
 - South: residential area and allotments.
 - West: playing fields associated with a Metropolitan Police centre and, towards the south, a residential area.

The site comprises a large area of land separated between parkland and arable fields by a Public Right of Way linking Little Bushey Lane to Finch Lane, and another from Little Bushey Lane to Hayfield Close. The site is bordered to the north by multi-use sports facilities, to the east by Little Bushey Lane dwellings and garden spaces off Geddes Road, Turner Road, Ford Close, Farm Way, Hayfield Close, Bournehall Avenue, and allotments off Bournehall Avenue; and to the west by a track linking Finch Lane to Aidenham Road.

key

- site boundary
- education
- residential
- Metropolitan sports club
- cemetery
- allotments
- Community Park
- Local Wildlife Site



Radlett

- 5.4.51. Radlett is a more rural settlement with a distinct village character and a lower offer in terms of services and facilities, although there is a busy and popular district centre along Watling Street. The railways station is easily accessible from most locations, but the Transport Study (2023) identified challenges in respect of bus, cycle and highway links. Also, it is noted that in the LCWIP none of the top 14 priority corridors for investment are located at Radlett. However, there is the possibility of a major cycle infrastructure upgrade along Theobald Street to link Radlett with Borehamwood at a cost of ~£12m.
- 5.4.52. There is very limited local employment and then a key issue is that Radlett does not have any secondary school. However, the Draft Plan consultation document in 2024 reported: *“The education authority has advised that Radlett would not be a suitable location for a new secondary school due to its distance from Watford and Bushey and due to it being too small to support its own secondary school.”* The situation has potentially moved on noting proposals for new schools at Carpenders and London Colney, but this will be a key issue to explore through the current consultation.
- 5.4.53. A final introductory point to note is a proposed allocation adjacent to the north of Radlett within the St Albans Local Plan, namely Harper Lane (274 homes), which includes PDL.
- 5.4.54. The emerging preferred approach is to allocate 2 **urban sites** for a total of 57 homes, which are not known to give rise to any particular challenges, and it can be noted that the lower of two density assumption options is applied for each of the sites (if the higher density assumption were to be used the combined capacity would be 111 homes).
- 5.4.55. Moving on to **Green Belt sites**, the emerging preferred approach involves allocation of five sites for a total of ~2,850 homes, and immediate points to note are that A) one of these has planning permission for 195 homes; and B) two were previously proposed for allocation in 2021 (although one of these sites is now expanded relative to 2021).
- 5.4.56. Beginning with Site 5 (Land South Of Shenley Hill; 195 homes), this site was recently granted permission at appeal (24/1211/OUT). The site is within ~1km of the railway station, well-contained by woodland, proposed to deliver 50% affordable housing (as is the expectation for Green Belts site under the 2024 NPPF), includes safeguarded land for a primary school expansion (safeguarded for 10 years) and safeguarded land for a medical centre (safeguarded for 5 years, with the land to deliver affordable housing if the medical centre is not delivered, acknowledging that this is a peripheral location).

5.4.57. The next for site for consideration is then Site 3 (Land North of Watford Road and East of Kemprow; 972 homes), which was mostly previously proposed for allocation in 2021 for 350 homes and a primary school. The larger scheme now proposed could certainly deliver a primary school alongside wider benefits in terms of a mix of onsite uses and new/upgraded infrastructure, and the site has good access onto the Watford Road (B462), but there is a degree of landscape sensitivity, and the site would not relate very well to the settlement edge without additional allocation of Site 7, which is adjacent.

5.4.58. With regards to Site 7 (Starveacres and Site to the West; 190 homes), this site benefits from a good relationship to the settlement edge, a degree of containment by a woodland and a historic field boundary / bridleway (on raised land), access onto the B462 and proximity to the centre / station. Overall, whilst it was not previously proposed for allocation in 2021 or 2024, it is considered to be a relatively strongly performing site.

Figure 5.9: A figure from the Transport Study (2023) showing Radlett centre as a key destination

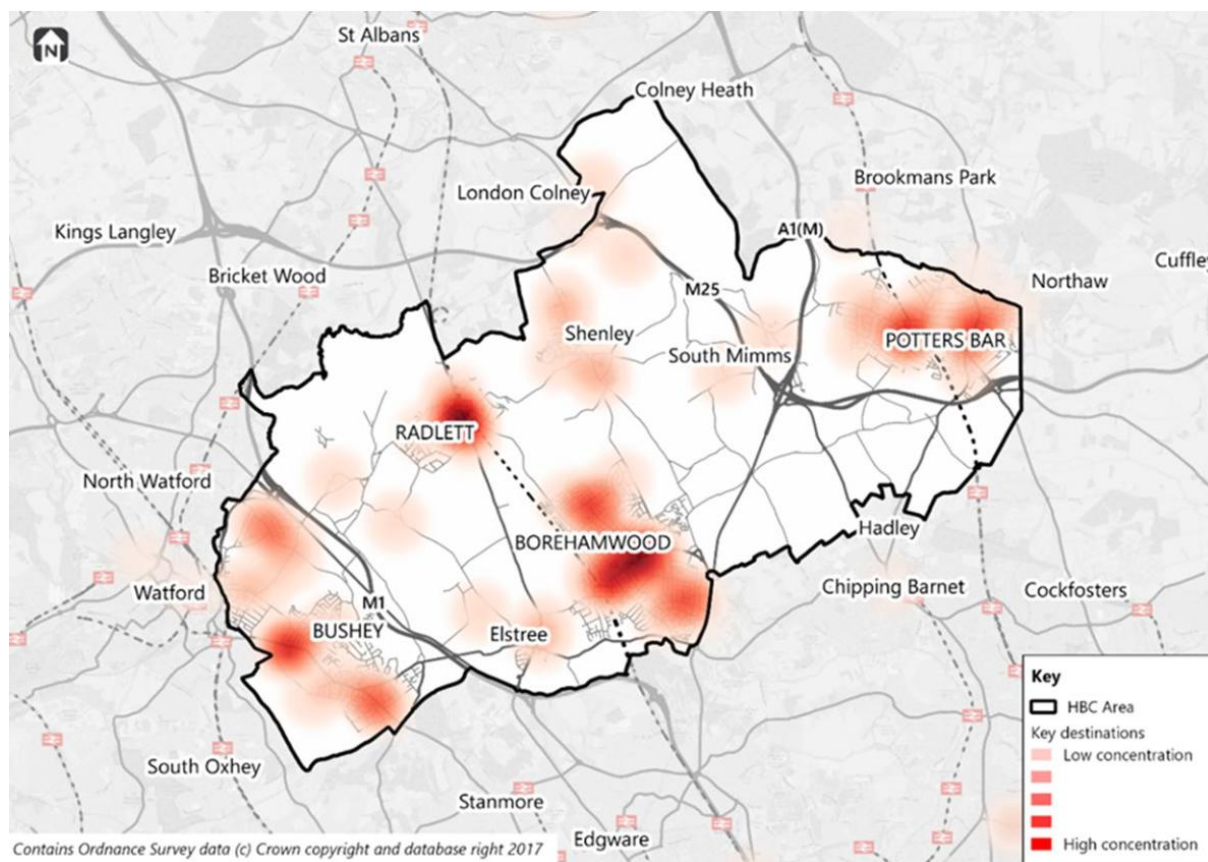
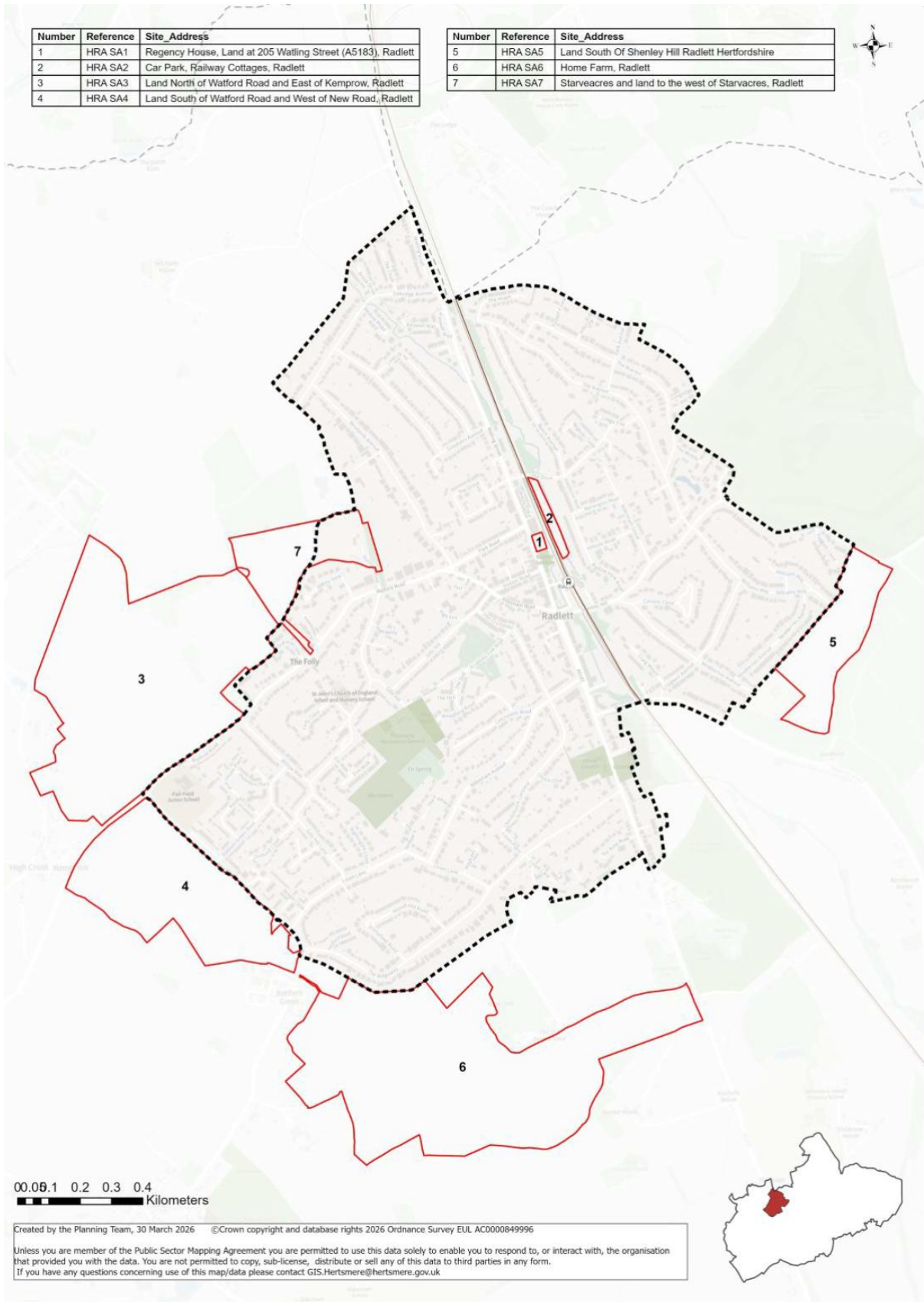


Figure 5.10: A table from the Transport Study (2023) highlighting challenges at Radlett

| | Borehamwood and Elstree | Bushey | Potters Bar and South Mimms | Radlett and Shenley |
|---------|-------------------------|---------|-----------------------------|---------------------|
| Walking | Good | Average | Poor | Average |
| Cycling | Average | Average | Poor | Poor |
| Bus | Average | Good | Good | Poor |
| Rail | Average | Poor | Average | Average |
| Highway | Average | Average | Good | Poor |

Figure 5.11: The emerging preferred approach – Radlett



5.4.59. The final two emerging preferred sites are then more challenging, namely:

- Site 4 (Land South of Watford Road and West of New Road; 450 homes) – the concern is that allocation could risk the sprawl of Radlett to the south west in the direction of Bushey/Watford. However, in combination with Site 3 to the north (also Site 7) there could be the potential to secure a comprehensive western expansion of Radlett that maximises the benefits of growth, and it could perhaps be that there is the potential to secure or facilitate the delivery of a secondary school. It is also noted that there is a large and relatively modern primary school located adjacent to the site.
- Site 6 (Home Farm; 1,040 homes) – is located to the south of Radlett and a planning application is likely forthcoming, with the site promoter having consulted on a ‘garden suburb’ scheme of 600 homes alongside a primary school, a neighbourhood centre and other uses. A concern is that 600 homes would not make best use of the site, and a further consideration is the need to consider a combined scheme with the field adjacent to the north that abuts the settlement edge (HELAA site 0033-2). The site benefits from road access onto the A5183 (Watling Street), and as discussed there is an opportunity here for a strategic cycle upgrade, but there is a need to consider the capacity of this key north/south road link, including noting potential growth west of Borehamwood. Also, a single road access point could limit the number of homes that can be delivered. A further constraint is the Hertfordshire Way, which runs through the site and links to a series of villages/hamlets and heritage assets to the west. Finally, it is noted that this is likely an area of better quality agricultural land in the Borough.

Figure 5.12: The current site promoter concept plan for Site 6



5.4.60. With regards to **omission sites**, the key sites are as follows:

- HELAA site 0033-2 – is located adjacent to Site 6 and would certainly need to be considered for allocation in combination with Site 6 with a view to a suitably comprehensive scheme. However, it appears unlikely that the site could be allocated in isolation due to challenging access (it would likely require access via Site 6).
- HELAA site 1052-2 – is located to the north and a key issue is bisected by a flood zone. However, the eastern part of the site could potentially deliver a modest scheme.
- HELAA site 214 – is located to the south east and was previously a proposed allocation for 55 homes in 2024 and was also a proposed allocation in 2021. The site relates well to the settlement edge and is in proximity to the centre of Radlett and the railway station and should be revisited for potential allocation at the next stage.

5.4.61. Finally, looking beyond HELAA sites attention focuses on the north east of Radlett, including noting that the Landscape Study (2020) identified this area as relatively low sensitivity. In the north of this area (adjacent to the Harper Lane site in the St Albans Local Plan) the settlement edge is defined by Kitwells Brook, but the valley of the brook could potentially be drawn upon for containment. In the south of this area (adjacent to Shenley Road) is a large golf course (associated with former parkland; see [historic mapping](#)), which could potentially suggest a degree of opportunity. However, transport connectivity in this area appears to be challenging and this is the gap to Shenley.

5.4.62. In **conclusion**, there is a need for further careful consideration of the approach to growth at Radlett, with a view to securing the benefits of growth – potentially to include a secondary school – and avoiding sprawl across a more sensitive landscape. There is a case to be made for lower growth, but it is difficult to pinpoint a clear lower growth scenarios. Taking the two broad potential directions for growth in turn:

- West – it is Site 4 south of the Watford Road that is highlighted above as the sequentially less preferable site, but a further consideration is that this is public sector owned land (HCC), such that there would be good potential to deliver public benefits alongside new homes. For example, at London Colney the St Albans Local Plan proposes to allocate a site owned by HCC for 324 homes alongside land for a secondary school. If Site 4 were to be removed then there would also be a case for removing the western part of Site 3 (i.e. the part that was not previously proposed for allocation in 2021), as it would not relate well to the settlement edge. This western part of Site 3 is owned by Cemex, and then the remaining part of Site 3 is owned by the Crown Estate, and Site 7 has a single private owner, such that overall land-ownership across the four sites suggests relatively good potential for coordinated growth that maximises the benefits and minimises the risk of future sprawl.
- South – consideration should be given to the possibility of a more modest scheme here focused on land adjacent to the A5183. However, it is recognised that there would be implications for what the scheme could deliver, e.g. a primary school.

5.4.63. Overall, whilst there is a clear need to give ongoing consideration to growth scenarios for Radlett it is not possible to pinpoint alternative scenarios at the current time. As such, just one growth scenario is progressed to Section 5.5, namely the emerging preferred approach involving 8 allocations to deliver a total of ~2,900 homes.

Shenley

5.4.64. Shenley has an extensive historic core – the largest conservation area in the Borough – and then to the north is a housing estate developed in the 1990s on the site of a former hospital (see [historic mapping](#)) alongside a neighbourhood centre. A further strategic consideration is primary school capacity, with the consultation response received from HCC in 2024 flagging a significant surplus in school places and explaining: “*Consistently large surpluses can prejudice schools’ financial sustainability and make maintaining high educational standards more challenging.*” This is an important consideration given an ageing population and a small reduction in population locally between 2011 and 2021.

Figure 5.13: Surplus in primary school places across the Borough (2024)

| Settlement | Year Group | | | | | | | Total |
|--------------------------|------------|-------|-------|-------|-------|-------|-------|-------|
| | R | 1 | 2 | 3 | 4 | 5 | 6 | |
| Borehamwood ⁹ | 7.6% | 9.0% | 4.0% | 9.1% | 3.8% | 12.4% | 11.4% | 8.3% |
| Bushey | 9.5% | 9.8% | 13.3% | 7.6% | 10.5% | 5.7% | 8.9% | 9.3% |
| Potters Bar | 6.2% | 8.9% | 8.2% | 8.2% | 6.3% | 7.1% | 11.8% | 8.1% |
| Radlett | 8.7% | 7.3% | 2.0% | 8.0% | 14.0% | 10.0% | 8.7% | 8.4% |
| Shenley | 30.0% | 30.0% | 16.7% | 11.7% | 16.7% | 6.7% | 30.0% | 20.2% |

- 5.4.65. In 2021 the proposal was for a comprehensive scheme to the west of the historic core (the grounds of former Shenley Grange) to deliver 240 homes alongside a community hub and a new village green, plus there was also a modest site proposed to the north east. In 2024 the proposal was for a smaller Shenley Grange scheme of 180 homes.
- 5.4.66. The situation now is that two sites have now gained permission to the west of the historic core, namely a site granted permission for 95 homes in 2025 ([24/1618/FUL](#)) and a site granted permission at appeal for 103 retirement homes and a community facility in 2025 ([23/1795/OUT](#)). Also, a site to the north east was recently permitted for 38 homes ([25/1347/FUL](#)). Finally, it can be noted that Site 5 at Radlett (recently permitted for 195 homes) is in proximity to the west, and furthermore there is a pending planning application for 200 homes at former Harperbury Hospital to the north ([25/0885/OUTEI](#)).
- 5.4.67. Whilst there is a case for supporting smaller sites at villages with strong viability and that are well suited to delivering early in the plan period, and allocations at villages could enable lower growth at higher order settlements (see discussion above), at Shenley there is considered to be limited case for allocating any sites over-and-above those with planning permission. Attention focuses on land to the west of the historic core, where there is land available over-and-above the two sites with planning permission, but there now appears to be no potential for a comprehensive scheme in this area, e.g. one that: A) delivers a road link between London Road and Radlett Lane; and B) avoids sprawl along and potentially increases accessibility to the Kitwells Brook valley.
- 5.4.68. In **conclusion**, given sites with planning permission there is considered to be just one reasonable growth scenario, namely no allocations over-and-above commitments.

Elstree Village

- 5.4.69. Elstree Village has a heritage value not dissimilar to Shenley. However, Elstree is a different proposition in that the village is associated with the crossroads of two A-roads (both a constraint and an opportunity; this is a traffic congestion hotspot and until recently this was an air quality management area, AQMA) and is in proximity to higher order centres, railway / tube stations and strategic employment land. In both 2021 and 2024 the proposal was for 90-140 homes to the north west of the village and around 100 homes to the south east, with the latter site comprising public sector owned land (HCC).
- 5.4.70. The situation now is that the site to the north east has a resolution to grant planning permission ([23/1123/FUL](#)) for retirement housing, and there is also a pending planning application for an “Integrated Retirement Community (IRC) of 90 extra care units (Use Class C2)” to the north east ([24/1663/FUL](#)). The latter site is well contained by woodland but nonetheless could contribute to a sense of sprawl / merging of settlements along Barnet Lane. Also, it is far from clear that there is a need for further homes for older people in this area, noting: the nearby committed site; an existing large care home centrally located within the village; the option of large scale schemes nearby at the eastern edge of Bushey and the western edge of Borehamwood; and a case to be made for focusing older persons housing at higher order settlements.

- 5.4.71. Whilst there is a case for supporting smaller sites at villages with strong viability and that are well suited to delivering early in the plan period, and allocations at villages could enable lower growth at higher order settlements, at Elstree Village there is considered to be limited case for allocating any sites over-and-above those with planning permission. Attention focuses on land to the south east, noting that this is public sector land such that there would be good potential to deliver public benefits alongside new homes, e.g. new accessible open space or a play / recreation / sports facility. However, it is recognised that whilst Elstree Village is associated with a distinct ridge of raised land the land in question to the south east is lower / descending land towards the M1 and London and serves a role as a landscape buffer on this basis. Finally, there is a need to acknowledge existing committed and potential additional growth in proximity to the village at Bushey and Borehamwood plus employment land growth west of the village.
- 5.4.72. In **conclusion**, given sites with planning permission there is considered to be just one reasonable growth scenario, namely no allocations over-and-above commitments.

South Mimms

- 5.4.73. South Mimms is a significantly smaller village but there is a primary school and there are nearby employment opportunities, including at the M25 / A1(M) service station. The conservation area covers the entirety of the village south of the B556, historic character continues to north along Blackhorse Lane, and then there is just one small area of 20th century housing to the north east (see [historic mapping](#)). There has not been significant housing growth for many decades and there are no pending planning applications.
- 5.4.74. In 2021 the proposal was for a comprehensive 'village growth strategy' involving consolidation of the existing somewhat dispersed built form to deliver a total of 260 homes alongside: a primary school expansion (the existing school has just 84 pupils, as reported [here](#), which could create a challenge for viability); a new village green; accessible open space including along Catherine Bourne River; and a new village shop. As part of this there would have been open space in proximity to the prominent and centrally located Grade I listed church. In 2024 the proposed approach was then amended significantly, with just one proposed allocation for 85 homes.
- 5.4.75. The situation at the current time is that:
- Virtually all land around the village has been promoted as available for development.
 - There remains a strategic case for growth as per that which led to the proposed strategy in 2021, including with a view to maintaining and boosting village vitality.
 - It is also the case that the latest strategic context in respect of local housing need (LHN) borough-wide is such that there is a strong argument for supporting smaller sites at villages able to deliver relatively early in the plan period (with a view to avoiding or minimising the need for a stepped housing requirement).
 - It is also important to acknowledge that whilst, on the one hand, the new emphasis on ensuring that spatial strategy / site selection aligns with vision-led transport principles can suggest a need to limit growth at villages, on the other hand well-targeted village growth can help to maintain and potentially expand the local offer in terms of services and facilities (also bus services) and therefore reduce car dependency.
 - If Bowmans Cross comes forward, then growth would be in close proximity and the new settlement would link to Potters Bar via South Mimms, plus there is a need to consider pressure on the woodland complex between South Mimms and Bowmans Cross, which includes Redwell Wood SSSI.
- 5.4.76. In **conclusion**, at this stage it is not clear that there is a reasonable alternative to the emerging preferred approach, which involves no allocations. There is a clear case for revisiting the possibility of growth here following clarity on Bowmans Cross.

Figure 5.14: An extract from the 2021 Draft Plan summarising the proposed strategy for villages

3. Supporting larger rural communities and growth of key villages

The Local Plan will deliver growth in the borough's main villages of Elstree, Shenley and South Mimms to create more sustainable and self-contained communities. Growth will be of a location, scale, type and design appropriate for the size and character of the existing villages and will pay particular regard to infrastructure capacity. As with the proposed neighbourhood extensions, the selection of sites to be allocated will reflect site availability and follow a rigorous process of assessing sites for their sustainability credentials.

Any outward growth of these villages, and indeed most development within the existing village boundaries, will involve some development in the current green belt. Exceptional circumstances justifying adjustments to green belt boundaries will be demonstrated; compensatory green belt improvements which enhance community access to and improve the local environment of the remaining green belt will also be required.

Table 4 sets out the anticipated distribution through the growth of key villages (by settlement).

Table 4: Distribution of growth of key villages development

| Supporting larger rural communities and growth of key villages | Allocations | Estimated Commitments | Estimated Windfall | Total |
|--|-------------|-----------------------|--------------------|------------|
| Elstree Village | 190 | 20 | 25 | 235 |
| Shenley | 290 | 15 | 45 | 350 |
| South Mimms | 225 | 10 | 25 | 260 |
| Total | 705 | 45 | 95 | 845 |

Bowmans Cross

- 5.4.77. Key issues and opportunities associated with the option of a new settlement at Bowmans Cross have already been introduced above, in Section 2.
- 5.4.78. On the one hand, at this stage in the process there is a strong case for progressing the option of a new settlement at Bowmans Cross to the RA growth scenarios as a 'constant', recognising that it has been repeatedly consulted on over a number of years, and given the new strategic context in respect of a much higher LHN figure (also understanding of challenges to growth at the existing settlements, as discussed above). Progressing Bowmans Cross to the RA growth scenarios as a 'constant' would also allow attention to focus on key choices elsewhere to a greater extent.
- 5.4.79. However, on the other hand, it remains the case that there are significant challenges associated with Bowmans Cross, including a range of concerns repeatedly highlighted by St Albans District through their consultation responses over the years. Also, there is the context of devolution and Local Government Reform (LGR) such that there is a case for deferring decision-making to a future local plan, e.g. for SW Herts.
- 5.4.80. In **conclusion**, at this stage it remains reasonable to explore the emerging preferred approach – which is to support Bowmans Cross new settlement with an assumption of 500 homes in the plan period to 2043 and then up to 7,500 homes in total – alongside an alternative approach whereby there is not support for Bowmans Cross.
- 5.4.81. As discussed, there are also ongoing questions around the number of homes that can be delivered in the plan period, development density (including to deliver a town centre), the scheme concept / masterplan (including in respect of employment land) and the ultimate scheme extent, but there are matters to potentially return to at the next stage.

Conclusion on settlement scenarios

- 5.4.82. This section has considered settlements in turn and for each settlement reached a conclusion on whether: A) the emerging preferred approach should be progressed to the RA growth scenarios as a 'constant' or B) the approach to growth should be a 'variable'.
- 5.4.83. Ultimately three settlements are progressed as a variable (Borehamwood; Potters Bar and Bowmans Cross) and in each case it is specifically the case that there are two scenarios, i.e. the emerging preferred approach alongside just one alternative.
- 5.4.84. It is acknowledged that a number of the decisions made within this section are reached 'on balance' and matters can be revisited at the next stage in light of the latest evidence base including consultation responses received. Perhaps most notably there is a need for ongoing consideration of alternative growth scenarios for Radlett and South Mimms.
- 5.4.85. Finally, it is important to be clear that where the emerging preferred approach is progressed to the RA growth scenarios as a 'constant' that is not to say that there is no choice, but only that there is considered to be relatively little in the way of a clear strategic choice. It is also the case that there is a pragmatic need to minimise the number of variables and scenarios in order to enable a manageable process.

5.5. Reasonable alternative growth scenarios

- 5.5.1. The final task is to define reasonable alternative (RA) growth scenarios defined as alternative approaches to supply from:
- Non-allocated sites with planning permission – the figure is uncertain at the current time, and in a state of flux, but is thought likely to be in the region of 1,000 homes.
 - A windfall assumption – the current assumption is 2,000 homes, but there is ongoing work to confirm this. Whilst there is primarily a need to simply project forward past trends there is also a need to consider reasons for a potential change in trend, e.g. reduced supply from office to residential conversions under permitted development rights, or increased urban intensification under a more permissive policy framework (including recalling that the Draft NPPF (2025) proposes a 'permanent presumption in favour of sustainable development' for sites within urban areas and in proximity to a well-connected railway station, e.g. the emerging Draft Buckinghamshire Local Plan proposes 15,000 homes additional supply on this basis). Finally, there is a need for further work to confirm no double counting of windfall and supply from permissions.
 - Allocations – as discussed in Section 5.4, for five settlements there is just one reasonable growth scenario, namely the emerging preferred approach, whilst for three settlements there are two growth scenarios, namely the emerging preferred approach alongside one alternative scenario. It is also important to note that under the emerging preferred approach numerous of the preferred sites have planning permission.
- 5.5.2. Given three variable settlements each associated with two growth scenarios it is possible to test every combination of the settlement scenarios which leads to **eight RA growth scenarios**. The final question is whether any of these scenarios are unreasonable in light of broad strategic objectives, with considerations as follows:
- The scenarios are placed in order of total growth quantum.
 - Under the lowest growth scenario (Scenario 1) total supply would be 6% above LHN, which amounts to a reasonable low growth scenario given: A) limited strategic case for a housing requirement set below LHN, as discussed in Section 5.2; B) the discussion of site options and settlement growth scenarios presented in Section 5.4; and C) the need for a healthy supply headroom given delivery risks and uncertainties associated with numerous aspects of the supply, perhaps most notably town centre regeneration, and given the crucial importance of being able to maintain a five year housing land supply over the early years of the plan period such that the plan remains up-to-date and the Borough avoids being subject to the presumption in favour of sustainable development (also given uncertainty around the potential for a stepped requirement).

- Scenario 8 is the emerging preferred approach and the highest growth scenario. Total supply would be 23% above LHN, such that the Borough would have the potential to argue for a large supply headroom (that maximises the potential for the local plan to remain up-to-date) or, alternatively, the housing requirement could be set modestly above LHN. This is a reasonable high growth scenario given the discussion of strategic factors in Section 5.2 and site options / settlement scenarios in Section 5.4.

5.5.3. Comments on the RA growth scenarios are welcomed at the current time.

5.5.4. Finally, it is important to be clear that whilst Scenario 8 is assumed here to represent an emerging preferred approach, in practice the allocations that feature in this scenario are 'candidate sites' for consultation and it could well be the case that some are deemed to be not suitable for allocation following and light of the consultation.

5.5.5. If candidate sites are removed from the supply, then the overall supply will reduce and potentially to a level that is problematic given: A) likely need to set the housing requirement at LHN; and B) the likely need for a healthy supply headroom. However, another factor is that the plan period could potentially be reduced (see Section 2.4), perhaps by one year, such that plan period LHN would reduce commensurately.

5.5.6. The RA growth scenarios are presented in the table below. Points to note are:

- For each variable the emerging preferred approach is highlighted with **green** shading.
- The site allocations that underpin the scenarios are explained in Section 5.4.
- Scenario 8 is the emerging preferred approach.

Table 5.2: The reasonable alternative growth scenarios (with constants greyed-out)

| Supply component | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Scenario 8 |
|------------------------------|------------|------------|------------|------------|------------|------------|------------|------------|
| Commitments (non-allocated) | 1,000 | 1,000 | 1,000 | 1,000 | 1,000 | 1,000 | 1,000 | 1,000 |
| Windfall | 2,000 | 2,000 | 2,000 | 2,000 | 2,000 | 2,000 | 2,000 | 2,000 |
| Borehamwood allocations | 5,650 | 5,650 | 5,650 | 5,650 | 8,000 | 8,000 | 8,000 | 8,000 |
| Potters Bar allocations | 4,000 | 4,100 | 4,000 | 4,100 | 4,000 | 4,100 | 4,000 | 4,100 |
| Bushey allocations | 3,000 | 3,000 | 3,000 | 3,000 | 3,000 | 3,000 | 3,000 | 3,000 |
| Radlett allocations | 2,900 | 2,900 | 2,900 | 2,900 | 2,900 | 2,900 | 2,900 | 2,900 |
| Bowmans Cross new settlement | 0 | 0 | 500 | 500 | 0 | 0 | 500 | 500 |
| Village allocations | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total homes 2024/5 to 2042/3 | 18,550 | 18,650 | 19,050 | 19,150 | 20,900 | 21,000 | 21,400 | 21,500 |
| % over LHN | 6% | 7% | 9% | 10% | 20% | 20% | 23% | 23% |

Part 2: SA findings at this stage?

6. Introduction to Part 2

6.1.1. This part of the report presents an appraisal of the eight reasonable alternative (RA) growth scenarios defined above in Part 1, in summary:

- 1 – lower growth at Borehamwood, Potters Bar and Bowmans Cross = 18,550 homes
- 2 – lower growth at Borehamwood and Bowmans Cross = 18,650 homes
- 3 – lower growth at Borehamwood and Potters Bar = 19,050 homes
- 4 – lower growth at Borehamwood = 19,150 homes
- 5 – lower growth at Potters Bar and Bowmans Cross = 20,900 homes
- 6 – lower growth at Bowmans Cross = 21,000 homes
- 7 – lower growth at Potters Bar = 21,400 homes
- 8 – the emerging preferred approach = 21,500 homes²²

6.1.2. The appraisal focuses on **growth scenarios** because this is a key matter at the heart of the current consultation, as discussed in Section 4. However, the current consultation also presents draft development management (DM) policies and brief account is taken of these as part of the appraisal below, and some recommendations are made.

7. Growth scenarios appraisal

7.1. Introduction

7.1.1. This section presents an appraisal of the RA growth scenarios under the SA framework.

Appraisal methodology

7.1.2. The appraisal is presented under 15 headings – one for each of the topics that together comprise the SA framework (see Section 3) – before a final section presents an overview appraisal ‘matrix’. Under each heading, the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green**.²³

7.1.3. Further methodological points are as follows:

- Section 5.4 – the aim is to minimise repetition of text from Section 5.4.
- Constants versus variables – a focus is on what varies across the scenarios (green in Table 5.2), but consideration is also given to supply components held constant.
- Growth quantum – it is not always appropriate to conclude a preference for lower growth (Scenario 1) from an environmental perspective, despite inevitable localised impacts. This is because low growth could either result in: unmet housing needs (if the housing requirement is set at a figure below LHN) that could have to be provided for elsewhere within a constrained sub-region; or a housing supply trajectory that lacks robustness due to the lack of a sufficient supply headroom (i.e. sufficient supply over-and-above the housing requirement), leading to a risk of the Local Plan becoming out-of-date such that ‘the presumption in favour of sustainable development’ applies.
- The baseline – is assumed to be a situation whereby growth continues to come forward in a relatively piecemeal / unplanned way under ‘the presumption’.

²² Under the emerging preferred approach (Scenario 8) supply comes from: 1) non-allocated planning permissions = ~1,000 homes; 2) a windfall assumption = ~2,000 homes; and 3) emerging preferred allocations (i.e. candidate sites) = ~18,500 homes.

²³ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

- Limitations – it is inevitably the case that some evidence emerges alongside work to define and appraisal growth scenarios, such that there are evidence limitations. As part of this, it can be noted that there is a need to make significant assumptions around scheme masterplanning, infrastructure delivery etc. The appraisal aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness and accessibility.

7.2. Air quality

N.B. the table below and all equivalent tables summarises each of the growth scenarios with reference to the settlements that would see *lower growth* relative to Scenario 8.

| Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Scenario 8 |
|------------|------------|------------|------------|------------|------------|------------|------------|
| BW, PB, BC | BW, BC | BW, PB | BW | PB, BC | BC | PB | - |
| = | = | = | = | = | = | = | = |

- 7.2.1. There are no air quality management areas (AQMA) in the Borough although there are a number of traffic congestion hotspots where air quality is potentially problematic or could become problematic under growth scenarios, including acknowledging the likelihood of significant growth in neighbouring areas, including a potential new town.
- 7.2.2. Higher growth could lead to challenges, but the baseline situation is improving air quality nationally.²⁴ Also, there is a need to recognise that Hertsmere is generally well connected in transport terms and that lower growth in Hertsmere could potentially lead to increased pressure for growth in neighbouring areas that are either less well-connected or where there are AQMA (notably Watford and all London Boroughs).
- 7.2.3. Overall, it is difficult to confidently and meaningfully differentiate between the growth scenarios. One matter for consideration is the combined effect of higher growth at Borehamwood alongside growth at Bushey and Radlett on the crossroads in the centre of Elstree Village where an AQMA was recently revoked, but it is difficult to suggest a significant concern. A further consideration is the possibility of growth at all four of the main settlements in combination leading to increased traffic within the centre of St Albans, where there is a small AQMA at the A1086 / A5183 junction. Moving forward, a key priority is confirming that the housing requirement will be set at LHN and then iteratively confirming the spatial strategy / proposed allocations with a view to enabling strategic transport planning including a focus on 'sustainable transport' interventions.
- 7.2.4. A final consideration is growth near to sources of air and noise pollution including motorways. This is notably issue for sites south of Potters Bar, namely: A) two emerging preferred sites that are a 'constant'; and B) HELAA site 362 which is an omission site but features in Scenarios 1, 3, 5, 7. The M25 is not in a cutting in this area (see [imagery](#)).

7.3. Biodiversity

| Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Scenario 8 |
|------------|------------|------------|------------|------------|------------|------------|------------|
| BW, PB, BC | BW, BC | BW, PB | BW | PB, BC | BC | PB | - |
| 2 | 2 | 2 | 2 | ★1 | ★1 | ★1 | ★1 |

- 7.3.1. The Borough is overall subject to limited biodiversity constraint, such that there is a case for higher growth, but the primary factor that dictates the order of preference is the approach to growth at Borehamwood.

²⁴ Air quality is set to improve as the national car fleet moves away from internal combustion engine (ICE) vehicles, but air quality will remain an issue, including as the weight of electric vehicles (EVs) leads to increased particulates pollution.

- 7.3.2. Specifically, under the lower growth scenario at Borehamwood the assumption is that two strategic urban extensions subject to limited biodiversity constraint (and with an inherent biodiversity opportunity on account of their scale) would be replaced by two modest urban extensions that are both subject to a degree of constraint. In particular, the site to the north is currently designated as a Local Wildlife Site (LWS) although there is some uncertainty and this matter is being explored through a planning application. Also, there is a stream corridor and historic field boundary along the southern edge of the site (where access would be gained). The second smaller site is then located to the south, where there are sensitivities given two committed sites in this area.
- 7.3.3. The other variable growth location to highlight as subject to biodiversity constraint is Bowmans Cross, given a close association with an important woodland complex that includes Redwell Wood SSSI, and also because the River Colne corridor to the north of Coursers Road is clearly a broad area of sensitivity (albeit also potentially opportunity).
- 7.3.4. However, on the other hand, much of the land is currently degraded such that there would likely be the potential to deliver a significant *onsite* biodiversity net gain. Also, there would be good potential to masterplan with biodiversity as a priority objective, and there could be the potential to fund or facilitate some targeted offsite interventions, e.g. well-managed access to nearby woodlands. However, the site promoter's emerging scheme masterplan does suggest housing in close proximity to areas of sensitivity.
- 7.3.5. Also, in respect of Bowmans Cross, it is important to say that biodiversity objectives feed into a clear argument for planning with a long term perspective, i.e. giving early consideration to any options for an expanded scheme.
- 7.3.6. Maintaining a focus on variable growth locations, the final point to note is potentially a case for supporting growth to the south of Potters Bar to minimise pressure on land to the north, including given relative proximity to designated woodlands.
- 7.3.7. Finally, with regards to emerging preferred sites that are a 'constant' across the growth scenarios (and with a particular focus on sites that are not already committed): at Potters Bar there is a degree of constraint affecting the golf course site, but this has fed into site capacity; and B) at Radlett there is a need to consider the effect of growth adjacent to and potentially enveloping woodlands around the settlement edge.

Figure 7.1: The site promoter's emerging masterplan for Bowmans Cross (2026)



7.4. Climate change adaptation

| Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Scenario 8 |
|---------------|------------|------------|------------|------------|------------|------------|------------|
| BW, PB, BC | BW, BC | BW, PB | BW | PB, BC | BC | PB | - |
| = | = | = | = | = | = | = | = |

- 7.4.1. The key issue here is flood risk, although it is acknowledged that the matter of overheating risk is also a significant consideration for the Local Plan given the high urban growth strategy that is assumed as a 'constant' under all of the growth scenarios.
- 7.4.2. Focusing on flood risk, whilst this has fed-in strongly as a factor influencing the selection of sites for inclusion within the growth scenarios, there are still a number of sites – which feature as either a constant or a variable across the scenarios – with an element of risk. Greenfield sites can often address flood zones by targeted onsite green/blue infrastructure, and urban sites can address risk through use mix and design/construction measures, but this will be explored further through Strategic Flood Risk Assessment (SFRA) prior to plan finalisation. It is understood that certain urban sites have been removed on account of flood risk, which is an important consideration, as pressure to demonstrate a strongly 'brownfield first' approach can lead to pressure to intensify uses on urban sites that have historically been seen as appropriate for only low intensity uses (e.g. car parks, industry, commercial, offices) due to flood risk. For example, in St Albans ten urban sites have recently been removed from the plan due to flood risk.
- 7.4.3. Specific considerations relating to flood risk are as follows:
- Borehamwood – surface water flood risk zones would need to frame a western strategic urban expansion, and a consideration is downstream flood risk (Radlett). With regards to the option of a Well End strategic urban extension, under the higher growth scenario there would be a need to factor-in a significant valley and associated surface water flood zone as part of masterplanning. With regards to the smaller sites assumed under the lower growth scenario, access to one of the sites is constrained by a stream, as discussed. Finally, several emerging preferred urban allocations are associated with significant flood risk, which will require further detailed consideration.
 - Potters Bar – there is a significant network of fluvial and surface water flood zones to the north west, which would need to factor-in to masterplanning for a strategic urban extension here, and could serve as an argument for lower growth in this area. However, on the other hand, valleys and associated flood zones can help to frame and contain growth and provide a framework under which to plan green/blue infrastructure. With regards to the option of a strategic urban extension to the south (Scenarios 1, 3, 5 and 7), whilst there are no fluvial flood zones intersecting the site there are several surface water flood corridors, particularly in the east of the site (a key area in terms of accessing the town centre and strategic road network), and there is a need to consider downstream flood risk affecting existing residential areas. However, there is likely the potential to deliver a strategic scheme that avoid and mitigates flood risk, including through high quality Sustainable Drainage Systems (SuDS) without having to significantly compromise on wider objectives, e.g. delivery of a primary school. Finally, flood risk is well-understood as a significant constraint to developing the golf course site located a short distance to the north of the railway station, but there is understood to be confidence in the ability to avoid and mitigate risk.
 - Bushey – there are relatively limited concerns, but there is a degree of surface water flood risk affecting the site to the east. This matter is being explored through the current planning application, accounting for the proposed masterplan and SuDS.
 - Radlett – there are relatively limited concerns, but there is a degree of surface water flood risk affecting the site to the south, including at the proposed point of access.

- Bowmans Cross – the northern part of the site is quite closely associated with the River Colne, and there is downstream flood risk affecting London Colney, but it is difficult to suggest any significant concerns because SuDS can likely deliver greenfield rates of surface water runoff, or even a betterment. Opportunities for strategic flood water attenuation could feasibly be explored (but there are already lakes in this area).
- 7.4.4. Briefly returning to the matter of urban intensification leading to overheating risk under climate change scenarios, one site to highlight is an urban green space (sports pitches) site in Borehamwood (Old Haberdasher's Sports Ground, Croxdale Road) which is proposed for 95 homes (there was previously an application for 170 homes in 2016 although this was subsequently withdrawn). There is significant urban greenspace in this northern part of Borehamwood, but there is nonetheless to give careful consideration to loss of urban greenspace from a climate change adaptation perspective. It is also noted that the site partly intersects a surface water flood zone.
- 7.4.5. Overall, whilst it is difficult to confidently and meaningfully differentiate between the growth scenarios at this stage, there is a clear need to flag the risk of a 'moderate or uncertain' negative effect ahead of consultation with the Environment Agency and further detailed SFRA work informed by latest understanding of site capacities, use mix etc.

7.5. Climate change mitigation

| Scenario 1 BW, PB, BC | Scenario 2 BW, BC | Scenario 3 BW, PB | Scenario 4 BW | Scenario 5 PB, BC | Scenario 6 BC | Scenario 7 PB | Scenario 8 - |
|-----------------------------|----------------------|----------------------|------------------|----------------------|------------------|------------------|-----------------|
| 2 | 2 | 2 | 2 | 2 | 2 | 1 | 1 |

- 7.5.1. Focusing on per capita (rather than absolute) greenhouse gas emissions from the built environment (rather than from transport, which is the focus of a separate discussion below), a priority is to direct growth to locations with strong development viability or otherwise where there is a location-specific opportunity to take an ambitious approach to decarbonisation. In particular, there is a need to support sites well suited to delivering net zero carbon development and, as part of this, ensuring that net zero is: A) carefully defined (including accounting for the question of operational emissions versus 'whole lifecycle' emissions including 'embodied' emissions in buildings and infrastructure); B) measured using an industry best practice metric (i.e. the Buildings Regulations metric versus the 'energy based' metric favoured by most industry specialists); and C) achieved in line with the energy hierarchy (including with offsetting only as a last resort).
- 7.5.2. Smaller and medium-sized greenfield sites can be well placed to deliver ambitious net zero carbon developments, but also potentially large-scale strategic sites, where there can be opportunities to masterplan for energy infrastructure, e.g. battery storage. Also, strategic scale schemes are often 'flagship' projects that come under considerable scrutiny including in terms of decarbonisation, albeit there are invariably many competing strategic priorities, and scrutinising decarbonisation merits can be complex.
- 7.5.3. Overall, whilst it is difficult to conclude with certainty that any of the variable growth locations represent a particular built environment decarbonisation opportunity, it is reasonable to suggest support for Scenarios 7 and 8 which would see a focus on large-scale strategic sites. Focusing on Bowmans Cross, the current site promoter's website makes a high-level commitment: *"We will target operational net zero carbon emissions from day one and also reduce the carbon emissions generated from construction..."*
- 7.5.4. With regards to significant effects, a 'moderate or uncertain' negative effect is predicted across all of the scenarios given the urgency of built environment decarbonisation and because it is difficult to conclude that this is a priority objective at the heart of the emerging Local Plan. Also, the emerging preferred approach is not to require net zero developments via DM policy (as is the approach often taken elsewhere, for example across Essex, although neighbours in SW Herts tend not to take this approach).

7.6. Communities 1: Education

| Scenario 1 BW, PB, BC | Scenario 2 BW, BC | Scenario 3 BW, PB | Scenario 4 BW | Scenario 5 PB, BC | Scenario 6 BC | Scenario 7 PB | Scenario 8 - |
|-----------------------------|----------------------|----------------------|------------------|----------------------|------------------|------------------|-----------------|
| 2 | 2 | 2 | 2 | 2 | 2 | 1 | 1 |

- 7.6.1. Secondary school capacity has long been understood to be a key issue for the Local Plan, but planning for secondary school capacity is challenging, both because it is difficult to identify preferred locations for new and/or expanded schools and because the baseline situation is constantly shifting as neighbouring areas explore growth scenarios and consider potential locations for new schools (in particular, the latest situation is that the St Albans Local Plan is near finalisation, and proposes a new secondary at London Colney, and the Three Rivers Local Plan is nearing finalisation and proposes a new secondary at Carpenders Park). It will be for Hertfordshire County Council (HCC) to comment in detail (once again) through the current consultation, but the current appraisal aims to flag support for strategic growth at both Borehamwood and Bowmans Cross (in particular) given potential to deliver a new secondary. It is also important to note that the approach to growth at Radlett is held 'constant' across the growth scenario on balance, with the settlement notably lacking a secondary school.
- 7.6.2. There may also be some challenges in respect of primary school capacity, particularly in terms of maintaining the ongoing viability of schools in light of an ageing population at certain villages, notably Shenley and South Mimms.
- 7.6.3. Equally, there is a need to deliver new and expanded primary school capacity alongside new homes, and overall there is support for the proposed growth strategy under all of the scenarios in this respect. One larger emerging preferred site – held constant across the growth scenarios – that would not deliver a primary school is Land at Little Bushey Lane (280 homes) and, as discussed in Section 5.4, ongoing consideration should be given to a comprehensive approach in this area that maximises the benefits of growth.
- 7.6.4. Overall, there is support for Scenarios 7 and 8 which would see a focus on large-scale strategic sites, but there is a need to predict a 'moderate or uncertain' negative effect across all of the growth scenarios ahead of further consultation with the County Council.

7.7. Communities 2: Services

| Scenario 1 BW, PB, BC | Scenario 2 BW, BC | Scenario 3 BW, PB | Scenario 4 BW | Scenario 5 PB, BC | Scenario 6 BC | Scenario 7 PB | Scenario 8 - |
|-----------------------------|----------------------|----------------------|------------------|----------------------|------------------|------------------|-----------------|
| = | = | = | = | = | = | = | = |

- 7.7.1. Planning for healthcare is challenging because the NHS requires flexibility such that it can be difficult to be certain that land provided will ultimately be taken up.
- 7.7.2. Having said this, what can be certain is that strategic growth locations give rise to an excellent opportunity to deliver new healthcare facilities, and overall there are not known to be any significant concerns under any of the scenarios.
- 7.7.3. It is also the case that a number of the urban extension options are well located in terms of accessing a town centre and/or a district centre, for example: 1) there is a considerable opportunity to the west of Borehamwood (a variable across the growth scenarios); 3) at Potters Bar one of the emerging preferred sites (a constant across the growth scenarios) is located in close proximity to the railway station; and 3) at Bushey one of the emerging preferred sites (a constant across the growth scenarios) is Council owned site located along the High Street and with good links to Watford. Finally, at Well End (north east of Borehamwood) there is an adjacent secondary school.

- 7.7.4. The other key consideration is then town centre regeneration, which is assumed as a ‘constant’ under all scenarios. There is very strong support for the ambitious regeneration strategies, informed by ongoing visioning and wider workstreams. However, certain of the sites are in an existing community use, such that re-providing for existing uses is a matter for ongoing consideration, plus it is acknowledged that town centre regeneration takes time and so leads to disruption in the short to medium term, although through a coordinated approach there is good potential to minimise issues.
- 7.7.5. Overall, whilst it is difficult to confidently and meaningfully differentiate between the growth scenarios, there is strong support for securing plan-led growth locally and a number of the non-committed allocation options perform well in terms of ensuring that homes come forward in a way that ensures good accessibility to services and facilities.

7.8. Communities 3: Health

| Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Scenario 8 |
|------------|------------|------------|------------|------------|------------|------------|------------|
| BW, PB, BC | BW, BC | BW, PB | BW | PB, BC | BC | PB | - |
| = | = | = | = | = | = | = | = |

- 7.8.1. Looking beyond the matter of ensuring good access to healthcare facilities (with capacity), there are also many wider ways in which the Local Plan influences the determinants of good health, e.g. see work by the [TCPA](#) and the [RTPI](#).
- 7.8.2. One key matter for consideration relates to strategic planning for green and blue infrastructure, both within and outside of development sites, and the related matter of ensuring that sites are masterplanned and designed with health as a priority objective.
- 7.8.3. In this regard it is fair to say that a priority objective is simply adopting a Local Plan such that growth comes forward in a plan-led way, as opposed to the baseline situation whereby growth continues to come forward in a piecemeal fashion in the absence of an up-to-date Local Plan with issues arising and opportunities missed in respect of planning for health. However, with regards to site specific issues and opportunities:
- Borehamwood – strategic growth to the west is supported in terms of very good access to the town centre, there is also a strategic green / blue infrastructure opportunity assuming the potential for coordinated growth across development sites, and one of the sites here that is held constant across the scenarios is set to deliver a relocated GP surgery. With regards to the option of a Well End strategic urban extension, under a higher growth scenario there would be excellent potential to deliver a district centre and plan strategically for green/blue infrastructure, including drawing upon topography / flood zones and a dense network of field boundaries and other landscape features.
 - Potters Bar – land to the north of the town is quite an accessible landscape, with a significant network of public rights of way (also a woodland nature reserve), which suggests both a constraint and an opportunity in terms of planning for strategic growth. It can also be noted that a leisure centre is located at the north west edge of the town.
 - Bushey – the emerging preferred approach would deliver significant new accessible open space / parks, and, from a health perspective, there is support for the ambitious proposal for a very large scale ‘intergenerational continuing care community’.
 - Radlett – land to the west and south of Radlett comprises relatively accessible and likely highly valued countryside, which represents both a constraint and an opportunity. The potential to deliver new strategic accessible open / green space to the south of Radlett might be explored, including noting the extent of woodland in this area.
 - Bowmans Cross – the site promoters vision includes, amongst other things: “... *new primary and secondary schools, health and social care services, community centres, shops, cafes and other amenities... many miles of new routes for walking, cycling and riding... and parks and green amenity spaces... sports pitches and a range of fitness trails would be provided within the parkland areas.*”

It can also be suggested that there is potentially a location opportunity given the close association of the site with the River Colne valley and extensive woodlands. However, a matter for ongoing consideration is ensuring that a critical mass is reached that supports a new town centre, significant new employment land and major transport infrastructure, with implications for both the site extent and development densities.

- 7.8.4. Overall, whilst it is difficult to confidently and meaningfully differentiate between the growth scenarios, there is broad support across the growth scenarios in a number of respects. On balance neutral effects are predicted given the wide-ranging nature of the determinants of health, but at the next stage the aim should be to reach a positive conclusion including accounting for detailed site-specific policies.

7.9. Communities 4: Cohesion

| Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Scenario 8 |
|------------|------------|------------|------------|------------|------------|------------|------------|
| BW, PB, BC | BW, BC | BW, PB | BW | PB, BC | BC | PB | - |
| ? | ? | ? | ? | ? | ? | ? | ? |

- 7.9.1. It is difficult to confidently and meaningfully differentiate between the growth scenarios. A key issue is an acknowledged local concern with large scale housing growth; however, on the other hand, A) the baseline is a situation whereby growth continues unabated under the presumption in favour of sustainable development (an essential component of the plan-led system under the NPPF, with the aim being to motivate local authorities to maintain an up-to-date local plan); and B) under the lower growth scenarios it could potentially prove challenging to progress the local plan as objectors might argue there is insufficient supply (but this is uncertain ahead of further work to firm up supply).
- 7.9.2. With regards to site and settlement-specific considerations, most of the key communities-related issues and opportunities have already been discussed above, but some points to note under this current heading are as follows:
- Borehamwood – there is considered to be a communities opportunity associated with coordinated strategic growth to the west, but a sensitivity relates to Elstree Village including in terms of increased traffic. With regards to the two scenarios under consideration for a Well End strategic urban extension, it is difficult to suggest which approach might be favoured by the residents of Borehamwood and the Borough.
 - Potters Bar – there are understood to be significant local community concerns with the option of a strategic urban extension to the south, likely partially reflecting the fact that this is a fairly prominent area of farmland that provides a visual setting to Potters Bar and perhaps contributes to something of a gateway from the south (the direction of London). However, a benefit of growth to the south relates to strong containment, whilst growth to the north must be carefully considered in order to avoid sprawl.
 - Bushey – as discussed in Section 5.4, there is considered to be a good opportunity for comprehensive growth to the north and east such that, in turn, there will be good potential to maintain the landscape gap to Watford/Oxhey in perpetuity.
 - Radlett – as discussed in Section 5.4, through and subsequent to the current consultation there will be a need for further detailed consideration of how the emerging preferred sites can come together to deliver a coordinated approach to growth that maximises benefits and avoids issues, including the risk of future sprawl.
 - Villages – as discussed in Section 5.4, there is a need for ongoing scrutiny of the proposed approach of not supporting growth over-and-above commitments, including from a perspective of maintaining villages services/facilities and overall vitality.
 - Bowmans Cross – relates closely to London Colney and so there will be a need for ongoing close collaboration with St Albans District, most notably in transport terms.

- 7.9.3. Overall, there is uncertainty at this stage ahead of consultation with residents and interest groups. Whilst the current higher growth strategy will undoubtedly lead to significant concerns there is a need to consider these in light of the baseline situation which is one whereby the Borough does not have an up-to-date Local Plan.

7.10. Economy and employment

| Scenario 1 BW, PB, BC | Scenario 2 BW, BC | Scenario 3 BW, PB | Scenario 4 BW | Scenario 5 PB, BC | Scenario 6 BC | Scenario 7 PB | Scenario 8 - |
|-----------------------------|----------------------|----------------------|------------------|----------------------|------------------|------------------|-----------------|
| 2 | 2 | 1 | 1 | 2 | 2 | 1 | 1 |

- 7.10.1. Existing sites with planning permission are sufficient to provide for identified needs under all scenarios, but there is nonetheless a case to be made for providing for additional employment land. In this regard there are two points to note:
- Bowmans Cross – there is understood to be a significant opportunity to deliver new employment land as part of a new settlement at Bowmans Cross. However, the site promoter’s emerging masterplan does not propose significant employment land, and so the Council is keen to explore options for higher growth, to include higher densities, to ensure that the scheme delivers a town centre and new employment land. As part of this, there is a need to caution against forecasting need for employment land on the basis of recent trends recognising that the new settlement would deliver over decades.
 - Potters Bar – the one emerging preferred employment allocation that does not already have planning permission is located to the south east of Potters Bar, adjacent to the east of the east of M25 Junction 24 (south of the motorway). This is a cross border site with LB Enfield, and the adjoining land is proposed as strategic employment site in the emerging Enfield Local Plan. Supporting this site represents a proactive approach.
- 7.10.2. Overall, there is a case for predicting ‘significant’ positive effects under all scenarios, but on balance ‘moderate or uncertain’ positive effects are predicted at this stage. The appraisal flags support for scenarios that include Bowmans Cross but, and to reiterate, this is on the assumption of a scheme that delivers significant employment land.

7.11. Historic environment

| Scenario 1 BW, PB, BC | Scenario 2 BW, BC | Scenario 3 BW, PB | Scenario 4 BW | Scenario 5 PB, BC | Scenario 6 BC | Scenario 7 PB | Scenario 8 - |
|-----------------------------|----------------------|----------------------|------------------|----------------------|------------------|------------------|-----------------|
| 1 | 1 | 1 | 1 | 3 | 3 | 2 | 2 |

- 7.11.1. Constraints are widespread across the Borough, but concerns with growth are overall limited, albeit there will be a need for further work ahead of plan finalisation to include Historic Impact Assessments (HIAs). All or most of the ‘variable’ sites are subject to a degree of constraint, but (on balance) the alternatives are differentiated with a view to flagging support for a more modest strategic urban extension NE of Borehamwood (Scenarios 1, 2, 3 and 4) and directing to Bowmans Cross (Scenarios 3, 4, 7 and 8).
- 7.11.2. Taking the settlements in turn:
- Borehamwood – there is tentative support for the option of strategic growth to the west given limited onsite and adjacent constraint, and given the potential for growth in this direction to be framed by Elstree Village and Aldenham House Registered Park and Garden (Grade II) to the west. However, proximity to Elstree Village is also a constraint, including in terms of increased traffic through the conservation area.

With regards to a strategic urban extension to the north east (Well End), it will be important to account for the undulating topography and the distinct cluster of heritage assets on raised ground adjacent to the north (High Canons), plus it can be noted that this is a landscape characterised by historic farms, lanes and field boundaries.


Finally, the two smaller urban extensions that are assumed to feature under the lower growth scenario for Borehamwood (Scenarios 1, 2, 3 and 4) appear unconstrained.

- Potters Bar – there is potentially a case for supporting growth to the south and, in turn, allowing for more modest expansion to the north west (Scenarios 1, 3, 5 and 7), on the basis that there are no designated historic environment assets in proximity to the urban extension option to the south. However, there are some adjacent low density residential areas with a degree of early to mid-20th century character. Finally, the golf course site (a constant across the growth scenarios) is adjacent to a conservation area there are only two listed buildings here (which are not adjacent to the site).
- Bushey – it is only the site to the west that appears to be associated with significant historic environment constraint, as discussed in Section 5.4. The site to the north would deliver green buffers to the Jewish cemetery and Royal Connaught Park.
- Radlett – there are important clusters / densities of historic environment assets across the rural landscape to the west of Radlett, hence there is a need to give consideration to ensuring a comprehensive approach with a long term perspective, as discussed.
- Villages – all three of the larger villages are subject to significant historic environment constraint, as discussed in Section 5.4, hence there is support for limiting growth. At South Mimms the potential for growth that respects historic character, including the setting of the Grade I listed church, can be envisaged but this is likely a matter better considered in the future once there is more certainty in respect of Bowmans Cross.
- Bowmans Cross – there is limited historic environment constraint, on the assumption that growth would not encroach towards Grade I listed Tyttenhanger House. Historic England did not comment on Bowmans Cross through the consultation in 2024.

Figure 7.2: Site promoter masterplan for Land rear of Farm Way, north of Bushey



7.12. Homes

| Scenario 1 BW, PB, BC | Scenario 2 BW, BC | Scenario 3 BW, PB | Scenario 4 BW | Scenario 5 PB, BC | Scenario 6 BC | Scenario 7 PB | Scenario 8 - |
|-----------------------------|----------------------|----------------------|------------------|----------------------|------------------|------------------|---|
| 8 | 7 | 6 | 5 | 4 | 3 | 2 |  |

- 7.12.1. Scenario 8 is potentially very proactive in that the total identified supply is ~23% above LHN such that: A) the housing requirement could be set at LHN with a large supply headroom (23%); or B) the requirement could be set modestly above LHN with a commensurately smaller supply headroom, recognising that there is a case for a housing requirement set above LHN given unmet need risk within the sub-region and also very high local affordable housing needs. Also, Scenario 8 is proactive in that Bowmans Cross would primarily deliver beyond the plan period. Furthermore, the plan period could potentially be reduced (as discussed) leading to a larger headroom figure.
- 7.12.2. However, in practice the allocations assumed to deliver the emerging preferred approach are 'candidate sites' such that some may fall away or reduce in scale ahead of plan finalisation, plus further work may confirm that some sites can deliver only late in the plan period. This is particularly the case for urban sites, noting potential challenges relating to existing viable uses and also flood risk affecting some sites.
- 7.12.3. Also, it is important to note that an issue with all of the scenarios, including Scenario 8, is a likely inability to deliver on LHN over the early years of the plan period, such that there will likely be a need for a 'stepped requirement' that is below LHN in the early years of the plan period and then commensurately higher (above LHN) over the latter years of the plan period. This will be a matter to explore further at the next stage, when the aim will be to confirm the supply 'trajectory' and consider implications for the ability to maintain a five year housing land supply over the early years of the plan period, including accounting for the likely need to apply a 20% buffer as part of five year housing land supply calculations (see NPPF paragraph 78).
- 7.12.4. Further considerations include:
- Affordable housing – the emerging policy requirement is to require 30% affordable housing (further work is needed to confirm the proportion that should be social rented affordable housing for those in greatest need), which reflects emerging understanding of what can be viably achieved given a need for sites to also align with wider policy requirements with cost implications. It may well be that some or perhaps even all of the greenfield allocations can viably deliver a higher proportion of affordable housing (whilst also delivering on wider objectives), but urban sites can and often do struggle to viably deliver affordable housing at this rate, and it is not uncommon for urban sites to deliver no affordable housing. Moving forward it will be important to consider the implications of spatial strategy / site selection for affordable housing delivery and also how to balance affordable housing with other competing policy objectives with cost/viability implications. It is noted that at least two emerging preferred greenfield sites are in public ownership, which suggests good potential to deliver affordable housing and with a good tenure mix (social housing focus). However, under any scenario there is clearly the potential to achieve a major step change in delivery.
 - Housing mix – the greenfield sites will have good potential to deliver a mix of housing in line with policy expectations including smaller family housing, self/custom build housing (an important means of allowing certain households to meet their needs) and specialist housing including for older people. The emerging preferred approach appears to include a very significant supply of housing for older people, but there will be a need for further work at the next stage to confirm that needs will be met.
 - Gypsy and traveller accommodation needs – as discussed, a recent needs assessment shows there to be a high need for between 123 and 132 pitches (to 2045) and for context there are currently 80 pitches.

Providing for Gypsy and Traveller accommodation needs is very important (e.g. see an RTPi report [here](#)) but invariably challenging and so this is a key matter for further consideration. It can be noted that St Albans have recently undertaken a significant exercise to identify existing sites with the potential for regularisation, intensification and extension, recognising that existing needs are often site-specific, and because of a paucity of suitable options for new sites. There will likely also be a need for further work to consider which of the strategic site options (urban extensions and Bowmans Cross) are potentially suited to delivering a Gypsy and Traveller site; however, this can result in delays in providing for needs and introduce a degree of delivery risk.

- 7.12.5. Overall, Scenario 8 is highlighted as performing very well but there is the significant outstanding matter of providing for Gypsy and Traveller accommodation needs.

7.13. Landscape

| Scenario 1 BW, PB, BC | Scenario 2 BW, BC | Scenario 3 BW, PB | Scenario 4 BW | Scenario 5 PB, BC | Scenario 6 BC | Scenario 7 PB | Scenario 8 - |
|-----------------------------|----------------------|----------------------|------------------|----------------------|------------------|------------------|-----------------|
| 2 | 2 | ★1 | ★1 | 2 | 2 | ★1 | ★1 |

- 7.13.1. Whilst there are no designated landscapes within the Borough there is a widespread concern regarding creep of the London suburbs into Hertfordshire, generally loss of open countryside that is highly appreciated and loss of settlement separation.
- 7.13.2. Concerns can be flagged at all settlements, but the appraisal aims to reflect a view that directing growth to Bowmans Cross represents a means of delivering growth in line with landscape objectives. The site comprises a significant area of degraded land, and there is good containment by the M25 to the south, rising land / woodlands / heritage assets to the east and the River Colne corridor to the north, but there does remain a need for ongoing work to confirm the extent of the site with a long term perspective.
- 7.13.3. Taking the existing settlements in turn:
- Borehamwood – strategic growth to the west has the potential to be quite well-contained given the A5183 / heritage assets to the west, flood zones to the north and rising land / the gap to Elstree Village to the south. However, maintaining a robust landscape gap to Elstree Village is a matter for ongoing scrutiny, and a further consideration is a network of public rights of way including the Hertfordshire Way.

To the north east (Well End), as discussed from a landscape perspective there is a need to carefully consider the extent of growth. The north east sector of the emerging preferred site relates least well to the settlement and appears to be generally less contained in landscape terms, but a valley could possibly assist with containment.

With regards to the two smaller urban extensions that feature under the lower growth scenario for Borehamwood (Scenarios 1, 2, 3, 4), the site to the south is well-related to the settlement edge but there are sensitivities relating to onsite greenspace, whilst the site to the north risks piecemeal expansion of the settlement edge (but concerns are reduced assuming land to the west will remain designated as a Local Wildlife Site).
 - Potters Bar – as discussed there is a case for the ‘alternative’ scenario that sees growth to the south and commensurately lower growth to the north, because the site to the south is well contained by the M25, but it is recognised that the site to the south likely has a degree of sensitivity as a buffer to the M25 and London and because it contributes to setting of the town as experienced from key directions of travel. Land to the north is an undulating landscape with a range of features including flood zones, woodland and heritage assets, hence there is a need for a concept masterplan. For context it is important to recall that the Draft Welwyn Hatfield Local Plan proposes piecemeal northern expansion of Potters Bar in the vicinity of Little Heath.

- Bushey – there is broadly support for the emerging preferred approach, including given the potential to protect the landscape gap to Watford/Oxhey in perpetuity, and because the site to the north has the potential to ‘complete’ expansion of the town in this direction. However, comprehensive growth to the east is a matter for ongoing consideration, given limited landscape sensitivity and good containment by the M1.
- Radlett – as discussed, there is a need for further work to consider how the emerging preferred sites will deliver comprehensive growth in combination that minimises the risk of future sprawl, given the Radlett’s association with the river and transport corridor and given a sensitive landscape to the west and south west.
- Villages – there is support for the low growth from a landscape perspective, perhaps most notably at Elstree Village where there is a need to maintain its distinct position in the landscape, in the context of nearby Borehamwood and the London suburbs.

7.14. Soils and other resources

| Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Scenario 8 |
|------------|------------|------------|------------|------------|------------|------------|------------|
| BW, PB, BC | BW, BC | BW, PB | BW | PB, BC | BC | PB | - |
| = | = | = | = | = | = | = | = |

N.B. a new agricultural land quality dataset was released on 13th April 2026.

- 7.14.1. Most of the key areas for consideration around Borehamwood, Potters Bar and Radlett comprising grade 3b quality land, which is not classed as ‘best and most versatile’. However, there is a distinct band of grade 2 quality land associated with south / south west of Radlett and the north of Bushey. Also, to the west of Radlett land that is not grade 2 is grade 3a (which is classed as best and most versatile), and there is also some grade 3a quality land to the north east of Borehamwood and south of Potters Bar.
- 7.14.2. With regards to Bowmans Cross, whilst much of the land is degraded there are areas in arable use, and this includes grade 2 quality land and potentially some that is grade 1 quality. The new agricultural land quality dataset shows a significant area of grade 1 quality land (i.e. land of the highest quality nationally) in the vicinity of London Colney.
- 7.14.3. Looking across the wider sub-region, neighbouring parts of South West Herts are associated with more significant pockets of grade 2 land, and then there is very extensive grade 2 land across North East Herts and South West Essex.
- 7.14.4. Another point is support for a focus on urban growth and also several greenfield sites comprising degraded land or golf courses, although several significant sites are in arable cultivation, including Well End and both Potters Bar strategic urban extension options.
- 7.14.5. Finally, minerals and waste planning is a factor in parts of the Borough including Bowmans Cross. The Environment Agency made detailed comments in 2024, but there is good confidence in the ability to address issues including via phasing.

7.15. Transport

| Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Scenario 8 |
|------------|------------|------------|------------|------------|------------|------------|------------|
| BW, PB, BC | BW, BC | BW, PB | BW | PB, BC | BC | PB | - |
| ? | ? | ? | ? | ? | ? | ? | ? |

- 7.15.1. The Borough is overall very well connected and there are major opportunities to deliver growth in proximity to a well-connected railway stations, along bus corridors and along priority routes identified in the Draft Local Cycling and Walking Infrastructure Plan (LCWIP, 2026). Also, there are significant opportunities to deliver large-scale strategic sites that can achieve trip internalisation and deliver strategic infrastructure upgrades.

7.15.2. However, the emerging preferred growth strategy is a major step-change on that previously consulted-on in 2024, such that it will be crucial to work closely with HCC, National Highways and others ahead of plan finalisation, including informed by transport modelling. Ahead of plan finalisation there is a need for further work to ensure not only that issues are avoided but also opportunities are realised, including in terms of minimising the need to travel, supporting modal shift and overall ensuring that the growth strategy for the Borough aligns with 'vision-led' transport planning principles.

7.15.3. Taking the settlements in turn:

- Borehamwood – whilst there is a clear transport case for a strategic urban extension to the south west, achieving access is challenging (as discussed in Section 5.4) and there are also sensitivities here relating to traffic generation including traffic through Elstree Village. A strategic urban extension to the north east (Well End) would be much more distant from the town centre and train station, and there could be challenges in respect of capacity at the nearby A1(M) junction, but strategic employment land is adjacent, as is an existing secondary school, and there will likely be transport solutions given the scale of growth under consideration.

With regards to the two smaller urban extensions that feature under the lower growth scenario for Borehamwood (Scenarios 1, 2, 3, 4), the site to the south benefits from good proximity to the town centre and railway station, and the site to the north is in proximity to some services and facilities in the north of Borehamwood. However, this is a significant site (the current planning application is for 292 homes) and there is a need to consider in-combination impacts with the adjacent site under construction.

- Potters Bar – all of the site options in question perform well in terms of accessing the town centre and railway station, as well as existing bus services, plus there are transport upgrade options to explore including informed by the Draft LCWIP (2025). Land to the north west is distant from the strategic road network, but the B556 is a reasonable road corridor. The golf course site is strongly supported in transport terms.
- Bushey – as discussed in Section 5.4, the one site that is neither permitted nor the subject of a live planning application is very strongly supported in transport terms, namely the emerging preferred site to the west. The site to the east is least well-connected, but it is not clear that there are significant concerns.
- Radlett – the two western-most emerging preferred sites will require careful consideration in terms of ensuring good links to the centre of Radlett and the railway station, and consideration should be given to enhancing links west towards Bushey / Watford. The site to the south is in relative proximity to the centre of Radlett, but it is noted that there is a single proposed point of access onto Watling Street, and there is a need to consider in combination effects with potential growth west of Borehamwood.
- Bowmans Cross – there are nearby links onto the strategic road network, but further work is needed to confirm necessary upgrades. As part of ongoing work there is a need to: A) ensure that the emerging vision includes a focus on a comprehensive scheme with a high degree of trip internalisation; B) explore options for 'sustainable transport' links to London Colney, St Albans, Hatfield and Potters Bar; and C) recognise that a new settlement would come forward over a period of decades such that there is a need to plan for future mobility including driverless cars.
- Villages – as discussed, whilst there is a clear case for concluding that a low growth strategy aligns with vision led transport planning principles, there is also a need to acknowledge that there can be a transport case for targeted growth at villages.

7.15.4. Finally, moving forward a key matter will be developing site specific policies and potentially concept masterplans, with a view to providing confidence that required transport measures / interventions / upgrades can be viably delivered alongside the achievement of wider objectives, e.g. relating to affordable housing and place-making.

7.16. Water

| Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Scenario 8 |
|------------|------------|------------|------------|------------|------------|------------|------------|
| BW, PB, BC | BW, BC | BW, PB | BW | PB, BC | BC | PB | - |
| ? | ? | ? | ? | ? | ? | ? | ? |

- 7.16.1. There are not known to be any key challenges in respect of either water supply or wastewater treatment capacity. One potential issue is reliance on Maple Lodge Sewage Treatment Works (at Maple Cross), which serves a very large catchment that includes numerous local authority / local plan areas.
- 7.16.2. A further consideration is then potential support for strategic growth locations which can potentially ensure a strategic and innovative approach to planning for water supply, wastewater treatment, water efficiency and the water environment.
- 7.16.3. The Environment Agency and Thames Water will wish to comment through the consultation, and they are encouraged to comment on whether there any strategic water constraints (also opportunities) with a bearing on growth quantum and spatial strategy / site selecting within Hertsmere. It is noted that the Environment Agency has raised concerns regarding water bodies that are not currently achieving good ecological status, but it is difficult to draw implications for spatial strategy and site selection.

7.17. Appraisal summary

- 7.17.1. Table 7.1 presents a summary of the appraisal above. The table aims to **1)** rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence, and “?” used where there is fundamental uncertainty at this stage); and then **2)** categorise performance in terms of ‘significant effects’ using **red / amber / light green / green**.²³
- 7.17.2. The appraisal shows there to be a clear case for supporting Scenario 8 (the emerging preferred approach), in that it is: ranked first under the greatest number of sustainability topic headings; predicted more positive effects than any other scenario (specifically, it is the only scenario to be predicted a ‘significant’ positive effect); and is predicted equal fewest negative effects.
- 7.17.3. However, it is important to be clear that the appraisal does not necessarily lead to a conclusion that Scenario 8 is the best performing scenario overall. This is because the appraisal is undertaken with no assumptions made regarding the degree of importance (‘weight’) that should be assigned to each of the topics as part of decision-making (and, to be clear, the topics are not assumed to have equal weight). It is for the Council to assign weight and reach a decision ‘on balance’ regarding which of the scenarios is best performing / best represents sustainable development.
- 7.17.4. The following bullet points explain the appraisal conclusions under each of the topics:
- **Air quality** – there are no air quality management areas (AQMA) in the Borough although there are a number of traffic congestion hotspots where air quality is potentially problematic or could become problematic under growth scenarios, including acknowledging the likelihood of significant growth in neighbouring areas, including a potential new town at Crews Hill (Enfield). Higher growth could lead to challenges, but equally the baseline situation is one whereby air quality is improving nationally. Also, there is a need to recognise that Hertsmere is generally well connected in transport terms and that lower growth in Hertsmere could potentially lead to increased pressure for growth in neighbouring areas that are either less well-connected or where there are currently AQMA (notably Watford and all neighbouring London Boroughs). Overall, it is difficult to confidently and meaningfully differentiate between the growth scenarios.

- **Biodiversity** – the Borough is overall subject to limited biodiversity constraint, such that there is a case for higher growth, but the primary factor that dictates the order of preference is the approach to growth at Borehamwood. Specifically, under the lower growth scenario at Borehamwood the assumption is that two strategic urban extensions subject to limited biodiversity constraint (and with an inherent biodiversity opportunity on account of their scale) would be replaced by two modest urban extensions that are both subject to a degree of constraint, in particular a site to the north that is currently designated as a Local Wildlife Site.
- **Climate change adaptation** – the key issue here is flood risk, although it is acknowledged that the matter of overheating risk is also a significant consideration for the Local Plan given the high urban growth strategy that is assumed as a ‘constant’ under all of the growth scenarios. Focusing on flood risk, whilst this has fed-in strongly as a factor influencing the selection of sites for inclusion within the growth scenarios, there are still a number of sites – which feature as either a constant or a variable across the scenarios – with an element of risk. Greenfield sites can often address flood zones by targeted onsite green/blue infrastructure, and urban sites can address flood risk through use mix and design/construction measures, but this will be explored further through Strategic Flood Risk Assessment (SFRA) prior to plan finalisation.
- **Climate change mitigation** – the focus under this topic heading is per capita built environment decarbonisation, given that transport decarbonisation factors-in under the ‘transport’ heading. Key considerations are: A) a ‘moderate or uncertain’ negative effect is predicted across all of the scenarios given the urgency of built environment decarbonisation and because it is difficult to conclude that this is a priority objective at the heart of the emerging Local Plan; and B) there is support for large-scale strategic urban extensions and new settlements that have the potential to be ‘exemplar’ schemes that deliver in line with a strict definition of ‘net zero development’.
- **Communities 1: Education** – secondary school capacity has long been understood to be a key issue for the Local Plan, but planning for secondary school capacity is challenging, both because it is difficult to identify preferred locations for new and/or expanded schools and because the baseline situation is constantly shifting as neighbouring areas explore growth scenarios and consider potential locations for new schools (in particular, the latest situation is that the St Albans Local Plan is near finalisation, and proposes a new secondary at London Colney, and the Three Rivers Local Plan is nearing finalisation and proposes a new secondary at Carpenders Park).²⁵ It will be for Hertfordshire County Council (HCC) to comment in detail (once again) through the current consultation, but the current appraisal aims to flag support for strategic growth at both Borehamwood and Bowmans Cross (in particular) given potential to deliver a new secondary. It is also important to note that the approach to growth at Radlett is held ‘constant’ across the growth scenario on balance, with the settlement notably lacking a secondary school.
- **Communities 2: Services** – planning for healthcare is challenging because the NHS requires flexibility such that it can be difficult to be certain that land provided will ultimately be taken up. Having said this, what can be certain is that strategic growth locations give rise to an excellent opportunity to deliver new healthcare facilities, and overall there are not known to be any significant concerns under any of the scenarios. The other key consideration is then town centre regeneration, which is assumed as a ‘constant’ under all scenarios. There is very strong support for the ambitious regeneration strategies, informed by ongoing visioning and wider workstreams.
- **Communities 3: Health** – there are also many wider ways in which the Local Plan influences the determinants of good health. One key matter for consideration relates to strategic planning for green and blue infrastructure, both within and outside of development sites, and also the related matter of ensuring that sites are masterplanned and designed with good health as a priority objective.

²⁵ There may also be some challenges in respect of primary school capacity, particularly in terms of maintaining the ongoing viability of schools in light of an ageing population at certain villages, notably Shenley and South Mimms.

In this regard it is fair to say that a priority objective is simply adopting a Local Plan such that growth comes forward in a plan-led way, as opposed to the baseline situation whereby growth continues to come forward in a piecemeal fashion in the absence of an up-to-date Local Plan with issues arising and opportunities missed.

- **Communities 4: Cohesion** – it is difficult to confidently and meaningfully differentiate between the growth scenarios. A key issue is an acknowledged local concern with large scale housing growth; however, on the other hand, A) the baseline is a situation whereby growth continues unabated under the presumption in favour of sustainable development (an essential component of the plan-led system under the NPPF, with the aim being to motivate local authorities to maintain an up-to-date local plan); and B) under the lower growth scenarios it could potentially prove challenging to progress the local plan as objectors might argue there is insufficient supply.
- **Economy and employment** – existing sites with planning permission are sufficient to provide for identified needs under all scenarios, but there is nonetheless a case to be made for providing for additional employment land. In this regard there is understood to be a significant opportunity to deliver new employment land as part of a new settlement at Bowmans Cross.
- **Historic environment** – constraints are widespread but concerns with growth are limited, albeit there is a need for further work to include Historic Impact Assessments (HIAs). All or most of the ‘variable’ sites are subject to a degree of constraint, but (on balance) the alternatives are differentiated with a view to flagging support for a more modest strategic urban extension NE of Borehamwood (Scenarios 1, 2, 3, 4) and directing to Bowmans Cross (Scenarios 3, 4, 7, 8).
- **Homes** – Scenario 8 is potentially very proactive in that the total identified supply is ~23% above LHN such that: A) the housing requirement could be set at LHN with a large supply headroom (23%); or B) the requirement could be set modestly above LHN with a commensurately smaller supply headroom, recognising that there is a case for a housing requirement set above LHN given unmet need risk within the sub-region and also very high local affordable housing needs. Also, Scenario 8 is proactive in that Bowmans Cross would primarily deliver beyond the plan period. However, in practice the allocations assumed to deliver the emerging preferred approach are ‘candidate sites’ such that some may fall away or reduce in scale ahead of plan finalisation, plus further work may confirm that some sites can deliver only late in the plan period. Also, it is important to note that an issue with all of the scenarios, including Scenario 8, is a likely inability to deliver on LHN over the early years of the plan period, such that there will likely be a need for a ‘stepped requirement’ that is below LHN in the early years of the plan period and then commensurately higher (above LHN) over the latter years of the plan period. Finally, providing for Gypsy and Traveller accommodation needs is an important outstanding issue in light of the recent needs assessment.
- **Landscape** – whilst there are no designated landscapes within the Borough there is a widespread concern regarding creep of the London suburbs into Hertfordshire, generally loss of open countryside that is highly appreciated and loss of settlement separation. Concerns can be flagged at all settlements, but the appraisal aims to reflect a view that directing growth to Bowmans Cross represents a means of delivering growth in line with landscape objectives.
- **Soils / resources** – agricultural land quality is not particularly high in the Borough although land south of Radlett (a ‘constant’ growth location) is known to be of high quality (grade 2). Another point to note is support for a focus on urban growth and also several greenfield sites comprising degraded land or golf courses, although several significant sites are in arable cultivation. Finally, minerals and waste planning is a factor in parts of the Borough including Bowmans Cross.
- **Transport** – the Borough is overall very well connected and there are major opportunities to deliver growth in proximity to a well-connected railway stations, along bus corridors and along priority routes identified in the Draft Local Cycling and Walking Infrastructure Plan (LCWIP, 2026). Also, there are significant opportunities to deliver large-scale strategic sites that can deliver strategic infrastructure upgrades and will benefit from a high degree of trip internalisation.

However, the emerging preferred growth strategy is a major step-change on that previously consulted-on in 2024, such that it will be crucial to work closely with HCC, National Highways and others ahead of plan finalisation, including informed by transport modelling.

- **Water** – there are not known to be any key challenges in respect of either water supply or wastewater treatment capacity, but the EA and Thames Water will wish to comment through the consultation. One issue is reliance on Maple Lodge Sewage Treatment Works (at Maple Cross), which serves a very large catchment that includes numerous local authority / local plan areas.

Table 7.1: Summary appraisal findings

| | Scenario 1 BW, PB, BC | Scenario 2 BW, BC | Scenario 3 BW, PB | Scenario 4 BW | Scenario 5 PB, BC | Scenario 6 BC | Scenario 7 PB | Scenario 8 - |
|---------------------------|--------------------------|----------------------|----------------------|------------------|----------------------|------------------|------------------|-----------------|
| Lower growth at... | | | | | | | | |
| Air quality | = | = | = | = | = | = | = | = |
| Biodiversity | 2 | 2 | 2 | 2 | ★1 | ★1 | ★1 | ★1 |
| Climate change adaptation | = | = | = | = | = | = | = | = |
| Climate change mitigation | 2 | 2 | 2 | 2 | 2 | 2 | ★1 | ★1 |
| Communities 1: Education | 2 | 2 | 2 | 2 | 2 | 2 | ★1 | ★1 |
| Communities 2: Services | = | = | = | = | = | = | = | = |
| Communities 3: Health | = | = | = | = | = | = | = | = |
| Communities 4: Cohesion | ? | ? | ? | ? | ? | ? | ? | ? |
| Economy and employment | 2 | 2 | ★1 | ★1 | 2 | 2 | ★1 | ★1 |
| Historic environment | ★1 | ★1 | ★1 | ★1 | 3 | 3 | 2 | 2 |
| Homes | 8 | 7 | 6 | 5 | 4 | 3 | 2 | ★ |
| Landscape | 2 | 2 | ★1 | ★1 | 2 | 2 | ★1 | ★1 |
| Soils / resources | = | = | = | = | = | = | = | = |
| Transport | ? | ? | ? | ? | ? | ? | ? | ? |
| Water | ? | ? | ? | ? | ? | ? | ? | ? |

Part 3: Next steps

8. Plan finalisation

8.1. Further work

- 8.1.1. Subsequent to the current consultation the Council will undertake further work in respect of spatial strategy / site selection including refining site delivery assumptions. As well as taking account of consultation responses, account will be taken of the appraisal findings presented in Section 7 of this report. There will also be a need for further work in respect of DM policy, both plan-area wide and area / site-specific (and potentially accounting for changes set out in the Draft NPPF (2025) in respect of ensuring that local-level DM policies fully align with those set out nationally).
- 8.1.2. Once further work has been completed a new set of RA growth scenarios will be developed and subjected to appraisal in order to inform plan finalisation.

8.2. Publication of the Proposed Submission Local Plan

- 8.2.1. The intention is for the next formal stage to involve publication of the proposed submission version of the Local Plan under Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is 'sound'. The formally required SA Report will be published alongside the Proposed Submission Local Plan, essentially providing an appraisal of "the plan and reasonable alternatives".

8.3. Submission, examination and adoption

- 8.3.1. Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 8.3.2. At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).

9. Monitoring

- 9.1.1. Within the SA Report (N.B. this is not the SA Report, but rather an "Interim" SA Report), the requirement is to present "measures envisaged concerning monitoring". The question of an appropriate monitoring framework will be revisited prior to plan finalisation but, at the current time, one point to highlight is the need for good data on infrastructure capacity, including transport infrastructure, schools infrastructure and wastewater treatment infrastructure. This data can be crucially important to local plan-making.

